

PREA AUDIT REPORT Interim Final

ADULT PRISONS & JAILS

Date of report: April 17, 2016

Auditor Information			
Auditor name: David Haasenritter			
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Email: david.k.haasenritter.civ@mail.mil			
Telephone number: 540 903 6457			
Date of facility visit: November 16-18, 2015			
Facility Information			
Facility name: Eden Detention Center			
Facility physical address: 702 East Broadway, Eden TX 76837			
Facility mailing address: (if different from above) PO Box 605 Edn TX 76837			
Facility telephone number: 325-869-2704			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input checked="" type="checkbox"/> Prison	<input type="checkbox"/> Jail	
Name of facility's Chief Executive Officer: Michael Pugh			
Number of staff assigned to the facility in the last 12 months: 358			
Designed facility capacity: 1438			
Current population of facility: 1299			
Facility security levels/inmate custody levels: Minimum			
Age range of the population: 18-79			
Name of PREA Compliance Manager: Robert Nilius		Title: Assistant Warden (Programs)	
Email address: Robert.niliuss@cca.com		Telephone number: 325 869-2704	
Agency Information			
Name of agency: Corrections Corporation of America			
Governing authority or parent agency: (if applicable) Click here to enter text.			
Physical address: 10 Burton Hills Blvd, Nashville, TN 37215			
Mailing address: (if different from above) Click here to enter text.			
Telephone number: 615-263-3000			
Agency Chief Executive Officer			
Name: Damon Hininger		Title: President and CEO	
Email address: Damon.hininger@CCA.com		Telephone number: 615-263-3301	
Agency-Wide PREA Coordinator			
Name: Lisa Hollingsworth		Title: Senior Director, PREA Programs and Compliance	
Email address: Lisa.hollingsworth@cca.com		Telephone number: 615-263-6915	

AUDIT FINDINGS

NARRATIVE

The PREA audit of the Eden Detention Center was conducted on November 16 – 18, 2015 by David Haasenritter. Approximately three weeks prior to the audit, the auditor received the PREA questionnaire and additional documents through a disk. The documents and questionnaire were organized, highlighted, and tabbed. The night before the audit the Eden Detention Center provided a roster of all inmates housed at the institution sorted by housing unit; lists of inmates for specific categories to be interviewed; and a lists of all staff by duty position and shifts. The auditor selected a sampling of inmates and staff to be interviewed (random and specific category) during the on-site visits from these lists.

The auditor contacted Just Detention International (JDI) in reference any information previously submitted by inmates at the Eden Detention Center and reviewed the Corrections Corporation of America (CCA) and Federal Bureau of Prisons website prior to the audit. The CCA website is very informative and one of the easiest to find PREA information of all agencies this auditor has audited. CCA PREA page lists: general information on PREA; agency zero tolerance policy; how to report; information on investigations; and where questions and inquiries can be forwarded to (PREA Coordinator phone and mailing address). It also has a number of links to include: PREA standards; PREA Resource Center website; CCA PREA policy; CCA 2013 and 2014 PREA Report; and CCA Institution PREA information. The CCA Institution PREA information link lists each CCA institution with information on that institution's PREA Compliance Manager; third party reporting methods; PREA policy; PREA audit dates; and PREA audit reports if completed and posted. The Federal Bureau of Prisons website PREA information can be located under the inmates tab and then search "Sexual Abuse Prevention" at the bottom of the page. There you will find the Federal Bureau of Prisons zero tolerance policy, how to report allegations, and the Federal Bureau of Prisons annual reports. To find a specific facility report you must use tab for facilities and then click on that specific facility.

Following the entrance meeting with staff, the auditor toured the Eden Detention Center on November 16, 2015, and went back to certain areas in the institution during the audit. While touring, inmates and staff were informally questioned about their knowledge of PREA, procedures for reporting, services available and their responsibilities. All staff and inmates informally interviewed during the tour acknowledged receiving PREA training. During the tour the auditor reviewed staffing; physical plant; sight lines and blind spots; camera coverage; documentation to assist in determining standard compliance; and tested the inmate phone system for reporting allegations and for emotional support services; and institution operations. Following the tour, the auditor began the formal interviews, review of investigations, checking of cameras, and random checks of personnel, medical, and training records. A total of 36 staff was formally interviewed in the course of the on-site audit (12 random, four contractors/volunteers, and 20 specialized staff). Security and medical staff were interviewed from all shifts. The interviews of the Agency Head/Designee had been previously completed by another auditor and the notes from those interviews were shared with the auditors prior to the on-site visit. The PREA Coordinator was also previously completed by another auditor and this auditor also previously interviewed her. Staff interviewed were well versed in their responsibilities in detecting, reporting and responding to sexual abuse, sexual harassment, and staff negligence; first responder duties; and evidence preservation. CCA has built a culture of zero tolerance.

A total of 20 inmates' formal interviews were conducted: 14 random (at least one from each housing unit); one disabled; four limited English speaking; and one who reported sexual abuse while confined. Additionally, one inmate refused to be interviewed as a random interview because he believed he would not be a victim to sexual abuse or sexual harassment. Inmates interviewed arrived at the facility between three months to four years. Majority of the inmates interviewed acknowledged receiving PREA training and written materials (posters, pamphlets, and inmate's handbooks) outlining the agencies zero tolerance policies towards sexual abuse; knew the reporting procedures; reported staff of the opposite gender announced when entering a housing area; and that they had been asked questions from the screen upon arrival if arriving in the last three years. The limited English inmates interviewed confirmed receiving the PREA training and written materials (poster, pamphlets, and inmate handbooks) outlining the agencies zero tolerance policies towards sexual abuse and reporting procedures. Staff interpreter for limited English inmates did a very good job and the inmates seemed relax having him interpret their responses. All inmates asked felt safe and did not believe sexual assaults were occurring at the Eden Detention Center. One inmate stated it was safer in Eden Detention Center than in the community. One inmate who reported abuse stated he reported after a few days but once he reported it staff reacted quickly. The alleged abuse was oral. He refused follow-up medical and mental health referrals though he was sent to the hospital. The auditor also called the Concho Valley Rape Crisis Center to discuss their role in PREA and support to the Eden Detention Center.

There were four allegations of a sexual abuse and sexual harassment at Eden Detention Center during the audit cycle. Three were investigated by the facility investigator, one by DoJ Office of the Inspector General. One was staff-inmate sexual abuse (substantiated); one inmate-inmate sexual harassment (unsubstantiated); and two unknown abusers on inmate sexual abuse (both unfounded). The two unknown abuser on inmate sexual abuse case involved the same inmate both while he was asleep. He reported one the next day and the other approximately two weeks after the incident. Eden Detention Center did not receive any reports of any incidents that occurred at another facility that an inmate advised them of, nor has a facility contacted Eden Detention Center alleging sexual abuse or harassment while at Eden Detention Center. All investigative files the auditor reviewed during the on-site visit appeared to thoroughly document the investigation process per agency policy. Criminal investigative referrals were documented.

When the on-site audit was completed, the auditor conducted an exit meeting. During the exit the auditor explained the process that would follow the on-site visit to include corrective measures. While the auditor could not give the institution a final finding, the auditor did provide

a preliminary status of his findings. The auditor explained that areas found not to meet the standards during the on-site visit must be corrected and he would be working closely with the agency PREA Coordinator and facility staff on each plan of action to correct all deficient standards. The auditor thanked CCA and Eden Detention Center staff for their hard work and commitment to the Prison Rape Elimination Act.

During the interim report writing period, the auditor reviewed modified policies and additional documents. The CCA PREA Coordinator and Eden Detention Center staff was very helpful in coordinating all the additional documentation.

DESCRIPTION OF FACILITY CHARACTERISTICS

Eden Detention Center's compound sits on approximately 13.8 acres within two secure perimeter fences with razor wire at the top. The Eden Detention Center (EDC) houses minimum security level federal male inmates. These inmates are committed to the Federal Bureau of Prisons through the Federal Court System. BOP contracts with CCA and the Eden Detention Center to house these inmates. The EDC is located in Eden, Texas, which is approximately 45 miles southwest of San Angelo, Texas.

There are nine buildings located inside the secure perimeter fence and four located outside the secure perimeter fence. The nine buildings located inside the secure perimeter fence house the administrative offices, food service, academic/vocational programs, the gymnasium, the chapel, visitation, medical, laundry, commissary, the inmate residential living units, segregation and master control.

The four buildings located outside the secure perimeter fence house the warehouse, maintenance, armory and the Bureau of Prisons contract staff. Most of these buildings are sprinkled and have smoke detectors and fire extinguishers strategically located throughout each building.

The inmate residential living units are dormitory style except for segregation which has double occupant cells that are wet. All the inmate dorms in the residential living units are designed to allow the inmates unimpeded access to restrooms and showers. The inmate residential living units meet the standard requirements for wash basins and showers. The inmate population has unimpeded access to all programs at EDC. They also have unimpeded contact and access to all staff 24/7.

The mission of Eden Detention Center according to their welcome book is "to provide for the public safety by operating a safe, secure, constitutionally sound correctional facility for adult male offenders committed from the Federal Bureau of Prisons, in accordance with standards established by the Federal Bureau of Prisons, Corrections Corporation of America, American Correctional Association, and Joint Commission".

SUMMARY OF AUDIT FINDINGS

The on-site audit of the Eden Detention Center was completed 18 November. On 24 November the auditor notified the Eden Detention Center only standard 115.15 (subsections 115.15 (d) and (f) was found to be not meet standards. On 22 December, the auditor completed the review of all corrective actions and found the Eden Detention Center met or exceeded all standards. The results of the Eden Detention Center is listed below.

Number of standards exceeded: 2

Number of standards met: 38

Number of standards not met: 0

Number of standards not applicable: 3

Standard 115.11 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Corrections Corporation of America (CCA) operates the Eden Detention Center to house Federal Bureau of Prisons inmates. CCA has a very good written policies mandating zero tolerance towards all forms of sexual abuse and sexual harassment and that outlines the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. Eden Detention Center uses mainly the CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, Sexual Abuse Prevention and Response. This policy outlines the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. Other agency policies such as CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae 13-79, Sexual Assault Responses supplement the main PREA policies. Agency policies and procedures were well organized and are continually revised. Additionally, the institution has a local zero tolerance policy dated January 2015, and also reference CCA PREA Policy 14-2.

CCA employs an upper-level, agency-wide PREA coordinator and a PREA compliance manager. Ms. Lisa Hollingsworth is the PREA Coordinator. She is very knowledgeable of PREA standards and is one of the top PREA Coordinators I have met. Ms. Hollingsworth has the authority to develop, implement, and oversee PREA compliance. She is very active in coordinating PREA, consistently sending updates to CCA facilities, especially as FAQs are posted on the PREA website. She conducts training and meetings to keep unit PREA Compliance Managers up to date on any changes and best practices. She is consistently looking for ways to improve CCA PREA program. Indirectly supervises 55 compliance managers.

Mr. Robert Nilius serves as the Assistant Warden (Programs) and Eden Detention Center PREA Compliance Manager. He was knowledgeable of PREA standards and was actively involved in PREA activities. He claimed to have enough time to perform her PREA duties. He advises the Warden on PREA; develops plans of actions for PREA issues; works with the Warden on the staffing plan and camera plan; coordinates training; provides PREA updates and information to staff at staff calls; and contacts CCA PREA Coordinator for clarification and assistance.

Standard 115.12 Contracting with other entities for the confinement of inmates

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Non-applicable.

Based on the documentation provided as well as the interviews of the Warden and CCA PREA Coordinator, CCA is a private provider and does not contract with other agencies for the confinement of inmates. Therefore this standard is not applicable.

Standard 115.13 Supervision and monitoring

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA ensures each institution it operates develops document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against sexual abuse by monitoring and reviewing the staffing plans. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 establishes procedures to develop and monitor staffing plans uses the criteria found in standard 115.13 (a) to include generally accepted correctional practices; any judicial findings of inadequacy; any findings of inadequacy from Federal investigative agencies; any findings of inadequacy from internal or external oversight bodies; all components of the institution's physical plant (including "blind-spots" or areas where staff or inmates may be isolated); composition of the inmate population; number and placement of supervisory staff; institution programs occurring on a particular shift; any applicable State or local laws, regulations, or standards; prevalence of substantiated and unsubstantiated incidents of sexual abuse; and other relevant factors to develop and review the staffing plan. CCA established a very good form to assess the staffing plan that addresses each of the criteria of the standard to determine and document any additional video monitoring systems (cameras) and requirements for additional staffing and duty positions. The form addresses policy and procedures, physical plant, video monitoring and technology changes, and staffing changes. The staffing plan is reviewed annually by the Warden and PREA Compliance Manager at the institution; and CCA PREA Coordinator and Vice President for Operations. Additionally, staffing levels are monitored daily by review of shift rosters. The auditor reviewed the 2015 annual review and individual shift rosters. Video monitoring has been deployed and upgraded to assist with the protection of inmates against sexual abuse and sexual harassment. Eden Detention Center has 193 cameras throughout the facility. In the last two years they have added ten new digital cameras. The cameras are monitored and recorded. The agency PREA Coordinated acknowledged future camera upgrades and additional cameras for Eden Detention Center.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires the staffing plan be complied with and when it does not, the institution shall document and justify all deviations from the plan. Through review of the staffing plan and shift documents, interview of staff and the leadership, it was determined Eden Detention Center had no deviations from the staffing plan in the last 12 months. Eden Detention Center uses overtime to ensure the staffing plan is complied with. If and when the staffing plan is not met, a notification is sent through the Warden to the CCA Corporate office. Interviews of facility leadership and staff verified staffing plan is always complied with.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires unannounced rounds by supervisors and prohibits staff from alerting other staff members that supervisory staff rounds are occurring. Unannounced rounds by intermediate-level or higher-level supervisors are documented in logs, and are done randomly on all shifts. The auditor reviewed prior to the audit, and logs on site. Staff interviews and the logs confirmed the unannounced rounds by supervisors are done on all shifts and staff were not alerting other staff the unannounced rounds were being conducted.

CCA agency head was interviewed prior to this audit and confirmed that a five-year capital expenditure plan had been approved to enhance camera coverage at all CCA facilities.

Standard 115.14 Youthful inmates

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Non-applicable.

Based on the documents provided and staff interviews, Eden Detention Center is an adult male institution and does not house youthful inmates; therefore this standard is not applicable.

Standard 115.15 Limits to cross-gender viewing and searches

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, outlines institutions shall not conduct cross-gender strip searches or cross-gender visual body cavity searches except in exigent circumstances; and shall document all cross-gender strip searches and cross-gender visual body cavity searches. Based on documents reviewed and interviews of staff and inmates, Eden Detention Center has not conducted cross-gender strip searches or cross-gender visual body cavity searches in the last 12 months. If and when a cross gender strip searches or cross-gender visual body cavity search had to be conducted it would be recorded on CCA 5-1B, Notice to Administration incident report.

The Eden Detention Center does not house female inmates, thus are NA with standards 115.15(b) and part of (c). CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 does not permit the facilities to conduct cross-gender pat-down searches of female inmates, absent exigent circumstances; and does not allow facilities to restrict female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states the institution shall enable inmates 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; and requires staff of the opposite gender to announce their presence when entering an inmate housing unit. It allows for transgender and intersex inmates to shower in the medical department at designated times if they desire. It provides guidance how opposite gender staff is to announce their presence when entering an inmate housing unit. Above or on the side of the door leading into each housing area is a sign that states "OPPOSITE GENDER MUST ANNOUNCE UPON ENTRY". Observation during the audit, and staff and inmate interviews confirmed that female staff announces themselves when they enter the housing units. Observation during the on-site audit determined some cameras monitored by female staff could observe male inmates use the toilets and showers; while other shower curtains for showers and toilets had to be adjusted when female

staff entered the area otherwise female staff could observe male genitalia. The facility leadership quickly assessed the issue and developed a corrective action plan. The corrective action plan included adjusting shower curtains, adding privacy curtains, building a higher wall next to a toilet, adjusting camera view, and digitally blocking camera coverage on the monitors. Some of the areas were corrected and observed by the auditor during the on-site audit; all others were completed by December 16th. Photos of the areas and monitors demonstrated the corrective action plan had been completed.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 and CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 9-05 Searches of Inmates/Residents and Various Locations, states searches or physical examinations of a transgender or intersex inmate/resident for the sole purpose of determining the inmate's genital status is prohibited; and if the inmate's genital status is unknown, it may be determined during conversations with the inmate, 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.

Standard 115.16 Inmates with disabilities and inmates who are limited English proficient

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, ensure inmates with disabilities and who are limited English proficient have access to PREA information and programs. CCA/Eden Detention Center has taken steps to ensure that inmates who are limited English proficient or 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. PREA handouts and inmate handbooks are in English and Spanish. English and Spanish PREA posters are posted throughout the institution for inmates and staff to see. CCA does have a contract with Language Line Solutions for language translator service for inmates who are limited English proficient. Some of the languages includes: Spanish, French, Chinese, Korean, and Farsi. Per the PREA Compliance Manager 25% of the staff were bi-lingual in Spanish. Approximately one-third of the staff interviewed spoke Spanish. The institution did have a TDD phone for those who are hearing impaired. The auditor interviewed one partially deaf inmate. He had a good knowledge of PREA and had been provided PREA information in formats that allowed him 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. The auditor interviewed four inmates who were limited English proficient, and one inmate whose primary language is Spanish. The auditor used one of the designated Spanish staff interpreters to do the interview. The inmate was comfortable with the staff interpreter. The inmate stated he had been provided PREA information in Spanish, and had a good understanding of PREA information and programs. The auditor interviewed the other limited English inmates who understood enough English or the auditors Spanish to do the interview. Based on staff and inmate interviews, Eden Detention Center does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, response of first-response, or the investigation of the inmate's allegations.

Standard 115.17 Hiring and promotion decisions

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, outlines policy and procedures to ensure staff and contractors are not hired or promoted who has engaged in sexual abuse in a prison, jail, lockup, community confinement institution, juvenile institution, or other institution; been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or been civilly or administratively adjudicated to have engaged in sexual activity facilitated by force, overt or implied threats of force, or coercion. Background checks include a local police check, NCIC check and an investigation. Prior to the audit, the auditor reviewed one hiring action that demonstrated CCA and the Eden Detention Center conduct background checks and do not hire staff or contractors who has engaged in sexual abuse in a prison, jail, lockup, community confinement institution, juvenile institution, or other institution; been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or been civilly or administratively adjudicated to have engaged in sexual activity facilitated by force, overt or implied threats of force, or coercion. A spreadsheet was also provided with listing hiring actions and dates approved once all checks are done. Two were not approved for hiring between May and July of 2015 based on background checks. During the audit, the auditor checked additional files of new and current employees and contractors and found all background checks were completed. Through review of personnel records and staff interviews it was determined Eden Detention Center staff and contractors are not hired or promoted who has engaged in sexual abuse in a prison, jail, lockup, community confinement institution, juvenile institution, or other institution; been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or been civilly or administratively adjudicated to have engaged in sexual activity facilitated by force, overt or implied threats of force, or coercion.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, outlines policy and procedures that requires the institution to 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 inmates. Prior to the audit one hiring action was reviewed. During the audit the auditor reviewed 11 additional employee application packets. Through review of personnel records and staff interviews it was determined Eden Detention Center considers 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 inmates.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, requires background checks for staff; and 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. Prior to the audit a request to a correctional facility for a former employee applying to work at Eden Detention Center was reviewed. During the audit 19 additional employee application packets were reviewed that demonstrated background checks were done prior to employment, and none had a background check more than five years old. CCA forms and process are used for background check of employees. Interviews of Human Resource staff and employee application packets also demonstrated contact with prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 and CCA Policy 1-19 General Administration – Roles of Consultants, Contract Employees, and Employees of Other Agencies requires criminal background records check before enlisting the services of any contractor who may have contact with inmates. Prior to the audit the facility did not provide an example. During the audit the auditor reviewed five contractor background checks and interviews of staff demonstrated background checks were done prior to contractor working at the institution. Per the questionnaire there were two background checks of new contractors conducted in the last 12 months before the audit.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 establishes the procedures to conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates. Prior to the audit the facility did not provide an example. During the audit background checks conducted on employees and contractors, and the spreadsheet that tracked last and next scheduled background checks was reviewed. All employees and contractors had a background check less than five years old.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 and CCA Policy 3-20-2 Career Opportunities states shall ask all applicants and employees who may have contact with inmates directly about previous sexual misconduct as described in PREA standard 115.17 (a) in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees; and imposes upon employees a continuing affirmative duty to disclose any such misconduct.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 and CCA policy 3-20-2 requires information be provided 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. Prior to the audit received one document for applicant demonstrating they addressed previous sexual misconduct as described in PREA standard 115.17 (a) in written applications. Both of these policies were confirmed through interviews and review of additional personnel documents to include examples of employee annual affirmation during the audit. During the audit the auditor reviewed 11 additional applicants and 10 employees files that demonstrated applicants (when applying) and employees (annually and for promotions) who may have contact with inmates directly are asked about previous sexual misconduct as described in PREA standard 115.17 (a) in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees; and imposes upon employees a continuing affirmative duty to disclose any such misconduct.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states material omissions regarding sexual misconduct, or the provision of materially false information, shall be grounds for termination. Interviews of staff verified staff knew of the policy.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states unless prohibited by law, CCA shall 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. There were no requests to be reviewed at this facility but the auditor have reviewed other CCA facilities providing the information when requested. The policy was confirmed through interviews of human resource staff.

Standard 115.18 Upgrades to facilities and technologies

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Through review of CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, and interviews of CCA Agency Head representative, PREA Coordinator, PREA Compliance Manager, and Warden it was determined that the CCA considers the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse. The agency head was interviewed prior to this audit and confirmed that a five-year capital expenditure plan had been approved to enhance camera coverage at all CCA institutions. During the review of the staffing plan, the video monitoring system is also reviewed to ensure coverage enhances the ability to protect inmates from sexual abuse. Eden Detention Center has 193 cameras throughout the facility. In the last two years they have added ten new digital cameras. The cameras are monitored and are recorded.

Standard 115.21 Evidence protocol and forensic medical examinations

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states investigative entity responsible for investigating sexual abuse shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. Eden Detention Center investigator handles all the administrative proceedings regarding PREA allegations. DoJ OIG is responsible for conducting investigations of sexual abuse. The Warden had an email from an agent who said they had procedures and protocols for collecting evidence in PREA cases, but did not provide a copy of the protocols. Majority of the staff interviewed were very knowledgeable of the evidence protocols, and could explain the protocol for obtaining useable evidence when an inmate alleged sexual abuse. Seventy-two hours is used for collection of evidence through a sexual assault medical forensic examination

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states investigative entity shall offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate; such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs); and if SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. There is an MOU between CCA-Eden Detention Center and the Shannon Hospital for medical and forensic exam services, the examinations to be done by a SANE. Investigative files from two investigations documented inmates alledging sexual abuse were offered forensic examinations at an outside hospital (Shannon Hospital) by a SANE, and in both allegations the inmate refused to have a forensic examination conducted. Medical staff at the facility explained the importance of the forensic exam and the inmate still refused to have a forensic examination conducted. The MOU was signed in September 2015. The services are provided at no costs to the inmate.

Prior to the audit the CCA did not have an agreement to make available to the victim a victim advocate from a rape crisis center, but did have an agreement with an independent Licensed Professional Counselor to provide the victim a victim advocate at Eden Detention Center. The auditor questioned the credentials of the independent Licensed Professional Counselor and upon further review on day one of the on-site audit determined the independent Licensed Professional Counselor did not meet the criteria to provide victim advocate service IAW with the standard. The auditor recommended the facility contact the Concho Valley Rape Crisis Center based on the auditors contact with Just Detention International prior to the audit. JDI had informed the auditor the Concho Valley Rape Crisis Center would be willing to provide the victim a victim advocate and other support. The MOU was finalized and signed on the last day of the on-site audit November 18, 2015 effective November 23, 2015. The Concho Valley Rape Crisis Center Executive Director was also willing to provide the Eden Detention Center training. The auditor, following the audit, contacted the Concho Valley Rape Crisis Center Executive Director to verify the agreement and thank her for her quick response to provide the required services and additional training. The main sections of the agreement between Eden Detention Center and the Concho Valley Rape Crisis Center is to provide a victim advocate upon the victim’s request, provide emotional support to a victim when requested, crisis intervention, provide training to facility staff and invite facility staff to regular community SART meetings.

CCA-Eden Detention Center is not responsible for investigating allegations of sexual abuse, and CCA requested that the Bureau of Prisons and DoJ OIG follow the requirements of paragraphs (a) through (e) of this section through its policies and agreements. The Eden Detention Center investigator is trained to conduct investigations per interview and review of training records.

Standard 115.22 Policies to ensure referrals of allegations for investigations

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment, that all allegations of sexual abuse or sexual harassment are referred for investigation by the appropriate authority. Prior to the audit reviewed one investigation of sexual abuse that was referred to DoJ OIG for investigation. Eden Detention Center investigator began the investigation, referred to DoJ OIG who completed the investigation. The incident involved hugging and kissing between a staff member and an inmate. Staff member was terminated. Case was referred to U.S. Attorney's Office for the Northern District of Texas who declined prosecution.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 and CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 5-1 Incident Reporting requires all 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. Both policies are published on the CCA website. Criminal cases would go to the DoD OIG or Concho County Sheriff Department. DoJ OIG conducted the only criminal case in the last 12 months.

There were four allegations of a sexual abuse and sexual harassment at Eden Detention Center during the audit cycle. Three were investigated by the facility investigator, one by DoJ Office of the Inspector General. One was staff-inmate sexual abuse (substantiated); one inmate-inmate sexual harassment (unsubstantiated); and two unknown abusers on inmate sexual abuse (both unfounded). The two unknown abuser on inmate sexual abuse case involved the same inmate both while he was asleep. He reported one the next day and the other approximately two weeks after the incident. Eden Detention Center did not receive any reports of any incidents that occurred at another facility that an inmate advised them of, nor has a facility contacted Eden Detention Center alleging sexual abuse or harassment while at Eden Detention Center. All investigative files the auditor reviewed during the on-site visit appeared to thoroughly document the investigation process per agency policy. Criminal investigative referrals were documented.

Through a review of the investigative file and interviews of the Warden and investigative staff; it was determined the Eden Detention Center ensures that an administrative and/or a criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Referrals of allegations are first investigated by the institution.

Standard 115.31 Employee training

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 addresses PREA staff training requirements. Eden Detention Center employees receive PREA training through scheduled training, Department Head meetings, shift briefings, and policy change notifications. Training uses CCA training curriculum. The PREA training curriculum was reviewed and verified that the training provided to employees is very comprehensive. Review of the lesson plan and slides demonstrated the training covered: zero-tolerance policy for sexual abuse and sexual harassment; how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; inmates' right to be free from sexual abuse and sexual harassment; the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; the dynamics of sexual abuse and sexual harassment in confinement; the common reactions of sexual abuse and sexual harassment victims; how to detect and respond to signs of threatened and actual sexual abuse; how to avoid inappropriate relationships with inmates; how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. Additionally, between training, the facility provides quarterly staff recall meetings where PREA training and policy updates are provided. Prior to the audit documents demonstrating three staff completed and understood the training in March and April 2015. During the audit, the auditor reviewed 19 staff training records. All received training annually, most since 2013, all during initial pre-service training. Though training was conducted annually since 2013, having staff acknowledge they understood the training was not documented till 2015. Staff

interviewed were well versed in the CCA zero tolerance policy; their responsibilities in reporting sexual abuse, sexual harassment, and staff negligence; first responder duties; and evidence preservation. The questionnaire stated all 284 staff was trained. The training is tailored to the gender of the inmates at the institution.

Standard 115.32 Volunteer and contractor training

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

All contractors and volunteers who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states all civilians (definition of civilian includes volunteers) and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures; level and type of training will be based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents; and that the facility will maintain documentation that volunteers and contractors understand the training they have received. Prior to the audit the facility provided a training roster for training conducted for volunteers in September 2014 to include PREA training; and a volunteer acknowledgement form that states they understood CCA Policy 14-2. On-site the auditor reviewed the volunteer and contractor training, and volunteer and contractor training records. Randomly the auditor pulled two volunteer training records and four contractor training records; all six had documentation acknowledging they understood the training. Some of the contractor training records demonstrated PREA training since 2013. All four volunteers/contractors interviewed on-site stated they were trained. Contractors receive the same training as staff. Volunteers stated they received some sort of PREA training every six months. All four volunteers/contractors interviewed were knowledgeable of the CCA zero tolerance policy, their responsibilities and how and who to report to. The PREA Pre-Questionnaire stated 42 new contractors and volunteers had received the training during the last 12 months.

Standard 115.33 Inmate education

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires that all inmates receive PREA information upon arrival and PREA education as part of the Admission and Orientation program. During intake inmates are provided

information through a PREA handout and inmate rule book (both available in English and Spanish) that explains the agencies zero tolerance policy regarding sexual abuse and sexual harassment; and how to report such incidents. Additionally, the staff verbally covers basic PREA information. During institution orientation (within 30 days of arrival) they receive additional training which expands on the previous information provided. One inmate record was provided prior to the audit, he received the PREA information and handbook upon arrival and additional PREA information during orientation seven days following arrival at the facility. Inmates acknowledge receiving the PREA information in writing. On site checked 16 inmate records for documentation demonstrating received PREA information upon arrival and follow-on training within 30 days of arrival. Majority received the initial and follow-on training as required, all received some PREA training.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-1 Inmate/Residents Rights requires the handbook to be both in English and the foreign language spoken by the majority of the inmates. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. Posters and inmate handbooks are provided to inmates or posted in the housing units in formats accessible to all inmates to ensure that key information is continuously and readily available or visible to inmates. Staff interpreters are available during inprocessing and orientation. The facility has an agreement with Language Line Interpreter Services as well as TDD phones to assist inmates with disabilities. Information on the posters and in the handbook include: inmate rights; how to report; what to expect after you report; and how to protect yourself against sexual assault. Information was printed in English and Spanish throughout the facility.

Posters and inmate handbooks are provided to inmates or posted in the housing units in formats accessible to all inmates to ensure that key information is continuously and readily available or visible to inmates. Information on the posters include: inmate rights; how to report; what to expect after you report; and how to protect yourself against sexual assault. The inmate handbook covers: facts about sexual assault and sexual abuse; ways to report and seek help external victim advocate and support services contact information; PREA definitions; keys to preventing sexual assault and sexual abuse; and how to help other inmates who are victims of sexual abuse.

During the tour and interviews most inmates acknowledged the information being provided upon arrival and orientation, and posters displayed throughout the institution. The inmates interviewed definitely knew the agency zero tolerance policy; the difference between sexual abuse and sexual harassment; and that they have the right to be free from retaliation for reporting such incidents. Based on inmate records, training information, posters, and handbooks and inmate interviews, inmates at Eden detention Center receive PREA information upon arrival, more in-depth during orientation within 30 days of arrival, continuously through posters and inmate handbooks and in formats accessible to all inmates.

Standard 115.34 Specialized training: Investigations

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires the institution's investigator receives specialized training in addition to the general education provided to all employees. Prior to the audit the facility provided the training record demonstrating the facility investigator received the PREA investigator training. The specialized training for investigators covered all requirements of the standard to include 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. During the audit the auditor reviewed the investigator training record to verify he has also received the general PREA training. Eden Detention Center maintains documentation that the investigator has received both the general and investigative PREA training. The lesson plans, slides and sign in sheets were reviewed and interview of the facility investigator demonstrated he understood the how to conduct a sexual abuse investigation in a confinement setting and what was his role in criminal and administrative cases.

Standard 115.35 Specialized training: Medical and mental health care

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 outlines the training required for medical and mental health practitioners to include how to detect and assess signs of sexual abuse and harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of sexual abuse and harassment. CCA have developed a very comprehensive training for its medical and mental health practitioners. Prior to the audit the auditor was provided a training roster demonstrating medical and mental health staff had received specialized medical and mental health training in August 2015. One medical staff member training record was provided which demonstrated both the medical/mental health PREA and basic PREA training was provided in 2015. The auditor checked three training records of medical staff on site in addition to what was provided prior to the audit. All training records reviewed documented medical and mental health staff understood the basic PREA training required in standard 115.31, and received specialized training for medical and mental health care staff. Interviews of medical and mental health staff demonstrated they understood: 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. Medical staff does not conduct forensic medical examinations.

Standard 115.41 Screening for risk of victimization and abusiveness

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires Eden Detention Center to conduct a screening for risks of sexual victimization and abusiveness within 24 hours of arrival by medical staff; and a follow-up screening for risks of sexual victimization and abusiveness within 30 calendar days from inmate arrival by a case manager or staff member designated by the Warden. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires the institution reassesses inmate's risk level again when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. Eden Detention Center uses the CCA screening form and is an objective screening instrument. The facility provided the auditor one inmate's screening form to review prior to the audit. It was done upon arrival and the reassessment within 30 days of arrival (26 days).

The form reviewed prior to the audit was from 2013, and was not the current Eden Detention Center form during the audit nor did it include all the criteria to assess the inmates risk for sexual victimization i.e. screeners were not assessing the inmate whether they were gender nonconforming or not. The new version of CCA form 14-2B-BOP (January 2015) has all the required elements in the standard. The same form is used for the initial and any follow-on screen and identifies each inmate as a victim, potential victim, non-applicable for victimization; and as a predator, potential predator or non-applicable. Third page provides instructions for the screeners to reference if needed. The auditor had two staff that performs the screen to conduct a screen of the auditor to demonstrate the process of filling out the screening form. All the criteria referenced in the standard are on the form and inmates are asked all of the questions required to be asked to the inmate. The screen also requires the screener to make his/her own assessment of whether the inmate is gender non-conforming. The screening instrument is objective in determining if the inmate is at risk for victimization or abusiveness. On-site the auditor randomly selected 16 inmates and reviewed their initial and reassessments within 30 days screening forms. Four inmates who arrived in 2013 only received the initial screen, the other 12 had their initial and follow-up screen within 30 days (one follow-up screen was a few days late).

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires inmates not be disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked. Interviews of staff and inmates verified inmates are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires the facility to implement 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 inmate's detriment by staff or other inmates. Auditor observation and staff interviews confirmed appropriate controls have been implemented to ensure that sensitive information is not released and exploited by staff or other inmates. Only a limited number of staff has access to risk screening records.

Standard 115.42 Use of screening information

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 outlines the use of the screening form to include: using the information from the risk screening to determine housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive; making individualized determinations about how to ensure the safety of each inmate; considering on a case-by-case basis whether to assign a transgender or intersex inmate to an institution for male or female inmates, housing and programming assignments, based on the inmate's health and safety, inmate's own views with respect to his or her own safety, and whether the placement would present management or security problems; reviewing twice a year placement and programming assignments for each transgender or intersex inmate to review any threats to safety experienced by the inmate; allowing transgender and intersex inmates the opportunity to shower separately from other inmates; and not placing lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated institution, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

Prior to the audit the facility provided the screening form and the classification paperwork to demonstrate how the screening form is used in determining housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Additional packets were reviewed during the audit. Through a review of screening forms, housing and program decisions, inmate and staff interviews, it was determined Eden Detention Center uses the screening information to determine housing, bed, work, education, and program assignment with the goal of keeping inmates at high risk of being sexually victimized separate from those at high risk of being sexually abusive. The decisions are made on a case-by-case basis using information from the screen, assigned PREA classification, and good correctional judgment. The process is clearly defined in the policies and implemented in the use of PREA forms. Designation to the facility is done by the FBOP per its classification plan. By the classification

plan Eden Detention Center is considered a low security detention facility for federal inmates; and its population is supposed to be mainly low security adult non-U.S. Citizens, males with 90 months or less remaining to serve on their sentence.

If they request transgender and intersex inmates are given the opportunity to shower separately from other inmates by showering in the medical unit at designated times.

Standard 115.43 Protective custody

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 and CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 10-1 Segregation/Restricted Housing Unit Management states inmates at high risks for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers; if placed in segregated housing involuntarily they shall have access to programs, privileges, education, and work opportunities to the extent possible; that the institution shall document any access to programs, privileges, education, or work opportunities that was restricted, duration of restriction and why; and that every 30 days, the institution shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population. Interviews of the Warden, PREA Compliance Manager, and segregation staff verified inmates at high risk of sexual victimization would not be placed in involuntary segregation unless other measures have been assessed; and if placed in segregated housing they would have access to programs, privileges, education, and work opportunities. Other measures included moving housing areas or facilities. It was confirmed through investigative paperwork and during interviews with the Warden and staff who supervise segregated inmates that no inmates at high risk for sexual victimization had been placed in involuntary segregated housing during the past 12 months prior to the audit.

Standard 115.51 Inmate reporting

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 require and provide multiple internal and external ways for inmates to report sexual abuse, sexual harassment and retaliation by other inmates or staff for reporting sexual abuse and sexual harassment. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states inmates can

report verbally and in writing to staff; meet with health services; facility 24-hour toll free hotline; forward letter sealed and marked confidential to Warden or any staff; call or write to third party; write the CCA Managing Director for Institution Operations; report to on-site FBOP staff; and Concho County Sheriff's Department. Inmate handbooks, PREA handouts, and posters throughout the facility provide specific internal and external ways for inmates to report sexual abuse, sexual harassment and retaliation by other inmates or staff for reporting sexual abuse and sexual harassment. Interviews of inmates and staff verified the inmates and staff knew of the multiple internal and external ways to report incidents of abuse or harassment, and retaliation. The auditor tested the numbers posted during the tour. Inmates can report verbally and in writing to staff; meet with health services; facility 24-hour toll free hotline; forward letter sealed and marked confidential to Warden or any staff; call or write to third party; write the CCA Managing Director for Institution Operations; report to on-site FBOP staff; and Concho County Sheriff's Department.

CCA and Eden Detention Center allows inmates to report abuse or harassment to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Inmates can do this in writing to Rape, Abuse, and Incest National Network (RAINN), National Organization for Victim Assistance, and Concho Valley Rape Crisis Center. The auditor using the inmate phone contacted the Concho Valley Rape Crisis Center, and the staff member from the Concho Valley Rape Crisis Center said she would report immediately but it could not be confidential.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 informs staff they can privately report sexual abuse and sexual harassment of inmates by sending a letter marked confidential to the Warden or Administrator and by using the CCA Ethics and Compliance hotline. CCA staff fliers provide information on PREA to include ways for staff to privately report sexual abuse and sexual harassment of inmates. During interviews some of the staff knew they could privately report sexual abuse and harassment of inmates to the CCA Ethics and Compliance hotline or by writing the Warden.

Staff are required to document immediately verbal writing and this was verified during interviews and review of investigations.

CCA websites provides information for third party reporting to include writing to the Warden (address provided) and CCA Managing Director for Institution Operations (address provided) or call the facility directly (number provided).

No one is detained solely for civil immigration purposes.

Standard 115.52 Exhaustion of administrative remedies

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

X Not Applicable

Eden Detention Center does not have an administrative process to address inmate grievances regarding sexual abuse. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states unless mandated by contract, alleged PREA incidents will not be processed through the facility grievance process. If a PREA allegation is submitted as a grievance it is immediately provided to the investigator for investigation. The Eden Detention Center does not list the grievance system as a way to report sexual abuse or sexual harassment.

Standard 115.53 Inmate access to outside confidential support services

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states inmates shall be provided access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations; and the institution shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible; and that the facility shall attempt to enter into MOUs or other agreements with outside victim advocates to provide these services.

Eden Detention Center entered into an agreement with an individual to provide emotional support services. The auditor questioned the individual's credentials to provide such services, and determined the individual was not qualified to provide emotional support services. The auditor informed the facility that the Concho Valley Rape Crisis Center had informed the auditor through JDI that they would be willing to provide the services. The facility immediately contacted the Concho Valley Rape Crisis Center and an agreement was established on November 23rd. Concho Valley Rape Crisis Center agreed to provide victims emotional support, a victim advocate at the hospital, training for the facility, and to be part of the Concho Valley Rape Crisis Center quarterly SART meeting.

The Eden Detention Center Inmate Handbook did list three agencies phone number and address that could provide external victim advocate and support services: National Organization for Victim Assistance (NOVA); RAINN; and Concho Valley Rape Crisis Center. The inmate handbook informs the inmates all inmate phones are recorded and monitored.

Inmate interviews confirmed a few inmates knew of the confidential support services provided, most knew there was a service available but not exactly what was provided based on they did not need or believed they would not need the specific information.

Standard 115.54 Third-party reporting

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states all facilities shall establish methods to receive third party reports of sexual abuse and sexual harassment. CCA has a PREA section on their web site, and the PREA section is easily accessible. On the PREA page there is a section that specifically addresses how inmates and others can report to include third party. It provides a phone number to the National Sexual Assault Hotline and CCA's Ethics and Compliance Helpline; along with information to write to the Warden at the institution. It has an online section that allows an individual to file a report or get an update on a report online. It also states "It is not required that any personal information be provided. However, the more information that can be provided regarding

dates, times, locations, witnesses, and as much detail about the alleged incident as is known serves to assist staff and law enforcement in their efforts to successfully conduct the investigations.” The PREA section also includes a tab for each facility specific PREA information which includes PREA compliance manager name, facility PREA policy, PREA report if completed and the facility third party reporting methods. Three methods for Eden Detention Center includes writing the Warden confidentially (address provided); writing to CCA Managing Director, Facility Operations (address provided); and calling the facility directly (number provided). Posters with the information was also observed in the housing areas.

The facility noted no one has made a third party reporting in the last 12 months.

Standard 115.61 Staff and agency reporting duties

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 require that all staff to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment; staff not to reveal any information related to a sexual abuse report to anyone other than extent necessary; and require staff to report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility’s designated investigators. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 5-1 Incident Reporting, require staff to report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility’s designated investigators. CCA form 5-1A Incident Report, is used to document the allegation and all the actions the facility took. The form is very good in capturing important information to document the incident and steps taken by staff. Three examples were provided prior to the audit for review, all were thoroughly filled out. Additionally, the Eden Detention Center will fill out the DoJ FBOP form to be sent to internal affairs if the incident involved a staff member. One example was provided prior to the audit.

Health practitioners are required to report sexual abuse and to inform inmates of the practitioner’s duty to report, and the limitations of confidentiality, at the initiation of services. The institution reports all allegations of sexual abuse and sexual harassment, including third party and anonymous reports, to the institution investigator. Review of investigative files; and interviews of staff and inmates verified staff immediately report to the institution’s designated investigator any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment; and that staff does not reveal information related to a sexual abuse report other than to people authorize to discuss the report. Health practitioners during interviews stated they are required and would report sexual abuse. Random interviews with staff revealed that staff is very aware of their responsibilities to report incidents of sexual abuse or harassment to the investigator or their supervisor and know not to reveal any information about a sexual abuse incident to other staff. Interviews with inmates and staff did not reveal any incident of sexual abuse or harassment not reported to the institution’s designated investigator.

Standard 115.62 Agency protection duties

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires staff to take immediate action to protect any inmate they learn is subject to substantial risk. Interviews with staff demonstrate they know the steps to take to protect an inmate subject to risk of imminent sexual abuse. Security staff immediately employs protection measures as separate the inmate from where or whom at risks with; pass the information is passed to the Investigator, PREA Compliance Manager and Warden. The Warden, PREA Compliance Manager, and investigator confirmed there have been no incidents in the past 12 months, where it was necessary for the institution to take any action in regards to an inmate being at substantial risk of sexual abuse.

Standard 115.63 Reporting to other confinement facilities

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires when an allegation that an inmate was sexually abused while confined at another institution, the Warden that received the allegation shall notify the Warden where the alleged abuse occurred as soon as possible but no later than 72 hours after receiving the allegation; that all sexual abuse allegations reported by another institution regarding any inmate that was confined at the Eden Detention Center be fully investigated. Interviews with the Warden, PREA Compliance Manager, and investigator confirmed their knowledge of the policies and responsibilities to report any allegations and investigate any allegations that may have occurred at Eden Detention Center. CCA form 5-1B is used to document the allegations, any details learned from the facility that the alleged incident occurred, and the facility’s response to the allegation. No inmate reported abuse to Eden Detention Center staff while confined at another institution in the last 12 months.

Standard 115.64 Staff first responder duties

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 outlines procedures to respond to an allegation of sexual abuse for both security and non-security staff. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 13-79 Sexual Assault, outlines triage and treatment, medical reporting, and victim support/counseling procedures when responding to a report of sexual abuse. CCA has a Sexual Abuse Incident Checklists form to document all the steps. The form is a good guide to follow to ensure all PREA procedures and steps are followed. All staff carry a PREA card which outlines first responder duties and steps. Prior to the audit the facility provided one complete packet from the allegation that included sexual abuse incident checklists for review. Random interviews with staff and inmates; and review of investigations and sexual abuse incident checklists confirmed both security and non-security staff were very knowledgeable of the procedures as a first responder to an inmate was sexually abused to include separating the alleged victim and abuser; how to preserve the crime scene; and what actions inmates should not take in order not to destroy physical evidence. The one inmate interviewed who had reported sexual abuse stated he told a correctional officer a couple of days after the incident and the correctional officer and other staff responded immediately to include telling him not to change his clothes and he was sent to the hospital. They offered but he denied follow-up medical treatment and services, and assistance from outside agencies for services such as emotional support.

Standard 115.65 Coordinated response

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Eden Detention Center PREA Response Plan serves as Eden Detention Center plan to coordinate actions taken in response to an incident of sexual abuse, amongst staff first responders, medical and mental health practitioners, investigators, and institution leadership. The plan includes responsibilities and responses to an alleged sexual abuse incident for first responders, medical and mental health practitioners, investigators, and institution leadership. Also includes data that must be entered into the FBOP inmate automated system (SENTRY). Interviews with staff (first responders, medical and mental health practitioners, investigators, and institution leadership), and review of related PREA documents (response forms, investigative files, medical documents) confirmed staff were knowledgeable about the PREA plan and the coordinated duties and collaborative responsibilities.

Standard 115.66 Preservation of ability to protect inmates from contact with abusers

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Eden Detention Center has no collective bargaining agreement. Eden Detention Center by policies has the ability to remove alleged staff

sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. There was one case where the alleged staff abuser was initially removed from contact with the alleged victim pending the outcome of an investigation.

Standard 115.67 Agency protection against retaliation

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The CCA sexual abuse incident checklists requires ongoing PREA retaliation monitoring, and describes who should be monitored, what should be monitored and for how long using CCA form 14-2D. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibola, Eden, McRae, NE Ohio Policy 14-2 outlines the policy and procedures for monitoring staff and inmates against retaliation. It includes designating which staff members or departments are charged with monitoring retaliation; employing multiple protection measures; monitoring the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff; and conducting periodic status checks through interviews at least every 30 days. Monitoring will occur for at least 90 days following the report of the allegation and may go beyond the 90 days if the monitoring indicates a continuing need. Monitoring includes periodic status checks (speaking with inmates and staff); reviewing inmate discipline, housing changes, and program changes; negative performance reviews and reassignment of staff. At Eden Detention Center the qualified mental health official uses the CCA monitoring form 14-2D to document monitoring of staff and inmates. Prior to the audit one example of monitoring an inmate for retaliation was provided, each demonstrating face-to-face meetings were conducted at approximately 30, 60, and 90 days. Interview of the PREA Compliance Manager who oversees the monitoring and could do the monitoring demonstrated the monitor also checked staff and inmate records during the monitoring.

Eden Detention Center uses multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Eden Detention Center did remove a staff from contact with victims, and reported zero retaliations have occurred during the audit cycle.

Standard 115.68 Post-allegation protective custody

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states involuntary segregated housing for inmates who have alleged to have suffered sexual abuse may be used only after an assessment of all available housing alternatives has shown there are no other means of protecting the inmate; and use of protective custody to protect alleged victim is only used as a last resort for a very short time. If placed in segregated housing involuntarily they shall have access to programs, privileges, education, and work opportunities to the extent possible; and that the institution shall document any access to programs, privileges, education, or work opportunities that was restricted and that every 30 days, the institution shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population. There were no inmates who have alleged to have suffered sexual abuse in protective custody during the audit. Interviews of the Warden, PREA Compliance Manager, staff and inmates, there were one instance of using segregation housing to protect an inmate who had alleged to have been sexually abused in the last 12 months. An assessment was done to put in administrative segregation; he had access to programs and privileges; and was removed from segregation back to general population within five days when it was determined protective custody was no longer needed. Based on his second allegation of sexual assault while asleep he was temporarily placed in post allegation protective custody.

Standard 115.71 Criminal and administrative agency investigations

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 outlines policies and procedures that ensures Eden Detention Center when conducting investigations into allegations of sexual abuse and sexual harassment, does so promptly, thoroughly, and objectively for all allegations; uses investigators who have received special training in sexual abuse investigations; investigators gather and preserve direct and circumstantial evidence (including any available physical and DNA evidence and electronic monitoring data), interview alleged victims, suspected perpetrators, and witnesses, and review prior complaints and reports of sexual abuse involving the suspected perpetrator; the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff, and no inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation; all investigations whether administrative or criminal are documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible; and substantiated allegations of conduct that appears to be criminal are referred for prosecution. Per CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, for investigations of rape, sexual assault, or employee on inmate sexual misconduct the Warden will notify Office of Internal Affairs who will notify the DoJ Office of the Inspector General and when appropriate will notify the FBI. Investigation will not begin until the Office of Internal Affairs notifies CCA they can investigate the case. In cases where outside agency does the investigation, Eden Detention Center will coordinate with the outside agency, record and secure any available physical and DNA evidence and electronic monitoring data. CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 1-15 Retention of Records outlines PREA investigation records will be retained for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

Prior to the audit, one copy of a facility investigation and copy of a DoJ Office of the Inspector General investigation was provided. The DoJ Office of the Inspector General investigation was referred to the Northern District of Texas for criminal prosecution, but they declined to prosecute the correctional officer. CCA terminated the correctional officer.

There were four allegations of a sexual abuse and sexual harassment at Eden Detention Center during the audit cycle. Three were investigated by the facility investigator, one by DoJ Office of the Inspector General. One was staff-inmate sexual abuse (substantiated); one inmate-inmate sexual harassment (unsubstantiated); and two unknown abusers on inmate sexual abuse (both unfounded). The two unknown abuser on inmate sexual abuse case involved the same inmate both while he was asleep. He reported one the next day and the other approximately two weeks after the incident. Eden Detention Center did not receive any reports of any incidents that occurred at another facility that an inmate advised them of, nor has a facility contacted Eden Detention Center alleging sexual abuse or harassment

while at Eden Detention Center. All investigative files the auditor reviewed during the on-site visit appeared to thoroughly document the investigation process per agency policy. Criminal investigative referrals were documented.

The one inmate who alleged an allegation of sexual abuse that was interviewed confirmed he was not asked to take a polygraph or other truth telling device.

Based on review of CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2; the four PREA investigations; interviews of Eden Detention Center Warden, PREA Compliance Manager; and investigator it was determined investigations into allegations of sexual abuse and sexual harassment are done promptly, thoroughly, and objectively for all allegations. Administrative and criminal investigations are documented in written reports with required investigative documentation. Written reports are maintained as long as the alleged abuser is incarcerated or employed by the agency, plus five years. Eden Detention Center investigator starts all investigations and conducts administrative investigations. Criminal cases are investigated by the DoD OIG or Concho County Sheriff Department. DoJ OIG conducted the only criminal case in the last 12 months. Eden Detention Center investigators have received special training in sexual abuse investigations. The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and not determined by the person's status as inmate or staff. CCA does not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. Investigators interview victims and witnesses; review camera, phone call monitoring, physical evidence, DNA evidence, and inmate records. The departure of the alleged abuser or victim from the employment or control of CCA does not provide a basis for terminating an investigation.

Administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse. All investigations are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

Standard 115.72 Evidentiary standard for administrative investigations

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states the facility will impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Training the facility investigators received from National PREA Resource Center and Moss Group received trained that the facility will impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. One case was reviewed prior to the audit and the determination was based on the preponderance of the evidence. Review of other investigations and interviews with the investigator and leadership staff confirm the Eden Detention Center has no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. When the investigator was asked what standard of evidence was used in determining if an allegation is substantiated, the agencies policy was recited confirming compliance with the standard.

Standard 115.73 Reporting to inmates

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires facilities to inform the inmate as to whether the allegation of sexual abuse has been determined to be substantiated, unsubstantiated, or unfounded; if investigated by an outside agency, request the outside investigative agency inform the inmate as to whether the allegation of sexual abuse has been determined to be substantiated, unsubstantiated, or unfounded; if the allegation is against a staff member, the facility shall inform the inmate whenever the staff member is no longer posted within the inmate's unit, no longer employed at the institution, has been indicted on a charge related to sexual abuse within the institution, or has been convicted on a charge related to sexual abuse within the institution; if the inmate allegation is against an inmate be whenever the alleged abuser has been indicted on a charge related to sexual abuse within the institution, or has been convicted on a charge related to sexual abuse within the institution; and that all notifications will be documented. Eden Detention Center uses the CCA form (14-2E) of notification for all cases investigated.

Prior to the audit, Eden Detention Center provided copy of a notification based on an Office of Inspector General case that notified the inmate the staff member had been moved from her post, had been terminated from employment and that the case was substantiated. During the audit, the auditor reviewed all the investigations in the last year. The auditor requested and received all other notices to inmates (two) not provided prior to the audit. The two other alleged sexual abuse cases the inmate was notified, though in one case the notification was months after the case was closed. The other two cases of sexual abuse the notifications were timely. The inmate with two cases interviewed said he was informed in writing of the one of the results, but documentation demonstrated he was notified in both cases, just one was late. All was provided in writing. Based on CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, review of the investigations and notices, it was determined in all allegations of sexual abuse: inmates were informed in writing the outcome of the investigations whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded; if the case had been referred for prosecution; if the alleged abuser was no longer working a posts within the inmates unit/work area; and if the staff member no longer worked at the institution.

Standard 115.76 Disciplinary sanctions for staff

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2, CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, Policy 3-3 Code of Conduct and CCA Code of Conduct Handbook; and interviews with Eden Detention staff, staff are subject to disciplinary sanctions for violating agency sexual abuse or sexual harassment policies; termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse; disciplinary sanctions for violations of agency policies

relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be 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; and all terminations or resignations in lieu of terminations for violations of agency sexual abuse or sexual harassment policies are reported to law enforcement agencies and/or relevant licensing bodies unless not criminal. The facility provided logs of all staff disciplinary action (highlighting the PREA violations), notices of terminations, and staff members code of conduct acknowledgement. In the past 12 months one staff member was terminated due to violation of the agency's sexual abuse and sexual harassment policy. The DoJ Office of the Inspector General investigation was referred to the Northern District of Texas for criminal prosecution, but they declined to prosecute the correctional officer. In 2014 another staff member was terminated due to violation of the agency's sexual abuse and sexual harassment policy. CCA enforces its zero tolerance policy through the discipline it takes on PREA violators. Staff interviewed stated they knew CCA and Eden Detention Center had a zero tolerance policy based on the investigations and disciplinary sanctions of staff who violate PREA.

Standard 115.77 Corrective action for contractors and volunteers

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 contractors or volunteers are prohibited from engaging in sexual abuse, and those that do are prohibited to have contact with inmates and requires they be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Interviews with contractors and volunteers confirmed they knew the zero tolerance policy and the punishment for engaging in sexual abuse or sexual harassment of inmates. Based on action taken on staff, they knew they would be reported to law enforcement agencies unless not criminal, to relevant licensing bodies, and/or would be prohibited from further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies. The Warden and PREA Compliance manager reported that have been no allegations of sexual abuse by contractors or volunteers during the audit cycle.

Standard 115.78 Disciplinary sanctions for inmates

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-

inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse; sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories; the disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed; if the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits; may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact; and for the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

FBOP Program Statement 5270.09 Inmate Discipline Program states the disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed; and prohibits and disciplines inmates for all sexual activity between inmates, but does not deem such activity to constitute sexual abuse if it determines that the activity is not coerced. During the audit cycle the facility had no disciplinary sanctions imposed on any inmate for substantiated inmate on inmate sexual abuse or criminal findings of guilt for inmate on inmate sexual abuse.

Standard 115.81 Medical and mental health screenings; history of sexual abuse

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 states: all inmates will receive a PREA screen and if the screening indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening; if the PREA screen indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening; any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law; medical and mental health practitioners shall obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18. Additionally, per CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 13-61 Mental Health Services all inmates are screened by a mental health provider within 14 days. Per interviews with staff who conduct screens, medical and mental health staff and review of documentation there is a good process in place for screeners to offer inmates who have a prior sexual victimization with a medical or mental health practitioner within 14 days of the intake screening; as well as offering an inmate who previously perpetrated sexual abuse a follow-up meeting with a mental health practitioner within 14 days of the intake screening; followed by notification to medical and mental health staff to conduct follow-up meeting within 14 days. Per interview with mental health staff if PREA screen identifies prior sexual victimization or perpetrated sexual abuse, would be discussed then whether requested referral or not. During the on-site audit, the auditor reviewed one example that the screener notified the mental health director of an inmate who was previously victimized, and one example of one inmate who previously perpetrated sexual abuse. Interviews of medical and mental health staff confirmed any information related to sexual victimization or abusiveness that occurred in the institution is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments.

Standard 115.82 Access to emergency medical and mental health services

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 and 13-79, inmate victims of sexual abuse shall 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; inmate victims of sexual abuse while incarcerated shall be 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; and the services at no costs are provided regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Qualified medical practitioners are on duty 24 hours. Upon returning from the hospital a registered nurse evaluates and documents the inmate's health status, and refers mental health services. The inmate is prioritized for sick call and if the hospital did not complete testing sexually transmitted diseases, testing is done at the facility. Forensic exams are done for up to 72 hours since the time of the incident. The facility reported no forensic exams conducted during the audit cycle. Interviews with the medical staff confirmed this practice and that the requirements of this standard are adhered to. MOU with Shannon Hospital clearly delineates responsibilities of the facility and hospital to ensure inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment. The MOU with Concho Valley Rape Crisis Center ensures they have unimpeded access for crisis intervention services. Staff interviews determined the nature and scope of medical and mental health treatment are determined by medical and mental health practitioners according to their professional judgement.

One proof provided before the on-site demonstrating inmate immediately taken to medical based on allegation a staff member had sexually assaulted him (kissing, hugging, touching his breast). Medical did an initial assessment, he denied any relationship or assault and he did not want nor was sent for forensic exam. Investigations documented medical actions in three other cases, all well done.

All medical staff interviews were outstanding, staff were very knowledgeable of their role and responsibilities, and the process. Medical interviews: when inmate brought to medical only provide life threatening treatment, emotional support, and preserve the evidence pending transfer to the hospital for forensic exam. Victims of sexual abuse hospital initiates offering timely information about and timely access to sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

Standard 115.83 Ongoing medical and mental health care for sexual abuse victims and abusers

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 and 13-79, the facility shall offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile institution; treatment services shall be 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; inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate, and conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners.

Based on staff and inmate interviews and review of medical and mental health records, Eden Detention Center offers and provides ongoing medical and mental health care for sexual abuse victims and abusers consistent with the community level of care. Medical and mental health conducts follow-up care for sexual abuse incidents and offers victims of sexual abuse tests for sexually transmitted infections as medically appropriate. Eden Detention Center provided medical and mental health information demonstrating inmate received initial medical and mental health treatment though he claimed there was no sexual abuse between a staff member and him. The inmate was offered tests for sexually transmitted infections which he declined. Despite denial of the incident, mental health followed up again due to nature of case. Per staff interviews, mental health services are provided within three days of referral for abuse counseling. Eden Detention Center provides group counseling for victims of sexual abuse, and one on one counseling for sexual abusers. Treatment is at no costs to the inmates and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Eden Detention Center is a male institution and thus non-applicable 115.83 (d) and (e) which deals with pregnancy testing and medical services.

Standard 115.86 Sexual abuse incident reviews

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires the facility to conduct a sexual abuse incident review within 30 days of the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded; identifies the minimum members of the review team, and covers the process for sexual abuse incident reviews to include a form the review team uses that addresses whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the institution; whether physical barriers in the area may enable abuse; the adequacy of staffing levels in that area during different shifts; and whether monitoring technology should be deployed or augmented to supplement supervision by staff. Per CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 the form is to be filled out to include making recommendations for improvement, submitted to the facility head and PREA compliance manager, and if the recommendations are not implemented, documenting the reasons for not doing so.

Prior to the audit the one incident review team CCA Form used was reviewed which recommended adjustment of a camera in a substantiated case. There were no other incident reviews conducted. The other cases were unfounded or unsubstantiated sexual harassment which does not require an incident review.

Standard 115.87 Data collection

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires the collection of uniform data that provides the minimum data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice; CCA maintains, reviews, and collects data as needed from all available incident-based documents, including incident reports, investigation files, and sexual abuse incident reviews; and CCA provides all such data from the previous calendar year to the Department of Justice when requested no later than June 30. CCA do not have private facilities with which it contracts for the confinement of its inmates.

Eden Detention Center provided the 2014 CCA annual report. In the annual report it noted Eden Detention Center it had two unsubstantiated and two unfounded inmate on inmate sexual abuse and three substantiated staff on inmate sexual abuse. There were no sexual harassment allegations.

CCA collects accurate uniform data for every allegation of sexual abuse at facilities under its control using a standardized instrument (Incident Reporting Tracking System). The policy requires information is entered in the Incident Reporting Tracking System on all allegations. The system allows the agency to prepare an annual PREA report, monitor trends, and take corrective action, and the facility submit the annual DOJ Survey of Sexual Violence (if requested). Review of previous DoJ Survey of Sexual Violence reports, annual agency PREA reports, and data submitted by the institution demonstrated the agency collects uniform data to be used by CCA. CCA does not contract its inmates to other facilities (115.87 (e)).

Standard 115.88 Data review for corrective action

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 requires the agency to review all of the data collected from all its facilities and aggregates that data annually to assess and improve the effectiveness of its sexual abuse program and practices. Eden Detention Center provided CCA 2014 annual report. Based on interviews with the PREA Compliance Manager, PREA Coordinator and review of the CCA website, CCA reviews the data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies; and to identify problem areas and take corrective actions. An annual report is published and posted on the CCA website. Information that needs to be redacted is not included in the annual report. The 2014 annual report was thorough, provided corrective measures taken and addressed the agency progress in addressing sexual abuse. The 2014 Annual Report noted 14

facilities were audited and was found to be in compliance with the National PREA standards. It also highlighted reinforcing the knock and announce standard by placing "Opposite Gender Must Announce Upon Entry" stickers at the entry to all inmate housing units, which was observed at Eden Detention Center. The report includes a comparison of the current year's data and with the previous year's data. The 2014 noted Eden Detention Center had two unsubstantiated and two unfounded inmate on inmate sexual abuse and three substantiated staff on inmate sexual abuse. There were no sexual harassment allegations.

The CCA website is the most informative and one of the easiest to find PREA information of all agencies this auditor has audited. CCA PREA page lists: general information on PREA; agency zero tolerance policy; how to report; information on investigations; and where questions and inquiries can be forwarded to (PREA Coordinator phone and mailing address). It also has a number of links to include: PREA standards; PREA Resource Center website; CCA PREA policy; CCA 2013 and 2014 PREA Report; and CCA Institution PREA information. The CCA Institution PREA information link lists each CCA institution with information on that institution's PREA Compliance Manager; third party reporting methods; PREA policy; PREA audit dates; and PREA audit reports if completed and posted.

Standard 115.89 Data storage, publication, and destruction

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

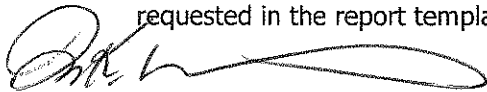
Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per review of CCA/Bureau of Prisons Contracted Facilities: Adams, Cibda, Eden, McRae, NE Ohio Policy 14-2 and 1-15 (Retention of Records), review of the CCA website, and interviews of staff it is determined data is properly stored, maintained and secured. All records pertaining to allegations of sexual abuse whether substantiated, unsubstantiated, or unfounded are maintained in the facility investigators office with restricted access. Access to data is controlled. Aggregate data on all its facilities is available to the public through its website. All CCA institution 2013 and 2014 data is in the annual report and posted on the website. CCA maintains sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of the initial collection in accordance with the CCA Retention Records Schedule. Before making aggregated sexual abuse data publicly available, CCA removes all personal identifiers.

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 inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.



David Haasenritter

17 April 2016

Auditor Signature

Date