

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS

Interim Final Report

Auditor Information

Auditor name: Katherine Brown

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Telephone number: 727-470-4123

Date of facility visit: December 5-6, 2016

Date report submitted: December 8 2016

Facility Information

Name of facility: Jenkins Correctional Center

Physical address: 3404 Kent Farm Dr. Millen GA 30442

Telephone number: 478-982-6300

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| Jenkins Correctional Center is: | <input type="checkbox"/> Military | <input type="checkbox"/> County | <input type="checkbox"/> Federal |
| | <input checked="" type="checkbox"/> Private for profit | <input type="checkbox"/> Municipal | <input type="checkbox"/> State |
| | <input type="checkbox"/> Private not for profit | | |

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| Facility Type: | <input type="checkbox"/> Jail | <input checked="" type="checkbox"/> Prison |
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| Name of facility's Chief Executive Officer: Robert Adams Jr. | Title: | Warden |
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Number of staff assigned to Jenkins Correctional Center in the last 12 months: 196

Designed facility capacity: 1250

Current population of facility: 1138

Facility security levels/inmate custody levels: Minimum/Medium

Age range of the population: 18-75

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| Name of PREA Compliance Manager: Stacey Nelson | Title: | Chief of Unit Mgmt. |
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| Email address: Stacey.nelson@corecivic.com | Telephone # | 478-982-6338 |
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Agency Information

Name of agency: Corrections Corporation of America

Governing authority or parent agency: N/A

Physical address: 101 Burton Hills Blvd. Nashville, TN 37215

Mailing address: N/A

Telephone number: 615-263-3000

Agency Chief Executive Officer

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| Name: Damon Hininger | Title: | President and Chief Executive Officer |
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| Email address: Damon.hininger@cca.com | Telephone number: | 615-263-3301 |
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Agency-Wide PREA Coordinator

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| Name: Lisa Hollingsworth | Title: | Senior Director PREA Programs & Compliance |
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| Email address: Lisa.hollingsworth@cca.com | Telephone # | 15-263-3915 |
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AUDIT FINDINGS

NARRATIVE:

The audit of Jenkins Correctional Center was conducted on December 5-6, 2016 by Katherine Brown, Certified PREA auditor. Prior to the onsite I received all the policies and documentation on November 8-10, 2016 to review.

The areas toured were a total of 11 housing units. There are 10 general population units and one administrative detention/segregation unit. I toured each of the housing unit's plus the kitchen, laundry, intake, medical, programs area, and work areas.

An entrance meeting was held with facility staff. The following people were in attendance: Warden Robert Adams; Stacey Nelson COUM/PRA Compliance Manager; Kendra Strowbridge, QA Manager; Gwynn Colvin, Mental Health Representative; Kim Durfee, Victim Services Coordinator; Shawn Sikes GDC Contract Monitor; Marie Taylor Administrative Supervisor; Lisa Hollingsworth PREA Programs & Compliance Sr. Director; Eric Pierson, PREA Programs & Compliance Ssr. Director.

Following the entrance meeting I toured the Jenkins Correctional Facility from 0830-1000. On the tour with me was, An entrance meeting was held with facility staff. The following people were in attendance: Warden Robert Adams; Stacey Nelson COUM/PRA Compliance Manager; Kendra Strowbridge, QA Manager; Gwynn Colvin, Mental Health Representative; Kim Durfee, Victim Services Coordinator; Shawn Sikes GDC Contract Monitor; Marie Taylor Administrative Supervisor; Craig Singletary, Investigator; Kasey Fountain, STG; Ana Caxton, K-9 Sgt; Lisa Hollingsworth PREA Programs & Compliance Sr. Director; Eric Pierson, PREA Programs & Compliance Ssr. Director.

During the tour all facility notices were posted in all inmate dorms, program areas, and public areas announcing the audit. As I entered all inmates living areas cross gender announcements were made.

I asked for an alpha listing of all inmates housed at Jenkins Correctional Center and randomly selected three inmates from each housing unit as well as any inmates who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impairment inmates there, I did interview two non-English speaking inmates using a staff interrupter. I also asked for any inmate who was transgender/intersex, which there were none. I asked for a shift roster and randomly selected 18 staff to interview. I conducted 13 specialized interviews.

There were 16 sexual assault/harassment allegation cases, all relatively recent (within the past year) 8 had been unfounded and 8 unsubstantiated.

DESCRIPTION OF FACILITY CHARACTERISTICS:

Jenkins Correctional Center is located in Millen, Georgia approximately 50 miles south of Augusta, Georgia and 85 miles northwest of Savannah, Georgia. The facility opened in March 2012. There are no juveniles or females housed at this facility. The facility is a 1234 (1158 general population, 76 restrictive housing and 8 medical) bed institution operated by Core Civic formerly known as Corrections Corporation of America and is contracted by the Georgia Department of Corrections to house 1135 minimum to medium security adult male offenders. The facility is located on 63 acres with 19 acres within the perimeter and 44 acres outside the perimeter. The facility has three buildings housing inmates. Building one has three dorms with one of these being segregation housing. Building two has two general population dorms and a dorm for education/ intake as well as a faith based dorm. Building three has three general population dorms and one dog program dorm.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 1

Number of standards met: 39

Number of standards not met:

Number of standards not applicable: 3

§115.11 Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

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

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response and Organizational chart as well as interviews with PREA Coordinator and PREA compliance manager I find they meet this standard.

Corrections Corporation of America has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Corrections Corporation of America's approach to preventing, detecting, and responding to such conduct. Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response mandates zero tolerance toward all forms of sexual misconduct and is used to prevent, detect, and respond to any form of sexual abuse and sexual harassment.

Jenkins Correctional Center employs or designates an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards. The PREA Compliance Manager was appointed by the Warden and has the authority to comply with this standard.

Corrections Corporation of America operates more than one facility; each facility has designated a PREA compliance manager with sufficient time and authority to coordinate Jenkins Correctional Center's efforts to comply with the PREA standards

§115.12 Contracting with other agencies for 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)
- X Not applicable standard

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

No other agency contracts for the confinement of the inmates.

§115.13 Supervision and monitoring

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response;; Annual PREA Staff Plan review; housing logs and interview with Warden, PREA Compliance Manager and PREA Coordinator I find they meet this standard.

Corrections Corporation of America has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect inmates against sexual abuse. Jenkins Correctional Center complies with the standard by using the developed staffing plan and housing logs that were reviewed as part of this audit.

In circumstances where the staffing plan was not complied with, Jenkins Correctional Center documented and justified all deviations from the plan. There have been no deviations from the staffing plan.

Corrections Corporation of America completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed. Based on review of the annual staffing report.

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| §115.14 Youthful inmates |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Not applicable

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

No juveniles are housed at this prison.

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| §115.15 Limits to cross gender viewing and searches |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Lesson Plan; Georgia DOC Training Roster; CCA Link to Introductory Video on Cross Gender and

Transgender Pat Search's as well as random staff and inmate interviews I find they meet this standard.

Jenkins Correctional Center does not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent. In the event a cross gender search is done Jenkins Correctional Center documents all cross-gender strip searches and cross-gender visual body cavity searches. During random staff and offender interviews it was confirmed staff do not perform cross gender strip searches.

Jenkins Correctional Center has policies and procedures that 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. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit. During the random offender interviews it was confirmed that offenders have privacy to perform bodily functions and cross gender staff announcements are made.

Jenkins Correctional Center does not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it is 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. There were no transgender offenders at the prison at the time of the audit but based on staff interviews transgender/intersex offenders would not be searched for sole purpose of determining the inmate's genital status.

Corrections Corporation of America trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Random staff interviews confirmed they have been trained in cross gender pat down searches.

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| §115.16 | Inmates with disabilities and limited English speaking |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Inmate Handbook English/Spanish; PREA Posters and trained staff for Sign Language as well as random inmate and staff interviews I find they meet this standard.

Corrections Corporation of America takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of Corrections Corporation of America's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Corrections Corporation of America 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. None have been used or required. The PREA Pamphlet is in both English/Spanish. Jenkins Correctional Center has a contract with the Language Line to provide translation for other languages as well as staff trained for sign language for the deaf.

§115.17 Hiring and promotion decisions

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Applicants background check for contractors; Applicants background check of Employee; Self declaration of Sexual Abuse/Sexual Harassment and interview with Human Resource Director Review of personnel files.

Corrections Corporation of America does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor who may have contact with inmates, who has engaged in sexual abuse in any criminal justice facility, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. Based on interview with human resources all applicants have a background check done prior to job offer, if any sexual activity is discovered during the background screen they would not be offered a job.

Corrections Corporation of America considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates. Based on interview with human resources all applicants have a background check done prior to job offer, if any sexual activity is discovered during the background screen they would not be offered a job.

Corrections Corporation of America performs a criminal background records check before enlisting the services of any contractor who may have contact with inmates performs a records check at least every five years of current employees and contractors who may have contact with inmates. Reviewed 5 year background check. Review of personnel files confirmed the background checks are being done.

§115.18 Upgrades to facilities and technology

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response and interview of agency head and warden I find they meet this standard.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Corrections Corporation of America considers how such technology may enhance Corrections Corporation of America's ability to protect inmates from sexual abuse. There have been no substantial or modifications to existing facilities. Jenkins Correctional Center currently utilizes an extensive camera system that is monitor operations to prevent sexual abuse and investigate allegations of wrongdoing. When installing new equipment, the Warden, Deputy Warden of Security, and facility SART will ensure it is used to protect inmates form sexual abuse.

§115.21 Evidence protocol and forensic medical exams

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; MOU Victim Advocacy & Forensic Exams Statesboro Regional Sexual Assault Center and interview with PREA compliance manager I find they meet this standard.

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

Corrections Corporation of America offers all victims of sexual abuse access to forensic medical examinations, at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations are be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) from Victim Advocacy & Forensic Exam Statesboro Regional Sexual Assault Center.

Corrections Corporation of America makes available to the victim a victim advocate from Statesboro Regional Sexual Assault Center.

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

To the extent Corrections Corporation of America itself is not responsible for investigating allegations of sexual abuse, Corrections Corporation of America requests that the investigating agency follow the requirements listed above as is stipulated in the MOU with Jenkins county

Sheriff Office. Normally GDOC Internal Investigations Unit would come in and conduct the investigation if it was determined to be going criminal.

§115.22 Policies to ensure referrals of allegations for investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; MOU with Jenkins County Sheriff Office and interview with agency head and investigative staff I find they meet this standard.

Corrections Corporation of America ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Jenkins Correctional Center follows the standards set forth by Corrections Corporation of America. The Department's response to sexual assault follows "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents." When an incident is reported, a physical examination of the alleged victim is conducted and SANE protocol is initiated. The Warden will immediately ensure an investigation is referred to the GDC Internal Investigations Unit. Referrals to outside law enforcement agencies will be made with the cooperation of the Internal Investigations Unit.

Corrections Corporation of America has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. Corrections Corporation of America publishes such policy on its website [cca.com/facilities/Jenkins correctional center](http://cca.com/facilities/Jenkins_correctional_center).

Corrections Corporation of America documents all such referrals. Whenever an allegation is made, the Warden will notify the Jenkins county Sheriff's Office. This notification will be made in writing and the notification will become part of the PREA investigation.

§115.31 Employee training

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Policy 14-2A Acknowledgement & Training Acknowledgement form; Lesson plan; Training Attendance Roster and interview with random staff I find they meet this standard.

Corrections Corporation of America trains all employees who have contact with inmates on:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment;
- (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- (3) Inmates' right to be free from sexual abuse and sexual harassment;
- (4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse;
- (8) How to avoid inappropriate relationships with inmates;
- (9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. All staff has received PREA training during in service training based on review of training records and random staff interviews.

The training is tailored to the gender of the inmates at Jenkins Correctional Center. The employees receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa. Staff receives training based on the population of Jenkins Correctional Center they are assigned to.

Corrections Corporation of America documents, through employee signature those employees understand the training they have received.

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| §115.32 | Volunteer and contractors training |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Policy 4-2A PREA Training Roster for contract Staff; Policy4-2A PREA training roster for Volunteers and interview with volunteer and contractors I find they meet this standard.

Corrections Corporation of America ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Corrections Corporation of America's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

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

Corrections Corporation of America has documentation confirming that volunteers and contractors understand the training they have received.

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Inmate Handbook; Inmate Pamphlet; PREA Video; Inmate Orientation Checklist and interview with random inmates and intake staff I find they meet this standard.

During the intake process, inmates receive information explaining Corrections Corporation of America’s zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. During the intake process all inmates receive the PREA pamphlet and watch the video.

Within 30 days of intake, Corrections Corporation of America provides a comprehensive education to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents.

Corrections Corporation of America provides 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. There is documentation of inmate participation in these education sessions. The PREA Pamphlet is in both English/Spanish; Jenkins Correctional Center has a contract with the Language Line to provide translation for other languages as well as sign language for the deaf.

§115.34 Specialized training: Investigators

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

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Investigator Training and Certificate; NIC PREA Investigating Sexual Abuse in a Confinement Setting; employment educations and training record and interview with investigative staff I find they exceed this standard based on the level of experience of the in house investigator..

In addition to the general training provided to all employees Corrections Corporation of America ensures that the in house investigators have received training in conducting investigations in

confinement settings. The investigator at Jenkins Correctional Center has 20 years of investigative experience.

Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Corrections Corporation of America maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Jenkins Correctional Center personnel who are tasked with conducting investigations or acting in any capacity with a PREA investigative team are required to attend a specialized PREA training class using the NIC Specialized Training PREA Medical and MH Standards curriculum. At the conclusion of the class members are given a written exam to ensure their understanding of the class instruction and content delivered. Class attendance is documented on the employment education and training record.

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| §115.35 | Specialized training: Medical and mental health care |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; PREA In Service Training Curriculum; PREA Specialty Training Roster and video; PREA Specialty Certificate, MOU with Statesboro Regional Sexual Assault center and attendance roster I find they meet this standard.

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

Corrections Corporation of America maintains documentation that medical and mental health practitioners have received the training.

Medical and mental health care practitioners also receive the training mandated for employees, contractors and volunteers.

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| §115.41 | Screening for risk of victimization and abusiveness |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; CCA Inmate sexual Abuse Screening Tool and 30 day Reassessment; GDOC Inmate sexual Abuse Screening Tool (SCRIBE) and interview with random inmates and intake staff responsible for screening. Only limited staff has access to the risk screening form only Medical, Mental Health and Warden as well as PREA Manager.

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

Intake screenings take place 24 hours of arrival at Jenkins Correctional Center.

Jenkins Correctional Center uses an objective screening instrument.

The intake screening considers, at a minimum, the following criteria to assess inmates for risk of sexual victimization:

- (1) Whether the inmate has a mental, physical, or developmental disability;
- (2) The age of the inmate;
- (3) The physical build of the inmate;
- (4) Whether the inmate has previously been incarcerated;
- (5) Whether the inmate's criminal history is exclusively nonviolent;
- (6) Whether the inmate has prior convictions for sex offenses against an adult or child;
- (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- (8) Whether the inmate has previously experienced sexual victimization;
- (9) The inmate's own perception of vulnerability; and
- (10) Whether the inmate is detained solely for civil immigration purposes.

The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Corrections Corporation of America, in assessing inmates for risk of being sexually abusive.

Within 30 days from the inmate's arrival at Jenkins Correctional Center, Jenkins Correctional Center reassesses the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Jenkins Correctional Center since the intake screening. Any inmate who has been identified as needing further evaluation due to additional information received will be reassessed when warranted.

An inmate's risk level is reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. Any inmate who has been identified as needing further evaluation due to additional information received will be reassessed when warranted.

Inmates are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked. No inmate is ever disciplined for refusing to participate in the intake process, if an inmate refuses to answer the questions during intake the counselor will meet with that inmate at a later time to conduct the rest of the screening. Those inmates would be placed in appropriate housing until a proper classification screening could be done.

Corrections Corporation of America implements appropriate controls on the dissemination within Jenkins Correctional Center 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. The only staff that have access to this information is Classification, Case Manager, Mental Health and Unit managers.

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| §115.42 | Use of screening information |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; OMS PREA Alert Tracking Roster; Predatory list and history of Victimization and interview with PREA compliance manager and staff responsible for risk screening I find they meet this standard.

Corrections Corporation of America uses information from the risk screening to decide 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. All information from the risk screening is used to determine housing, bed assignments, work, education and programming.

Corrections Corporation of America makes individualized determinations about how to ensure the safety of each inmate.

Jenkins Correctional Center has not had a transgender or intersex inmate however there are policies in place that address the following:

In deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, Corrections Corporation of America considers on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.

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

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

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

Corrections Corporation of America does not place 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 facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

§115.43 Protective custody

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

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response and interview with warden I find they meet this standard.

Jenkins has not housed any high risk inmates in involuntary segregation in the past year.

Inmates at high risk for sexual victimization are not placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers.

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

Jenkins Correctional Center assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment does not ordinarily exceed a period of 30 days. If involuntary segregated housing assignment is made Jenkins Correctional Center clearly documents the basis for Jenkins Correctional Center's concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Every 30 days a review is performed to determine whether there is a continuing need for separation from the general population.

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; MOU with Statesboro Regional Sexual Assault center; PREA Posters; TDD Machine; Inmate Handbook; PREA Investigation packet and interviews with random staff and inmates I find they meet this standard.

Corrections Corporation of America provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may

have contributed to such incidents. The inmates may make a report of sexual abuse, sexual harassment, or retaliation in writing, verbally, by utilizing the PREA hotline, and by phone or mail to the Statesboro Regional Sexual Assault Center. Inmates are encouraged to report allegations immediately and directly to staff at all levels. All reports are promptly documented and reported to the proper authority.

The auditor tested the PREA hotline number. It does not require the inmate to put in a pin so they can remain anonymous.

Corrections Corporation of America provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of Corrections Corporation of America, 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. Jenkins Correctional Center staff provides inmates at orientation with information from Statesboro Regional Sexual Assault Center.

Staff accepts reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports. Jenkins Correctional Center staff has been trained to forward all reports or observations of sexual assault/harassment to their immediate supervisor and/or designated SART member promptly. These reports may be made in writing, verbally, anonymously, or from third parties.

Corrections Corporation of America provides a method for staff to privately report sexual abuse and sexual harassment of inmates.

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| §115.52 exhaustion of administrative remedies |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Corrections Corporation of America does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. Jenkins Correctional Center does not impose time restrictions upon inmates in regard to filing grievances alleging sexual abuse prior to or upon completion of a SART investigation.

Corrections Corporation of America does not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse. Any allegation of sexual abuse, reported by any means, will be treated as a formal allegation and forwarded to the Investigation Unit for full investigation.

Corrections Corporation of America ensures that an inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint. All grievances filed at Jenkins Correctional Center can be submitted to any staff member. In a case where the staff member is the subject of the complaint, any other counselor can be utilized to submit the grievance.

Corrections Corporation of America issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and are also be permitted to file such requests on behalf of inmates. Jenkins Correctional Center will accept notification reports of sexual assault/harassment from third parties; however, standard policies and procedures will be used in the process from that point forward.

Corrections Corporation of America has established procedures for the filing of an emergency grievance when the inmate is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, Corrections Corporation of America immediately forwards the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action is taken, and provides an initial response within 48 hours, and issues a final agency decision within 5 calendar days. The initial response and final agency decision documents Corrections Corporation of America's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Corrections Corporation of America may discipline an inmate for filing a grievance related to alleged sexual abuse only where Corrections Corporation of America demonstrates that the inmate filed the grievance in bad faith.

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| §115.53 | Inmate access to outside confidential support services |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; MOU with Statesboro Regional Sexual Assault Center; PREA Pamphlet and interview with random inmates and inmates who reported sexual assault I find they meet this standard.

Jenkins Correctional Center provides inmates with 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. Jenkins Correctional Center enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. The staff provides the contact information for a rape victim advocacy and service agency located in the community. This information is also available to them upon request. An inmate may make a verbal or written request to staff to contact a victim service advocate or agency at any time. All reasonable measures will be taken to allow for as much privacy as possible.

Jenkins Correctional Center informs inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. If inmates of Jenkins Correctional Center request to contact a rape crisis organization staff will make every effort to offer the inmate reasonable privacy while maintaining visual security if located in restricted or sensitive areas within Jenkins Correctional Center.

Corrections Corporation of America maintains *memoranda* of understanding with Statesboro Regional Sexual Assault center.

§115.54 Third party reporting

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

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; PREA Signs and PREA hotline I find they meet this standard.

Corrections Corporation of America has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of an inmate. Visitors can go to www.cca.com/facilities/Jenkinscorrectionalcenter.

§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)

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; PREA Packet including staff written statement and interviews with random staff; warden and medical/mental health staff I find they meet this standard.

Corrections Corporation of America requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of Corrections Corporation of America; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All personnel at Jenkins Correctional Center are provided with PREA training that instructs them on the proper procedure for reporting any incidents that are in any way related to PREA.

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

Jenkins Correctional Center's staff is instructed through PREA training that any information obtained is limited to a need-to-know basis for staff, and only for the purpose of treatment, security, and management decisions, such as housing, work, education and programming assignments. Information is not to be indiscriminately discussed. Supervisors will always remind staff of this issue when staff report PREA-related issues to their supervisor.

Jenkins Correctional Center reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Jenkins Correctional Center's designated investigators. All allegations of sexual abuse and sexual harassment, including third party and anonymous reports, will be reported to the assigned investigator. The Warden will be responsible for ensuring these notifications are made as soon as possible

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

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; PREA Incident Report and interviews with random staff, and warden I find they meet this standard.

Immediate action is taken to protect inmates when Corrections Corporation of America learns that an inmate is subject to a substantial risk of imminent sexual abuse. If an inmate at Jenkins Correctional Center is determined to be in imminent danger of sexual abuse, the Warden will be notified immediately and the inmate will be separated immediately in order to protect them.

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| §115.63 | Reporting to other confinement facilities |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response and interview with agency head and warden I find they meet this standard.

Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of Jenkins Correctional Center that received the allegation notify's the head of Jenkins Correctional Center or appropriate office of Corrections Corporation of America where the alleged abuse occurred. Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. In cases where an inmate of Jenkins Correctional Center is sexually abused while confined at another facility the PREA Compliance will immediately upon notification notify the head of that facility.

§115.64

Staff first responder duties

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

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Incident Report and interview with security staff who are first responders and random staff I find they meet this standard.

Upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond separates the alleged victim and abuser; preserves and protects any crime scene until appropriate steps can be taken to collect any evidence; and if the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and if the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

If the first staff responder is not a security staff member, the responder request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. All non-security staff interviewed acknowledged they had been trained on what to do in the event a sexual assault was reported to them.

§115.65

Coordinated response

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

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; CCA/JCC Policy 13-79 Sexual Assault Response; CCA/JCC 14-2C Sexual Abuse Incident Check sheet; Certificate Evaluation & Treatment of Sexual Assault and interview with warden I find they meet this standard.

Jenkins Correctional Center has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

§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)
- X Not applicable standard.

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

Jenkins correctional Center has no Collective Bargaining.

§115.67

Agency protection against retaliation

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

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Retaliation Monitoring Report and interview with agency head, warden, designated staff member with monitoring retaliation victimization I find they meet this standard.

Corrections Corporation of America has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and designate which staff members or departments are charged with monitoring retaliation. Anyone who retaliates against a staff member or an offender who has reported in good faith an allegation of sexual abuse or sexual harassment in good faith shall be subject to disciplinary action.

Corrections Corporation of America has 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 that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Multiple protection measures include inmate housing changes or transfers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, Corrections Corporation of America monitors 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 act promptly to remedy any such retaliation. There is periodic status checks performed. Items Corrections Corporation of America

should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Corrections Corporation of America continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need. The appointing authority's designee for monitoring retaliation shall, for at least 90 days following a report of abuse, monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are any changes that may suggest possible retaliation, and will act promptly to remedy any such retaliation. This monitoring will include review of any inmate disciplinary reports, housing or program changes, or negative performance reviews or reassignments of staff. Such monitoring shall continue beyond 90 days if the initial monitoring indicates a continuing need.

If any other individual who cooperates with an investigation expresses a fear of retaliation, Corrections Corporation of America takes appropriate measures to protect that individual against retaliation. If any other individuals/inmates, who are cooperating with the investigation, feel a need for retaliation monitoring, the appointed staff for the victim will also serve in this capacity for these identified individuals.

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| §115.68 | Post allegation protective custody |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; CCA/JCC 10-1 Segregation Restricted Housing Unit Management and interview with warden and inmates in segregation for risk of sexual victimization I find they meet this standard.

Segregation housing has not been used.

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

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| §115.71 | Criminal and administrative agency investigation |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response, CA Record Retention Schedule 1-15; Investigator Training curriculum – NIC PREA Investigating Sexual Abuse in a Confinement Setting; MOU with Jenkins county Sheriff Office; PREA Investigation packet and interview with investigative staff I find they meet this standard.

When Corrections Corporation of America conducts its own investigations into allegations of sexual abuse and sexual harassment, it does so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. All initial abuse and harassment allegation investigations will be conducted by Jenkins Correctional Center Sexual Abuse Response Team (SART). Substantiated SART investigations will immediately be referred to the Georgia Department of Corrections Investigative Unit.

Where sexual abuse is alleged, Corrections Corporation of America uses investigators who have received special training in sexual abuse investigations. All SART team members are required to attend additional PREA training.

Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. Jenkins Correctional Center Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response Jenkins Correctional Center will follow a uniform evidence protocol that maximizes the potential for obtaining usable (physical) evidence for administrative proceedings and criminal prosecutions. The response to sexual assault follows the U.S. Department of Justice's Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents, dated April 2013, or the most current version. SANE protocols and SART investigation procedures are initiated.

When the quality of evidence appears to support criminal prosecution, Corrections Corporation of America conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. Jenkins Correctional Center complies with this standard by following policies and procedures as outlined in Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response in regard to PREA Investigations concerning criminal prosecutions.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. No agency requires 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.

Criminal investigations shall be 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.

Administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that contain a thorough description of physical, testimonial, and documentary evidence, the reasoning behind credibility assessments, and investigative facts and findings, and attaches copies of all documentary evidence where feasible.

Substantiated allegations of conduct that appears to be criminal are referred to Georgia Department of Corrections Internal Investigative Unit for prosecution.

Corrections Corporation of America retains all written reports for as long as the alleged abuser is incarcerated or employed by Corrections Corporation of America, plus five years. Jenkins Correctional Center complies with this standard by following policies and procedures as outlined

in CCA Record Retention Schedule 1-15B. in regard to PREA Investigations concerning criminal prosecutions.

The departure of the alleged abuser or victim from the employment or control of Jenkins Correctional Center or agency does not provide a basis for terminating an investigation.

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| §115.72 | Evidentiary standard for administrative investigation |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; PREA Incident and interview with investigative staff I find they meet this standard.

Corrections Corporation of America imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

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| §115.73 | Reporting to inmates |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; CCA 14-2E Inmate/Inmate PREA Allegation Status Notification and interview with warden; investigative staff I find they meet this standard.

Following an investigation into an inmate's allegation that they suffered sexual abuse in an agency facility, Corrections Corporation of America informs the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

If Corrections Corporation of America did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the inmate. Jenkins Correctional Center will obtain a copy of the investigation document and make proper notification to the inmate as defined by policy.

Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, Corrections Corporation of America subsequently informs the inmate (unless Corrections Corporation of America has determined that the allegation is unfounded) whenever the staff member is no longer posted within the inmate's unit; the staff member is no longer

employed at Jenkins Correctional Center; Corrections Corporation of America learns that the staff member has been indicted on a charge related to sexual abuse within Jenkins Correctional Center; or Corrections Corporation of America learns that the staff member has been convicted on a charge related to sexual abuse within Jenkins Correctional Center.

Following an inmate's allegation that they had been sexually abused by another inmate, Corrections Corporation of America subsequently informs the alleged victim whenever Corrections Corporation of America learns that the alleged abuser has been indicted on a charge related to sexual abuse within Jenkins Correctional Center; or Corrections Corporation of America learns that the alleged abuser has been convicted on a charge related to sexual abuse within Jenkins Correctional Center.

All such notifications or attempted notifications are documented.

An agency's obligation to report under this standard is terminated if the inmate is released from Corrections Corporation of America's custody.

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| §115.76 | Disciplinary sanctions for staff |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response I find they meet this standard. Jenkins Correctional has had no staff involved in a PREA allegation.

There have been no PREA incidents involving staff.

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

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

All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. Staff members who are found to have engaged in sexual misconduct/abuse shall be banned from correctional institutions or subject to disciplinary sanctions up to and including termination. Staff may also be referred for criminal prosecution. Contractors and Volunteers who engage in sexual abuse will be prohibited from contact with inmates and reported to the appropriate law enforcement agencies.

Contractors and Volunteer who engage in sexual abuse will be prohibited from contact with inmates and reported to law enforcement agencies, unless the activity was not criminal. Appropriate licensing agencies will be notified.

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response and interview with warden I find they meet this standard.

There have been no PREA incidents involving a contractor or volunteer.

Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and are reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Jenkins Correctional Center’s staff will immediately remove any contractor or volunteer from Jenkins Correctional Center if they engage in sexual abuse. The contractor/volunteer will be prohibited from contact with inmate and will be reported to the appropriate law enforcement agency. The relevant licensing body will also be notified.

Jenkins Correctional Center takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. All Jenkins Correctional Center’s volunteers and contractors that do not adhere to the PREA standards are subject to the disciplinary standards.

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; GDOC SOP I/M discipline IIB02-001 and interview with medical/mental health staff I find they meet this standard.

Inmates are 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. Jenkins Correctional

Center will subject inmates to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or a criminal finding of guilt for inmate-on-inmate sexual abuse.

Sanctions are 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. Sanctions will 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 considers whether an inmate's mental disabilities or mental illness contributed to *his* behavior when determining what type of sanction, if any, should be imposed.

Corrections Corporation of America disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

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

Corrections Corporation of America prohibits all sexual activity between inmates and may discipline inmates for such activity.

§115.81

Medical and Mental health screening; history of sexual abuse

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Policy 13-61 Mental Health; Policy 13-58 Medical Records; Policy 13074 Privacy of Protected health Information; Comprehensive Mental Health Evaluation; Sexual Abuse Screening Tool; PREA Sexual victim/Sexual Aggressor classification Screening and interview with staff responsible for risk screening and medical/mental health staff I find they meet this standard.

If the screening indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff 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 screening indicates that an inmate has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff 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 is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including

housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

Medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting.

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Policy 13-79 Sexual Assault Response; 13-34 Medical Emergency Response; Policy 13.80 sick Call; MOU Statesboro Regional Sexual Assault Center; Policy 13-79 Rape/Sexual Assault Protocol and interview with medical and mental health staff and inmates who reported sexual abuse.

Inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.

If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and immediately notify the appropriate medical and mental health practitioners.

Inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. All doctors' orders received from the hospital are carried out at Jenkins Correctional Center.

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Inmates are never charged for incidents arising out of a sexual assault.

§115.83

Ongoing medical and mental health care for sexual abuse victims

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Policy 13-79 Sexual Assault Response; Sexual abuse Incident check sheet and interview with medical/mental health staff I find they meet this standard.

Jenkins Correctional Center offers 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 facility.

The evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.

Jenkins Correctional Center provides such victims with medical and mental health services consistent with the community level of care. Medical and mental health staff will provide services consistent with the community level of care.

Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. All Jenkins Correctional Center's inmates who are victims of Sexual assault are treated by the Sexual Assault Nurse Examiner (SANE). Depending on the circumstances of the abuse, testing for sexually transmitted infections may be conducted at Jenkins Correctional Center or at Statesboro Regional Sexual Assault Center at no cost to the inmate.

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Jenkins Correctional Center does not charge inmates for PREA related treatments or services.

Jenkins Correctional Center shall attempt to 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.

§115.86

Sexual abuse incident reviews

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; memo identifying ART Team; Sexual Abuse Incident Review Report; Incident Investigation Report and interview with warden, PREA compliance manager; incident review team I find they meet this standard.

Jenkins Correctional Center conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. This review occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender,

or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at Jenkins Correctional Center; and they examine the area in Jenkins Correctional Center where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; CCA Annual Report I find they meet this standard.

Corrections Corporation of America collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions, and aggregates the incident-based sexual abuse data at least annually.

The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

Corrections Corporation of America maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Corrections Corporation of America obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.

Upon request, Corrections Corporation of America provides all such data from the previous calendar year to the Department of Justice no later than June 30.

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; CCA Annual Report interview with PREA coordinator I find they meet this standard.

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

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

Corrections Corporation of America's report is approved by Corrections Corporation of America head and made readily available to the public through its website www.cca.com/facilities/JenkinsCorrectionalCenter

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

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

Based on review of Policy CCA/JCC Policy 14-2.1 Sexual Abuse Prevention and Response; Policy 1-15 Retention Records; CCA Annual Report I find they meet this standard.

Corrections Corporation of America makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website www.cca.com/facilities/JenkinsCorrectionalCenter

All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires.

AUDITOR CERTIFICATION:

The auditor certifies that the contents of the report are accurate to the best of her knowledge and no conflict of interest exists with respect to his or her ability to conduct an audit of Corrections Corporation of America under review.

Katherine Brown

December 8, 2016

Auditor Signature

Date