

**PREA AUDIT REPORT**     Interim     Final  
**ADULT PRISONS & JAILS**

**Date of report:** September 10, 2016

<b>Auditor Information</b>			
<b>Auditor name:</b> Rodney P. Bivens			
<b>Address:</b> P.O. Box 392, Sweetwater, TN 37874			
<b>Email:</b> rkcorrectionalconsulting@gmail.com			
<b>Telephone number:</b> (865) 659-2424			
<b>Date of facility visit:</b> August 01-03, 2016			
<b>Facility Information</b>			
<b>Facility name:</b> South Central Correctional Center			
<b>Facility physical address:</b> 555 Forrest Avenue, Clifton, Tennessee 38425			
<b>Facility mailing address:</b> <i>(if different from above)</i> N/A			
<b>Facility telephone number:</b> (931) 676-5372			
<b>The facility is:</b>	<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		
<b>Facility type:</b>	<input checked="" type="checkbox"/> Prison	<input type="checkbox"/> Jail	
<b>Name of facility's Chief Executive Officer:</b> Cherry Lindamood			
<b>Number of staff assigned to the facility in the last 12 months:</b> 301			
<b>Designed facility capacity:</b> 1676			
<b>Current population of facility:</b> 1642			
<b>Facility security levels/inmate custody levels:</b> Medium, Minimum to Medium			
<b>Age range of the population:</b> 18 to 86			
<b>Name of PREA Compliance Manager:</b> Danny Dodd		<b>Title:</b> Assistant Warden	
<b>Email address:</b> danny.dodd@cca.com		<b>Telephone number:</b> (931) 676-5372	
<b>Agency Information</b>			
<b>Name of agency:</b> Corrections Corporation of America			
<b>Governing authority or parent agency:</b> <i>(if applicable)</i> N/A			
<b>Physical address:</b> 10 Burton Hills Blvd, Nashville, TN 37215			
<b>Mailing address:</b> <i>(if different from above)</i> N/A			
<b>Telephone number:</b> (615) 263-3000			
<b>Agency Chief Executive Officer</b>			
<b>Name:</b> Damon Hininger		<b>Title:</b> President and Chief Executive Officer	
<b>Email address:</b> damon.hininger@cca.com		<b>Telephone number:</b> (615) 263-3301	
<b>Agency-Wide PREA Coordinator</b>			
<b>Name:</b> Lisa Hollingsworth		<b>Title:</b> Senior Director PREA Programs and Compliance	
<b>Email address:</b> lisa.hollingsworth@cca.com		<b>Telephone number:</b> (615) 263-6915	

## AUDIT FINDINGS

### NARRATIVE

The Prison Rape Elimination Act on-site PREA audit of the Corrections Corporation of America - South Central Correctional Center in Clifton, Tennessee, was conducted August 01-03, 2016 by Rodney P. Bivens (Lead Auditor) and Brian D. Bivens who are United States Department of Justice Certified PREA Auditors for adult facilities. The auditors wish to extend their deepest appreciation to Warden Cherry Lindamood and her staff for their professionalism, hospitality, and kindness. The auditors also wish to compliment the Corrections Corporation of America's PREA Coordinator Lisa Hollingsworth and the facility PREA Compliance Manager Danny Dodd for their outstanding work in organizing the files that were provided to the auditors in advance of the on-site audit. This enabled the audit to move forward very efficiently.

The pre-audit preparations consist of a thorough review of all documentation and materials submitted by the facility which included the "Pre-Audit Questionnaire". The documentation reviewed included agency policies, procedures, forms, posters, pamphlets, brochures, handbooks, education materials, training curriculums, organizational charts and all other PREA related materials the facility provided to demonstrate compliance with each PREA standard. The auditors and the PREA Coordinator had ongoing communication for several weeks prior to the audit to prepare for the on-site visit.

During the on-site visit the facility supplied a list of inmate names sorted by housing units, disabilities, and special designations, as well as a list of facility staff names to the auditors. From these lists the auditors selected, at random, a sampling of inmates and staff to be interviewed during the on-site visit. Due to the size of this facility the sampling size for both inmates and staff was elevated to ensure consistency in training and implementation of the PREA standards. The sampling size for inmates included at least two inmates from each individualized housing unit pod. This decision was made to ensure all inmates throughout the facility were receiving the same information and education related to all aspects of the PREA program.

The on-site audit began with an entrance meeting being conducted on Monday, August 01, 2016 at 8:35 a.m. in the administration conference room. The following staff attended the entrance meeting:

Warden Cherry Lindamood  
Assistant Warden Danny Dodd, PREA Manager  
Lisa Hollingsworth, PREA Coordinator  
Allen Clark, Mental Health Coordinator  
Greg Abrams, Quality Assurance

Following the entrance meeting, the auditors conducted a comprehensive site review that began at approximately 9:30 a.m. and continued throughout the three days. During the on-site review the auditors reviewed camera placement, blind spots, staff placement, and documentation to assist in determining standard compliance. While touring the facility the auditors observed the notices of this PREA audit in all the buildings, as well as posters that called attention to the agency's Zero Tolerance Policy and how to report allegations of sexual abuse and sexual harassment. Random staff and inmate interviews were conducted in private offices provided at each housing unit during the on-site review as well. The following staff accompanied the auditors on the site review:

Assistant Warden Danny Dodd  
Lisa Hollingsworth, PREA Coordinator  
Allen Clark, Mental Health Coordinator  
Randall Runions, Chaplain

All housing units, day rooms, inmate program areas, work areas, and all other inmate accessible areas were toured during the on-site review. While touring several inmates and staff were questioned about their knowledge of PREA standards, procedures for reporting, services available, and their responsibilities. All staff and inmates informally interviewed during the tour acknowledged receiving training and procedures for reporting sexual abuse, sexual harassment, and/or retaliation for reporting.

A total of 53 staff members was interviewed during the course of this on-site audit. Staff interviews consisted of: 20 randomly selected correctional security staff members covering all shifts, 4 volunteers, 4 contract employees, 2 intermediate or higher level supervisors, 14 specialized staff members, and 9 employees informally selected during the facility tour. All staff interviewed were well versed in their respective areas of responsibility regarding PREA and affirmed compliance with the applicable PREA standards. However, due to inconsistent answers regarding pat searches of transgender and intersex inmates, opposite gender announcements, and confidentiality related to PREA allegations the auditors required additional staff training to ensure consistency. During the 30-day interim report writing period the facility provided documentation of staff being retrained in these areas satisfying this requirement. When questioned about evidence preservation, all staff responses reflected knowledge of agency policies and procedures. There is no SAFE or SANE staff at the facility; they are made available at the Jackson-Madison County General Hospital in Jackson, Tennessee.

There were 46 inmates interviewed during the on-site visit. These inmates consisted of: 34 inmates selected at random and 12 informally

selected during the facility tour. There were 9 of the 34 inmates selected at random requiring specialized interviews broken down as follows: 3 limited English proficient, 1 low vision, 2 LBGTI, 2 inmates that had reported being sexually harassed, and 1 that reported being sexually assaulted. All of the Inmates interviewed acknowledged receiving PREA training and written materials (posters, pamphlets, and inmate handbooks) outlining the agencies zero tolerance policies towards sexual abuse, sexual harassment, and retaliation for reporting, as well as the procedures for reporting during intake. However, during the inmate interviews the auditors received inconsistent answers regarding the 30-day comprehensive education being provided via video and required the facility to provide an additional showing of the video to all the inmates housed at the facility. The facility provided documentation during the 30-day interim report writing period of the additional video education being provided satisfying this requirement. The inmate with a disability and the limited English proficient inmates interviewed confirmed receiving the PREA training and written materials in languages they could understand as well. All inmates interviewed felt if they had to file a PREA complaint the facility would respond appropriately to their complaint and that all PREA complaints are taken very serious by staff at this facility.

The auditor selected and carefully examined 12 personnel files, 12 staff training files, and 3 volunteer\contractor files. The personnel and volunteer\contractor files were very well organized and contained all the necessary background check information and signed statements regarding previous sexual misconduct described in the standards. The training records were also very complete and included written documentation that staff, contractors and volunteers received the required PREA training. The training records also contained a signed "Training Acknowledgement Form" documenting that the staff understood the PREA Training being taught.

The auditor also reviewed 12 offender files and saw documentation of offender education, as well as documentation of the initial risk screenings, the 30-day re-screenings, and screenings upon additional information being completed as required by the standard. However, the facility was utilizing the Corrections Corporation of America's paper screening instrument as well as the Tennessee Department of Corrections electronic screening instrument duplicating work for staff. The auditors suggested and the PREA Coordinator agreed that the facility should utilize the Tennessee Department of Corrections electronic instrument that drives housing and program placement based on risk screening data entered alleviating any unintentional staff placements. The facility staff is to be commended for their response to this suggestion and for providing documentation that all inmates were rescreened on the Tennessee Department of Correction electronic instrument during the 30-day interim report period.

In the twelve months preceding the audit, Corrections Corporation of America - South Central Correctional Center had received and investigated a total of thirty-seven PREA complaints broken down as follows:

<u>Number Received</u>	<u>Description of Complaint</u>	<u>Offender</u>	<u>Investigative Results</u>
5	Sexual Abuse (Intentional touching)	Inmate	2 Unsubstantiated 1 Substantiated 2 Unfounded
6	Sexual Abuse (Contact and/or Penetration)	Inmate	6 Unsubstantiated
8	Sexual Harassment	Inmate	7 Unsubstantiated 1 Substantiated
3	Sexual Abuse (Intentional touching)	Staff	3 Unsubstantiated
8	Sexual Abuse (Contact and/or Penetration)	Staff	1 Substantiated 6 Unsubstantiated 1 Unfounded
1	Sexual Abuse (Request to engage)	Staff	1 Unsubstantiated
6	Sexual Harassment	Staff	5 Unsubstantiated 1 Unfounded

All investigative files were reviewed during the on-site visit and appeared to thoroughly document the investigation process per agency policy. Criminal investigative referrals were documented and proper referrals were made when warranted. During interviews with 3 inmates that had reported an incident of sexual abuse or sexual harassment, they all reported PREA violations were taken serious and investigated properly in their opinions. They all reported being kept informed during the investigative process and retaliation monitoring was being conducted regularly as well.

During the random inmate interviews it was repeatedly reported to the auditors that inmates continually filed false PREA reports to have a staff member removed from his/her post or to obtain an unnecessary housing change. During follow up questioning the random inmates reporting this behavior confirmed that each case was investigated and taken just as serious as if it had really happened. All sexual abuse cases warranting a criminal investigation were referred to the Clifton Police Department of Clifton, Tennessee and the Tennessee Department of Correction Special Investigations Unit who are responsible for investigating each case for potential criminal activity.

At the conclusion of the on-site visit an exit meeting was held to discuss the audit findings. The following people were in attendance:

Warden Cherry Lindamood  
Assistant Warden Danny Dodd, PREA Manager  
Assistant Warden of Operations Eric Bryant  
Chief of Unit Management Ryan Deatherage  
Lisa Hollingsworth, PREA Coordinator  
Allen Clark, Mental Health Coordinator  
Greg Abrams, Quality Assurance

During the exit meeting the auditors explained the process that would follow the on-site visit. The auditors also explained that all areas found to not meet the standards during the on-site visit must be corrected and they would be working closely with the PREA team to accomplish compliance. Finally, the auditors acknowledged the willingness of all staff involved to accomplish PREA compliance and advised the PREA team of their requirements to post the final report on the facility website once compliance with all standards was achieved.

## **DESCRIPTION OF FACILITY CHARACTERISTICS**

The Corrections Corporation of America - South Central Correctional Center located at 555 Forrest Avenue in Clifton, Tennessee, was opened in 1992 and received its first inmates in February of that year. The facility is located near the Tennessee River in the Town of Clifton, Wayne County, Tennessee. The facility is approximately 100 miles southeast of Nashville. The facility is operated by Corrections Corporation of America under contract with the Tennessee Department of Corrections.

The 1676 bed multi-security adult male prison has sixteen main buildings within the secured perimeter, including a 108 bed High Security Annex, on six hundred acres of property. Five housing units provide double-bunked rooms with the unit management team offices within the housing units. A 300 bed Minimum Security Annex and the maintenance/warehouse complex is directly outside the perimeter. The two housing units within the annex supply single and double-bunk rooms in which the inmates maintain their own keys.

The Corrections Corporation of America - South Central Correctional Center's stated mission is: "advancing corrections through innovative results that benefit and protect all we serve." Corrections Corporation of America values are "having PRIDE in all we do". It was evident the staff at the Corrections Corporation of America's - South Central Correctional Center were committed to excellence in corrections, by providing a dedicated team of professionals whose focus is on the enhancement of the quality of life through self-improvement opportunities for the inmates entrusted to their care.

## **SUMMARY OF AUDIT FINDINGS**

On August 01-03, 2016, the on-site visit was completed. During the on-site visit the auditors determined that additional staff training was required due to inconsistent answers regarding pat searches of transgender and intersex inmates, opposite gender announcements, and confidentiality related to PREA allegations. On August 25, 2016, during the 30-day interim report writing period the facility provided documentation of staff being retrained in these areas satisfying this requirement. The auditors also determined that additional inmate education was required due to receiving inconsistent answers and documentation, during the inmate interviews and inmate file reviews, regarding the 30-day comprehensive education being provided via video. The auditors required the facility to provide an additional showing of the video to all the inmates housed at the facility and provide documentation of inmate attendance. The facility provided documentation on August 25, 2016, during the 30-day interim report writing period of the additional video education being provided satisfying this requirement. Lastly, the facility was utilizing the Corrections Corporation of America's paper screening instrument as well as the Tennessee Department of Corrections electronic screening instrument duplicating work for staff. The auditors suggested and the PREA Coordinator agreed that the facility should utilize the Tennessee Department of Corrections electronic instrument that drives housing and program placement, based on risk screening data entered, alleviating any unintentional placements. The facility staff is to be commended for their response to this suggestion and for providing documentation that all inmates were rescreened utilizing the Tennessee Department of Correction electronic instrument August 25, 2016, during the 30-day interim report period allowing the auditor to begin the final report.

The results of the Corrections Corporation of America - South Central Correctional Center audit are listed below:

Number of standards exceeded: 4

Number of standards met: 36

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.**

115.11 (a) The Corrections Corporation of America - South Central Correctional Center staff follows the Corrections Corporation of America PREA policy 14-2 which mandates a zero tolerance for all forms of sexual abuse and sexual harassment. This policy outlines the agency's approach to preventing, detecting, and responding to such conduct. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.11 (B) and (C) The agency employs an upper-level, agency-wide PREA Coordinator. The Corrections Corporation of America - South Central Correctional Center PREA policy, 14-2, pages 1 and 2 outlines the responsibilities of the PREA Coordinator and the PREA Compliance Manager. Mrs. Lisa Hollingsworth is the agency-wide PREA Coordinator at Corrections Corporation of America - South Central Correctional Center. Lisa was appointed as the agency-wide PREA Coordinator on May 06, 2014 and was assisted by PREA Compliance Manager Danny Dodd during this audit. The facility provided the auditors with the organizational chart showing the PREA Coordinator position as an upper-level, agency-wide position. Lisa is very knowledgeable of the PREA standards and actively assists the facility with compliance. Mrs. Hollingsworth has the authority to develop, implement, and oversee PREA compliance. She is actively updating the facility as new Frequently Ask Questions (FAQ's) results are published on the PREA Resource Center website.

During interviews with the PREA Coordinator and the PREA Compliance Manager, both indicated they had sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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)
- Not Applicable

**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.**

Based on the documentation provided as well as staff interviews it was determined the Corrections Corporation of America - South Central Correctional Center does not contract with other facilities to house inmates assigned to their custody. Therefore, this standard was found to be non-applicable to this facility during this audit

### **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.**

Based on staff interviews, review of documentation provided and review of Corrections Corporation of America - South Central Correctional Center PREA policy, 14-2, pages 8, 9 and 10, sections D and E, as well as Tennessee Department of Corrections Policy 502.06, page 4 section H. The following delineates the audit findings regarding this standard:

115.13 (a) The facility has documented and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing as described and required by this standard. The established staffing plan uses the criteria found in the standard 115.13 (a) to include the physical layout of the facility, composition of the residents housed, the prevalence of substantiated and unsubstantiated incidents of sexual abuse, and any other relevant factors identified. Video monitoring has been deployed to assist with the protection of offenders against sexual abuse at this facility. The staffing levels are monitored daily by review of shift rosters. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (b) The facility has procedures in place to ensure all deviations are covered by overtime or notification must be documented on “Notice to Administration” form 5-1B and submitted to the Warden outlining the reason(s) for the deviation. There have been no deviations reported where the staffing plan has not been complied with in the past twelve months, as confirmed by written documentation and during interview with the Warden. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (c) The staffing plan is reviewed annually by the PREA Manager and forwarded to the PREA Coordinator and Warden for review. It is then forwarded to the Vice President of Facility Operations for signature and approval of any recommendations made which would include changes to policy and procedures, physical plant, video monitoring, or staffing levels. The last Annual Staffing Plan assessment was completed on May 2, 2016. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (d) Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section E on pages 9 and 10, staff interviews, and documentation provided. Intermediate-level or higher-level supervisors are required to conduct and are documenting UNANNOUNCED rounds on all shifts as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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)
- Not Applicable

**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.**

Based on the documentation provided, on-site observation, and staff interviews it was determined that the Corrections Corporation of America - South Central Correctional Center houses only adult inmates and does not house youthful offenders. Therefore, this standard was found to be non-applicable to this facility during this audit.



## 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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section K, pages 15 and 16, training curriculums, staff interviews, training file reviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.15 (a) Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section K on pages 15 and 16 outlines offender searches including searches of transgender and intersex offenders. The review of training curriculums and staff interviews revealed cross gender strip searches are prohibited except in exigent circumstances and must be documented on "Notice to Administration" form 5-1B when conducted. There have been no documented cross-gender visual body cavity or strip searches reported in the past 12 months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (b) Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section K, 1, b on page 16 prohibits male employees from frisk/pat searches of female inmates/residents except in exigent circumstances. However, Corrections Corporation of America - South Central Correctional Center is an all adult male facility. Therefore, this part of the standard was found to be non-applicable to this facility.

115.15 (c) Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section K on pages 15 and 16 prohibits frisk/pat searches of the female inmates by male staff and requires that all cross-gender searches in exigent circumstances be documented on the "Notice to Administration" form 5-1B. However, Corrections Corporation of America - South Central Correctional Center is an all adult male facility. Therefore, this part of the standard was found to be non-applicable to this facility.

115.15 (d) Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section K on pages 15 and 16 outlines that inmates shall be permitted to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks or genitalia. The inmates confirmed during interviews they have privacy when showering, using the toilets and while changing their clothes. Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section K on pages 15 and 16 also requires staff of the opposite gender to announce their presence prior to entering the housing units. However, due to inconsistent answers regarding opposite gender announcements the auditors required additional staff training to ensure consistency. During the 30-day interim report writing period the facility provided documentation of staff being retrained in these areas satisfying this requirement. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (e) Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section K on pages 15 and 16, training curriculum provided and staff interviews the facility prohibits staff from physically examining transgender or intersex inmates for the sole purpose of determining 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. During interviews with the LBGTI inmates it was confirmed that the inmates did not feel they were strip searched for this purpose. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (f) Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section K on pages 15 and 16, training curriculum provided, staff training file reviews, and staff interviews the facility trains security staff 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. During interviews with the LBGTI inmates it was confirmed that the inmates feel the staff conducts proper searches. There also were no complaints filed by the LBGTI inmates in the past 12 months related to searches. However, during the on-site visit the auditors determined that additional staff training was required due to inconsistent answers being given, during random staff interviews, regarding pat searches of transgender and intersex inmates. On August 25, 2016, during the 30-day interim report writing period the facility provided documentation of staff being retrained in this area satisfying this requirement. Therefore, the facility demonstrated

compliance with this part of the standard during this audit.

### **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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, pages 13 and 14, section I, review of the lesson plans, and review of Language Line contract, as well as staff and inmate interviews. The following delineates the audit findings regarding this standard:

115.16 (a) The Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 mandates the agency to take 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 its 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. PREA handouts, PREA postings, PREA education video, and the inmate handbook are provided in both English and Spanish. A TDD phone is also available at this facility. During interviews with the inmates identified to meet the aspects of this standard, they all confirmed they received training and materials they could understand. The inmates and staff also confirmed that interpretive services are available when needed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16 (b) The Corrections Corporation of America - South Central Correctional Center PREA policy mandates the agency to take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially. Language Line Interpreter Services and/or staff interpreters are used to translate at this facility. There were three Spanish speaking inmates interviewed during the on-site visit and they confirmed during interviews receiving all written PREA information and viewing the Spanish version of the Corrections Corporation of America PREA DVD. The inmates and staff also confirmed that interpretive services are available when needed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16 (c) Corrections Corporation of America - South Central Correctional 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. During this audit cycle there were no instances where an inmate interpreter had to be utilized. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section B, pages 5 and 6, Human Resource staff interviews, and personnel file reviews. The following delineates the audit findings regarding this standard:

115.17 (a) Corrections Corporation of America - South Central Correctional Center does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor or volunteer who may have contact with inmates, who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. The facility completes a "Corrections Corporation of America PREA Self-Declaration" 14-2H form on all applicants as well as background checks are completed by the Tennessee Department of Corrections, with the results forwarded to the facility on all new applicants confirming compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (b) Corrections Corporation of America - South Central Correctional Center considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor or volunteer, who may have contact with inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (c)-1 Corrections Corporation of America - South Central Correctional Center requires a criminal background records check be completed before hiring any new employee. These background checks are completed by the Tennessee Department of Corrections and the results are forwarded to the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

(c)-2 Corrections Corporation of America - South Central Correctional Center makes their best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegation of sexual abuse. This request is documented on Corrections Corporation of America's "Verification of Prior Employment" form 3-20-2A. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (d) Corrections Corporation of America - South Central Correctional Center requires a criminal background records check be completed before enlisting the services of any contractor or volunteer who may have contact with the inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (e) Corrections Corporation of America - South Central Correctional Center requires a criminal background records check be completed on all current employees, volunteers, and contractors annually. Therefore, exceeding the requirements of this part of the standard.

115.17 (f) Corrections Corporation of America - South Central Correctional Center instills upon all employees a continuing affirmative duty to disclose any sexual misconduct as required by this standard. A Corrections Corporation of America's "Self-Declaration of Sexual Abuse/Sexual Harassment" form 14-2H is completed by all applicants, upon being hired and if being considered for a promotion. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (g) Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 mandates that material omissions regarding sexual misconduct, and the provision of materially giving false information, are grounds for termination as required by this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (h) Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 requires that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a current or former employee upon receiving a request from an institutional employer for whom such employee has applied to work. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

## **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, page 30, section V, staff interviews and review of documentation provided. The following delineates the audit findings regarding this standard:

115.18 (a) Corrections Corporation of America - South Central Correctional Center requires when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse. During this audit cycle there have been no expansions or modifications to this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.18 (b) Corrections Corporation of America - South Central Correctional Center policy requires when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse. During this audit cycle there have been minimal enhancements and modifications to the video monitoring system, electronic surveillance system, or other monitoring technology at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, pages 23 and 24, section O and policy 13-79, page 2, section A-i and ii, investigative staff interviews, and review of documentation provided. The following delineates the audit findings regarding this standard:

115.21 (a) and (b) Corrections Corporation of America - South Central Correctional Center complies with all elements of this standard. The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings. The Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit investigates all PREA complaints for potential criminal activity and maintains a close working relationship with the County Prosecutor and the South Central Correctional Center's investigator on each case. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (c) Corrections Corporation of America - South Central Correctional Center offers all victims of sexual abuse access to forensic medical examinations at the Jackson-Madison County General Hospital of Jackson, Tennessee without financial cost, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (d) The Corrections Corporation of America - South Central Correctional Center has entered into a Memorandum of Understanding with the Center of Hope in Columbia, Tennessee which agrees to provide outside victim advocacies services to the inmates. The services of these victim advocates has not been requested or used by the inmates during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (e) Corrections Corporation of America - South Central Correctional Center has entered into a Memorandum of Understanding with the Center of Hope in Columbia, Tennessee which agrees to provide outside victim advocacies services to the inmates upon request. The facility also makes available to the victim a qualified agency staff member, upon request by the victim, who will accompany and support the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, PREA Audit Report

information, and referrals as warranted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (f) The Corrections Corporation of America - South Central Correctional Center is responsible for administrative investigations and has an agreement with the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit to provide criminal investigations covering all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section O on pages 20 through 24, investigative staff interviews, and review of documentation provided. The following delineates the audit findings regarding this standard:

115.22 (a) The Corrections Corporation of America - South Central Correctional Center is required to investigate ALL PREA complaints received at this facility. All potential criminal activity is referred to the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit for criminal investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.22 (b) All PREA allegations are investigated by the Corrections Corporation of America - South Central Correctional Center for potential criminal activity. If it is determined that the allegation involves potential criminal activity, it is referred to the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit for criminal investigation and prosecution as warranted. This policy is published on the agency website as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.22 (c) The Corrections Corporation of America - South Central Correctional Center refers all criminal allegations for investigation to the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit. The requirements of this part of the standard are outlined in the policy that is posted on the agency website. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section C on page 6, staff interviews, random staff training file review and review of documentation provided (power points, certificates, sign in sheets, signed acknowledgement forms, training curriculums and employee handouts). The following delineates the audit findings regarding this standard:

115.31 (a) Corrections Corporation of America - South Central Correctional Center train all their 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.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31 (b) The training is tailored to the gender of the inmates at Corrections Corporation of America - South Central 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31 (c) The training staff provided a report containing all staff that had been PREA trained which confirmed the requirements needed to meet the standard and proved that all current staff was trained within one year of the effective date of the PREA standards. All staff receive annual refresher PREA training during in-service which exceeds the requirements of this standard. Therefore, the facility exceeded this part of the standard during this audit.

115.31 (d) Corrections Corporation of America - South Central Correctional Center documents, through employee signature on an acknowledgement form, that all employees understand the training they have received. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section C-2 on page 8, volunteer and contractor interviews, random training file reviews and review of documentation provided (power points, certificates, sign in sheets, signed acknowledgement forms, training curriculums and handouts). The following delineates the audit findings regarding this standard:

115.32 (a) Corrections Corporation of America - South Central Correctional Center ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Corrections Corporation of America - South Central Correctional Center's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32 (b) 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 - South Central Correctional Center's zero-tolerance policy 14-2 regarding sexual abuse and sexual harassment and their requirements to report such incidents. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32 (c) Corrections Corporation of America - South Central Correctional Center documents through signature on an acknowledgement form that volunteers and contractors understand the training they have received. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on review of the Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section I-1 and 2 on pages 13 and 14, the Inmate Handbook, PREA Pamphlets, Facility Orientation, PREA Posters, and the PREA video; as well as interviews with random inmates and staff. The following delineates the audit findings regarding this standard:

115.33 (a) During the intake process, inmates receive information explaining Corrections Corporation of America - South Central Correctional Center's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (b) Within 30 days of intake, Corrections Corporation of America - South Central Correctional Center is required by policy to provide comprehensive education to the inmates, administered by 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. However, due to receiving inconsistent answers during the inmate interviews and inconsistent documentation in the offender files regarding the 30-day comprehensive education. The auditors required the facility to provide an additional showing of the video to all the inmates housed at the facility and to provide documentation of attendance. During the 30-day interim report writing period the facility provided the documentation satisfying this requirement. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (c) Corrections Corporation of America - South Central Correctional Center shall provide per policy such education within one year of the effective date of the PREA standards to all its inmates, and shall provide education to inmates upon transfer as required by this standard. However, due to receiving inconsistent answers during the inmate interviews and inconsistent documentation in the offender files regarding the 30-day comprehensive education. The auditors required the facility to provide an additional showing of the video to all the inmates housed at the facility and to provide documentation of attendance. During the 30-day interim report writing period the facility provided the documentation satisfying this requirement. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (d) Corrections Corporation of America - South Central Correctional Center 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. The facility has an agreement with Language Line Interpreter Services as well as TDD phones to assist inmates with these disabilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (e) There was some documentation provided of the inmate's participation in PREA educational sessions as required by this part of the standard. However, due to receiving inconsistent documentation in the offender files regarding the 30-day comprehensive education. The auditors required the facility to provide an additional showing of the video to all the inmates housed at the facility and to provide documentation of attendance. During the 30-day interim report writing period the facility provided the documentation satisfying this requirement. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (f) Corrections Corporation of America - South Central Correctional Center does provide the inmates with posters, pamphlets, and an inmate handbook in English and Spanish outlining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on review of the Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section b - i on page 7 as well as the PREA Specialized Investigator Training curriculums provided, Investigators training file review and investigative staff interviews. The following delineates the audit findings regarding this standard:

115.34 (a) In addition to the general training provided to all employees Corrections Corporation of America - South Central Correctional Center ensures that the investigators have received training in conducting investigations in confinement settings. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34 (b) 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34 (c) Corrections Corporation of America - South Central Correctional Center maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on review of the Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section b - ii on page 7 as well as the PREA Specialized Medical/Mental Health training video and curriculum provided, training file review and staff interviews. The following delineates the audit findings regarding this standard:

115.35 (a) Corrections Corporation of America - South Central Correctional Center PREA policy as well as the PREA Specialized



Medical/Mental Health training video, curriculum provided, training file review and staff interviews revealed the agency has provided specialized training to all its medical and mental health staff on how to detect and assess signs of sexual abuse and sexual 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 sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35 (b) The medical staff at this facility does not conduct forensic exams they are provided at the local hospital. Therefore, this part of the standard is not applicable to this facility.

115.35 (c) The agency maintains documentation that all medical and mental health practitioners have received specialized training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35 (d) Medical and mental health care practitioners also receive the annual training mandated for all employees, contractors, and volunteers. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section H on pages 12 and 13, inmate and staff interviews, inmate file reviews, a review of the 14-2B objective “Initial and 30 day PREA Screening Assessment” form and the Tennessee Department of Corrections electronic screening instrument. The facility was utilizing the Corrections Corporation of America’s paper screening instrument as well as the Tennessee Department of Corrections electronic screening instrument duplicating work for staff. The auditors suggested and the PREA Coordinator agreed that the facility should utilize the Tennessee Department of Corrections electronic instrument that drives housing and program placement based on risk screening data entered alleviating any unintentional placements. The facility staff is to be commended for their response to this suggestion and for providing documentation that all inmates were rescreened on the Tennessee Department of Corrections electronic instrument during the 30-day interim report period. Therefore, the following delineates the audit findings regarding this standard:

115.41 (a) Corrections Corporation of America - South Central Correctional Center ensures that all inmates are assessed during intake and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (b) The Corrections Corporation of America - South Central Correctional Center provided documentation proving compliance with the standard that all inmates are screened for their risk of being sexually abused by other inmates or being sexually abusive toward other inmates normally upon intake but no later than 72 hours of arrival at the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (c) Based on the documentation provided and inmate file reviews the facility utilizes an objective screening instrument that covers all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (d) The intake screening instrument used 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.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (e) 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 - South Central Correctional Center, in assessing inmates for risk of being sexually abusive. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (f) Within 30 days from the inmate's arrival, the Corrections Corporation of America - South Central Correctional Center will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Corrections Corporation of America - South Central Correctional Center since the intake screening. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (g) Corrections Corporation of America - South Central Correctional Center will reassess an inmate's risk level 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (h) Corrections Corporation of America - South Central Correctional Center does not discipline inmates for refusing to answer screening questions or not disclosing complete information. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (i) Corrections Corporation of America - South Central Correctional Center implements appropriate controls on the dissemination 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. Based on policy review, interview with the Warden, and interviews with the staff responsible for completing the screening, all information gathered on the screening instrument is restricted to staff making housing, work and program assignments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

## 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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section J on pages 14 and 15, inmate and staff interviews, inmate file reviews, a review of the 14-2B objective "Initial and 30 day PREA Screening Assessment" form and the Tennessee Department of Corrections electronic screening instrument. The facility was utilizing the Corrections Corporation of America's paper screening instrument as well as the Tennessee Department of Corrections electronic screening instrument duplicating work for staff. The auditors suggested and the PREA Coordinator agreed that the facility should utilize the Tennessee Department of Corrections electronic instrument that drives housing and program placement based on risk screening data entered alleviating any unintentional placements. The facility staff is to be commended for their response to this suggestion and for providing documentation that all inmates were rescreened on the Tennessee Department of Corrections electronic instrument during the 30-day interim report period. Therefore, the following delineates the audit findings regarding this standard:

115.42 (a) Corrections Corporation of America - South Central Correctional Center 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (b) Corrections Corporation of America - South Central Correctional Center makes individualized determinations about how to ensure the safety of each inmate. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (c) Corrections Corporation of America - South Central Correctional Center outlines the procedures to be followed in deciding whether to assign a transgender inmate to a facility for male or female inmates, and the process for making housing and programming assignments, on case by case basis as required by this standard. Based on interviews with the LBGTI inmates housed at this facility they both stated they felt safe at the facility and staff considers their safety when making housing and programming assignments. They both stated their case manager meets with them frequently and inquiries about their safety. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (d) Corrections Corporation of America - South Central Correctional Center outlines the procedures for placement and programming assignments of each transgender or intersex inmate being reassessed at least twice per year to review any threats to safety experienced by the inmate as required by this standard. Based on interviews with the LBGTI inmates housed at this facility they both stated they felt safe at the facility and staff considers their safety when making housing and programming assignments. They both stated their case manager meets with them more frequent than ever six months to inquire about their safety. Documentation provided revealed that a review is conducted and documented every six months as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (e) Corrections Corporation of America - South Central Correctional Center requires that a transgender and intersex inmate's own views regarding their own safety be given serious consideration. Both LBGTI inmates stated they felt safe at the facility and that staff gave serious consideration to their safety regarding housing assignments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (f) Corrections Corporation of America - South Central Correctional Center policy requires that transgender and intersex inmates be given the opportunity to shower separately from other inmates. Both LBGTI inmates stated they were given the opportunity but the showers are covered and give them their privacy. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (g) Corrections Corporation of America - South Central Correctional Center 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section J on pages 14 and 15, staff interviews, inmate interviews, and documentation review. The following delineates the audit findings regarding this standard:

115.43 (a) 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. The Corrections Corporation of America - South Central Correctional Center policy outlines the procedures to ensure compliance with this standard. Staff and inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past 12 months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (b) Inmates placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to

the extent possible. If Corrections Corporation of America - South Central Correctional Center restricts access to programs, privileges, education, or work opportunities, Corrections Corporation of America - South Central Correctional Center documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (c) Corrections Corporation of America - South Central 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (d) If an involuntary segregated housing assignment is made, Corrections Corporation of America - South Central Correctional Center clearly documents the basis for the facilities' concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (e) Corrections Corporation of America - South Central Correctional Center requires a 30-day review to determine whether there is a continuing need for separation from the general population. Therefore, the facility demonstrated compliance with this part of the standard during this 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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section L on pages 16 and 17, the Inmate Handbook, PREA pamphlets, and posters provided to inmates were utilized to verify compliance with this standard. Staff and inmate interviews verified the inmates have multiple internal ways to report incidents of sexual abuse or sexual harassment. They can report verbally, in writing, dialing the hotline provided and/or through report of a third party. The following delineates the audit findings regarding this standard:

115.51 (a) Corrections Corporation of America - South Central Correctional Center PREA policy outlines multiple internal ways for inmates to report incidents of abuse or harassment. They can report verbally, in writing, dialing the hotline provided and/or through report of a third party. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (b) Corrections Corporation of America - South Central Correctional Center 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 - South Central Correctional Center, 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. The Corrections Corporation of America - South Central Correctional Center has provided the phone numbers for the Avalon Rape Crisis Center and the Center of Hope to the inmates satisfying the requirements of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (c) Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section L-2 page 17 requires all staff to accept reports made verbally, in writing, anonymously and from third parties. All allegations shall be promptly documented in an incident report and reported to the supervisor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (d) Corrections Corporation of America - South Central Correctional Center staff may privately report sexual abuse and sexual harassment to the Warden, a supervisor, PREA manager, or the agencies ethics hotline at the corporate office. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### 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)
- Not Applicable (Exempt)

**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 Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, L on page 17 does not require an inmate to submit a grievance or allow a PREA incident reported on a grievance to be processed through the facility's grievance process. Should a report be submitted, it is the policy to immediately forward the complaint to the Investigator or the Administrative Duty Officer on duty. Therefore, this standard was found not applicable and the facility is exempt.

### 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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy section F on page 10, staff interviews, inmate interviews and documentation review. The following delineates the audit findings regarding this standard:

115.53 (a) The facility has entered into a Memorandum of Understanding with the Avalon Rape Crisis Center and the Center of Hope which agrees to provide confidential outside victim advocacies services to the inmates at Corrections Corporation of America - South Central Correctional Center. The mailing address and telephone number for these agencies are made available to all inmates at the facility. Corrections Corporation of America - South Central Correctional Center enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. The services of these victim advocates have not been requested or used by the inmates during this audit cycle, verified by phone call. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.53 (b) Corrections Corporation of America - South Central 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.53 (c) Corrections Corporation of America - South Central Correctional Center has entered into a Memorandum of Understanding with the Avalon Rape Crisis Center and the Center of Hope and has maintained a Memorandum of Understanding with these victim advocates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### 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.**

Based on the review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section L, on pages 17 and 18 as well as a review of the agency website outlining third party reporting. The following delineates the audit findings regarding this standard:

115.54 (a) The agency provides multiple methods for receiving third-party reports of sexual abuse and sexual harassment on the agency website at: [www.cca.com](http://www.cca.com). The information available on the website explains how to report sexual abuse and sexual harassment on behalf of an inmate. The facility takes all reports seriously no matter how they are received and investigates each reported incident. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

#### **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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section L on pages 17 and 18, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.61 (a) Corrections Corporation of America - South Central Correctional Center 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 - South Central Correctional Center; 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (b) Corrections Corporation of America - South Central Correctional Center requires apart from reporting to designated supervisors or officials, staff do 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. However, due to inconsistent answers regarding confidentiality related to PREA allegations the auditors required additional staff training to ensure consistency. During the 30-day interim report writing period the facility provided documentation of staff being retrained in this area satisfying this requirement. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (c) Corrections Corporation of America - South Central Correctional Center requires medical and mental health practitioners to report sexual abuse immediately to the security staff supervisor. Medical and mental health practitioners are required to inform the inmates of their duty to report, and the limitations of confidentiality, at the initiation of services. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (d) If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, Corrections Corporation of America - South Central Correctional Center reports the allegation to the designated state or local services agency. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (e) Corrections Corporation of America - South Central Correctional Center reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility investigator as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 on page 1, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.62 (a) Policy and staff training requires all staff to take immediate action and staff acknowledged during their interviews the requirement of all staff to protect inmates when it is learned that an inmate at the Corrections Corporation of America - South Central Correctional Center is subject to a substantial risk of imminent sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section M-3 page 20, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.63 (a) Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of Corrections Corporation of America - South Central Correctional Center that received the allegation notifies the head of the facility or appropriate office where the alleged abuse occurred. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63 (b) and (c) Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63 (d) Upon receiving a call from an outside facility that an inmate had been sexually abused while in the custody of the Corrections Corporation of America - South Central Correctional Center, the allegation is referred immediately to the facility investigator to be investigated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

#### **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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section M on pages 18 - 20, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.64 (a) Corrections Corporation of America - South Central Correctional Center policy outlines the responsibilities of all staff members receiving an allegation of sexual abuse to follow these guidelines:

- (1) Separate the alleged victim and abuser;
- (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;
- (3) 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
- (4) 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.64 (b) Corrections Corporation of America - South Central Correctional Center PREA policy mandates when the first staff responder is not a security staff member, they shall advise the alleged victim not to take any actions that could destroy physical evidence, and then notify security staff immediately. The auditor confirmed compliance based on interviews with and training records of non-security staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

#### **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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section G pages 10-12, section M pages 18-21, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:



115.65 (a) Corrections Corporation of America - South Central Correctional Center has a very comprehensive written 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. The plan clearly defines the roles and responsibilities of each person involved and the procedures to be followed in detail. Interviews with SART members confirmed their knowledge of the response plan.

Part of the response plan is the "Sexual Abuse Incident Check Sheet" form 14-2C which is initiated upon receiving a PREA allegation and ensures all steps in the plan are carried out in a timely manner exceeding the requirements of this standard.

### **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.**

Based on PREA Policy 14-2, section R pages 25 and 26, interviews with agency head and the PREA Coordinator, and documentation provided. The following delineates the audit findings regarding this standard:

115.66 (a) Employees are subject to disciplinary sanctions up to termination for violating Corrections Corporation of America - South Central Correctional Center policies on sexual abuse and sexual harassment. When the Agency Head was interviewed he reported that 7% of Corrections Corporation of America facilities are unionized and 93% are not. The Corrections Corporation of America - South Central Correctional Center has not entered into any collective bargaining agreements during this audit cycle. Therefore, the facility has demonstrated compliance with this part of the standard.

### **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.**

Based on Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section G on page 11, staff interviews, inmate interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.67 (a) Corrections Corporation of America - South Central Correctional Center 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 designates which staff members or departments are charged with monitoring retaliation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (b) Corrections Corporation of America - South Central Correctional Center has multiple protection measures, such as housing changes or transfers for inmates, 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (c) For at least 90 days following a report of sexual abuse, Corrections Corporation of America - South Central Correctional Center 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 are periodic status checks performed and documented as required by this standard. Corrections Corporation of America - South Central Correctional Center's monitoring includes any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring indicates a continuing need. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (d) If any other individual who cooperates with an investigation expresses a fear of retaliation, Corrections Corporation of America - South Central Correctional Center takes appropriate measures to protect that individual against retaliation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

115.68 (a) Corrections Corporation of America - South Central Correctional Center prohibits offenders who have alleged sexual abuse to be placed in involuntary segregated housing. If segregated housing is used, the same provisions as outlined in PREA policy 14-2, section J on pages 14 and 15 would apply. Interviews with the Warden and segregation staff revealed that involuntary segregation has not been used for this purpose in the past 12 months. The Warden stated that if separation was required to protect the offender, they would be placed in segregation for no longer than 72 hours. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based upon review of the Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section N pages 21 and 22, policy 14-2 section O pages 22 and 23, investigative staff interviews, training certificates, investigative reports, as well as interviews with the PREA Coordinator, and the PREA Compliance Manager. The following delineates the audit findings regarding this standard:

115.71 (a) Corrections Corporation of America - South Central Correctional Center Investigators conduct an investigation immediately when notified of an allegation of sexual abuse and sexual harassment. The investigative files were reviewed and it appeared that the

investigations were conducted promptly, documented thoroughly, and objectively for all allegations, including third-party, and anonymous reports. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (b) Based on training curriculums provided, Investigators training file review, and investigative staff interviews, it was evident the facility provided, in addition to the general training received by all employees, specialized training to all its investigators. This training included 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (c) Corrections Corporation of America - South Central Correctional Center 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (d) When the quality of evidence appears to support criminal prosecution, Corrections Corporation of America - South Central Correctional Center refers the case to the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit for the criminal investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (e) 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. The inmate who alleges sexual abuse is not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (f) Corrections Corporation of America - South Central Correctional Center administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (g) Corrections Corporation of America - South Central Correctional Center criminal investigations are documented by the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (h) Corrections Corporation of America - South Central Correctional Center refers all allegations to the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit for investigation and prosecution when warranted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (i) Corrections Corporation of America - South Central Correctional Center retains all written reports for as long as the alleged abuser is incarcerated or employed by Corrections Corporation of America - South Central Correctional Center, plus five years. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (j) The departure of the alleged abuser or victim from employment or control of the Corrections Corporation of America - South Central Correctional Center or agency does not provide a basis for terminating an investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (k) The Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit conducts criminal sexual abuse investigations pursuant to the requirements of this standard. Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, outlines the requirements of the criminal investigation and complies with all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (l) Corrections Corporation of America - South Central Correctional Center refers all criminal cases to the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit and cooperates with their investigators during the entire investigation. The facility remains informed of the progress of the investigation through communication between the facility investigator and the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit agent(s) handling the case. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

## **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section O, subsection 5 on page 24 and investigative staff interviews. The following delineates the audit findings regarding this standard:

Corrections Corporation of America - South Central Correctional Center imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section Q on pages 24 and 25, documentation provided, and staff interviews. The following delineates the audit findings regarding this standard:

115.73 (a) Based on Corrections Corporation of America - South Central Correctional Center PREA policy it was confirmed that following an investigation into an inmate’s allegation he/she suffered sexual abuse in the facility, the inmate was to be informed whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded. The documentation provided confirmed the inmates were provided this notification on the “Inmate/Resident PREA Allegation Status Notification” form 14-2E. The inmates are required to sign the form documenting acknowledgement of this notification as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (b) The agency does request all relevant information from the criminal investigation conducted by the Clifton Police Department and the Tennessee Department of Corrections Special Investigations Unit in order to inform the inmate as required by this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (c) Based on Corrections Corporation of America - South Central Correctional Center PREA policy and documentation provided, it was confirmed that following an inmate’s allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:

- (1) The staff member is no longer posted within the inmate’s unit;
- (2) The staff member is no longer employed at the facility;
- (3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the Corrections Corporation of America - South Central Correctional Center; or
- (4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the Corrections Corporation of America - South Central Correctional Center

The documentation provided confirmed the inmates were provided this notification on the “Inmate/Resident PREA Allegation Status

Notification” form 14-2E. The inmates are required to sign the form documenting acknowledgement of this notification as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (d) Following an inmate’s allegation they had been sexually abused by another inmate, Corrections Corporation of America - South Central Correctional Center subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or Corrections Corporation of America - South Central Correctional Center learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The documentation provided confirmed the inmates were provided this notification on the “Inmate/Resident PREA Allegation Status Notification” form 14-2E. The inmates are required to sign the form documenting acknowledgement of this notification as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (e) All such notifications or attempted notifications are documented on the “Inmate/Resident PREA Allegation Status Notification” form 14-2E. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (f) Policy outlines the agency’s obligation to report under this standard terminates if the inmate is released from Corrections Corporation of America - South Central Correctional Center’s custody. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section R on pages 25 and 26, documentation provided, agency head, and PREA Coordinator interviews. The following delineates the audit findings regarding this standard:

115.76 (a) and (b) Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who has engaged in sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (c) 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (d) 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, unless the activity was clearly not criminal, and to any relevant licensing bodies. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section R3 on pages 26 and 27, documentation provided, agency head, Warden, and PREA Coordinator interviews. The following delineates the audit findings regarding this standard:

115.77 (a) Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and are reported to law enforcement, unless the activity was clearly not criminal, and to relevant licensing bodies. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.77 (b) Corrections Corporation of America - South Central 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

#### **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.**

Based upon review of Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section R on pages 25 and 26, documentation provided, agency head, and PREA Coordinator interviews. The following delineates the audit findings regarding this standard:

115.78 (a) 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (b) 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (c) The disciplinary process considers 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (d) The Mental Health staff offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, Corrections Corporation of America - South Central Correctional Center does not require the offending inmate to participate in such interventions as a condition of access to programming or other benefits. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (e) Corrections Corporation of America - South Central Correctional Center disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. Therefore, the facility demonstrated compliance with this part of the

standard during this audit.

115.78 (f) Policy states 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (g) Corrections Corporation of America - South Central Correctional Center prohibits all sexual activity between inmates and may discipline inmates for such activity. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on medical and mental health staff interviews and documentation provided as well as Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section E on pages 9 and 10, section L on pages 17 and 18, and section M on pages 18 and 19. Also, policy 13-79 section A on pages 2 - 4. The following delineates the audit findings regarding this standard:

115.81 (a) and (c) If the screening indicates the inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, the screening staff at the Corrections Corporation of America - South Central Correctional Center ensures the inmate is offered a follow-up meeting with the medical and/or mental health staff within 14 days of the intake screening as required by this part of the standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81 (b) If the screening indicates an inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, the screening staff at the Corrections Corporation of America - South Central Correctional Center ensures the inmate is offered a follow-up meeting with mental health staff within 14 days of the intake screening as required by this part of the standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81 (d) Corrections Corporation of America - South Central Correctional Center requires that any information related to sexual victimization or abusiveness that occurred in the facility 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81 (e) Corrections Corporation of America - South Central Correctional Center requires medical and mental health practitioners to obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in the facility, unless the inmate is under the age of 18. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on medical and mental health staff interviews and documentation provided as well as Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section E on pages 9 and 10, section L on pages 17 and 18, and section M on pages 18 and 19. Also, policy 13-79 section A on pages 2 - 4. The following delineates the audit findings regarding this standard:

115.82 (a) Corrections Corporation of America - South Central Correctional Center has an agreement with the Jackson-Madison County General Hospital of Jackson to treat inmate victims of sexual abuse. The facility also has medical and mental health staff at the facility ensuring inmates 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (b) Corrections Corporation of America - South Central Correctional Center has procedures to follow when 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 shall immediately notify the appropriate medical and mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (c) Corrections Corporation of America - South Central Correctional Center ensures 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (d) Corrections Corporation of America - South Central Correctional Center requires that all treatment services provided to the victim are without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on medical and mental health staff interviews and documentation provided, Corrections Corporation of America - South Central Correctional Center PREA policy 13-70, page 3 and 4, section 1 and 2, policy 13-79, page 3, section A, page 4, section 2 and page 5, section 2 and 3. The following delineates the audit findings regarding this standard:

115.83 (a) Corrections Corporation of America - South Central Correctional Center offers medical and mental health evaluations and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (b) Corrections Corporation of America - South Central Correctional Center mandates that the evaluations 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.



115.83 (c) Corrections Corporation of America - South Central Correctional Center requires that medical and mental health staff provide all victims with medical and mental health services consistent with the community level of care. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (d and e) Based on Corrections Corporation of America - South Central Correctional Center policy 13-79 section A on page 3 requires inmate victims of sexually abusive vaginal penetration, while incarcerated, shall be offered pregnancy tests and timely information about, and access to, all pregnancy-related medical services that are lawful in the community as required by this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (f) Corrections Corporation of America - South Central Correctional Center requires that medical and mental health staff provide inmate victims of sexual abuse while incarcerated tests for sexually transmitted infections as medically appropriate. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (g) Corrections Corporation of America - South Central Correctional Center requires that medical and mental health staff provide treatment services 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (h) Corrections Corporation of America - South Central Correctional Center attempts to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning such abuse history and offer treatment when deemed appropriate by the mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

#### **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.**

Based on interviews with the Warden, PREA Coordinator, the PREA Manager, and documentation provided as well as Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section N on pages 21 and 22. The following delineates the audit findings regarding this standard:

115.86 (a) Corrections Corporation of America - South Central 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (b) Corrections Corporation of America - South Central Correctional Center ensures that these reviews occur within 30 days of the conclusion of the investigation and documents the review on the "Sexual Abuse Incident Review Report" form 14-2F. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (c) The review team consist of upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (d) 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 the facility; and they examine the area in Corrections Corporation of America - South Central 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. The agency has deployed an excellent PREA after action review form which addresses all elements of the standard. Corrections Corporation of America - South Central Correctional Center conducts an incident review for all cases and reviews all findings

telephonically with the agency wide PREA Coordinator for additional clarification and guidance. Therefore, the facility exceeds the intent of this part of the standard.

115.86 (e) Corrections Corporation of America - South Central Correctional Center shall implement the recommendations for improvement, or shall document its reasons for not doing so. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on interviews with the PREA Coordinator, the PREA Manager, and documentation provided as well as Corrections Corporation of America - South Central Correctional Center PREA policy 14-2 section T, on pages 27 and 28. The following delineates the audit findings regarding this standard:

115.87 (a), (b) and (c) Corrections Corporation of America - South Central Correctional Center 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (d) Corrections Corporation of America - South Central Correctional Center maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (e) Corrections Corporation of America - South Central Correctional Center does not contract its inmates to other facilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (f) Upon request, Corrections Corporation of America - South Central Correctional Center provides all such data from the previous calendar year to the Department of Justice no later than June 30 when required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

### **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.**

Based on interviews with the PREA Coordinator, the PREA Manager, and documentation provided as well as Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section T-3 page 28. The following delineates the audit findings regarding this standard:

115.88 (a) Corrections Corporation of America - South Central Correctional Center 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 - South Central Correctional Center as a whole. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88 (b) 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 - South Central Correctional Center's progress in addressing sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88 (c) Corrections Corporation of America - South Central Correctional Center's report is approved by the Corrections Corporation of America's agency head and made readily available to the public through its website: [www.cca.com](http://www.cca.com). Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88 (d) Corrections Corporation of America - South Central Correctional Center may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility, but must indicate the nature of the material redacted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

**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.**

Based on interviews with the PREA Coordinator, the PREA Manager, and documentation provided as well as Corrections Corporation of America - South Central Correctional Center PREA policy 14-2, section T-2-c on page 27. The following delineates the audit findings regarding this standard:

115.89 (a) through (d) Corrections Corporation of America agency PREA Coordinator makes all aggregated sexual abuse data, from facilities under Corrections Corporation of America direct control readily available to the public at least annually through the agency website: [www.cca.com](http://www.cca.com).

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 otherwise. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

**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.

Rodney P. Bivens

September 10, 2016

Auditor Signature

Date