

PREA AUDIT REPORT Interim Final
ADULT PRISONS & JAILS

Date of report: October 5, 2016

Auditor Information			
Auditor name: David Haasenritter			
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Telephone number: 540-903-6457			
Date of facility visit: February 16-18, 2016			
Facility Information			
Facility name: Lawrenceville Correctional Center			
Facility physical address: 1607 Planters Road Lawrenceville, Virginia 23868			
Facility mailing address: <i>(if different from above)</i> Click here to enter text.			
Facility telephone number: 434-848-9349			
The facility is:	<input type="checkbox"/> Federal	<input checked="" type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input checked="" type="checkbox"/> Prison	<input type="checkbox"/> Jail	
Name of facility's Chief Executive Officer: Ed Wright			
Number of staff assigned to the facility in the last 12 months: 313			
Designed facility capacity: 1595			
Current population of facility: 1580			
Facility security levels/inmate custody levels: Medium			
Age range of the population: 18-71			
Name of PREA Compliance Manager: Belinda Bullock		Title: Classification Coordinator	
Email address: bbullock@geogroup.com		Telephone number: 434-848-9349	
Agency Information			
Name of agency: The GEO Group Inc.			
Governing authority or parent agency: <i>(if applicable)</i> Click here to enter text.			
Physical address: One Park Place, Suite 700, 621 Northwest 53 rd Street, Boca Raton, Florida 33487			
Mailing address: <i>(if different from above)</i> Click here to enter text.			
Telephone number: 561-999-5827			
Agency Chief Executive Officer			
Name: George C. Zoley		Title: Chairman of the Board, CEO and Founder	
Email address: gzoley@geogroup.com		Telephone number: 561-893-0101	
Agency-Wide PREA Coordinator			
Name: Phebia L. Moreland		Title: Director, Contract Compliance, PREA Coordinator	
Email address: pmoreland@geogroup.com		Telephone number: 561-999-5827313	

AUDIT FINDINGS

NARRATIVE

The PREA audit of the Lawrenceville Correctional Center was conducted on February 16 – 18, 2016 by Mr. David Haasenritter (lead) and Mr. Charles Kehoe. The announcement of the audit was posted on January 8, 2016. Approximately three weeks prior to the audit, the auditors received the PREA questionnaire and additional documents through a disk. The documents and questionnaire were well organized, highlighted, and tabbed. This along with providing the information three weeks in advance of the audit enabled the audit to move forward very efficiently. The night before the audit the institution provided a roster of all inmates housed at the institution; lists of inmates for specific categories to be interviewed; and a lists of all staff by duty position and shifts that were used to identify inmates and staff to be interviewed (random and specific category).

The lead auditor contacted Just Detention International (JDI) in reference to any information previously submitted by inmates at the Lawrenceville Correctional Center and reviewed both the GEO website and Virginia Department of Corrections prior to the audit. Both websites are very informative and GEO's website is one of the easiest to find PREA information of all agencies this auditor has audited. GEO PREA page is very informative and has information and links on: general information on PREA; agency zero tolerance policy; how to report; how employees can report; information on investigations; and where questions and inquiries can be forwarded to the PREA Coordinator (phone number, email, and mailing address). It also has a number of links to include: PREA standards; GEO basic and investigative PREA policy; GEO facility PREA audit reports; and GEO current annual PREA Report.

Following the entrance meeting with staff, the auditors toured the entire institution on February 16, 2016 and went back to certain areas in the institution on February 17 – 18, 2016. While touring, random inmates and staff were informally interviewed (not counted in interview count) and 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. During the tour the auditors reviewed staffing; logs; physical plant; sight lines; camera coverage; tested the inmate phone system for reporting allegations and for emotional support services; and institution operations. Following the tour, the auditors began the formal interviews, review of investigations, checking of cameras, and random checks of personnel, medical, and training records. A total of 36 staff was formally interviewed in the course of the audit (12 random, two contractor/volunteers, and 22 specialized staff). The interviews of the Agency Head/Designee had been previously completed by another auditor and the notes from those interviews were shared with the auditors prior to the on-site visit. The PREA Coordinator was also previously completed by another auditor and this auditor also previously interviewed her. Staff interviewed were well versed in their responsibilities in reporting sexual abuse, sexual harassment, and staff negligence; first responder duties; and evidence preservation. GEO has continued to build a culture of zero tolerance.

A total of 35 inmates were formally interviewed: 19 random (at least one from each housing unit); and 16 specialized (LGBTI, disabled; non-English speaking; who disclosed sexual victimization during screening; and who reported sexual abuse while confined). Majority of the inmates interviewed acknowledged receiving PREA training and written materials (posters, pamphlets, and inmates handbooks) outlining the agencies zero tolerance policies towards sexual abuse; knew the reporting procedures; reported staff of the opposite gender announced when entering a housing area; and that they had been asked questions from the screen upon arrival. All but one inmate who was asked stated they felt safe at the institution. The auditors found the inmates very aware of PREA.

The auditors reviewed 20 investigations of sexual abuse and sexual harassment at Lawrenceville Correctional Center during the audit cycle and report writing period. There were eight inmate-inmate allegations: one inmate-inmate sexual harassment unsubstantiated; one inmate-inmate sexual harassment unfounded; two inmate-inmate sexual abuse unfounded; and four inmate-inmate sexual abuses under investigation. There were 12 staff-inmate allegations: two staff-inmate sexual harassment unsubstantiated; four staff-inmate sexual harassment unfounded; three staff-inmate sexual harassment under investigation; two staff-inmate sexual abuses unsubstantiated; and one staff-inmate sexual abuse unfounded.

During the corrective action period the auditor received investigative packets to include investigative summaries; notice to the victim of the findings; monitoring for retaliation; and incident reviews for two allegations that was not closed and one new case as applicable. There was one inmate-inmate sexual harassment unfounded; one staff-inmate sexual harassment substantiated; and the new case was staff-inmate voyeurism through an anonymous report that was unfounded. The staff involved in the sexual harassment case was initially moved to a post away from inmate contact and then resigned as the investigation continued.

When the on-site audit was completed, the auditors conducted an exit meeting. While the auditor could not give the institution a final finding, the auditor did provide a preliminary status of his findings. The auditor thanked GEO, Virginia DOC, and Lawrenceville Correctional Center staff for their hard work and commitment to the Prison Rape Elimination Act.

During the interim report writing and corrective action period, the auditor reviewed modified policies, and additional documents. The GEO PREA Coordinator was very helpful in coordinating all the additional documentation.

DESCRIPTION OF FACILITY CHARACTERISTICS

Lawrenceville Correctional Center is a 1,596 medium security facility for male felony offenders, located near the small town of Lawrenceville, Virginia, approximately 50 miles from Richmond. The count on the first day of the audit was 1,574 inmates. The facility was opened in early 1997 by a private correctional company through a contract with the Virginia Department of Corrections. The GEO assumed correctional responsibilities in March of 2003. All of the inmates assigned to the facility are legally committed to the Virginia Department of Corrections and have been processed into the Virginia system prior to being assigned to Lawrenceville. Virginia Department of Corrections works closely with the facility and provides a number of centralized services for assigned inmates such as time computation, victim notification, restitution collection and initial admission and classification. In addition, Virginia Department of Corrections works closely with the facility to transfer those inmates who need specific additional services including significant mental health and medical treatment as well as those who need a higher security classification. The facility has an on-site contract monitor whose job is to ensure on-going compliance with the contract and consistency with expected practices of the Virginia Department of Corrections. Most of the employees are full time Geo employees with the exception of some contract employees. The Keefe Corporation provides commissary services to the facility.

The Lawrenceville Correctional Center has six general population housing units, one unit is designated as a therapeutic community unit and one restricted housing unit. The general population and therapeutic community units consist of three pods per unit, two pods house eighty offenders each and one pod houses ninety-six offenders. Each housing unit has an elevated control room that provides a view into each pod of the housing unit and provides access to all areas within the unit and controls external doors. Housing unit are staffed with a control room officer, two officers in the pods and a Sergeant who moves throughout the building. Each unit is equipped with a barber shop, telephones, microwaves, ice machines and a washer and dryer. Unit manager and counselor office are located within each housing unit which allows staff easy access to offenders. The Sergeant Unit is comprised of fifty two, single bed cells, equipped with wash basin, toilet, and a writing table. Three cells are fully equipped to include a shower, while two cells are handicap accessible. Observation and documentation indicated that offenders housed in the Segregation Unit are observed by a correctional officer at least every 30 minutes on an irregular schedule. Additionally, officers who are violent or have mental disorders or who demonstrate unusual or bizarre behavior receive more frequent observation. Suicidal offenders are under continuous observation as directed by the medical/mental health staff. A Housing Unit Counselor is assigned to the Segregation Unit to provide counseling services to the segregated offenders. A Unit Manager is also assigned to Segregation to address offenders concerns.

The facility has a full-time medical staff and an on-site infirmary unit. There are no prison industries or other joint-venture industries. The facility has successfully participated in the American Correctional Association Accreditation process since the facility's activation.

It is the mission of Lawrenceville Correctional Center to provide opportunities for all inmates to develop job skills, academic skills and social living skills essential to peaceful and productive co-existence with others. GEO and Lawrenceville Correctional Center Core Values are Integrity, Respect, Professionalism and Fairness. Lawrenceville Correctional Center is committed to the Continuum of Care mission of the GEO in preparing offenders for release.

SUMMARY OF AUDIT FINDINGS

On February 16 – 18, 2016, the on site visit was completed. Within a week of the audit being completed, the auditor provided a list of not met standards, and standards requiring additional information. During the 30 day interim report writing period, five standards were identified as requiring corrective action. During the corrective action period five standards had to be corrected. All correction action plans were completed and standards met on June 10, 2016. The final results of Lawrenceville Correctional Center PREA audit is listed below:

Number of standards exceeded: 5

Number of standards met: 38

Number of standards not met: 0

Number of standards not applicable: 0

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.

GEO operates the Lawrenceville Correctional Center to house Virginia Department of Corrections inmates. GEO has very good written policies mandating zero tolerance towards all forms of sexual abuse and sexual harassment that outlines the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The main PREA policies are GEO Policy 5.1.2, Sexual Abuse Behavior Prevention and Intervention Program (PREA); GEO Policy 5.1.2-A, Sexual Abuse Behavior Prevention and Intervention Program (PREA for Adult Prison, Jail, and Adult Community Confinement Facilities); and GEO Policy 5.1.2-E, Investigating Allegations of Sexually Abusive Behavior (PREA). Other agency policies supplement these main PREA policies. Lawrenceville Correctional Center Policy 17.003 Prison Rape Elimination Act (PREA) is the facility supplement to implement PREA. Agency and facility policies and procedures were very well organized. It is clear to the auditor that the Prison Rape Elimination Act is part of the GEO fabric.

GEO employs an upper-level, agency-wide facility PREA coordinator and a PREA compliance manager. Ms. Phebia Moreland is the PREA Coordinator. She is very knowledgeable of PREA standards and is one of the top PREA Coordinators I have met. Ms. Moreland has the authority to develop, implement, and oversee PREA compliance. She is very active in coordinating PREA, consistently sending updates to facilities, especially as FAQs are posted on the PREA website. She conducts training and meetings to keep unit PREA Compliance Managers up to date on any changes and best practices. She is consistently looking for ways to improve GEO PREA program. Reviewed the GEO organization chart which demonstrates she is in a position of authority and have observed her develop, implement and oversee compliance during this and other audits I have conducted. Indirectly supervises 80 compliance managers (Prisons and Jails, Community Corrections, Lockups, and Juveniles) through three regional corrections, one community corrections, and one juvenile coordinator. She often goes directly to the compliance managers to coordinate changes, provide updates, conduct training, and on-site during audits. For Lawrenceville Correctional Center, she also works with the Virginia Department of Corrections PREA Coordinator.

Ms. Brenda Bullock is the Lawrenceville Correctional Center PREA Compliance Manager and Classification Coordinator who reports to the Warden through the Associate Warden of Programs. She also has access to the GEO PREA Coordinator, which she does contact as questions and issues arise. She was knowledgeable of PREA standards and was actively involved in PREA activities. Ms. Bullock claimed to have enough time to perform her PREA duties. She coordinates and conducts training, provides info to staff at staff calls, contacts PREA Coordinator for clarification and coordinates with facility leadership. Reviewed the Lawrenceville Correctional Center organizational chart that demonstrated that she is in a position of authority to make changes and discuss issues with the Warden.

Standard 115.12 Contracting with other entities for the confinement of inmates

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

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

GEO Policy 5.1.2-A Sexually Abusive Behavior Prevention and Intervention Program (PREA for Adult Prison and Jail and Adult Community Confinement Facilities) states GEO shall adhere to all contracts with other entities for the confinement of individuals that require its obligation to adapt and comply with the PREA standards. It also states contractors in its facilities that have direct contact with individuals in GEO facilities or programs shall be obligated to comply with PREA standards. These requirements are required to be in the contracts. Virginia Department of Corrections contract requires compliance with PREA standards. Provided copies of contracts with Virginia Department of Corrections for review. GEO is a private provider and does not contract with other agencies for the confinement of inmates.

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.

GEO ensures each institution it operates develops documents, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect inmates against sexual abuse by monitoring and reviewing the staffing plans. GEO Policy 5.1.2-A establishes procedures to develop and monitor staffing plans uses the criteria found in standard 115.13 (a) to include generally accepted correctional practices; any judicial findings of inadequacy; any findings of inadequacy from Federal investigative agencies; any findings of inadequacy from internal or external oversight bodies; all components of the institution's physical plant (including "blind-spots" or areas where staff or inmates may be isolated); composition of the inmate population; number and placement of supervisory staff; institution programs occurring on a particular shift; any applicable State or local laws, regulations, or standards; prevalence of substantiated and unsubstantiated incidents of sexual abuse; and other relevant factors to develop and review the staffing plan. Lawrenceville Correctional Center Policy 17.003 also addresses supervision and monitoring.

Lawrenceville Correctional Center had approximately 144 cameras located on the outer perimeter, visitation, offender housing, medical, and high inmate traffic zones. During the interview of the Warden he discussed six cameras and numerous mirrors that were installed based on the 2015 review. The facility also provided pictures of the mirrors, doors for bathrooms, shower curtains, and purchase orders for items prior to the audit.

The auditors reviewed the Lawrenceville Correctional Center staffing plan and 2014 and 2015 annual reviews and found it to be very complete. The staffing plan is reviewed annually by the facility, GEO Corrections Division, and PREA Coordinator. GEO has established a good form to conduct the annual assessment to ensure all eleven criteria are properly reviewed and addressed. All findings and corrective action is documented by the PREA Coordinator. The plan follows generally accepted correctional practices which are spelled out in the GEO/Virginia Department of Corrections Contract. There have been no findings of inadequacy from any external or internal oversight bodies. All components of the facility's physical plant are considered and blind-spots are acknowledged and steps are taken to fix the blind spots. There is a brief description of the inmate population and the times programs are occurring. There are no applicable state laws, regulations, or standards, but, as previously mentioned, there is a contract between the Virginia Department of Corrections and the GEO. The prevalence of substantiated and unsubstantiated incidents of sexual abuse are also mentioned. The Warden provided documentation that Lawrenceville Correctional Center assesses, determines, and documents whether adjustments are needed to the staffing plan, the facility's deployment of video monitoring and other monitoring technologies, and the resources the facility has available to commit to ensure adherence to the staffing plan. The signature of the PREA Coordinator on the Annual Review confirmed that this was done in consultation with her. These annual reviews were submitted for 2014 and 2015.

By policy the facility documents all deviations to the plan and it would be provided to GEO and Virginia Department of Corrections. Per a memorandum from the Warden and review of manning sheets (five), there were no deviations from the plan. The facility uses part time staff and authorizes overtime to fill all positions.

Throughout the site review, the auditors saw evidence that intermediate and higher level supervisors (Assistant Wardens and others) conduct and document unannounced rounds on all shifts to deter and identify staff sexual abuse and sexual harassment. Staff and inmate interviews

further confirmed the unannounced rounds by supervisors. What was especially impressive was the checklist list the facility uses which includes several questions random staff and random inmates are asked as the unannounced rounds are made (zero tolerance policy, reporting, first responder duties); checks to ensure PREA information is posted; and whether opposite gender staff announce when entering the housing units. That exceeded the requirements of 115.13 (d). Four of the PREA unannounced rounds sheet was provided prior to the audit, the auditors reviewed 12 additional sheets while on site. Staff are also prohibited from alerting other staff that unannounced rounds are being conducted. Supervisors prevent alerting by going to housing and program areas at different times throughout the shifts.

Standard 115.14 Youthful inmates

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

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

Lawrenceville Correctional Center is not contracted to house youthful offenders; therefore this standard is not applicable. GEO policy 5.1.2.A does cover all parts of the standards for GEO facilities that do confine juveniles. Per memorandum from the Virginia Department of Corrections there are two facilities that are designated to hold youthful inmates in the VA Department of Corrections system.

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 review of GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003, review of training material, interview of staff and inmates, and observation it was determined the facility limits cross-gender viewing and searches. Lawrenceville Correctional Center does not conduct cross-gender strip searches or cross-gender visual body cavity searches, and staff are prohibited and do not search transgender or intersex inmates to determine inmates' genital status. The facility provided memorandum stating no cross-gender strip searches or cross-gender visual body cavity searches, the auditors checked inmate search log located in the intake area and there were no recorded cross-gender strip searches or cross-gender visual body cavity searches. All strip searches are done using two correctional officers, review of the strip search log and staff interviews verified following the policy

Standards 115.15 b and part of c does not apply as Lawrenceville Correctional Center is a male only facility.

Based on review of GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003, review of training material, interview of staff and inmates, and observation it was determined inmates are able to shower, perform bodily functions, and change clothes without non-medical staff observing their genitalia or buttocks, except in exigent circumstances or when such viewing is incidental to routine cell checks. There were a few showers that did not have shower curtains, but they were replaced immediately during the audit. Most inmates interviewed

stated they could shower and change clothes without being observed by female staff. A memorandum states inmates are responsible to maintain being dressed because there are females working the facility. Based on review of GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003, review of training material, interview of staff and inmates, and observation it was determined female staff announce their presence when entering an inmate housing unit. Also of note, all doors leading into each housing area has a sign reminding female staff to announce when they enter.

Review of training records and lesson plans demonstrated staff had been trained to conduct how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Prior to the audit, 2015 training documents were provided to the auditor demonstrating staff had been trained on searches of transgender and intersex inmates. The training slides stated there were three ways to search transgender women and each facility would decide which method would be used. The three methods were: conducted by medical; conducted by female staff; and ask the inmate. Interviews of staff demonstrated staff was unsure of the proper procedures to conduct pat down searches of transgender and inter sex inmates. Some stated first ask the inmate and then check medical records; others would not conduct search; others said would search transgender females inmates as if were male inmates using front of palms; and some said female staff would do the top half of the inmate and a male staff would do the bottom half. Note GEO policy does not have a male and female conduct the search, though the Virginia Department of Corrections did at one time. A number said search professionally but could not explain what that meant. Though provided training, staff consistently during interviews had trouble defining transgender and intersex inmates, and how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates. Corrective Action Plan was developed to retrain staff on defining transgender and intersex; how to communicate effectively; and how to conduct searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible (standards 115.15 and 115.31). The auditors reviewed the training material and sign in rosters. In April the lesson plan and sign in rosters for training of staff was provided by GEO and the facility. The auditor reviewed the lesson plan and sign in rosters and found the Lawrenceville Correctional Center as having met the standard.

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.

GEO policies 5.1.2-A and 12.008 and Lawrenceville Correctional Center policy 17.003 ensure inmates with disabilities and who are limited English proficient have access to PREA information and programs. GEO and Lawrenceville Correctional Center has taken appropriate steps to ensure that inmates who are limited English proficient or disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. GEO has a contract for Language Line to provide foreign language translation, the auditor checked the line for usage. PREA handouts and inmate handbooks are in English and Spanish. English and Spanish PREA posters are posted throughout the institution for inmates and staff to see. The facility has designated staff who speak Italian, French, Spanish, and Swahili. Staff and inmates interviewed stated inmates are not used as interpreters when addressing sexual abuse and sexual harassment allegations. The Pre-Audit Questionnaire (PAQ) stated no inmate interpreters had been used.

Informational and educational materials for inmates with disabilities are provided in ways that will enable the inmate to understand the GEO zero tolerance policy and related material and be able to make a claim of sexual abuse or sexual harassment, if necessary. For inmates who are hearing impaired, the facility has a Teletype (TTY) machine available for inmates who are hearing impaired. Provisions can be made for inmates who may be visually impaired, though those with limited vision is assisted by some of the posters having been printed in larger print.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 outlines policy and procedures to ensure staff and contractors are not hired or promoted who has engaged in sexual abuse in a prison, jail, lockup, community confinement institution, juvenile institution, or other institution; been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or been civilly or administratively adjudicated to have engaged in sexual activity facilitated by force, overt or implied threats of force, or coercion. GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 also requires the institution to consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates. Prior to the audit reviewed two employee application packets and one contractor packet; and during the audit reviewed 12 additional employee application packets and two contractor packets. Through review of staff and contractor records and staff interviews it was determined Lawrenceville Correctional Center staff and contractors are not hired or promoted who has engaged in sexual abuse in a prison, jail, lockup, community confinement institution, juvenile institution, or other institution; been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or been civilly or administratively adjudicated to have engaged in sexual activity facilitated by force, overt or implied threats of force, or coercion. The documents and interviews also demonstrated GEO and the facility considers incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires background checks for staff; and to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. Prior to the audit reviewed two background check of an employee. During the audit reviewed 12 additional background checks and employee application packets that demonstrated background checks were done prior to employment, and none had a background check more than five years old. Interviews of Human Resource staff and employees, and review of application packets also demonstrated contact with prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires criminal background records check before enlisting the services of any contractor who may have contact with inmates. Reviewed two contractors background check prior to the audit, and one during the audit. Interviews of Human Resource staff and contractors, and review of contractor packets demonstrated background checks were conducted.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 states shall ask all applicants and employees who may have contact with inmates directly about previous sexual misconduct as described in PREA standard 115.17 (a) in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees; and imposes upon employees a continuing affirmative duty to disclose any such misconduct. GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires information be provided on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work. Prior to the audit received two staff applications, and one annual review demonstrating they addressed previous sexual misconduct as described in PREA standard 115.17 (a) in written applications or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. Both of these policies were confirmed through interviews and review of additional personnel documents to include examples of employee annual affirmation during the audit. During the audit reviewed six additional employees files that demonstrated employees who may have contact with inmates directly are asked about previous sexual misconduct as described in PREA standard 115.17 (a) in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees; and imposes upon employees a continuing affirmative duty to disclose any such misconduct.

GEO policy 5.1.2-A establishes the procedures to conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates. Prior to the audit and during the audit reviewed background checks conducted on employees and contractors, and the spreadsheet that tracked last and next scheduled background checks and all employees and contractors had a background check less than five years old, most done between 2014 and 2015. Interviews of Human Resource staff demonstrated the process of conducting background checks every five years were in place, though it did not start till 2014. They conduct all background checks due in the next 12 months in September.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 states material omissions regarding sexual misconduct, or the provision of materially false information, shall be grounds for termination.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 states GEO will provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work. Interviews of personnel staff and one request for information demonstrated they would provide the information.

Standard 115.18 Upgrades to facilities and technologies

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

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

Through review of GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003, and interviews of the Agency Head representative, PREA Coordinator, PREA Compliance Manager, and Warden it was determined that the GEO considers the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse.

During the review of the staffing plan, the video monitoring system is also reviewed to ensure coverage enhances the ability to protect inmates from sexual abuse. Review of the staffing plan and camera plan demonstrated information from the PREA allegations was used to assist in the assessment. Per the Warden, Lawrenceville Correctional Center has installed additional eight cameras and mirrors to enhance the facilities ability to protect inmates from sexual abuse during the last 12 months. The cameras are monitored and are recorded.

Standard 115.21 Evidence protocol and forensic medical examinations

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

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

GEO Policy 5.1.2-E Investigating Allegations of Sexually Abusive Behavior (PREA) and Lawrenceville Correctional Center policy 17.003 outline evidence protocols for administrative proceedings and criminal prosecutions; requirements for forensic medical exams; and when requested by the victim, a victim advocate to accompany and support the victim through the forensic examination, investigatory interviews, emotional support, crisis intervention, information, and referrals. Lawrenceville Correctional Center investigator handles all the administrative proceedings regarding PREA allegations. Criminal investigations are conducted by the Virginia Department of Corrections Special Investigative Unit. There is a uniform evidence protocol that maximizes the potential for usable physical evidence for administrative and criminal prosecutions. The protocols were reviewed and found to be in line with DoJ's National Protocol for Sexual Assault Medical Forensic Examinations. Majority of the staff interviewed were very knowledgeable of the evidence protocols, and could explain the protocol

for obtaining useable evidence when an inmate alleged sexual abuse. One of the auditors conducted interviews with Lawrenceville Correctional Center investigator, and he had a good understanding of the investigative procedures and responsibilities and evidence protocols.

GEO Policy 5.1.2-E requires all victims of sexual abuse are provided access to forensic medical examinations whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate, by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. Lawrenceville Correctional Center would send inmates needing a forensic exam to Virginia Commonwealth University Medical Center. No inmates were sent for a forensic exam in the last 12 months, no allegations resulted in penetration. Review of documentation demonstrated the victims of the nine alleged sexual abuse were offered an appointment with the Qualified Mental Health Professional.

GEO Policy 5.1.2-A requires the facility to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the facility shall make available to provide these services a qualified staff member from a community-based organization or a qualified agency staff member. Lawrenceville Correctional Center falls under the Virginia Department of Corrections MOU with Virginia Sexual and Domestic Violence Action Alliance who either provides a victim advocate or a training for facility victim advocates. Virginia Department of Corrections has trained victim advocates who are on call and available by region. The Virginia Department of Corrections victim advocates received appropriate training by Virginia Sexual and Domestic Violence Action Alliance. The Lawrenceville Correctional Center also uses these on call victim advocates accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals. Inmates can also call Virginia Sexual and Domestic Violence Action Alliance provide emotional support, crisis intervention, information, and referrals telephonically. The facility PREA posters and signs was not clear on the role of the victim advocate services and did not specifically mention that emotional support was available. That PREA poster was modified to be clearer on the role of the victim advocate services before the end of the on-site 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.

GEO Policy 5.1.2-E requires an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment, that all allegations of sexual abuse or sexual harassment are referred for investigation by the appropriate authority. Based on review of the investigative paperwork, and interview of staff and inmates; an administrative or criminal investigation was completed for all allegations of sexual abuse and sexual harassment. The auditor reviewed twenty investigations (13 closed and 7 pending) with the PREA Investigator. When criminal conduct is suspected, the Lawrenceville Correctional Center Investigator will notify the GEO Corporate Office and request assistance from the Virginia Department of Corrections, Special Investigations Unit. The Special Investigations Unit investigators have the legal authority to conduct criminal investigations. The Special Investigations Unit follow the Virginia Department of Corrections OP 038.3 Prison Rape Elimination Act (PREA) and Virginia Department of Corrections OP 030.4 Special Investigative Unit policies. The Lawrenceville Correctional Center and the Special Investigations Unit enjoy a very cooperative and professional relationship and remain informed during the entire investigation. GEO's Investigative policy is available on the GEO Web site.

The auditors reviewed 20 investigations of a sexual abuse and sexual harassment at Lawrenceville Correctional Center during the audit cycle. There were eight inmate-inmate allegations: one inmate-inmate sexual harassment unsubstantiated; one inmate-inmate sexual harassment unfounded; two inmate-inmate sexual abuse unfounded; and four inmate-inmate sexual abuses under investigation. There 12 staff-inmate allegations: two staff-inmate sexual harassment unsubstantiated; four staff-inmate sexual harassment unfounded; three staff-inmate sexual harassment under investigation; two staff-inmate sexual abuses unsubstantiated; and one staff-inmate sexual abuse unfounded.

During the corrective action period the auditor received investigative packets to include investigative summaries; notice to the victim of the findings; monitoring for retaliation; and incident reviews for two allegations that was not closed and one new case as applicable. There was one inmate-inmate sexual harassment unfounded; one staff-inmate sexual harassment substantiated; and the new case was staff-inmate

voyeurism through an anonymous report that was unfounded. The staff involved in the sexual harassment case was initially moved to a post away from inmate contact and then resigned as the investigation continued.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 addresses PREA staff training requirements. Lawrenceville Correctional Center employees receive PREA training annually through scheduled training and staff recall meetings. The PREA training curriculum was reviewed and verified that the training provided to employees is very comprehensive. Review of the lesson plan and slides demonstrated the training covered: zero-tolerance policy for sexual abuse and sexual harassment; how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; inmates' right to be free from sexual abuse and sexual harassment; the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; the dynamics of sexual abuse and sexual harassment in confinement; the common reactions of sexual abuse and sexual harassment victims; how to detect and respond to signs of threatened and actual sexual abuse; how to avoid inappropriate relationships with inmates; how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. Employees have to acknowledge they understood the training. Staff interviewed were well versed in the GEO zero tolerance policy; their responsibilities in reporting sexual abuse, sexual harassment, and staff negligence; first responder duties; and evidence preservation. Though provided training, staff consistently during interviews did not know the definition of transgender and intersex nor how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates. Corrective action plan (training) was combined with standard 115.15 and was completed in April.

Some training has been through e-learning on line and includes a test that requires a score of 70 percent to pass. The questions are not basic and test the knowledge of the staff. Employees sign an acknowledgement form that they have received and understood the training they received during pre-service training. Prior to the audit the auditor reviewed sign-in rosters with 22 staff and two staff memorandum demonstrating staff understood the PREA training provided. During the audit, the auditor randomly selected six additional training records for review, all staff members had been trained and there was documentation the staff signed stating they understood the training received.

Standard 115.32 Volunteer and contractor training

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

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

All contractors and volunteers who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 and the PREA training curriculum outline training requirements for volunteers and contractors who have contact with inmates. Prior to the audit, reviewed Virginia Department of Corrections Contractor and Volunteer PREA training material; and one contractor and two volunteer training records and memorandum stating they understood the training was provided. The PREA Pre-Questionnaire stated 25 contractors and volunteers had received the training during the last 12 months. While on-site the auditor randomly reviewed one contractor and one volunteer training records, each have signed they understand the PREA training they received. One volunteer and one contractor was interviewed. Interviews of the contractor and volunteer demonstrated their knowledge of PREA, their responsibilities and the agency zero tolerance policy.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires that all inmates receive PREA information upon arrival and PREA education within 30 days of intake (within 10 days by institutional policy). During intake inmates are provided information through a Virginia Department of Corrections PREA handout and Lawrenceville Correctional Center inmate rule book (both available in English and Spanish) that explains the both agencies zero tolerance policy regarding sexual abuse and sexual harassment; and how to report such incidents while at Lawrenceville Correctional Center. Additionally, the staff covers basic PREA information verbally and the inmates watch the "What you need to know" video developed by JDI in 2014. The 16-minute inmate education video reinforces PREA information provided. During institution orientation (within 30 days of arrival) they receive additional training which expands on the previous information provided, and they watch the "What you need to know" video again. Most inmates receive the comprehensive education within ten days. Inmates acknowledge receiving the PREA information in writing. Posters and inmate handbooks are provided to inmates or posted in the housing units in formats accessible to all inmates to ensure that key information is continuously and readily available or visible to inmates. Information on the posters and in the handbook include: inmate rights; how to report; what to expect after you report; and how to protect yourself against sexual assault. GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires information be provided 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.

During the tour and interviews most inmates acknowledged the information being provided upon arrival and orientation, and posters displayed throughout the institution. The video is also played on the "green channel" throughout each day. The inmates interviewed definitely knew the zero tolerance policy; how and who to report to; and that they have the right to be free from retaliation for reporting such incidents. Prior to the audit, the auditor reviewed five examples of an inmate documenting training; and randomly reviewed five additional inmate records onsite which demonstrated inmates received PREA information upon arrival, training within 30 days of arrival, and acknowledged through signature they have received and understood the training.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires the facility investigator receives specialized training in addition to the general education provided to all employees. GEO PREA Coordinator attended the Moss Group “Train the Trainers Specialized Training; Investigating Sexual Abuse in Corrections Setting” sponsored by the PREA Resource Center. She then tailored the program for GEO investigators and is the instructor for all GEO investigator training. The auditor reviewed the specialized training for investigators, and it covered all requirements of the standard to include: techniques for interviewing sexual abuse victims; proper use of Miranda and Garrity warnings; sexual abuse evidence collection in confinement settings; and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Four Lawrenceville Correctional Center investigators have been trained between 2013 and 2015. The agency maintains documentation that the investigator has received both the general and investigative PREA training. All current investigators are trained. The lesson plans, slides and sign in sheets were reviewed and interview of the investigator demonstrated good understanding of how to conduct a sexual abuse investigation in a confinement setting.

The auditors previous interview of investigators from Virginia Department of Corrections Special Investigations Unit and verified their knowledge of conducting investigations. All Special Investigations Unit agents received the specialized training in January 2013 by the Moss Group. All new Special Investigations Unit agents are required to complete Virginia Department of Corrections Investigator School which includes the PREA specialized training and the NIC Specialized Training for investigators.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 outlines the training required for medical and mental health practitioners to include how to detect and assess signs of sexual abuse and harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of sexual abuse and harassment. GEO has developed a very comprehensive training for its medical and mental health practitioners which the auditor reviewed. The auditor was provided training records demonstrating three medical and mental health staff had received specialized medical and mental health training in 2015, and annual basic PREA training each year of employment since 2012. The auditor checked three additional training records of medical staff on site in addition to what was provided with the questionnaire; all had received PREA training since 2012 (one also in 2011) and medical PREA training in 2015. Interviews of medical and mental health staff demonstrated they understood: how to detect and assess signs of sexual abuse and sexual harassment; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment. GEO requires medical and mental health staff to pass a test. Medical staff knowledge of PREA in general and specifically related to medical as related to the interviews was one of the best of over 30 audits the lead auditor has done. Medical staff does not conduct forensic medical examinations.

Standard 115.41 Screening for risk of victimization and abusiveness

- Exceeds Standard (substantially exceeds requirement of standard)

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

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

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires Lawrenceville Correctional Center to: conduct a screening for risks of sexual victimization and abusiveness within 24 hours of arrival; a follow-up screening for risks of sexual victimization and abusiveness within a set time period, not to exceed 30 days from the inmate's arrival at the facility; and reassesses inmate's risk level again when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. Lawrenceville Correctional Center uses the Virginia Department of Corrections electronic screening program for the initial screen and the GEO reassessment screens for the follow-up screening. The auditor reviewed three inmate screening forms (initial screen and follow-up screen) prior to the audit. On site the auditor randomly selected ten inmates and reviewed their initial and reassessments within 30 days screening forms. The auditor had two staff who conduct the screens perform the screen of the auditor to demonstrate the process of filling out the screening form. The process was done very professionally. All the criteria referenced in the standard are on the form and inmates are asked all of the questions required to be asked of the inmate except whether the inmate has a physical disability. The screen also requires the screener to make his/her own assessment of whether the inmate is gender non-conforming. The screening instrument is objective in determining if the inmate is at risk for victimization or abusiveness.

Virginia Department of Corrections, GEO and the auditors discussed the initial screen not asking the inmate if they had a physical disability. Virginia Department of Corrections felt that since the inmate gets a physical, it met the standard. The auditor contacted the PREA Resource Center who confirmed it must be asked, especially if the physical is not done within 72 hours. It was determined they must ask the inmate if they had a physical disability and a corrective action plan was created. There was a discussion of using the GEO initial screening form, but it was determined the Virginia Department of Corrections system would be modified and used. The corrective action plan was for the initial screening process include asking the inmate if he had a physical disability and annotate asking the question and response in the system. Lawrenceville Correctional Center was then required to provide examples over a two month period of the initial and follow-up screen on inmates. In April, Lawrenceville Correctional Center provided copies of the new initial assessment protocols; revised Lawrenceville Correctional Center policy 17.003 with the new protocols; training of staff on the new protocols; and three initial assessments using the new system all demonstrating the medical disabilities being addressed. The auditor then requested the facility continue the process and provide ten more examples from April, May and early June. In June the auditor reviewed ten additional initial and follow-up assessments as requested, all meeting the standard.

All inmates are assessed during intake screening for their risks of being sexually abused by other inmates or sexually abusive towards other inmates. Staff interviews confirmed appropriate controls have been implemented to ensure that sensitive information is not released and exploited by staff or other inmates. The screening instrument was restricted to staff making housing, work and program assignments. Inmates are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked. During inmate interviews, all inmates who arrived within the last 12 months remembers receiving the initial screen upon arrival, some remember a second screen.

The GEO policy states that inmates will not be disciplined for refusing to answer or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d) (7), (d) (8), or(d) (9) of the standard.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 outlines the use of the screening form to include: using the information from the risk screening to determine housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive; and making individualized determinations about how to ensure the safety of each inmate. GEO policy 5.1.2-A states the agency shall consider on a case-by-case basis whether to assign a transgender or intersex inmate to an institution for male or female inmates, housing and programming assignments, based on the inmate's health and safety, inmate's own views with respect to his or her own safety, and whether the placement would present management or security problems; reviewing twice a year placement and programming assignments for each transgender or intersex inmate to review any threats to safety experienced by the inmate; allowing transgender and intersex inmates the opportunity to shower separately from other inmates; and not placing lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated institution, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

Through a review of screening forms, housing and program decisions, inmate and staff interviews, it was determined Lawrenceville Correctional Center uses the screening information to determine housing, bed, work, education, and program assignment with the goal of keeping inmates at high risk of being sexually victimized separate from those at high risk of being sexually abusive. The decisions are made on a case-by-case basis using information from the screen, assigned PREA classification, and good correctional judgment. The process is clearly defined in the policies and implemented in the use of PREA and classification forms. Additionally, the screening form is computerized and automatically provides flags when an inmate is programmed for a cell and cell mate that is not compatible.

There were inmates who were transgender and gay and they acknowledged they were treated with respect and were not housed in dedicated housing area. GEO, Virginia Department of Corrections, Lawrenceville Correctional Center do not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status. Transgender or intersex inmate's own views with respect to his or her own safety are given serious consideration when making housing, programs and other decisions; and transgender and intersex inmates are given the opportunity to shower separately from other inmates. Transgender inmates interviewed stated they were given an opportunity to shower separately from other inmates but elected not to. Reviewed one transgender screening packet.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 states inmates at high risks for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers; if placed in segregated housing involuntarily they shall have access to programs, privileges, education, and work opportunities to the extent possible; that the facility shall document any access to programs, privileges, education, or work opportunities that was restricted, duration of restriction and why; and that every 30 days, the facility shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population. Interviews of the Warden, PREA Compliance Manager, and segregation staff verified inmates at high risk of sexual victimization would not be placed in involuntary segregation unless other measures have been assessed. Other measures included moving housing areas or facilities. It was confirmed through Pre Audit Questionnaire; investigative paperwork; and during interviews with the Warden, staff who supervise segregated inmates, and inmates; that no inmates at high risk for sexual victimization had been placed in involuntary segregated housing during the past 12 months prior to the audit. GEO documents any review of alternatives using a form that addresses possible alternatives reviewed prior to placing inmates at high risks for sexual victimization shall not be placed in involuntary segregated housing.

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.

Lawrenceville Correctional Center inmate handbook, PREA handouts, and posters throughout the facility provide specific internal and external ways for inmates to report sexual abuse, sexual harassment and retaliation by other inmates or staff for reporting sexual abuse and sexual harassment. Interviews of inmates and staff verified they knew of the multiple internal and external ways to report incidents of abuse or harassment, and retaliation. Inmates can report verbally and in writing to staff; through a 24 hour toll free PREA hotline to Virginia Department of Corrections; using the grievance system; and through a third party. Virginia Department of Corrections has a MOU with Virginia Sexual and Domestic Violence Action Alliance that allows inmates to contact as a public or private outside agency 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 auditor called the PREA hotline to Virginia Department of Corrections. Within an hour Virginia Department of Corrections emailed the information the auditor provided to be reported. Additionally, inmates' family members/friends can contact the GEO by phone or the Virginia Department of Corrections hotline by phone or website.

GEO Employees reporting Sexual Abuse or Sexual Harassment may report such information to the Chief of Security or facility management privately if requested. They may also report Sexual Abuse or Sexual Harassment directly to the Employee Hotline, which is an independent, professional service, available 24 hours per day, 7 days a week on the Internet at www.reportlineweb.com/geogroup or at the toll free phone number (866) 568-5425. Employees may also contact the Corporate PREA Director directly at (561) 999-5827.

During interviews most inmates stated they felt comfortable at Lawrenceville Correctional Center reporting sexual abuse and harassment. Examples of inmate reporting through different means were reviewed when investigative cases were reviewed. Staff accepts reports made verbally, in writing, anonymously, and from third parties, and are promptly documented any verbal reports.

No one is detained solely for civil immigration purposes.

Standard 115.52 Exhaustion of administrative remedies

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

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

GEO policy 5.1.2-A, Lawrenceville Correctional Center policy 12.006 Grievance Procedures, and Virginia Department of Corrections OP 866.1 Grievance Procedures covers the use of administrative remedies/grievances. All requirements of the standards to include timelines, who the grievances can be provided to, and emergency grievances were covered. Prior to the audit, the facility provided a PREA grievance

for sexual harassment. Though not abuse as required by the standard, it was reviewed and found to be in compliance with the standard. On site reviewed two PREA grievances for sexual abuse, final decisions were made within 90 days. There were no emergency grievances and one inmate was disciplined for filing a grievance related to a sexual abuse in bad faith.

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.

GEO policy 5.1.2-A, and Virginia Department of Corrections OP 038.3 states inmates shall be provided access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations; and the facilities shall enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. Lawrenceville Correctional Center falls under the Virginia Department of Corrections MOU with Virginia Sexual and Domestic Violence Action Alliance who provides a victim access to outside confidential support services. Phone numbers and mailing addresses are provided to the inmate on the Virginia Department of Corrections PREA fliers provided to the inmate. Inmate interviews identified some inmates did not know of the confidential support services provided. Lawrenceville Correctional Center immediately posted additional fliers with the information during the 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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 establishes a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate. GEO and Virginia Department of Corrections websites outlines GEO and Virginia Department of Corrections methods to receive third party reports of sexual abuse and sexual harassment. GEO website provides a number and mailing address. The Virginia Department of Corrections Website provides a phone number, email address, and a form you can mail in to report sexual abuse or sexual harassment. Pamphlets at the facility provides the inmates the same information. Discussion with inmates demonstrated they knew how third party reporting could be accomplished.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 require all staff to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment; and for staff not to reveal any information related to a sexual abuse report to anyone other than extent necessary. Lawrenceville Correctional Center policy 17.003 does not address juveniles for Lawrenceville Correctional Center does not confine juveniles, Virginia Department of Corrections has designated facilities to house juveniles. Health practitioners are required to report sexual abuse and to inform inmates of the practitioner’s duty to report, and the limitations of confidentiality, at the initiation of services. Health practitioners during interviews stated they are required and would report sexual abuse. Review of investigative files; and interviews of staff and inmates verified staff immediately report to the facility’s designated investigator any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment; and that staff does not reveal information related to a sexual abuse report other than to people authorize to discuss the report. Interviews with inmates and staff did not reveal any incident of sexual abuse or harassment not reported to the facility’s designated investigator.

Standard 115.62 Agency protection duties

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

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

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires staff to take immediate action to protect any inmate they learn is subject to substantial risk-. Interviews with staff demonstrate they know the steps to take to protect an inmate subject to risk of imminent sexual abuse. Security staff immediately employs protection measures as the information is passed to the Investigator, PREA Compliance Manager and Warden. Per the Pre-Audit questionnaire and interview with the PREA Compliance Manager and Warden, no inmate has reported substantial risk of imminent sexual abuse.

Standard 115.63 Reporting to other confinement facilities

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance

determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires when an allegation that an inmate was sexually abused while confined at another institution, the Warden that received the allegation shall notify the Warden where the alleged abuse occurred within 72 hours after receiving the allegation; that all sexual abuse allegations reported by another institution regarding any inmate that was confined at the Lawrenceville Correctional Center be fully investigated. Interviews with the Warden, PREA Compliance Manager, and investigator confirmed their knowledge of the policies and responsibilities to report any allegations and investigate any allegations that may have occurred at Lawrenceville Correctional Center. The Warden would call first and then follow up with an email to document providing the information. No inmate reported abuse to Lawrenceville Correctional Center staff while confined at another institution. There was one report of a sexual abuse allegation at Lawrenceville Correctional Center by an inmate at another institution in the last 12 months. The auditor reviewed the case. The Virginia Department of Corrections PREA Regional Coordinator notified the Lawrenceville Correctional Center PREA Compliance Manager that an inmate at another Department of Corrections facility reported he had a sexual relationship with one of the correctional officers who may no longer be working there. The case was investigated by the Virginia Department of Corrections Special Investigative Unit. The case was unsubstantiated and the Lawrenceville Correctional Center Warden contacted by email the facility the inmate was at to ensure the inmate was given the notice of the result of the case.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 outlines procedures to respond to an allegation of sexual abuse for both security and non-security staff. There is a GEO/Lawrenceville Correctional Center Incident Checklists to be used when responding to sexual abuse or sexual harassment. Random interviews with security and non-security staff confirmed both security and non-security staff knew what to do upon learning an inmate was sexually abused to include separating the alleged victim and abuser; how to preserve the crime scene; and what actions inmates should not take in order not to destroy physical evidence. Good training has prepared the staff to properly respond. Lawrenceville Correctional Center uses 96 hours from when the abuse occurred to do a forensic exam. No forensic exam occurred during the audit cycle.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires Lawrenceville Correctional Center to develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Lawrenceville Correctional Center Response Plan was updated in 2015. Interviews with staff (first responders, medical and mental health practitioners, investigators, and institution leadership), and review of the Sexual Abuse Incident Checklists, investigative and medical files confirmed staff were knowledgeable about the PREA plan and the coordinated duties and collaborative responsibilities.

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

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

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

GEO Policy 5.1.2.-A addresses collective bargaining units and says in every case remove alleged staff sexual abusers from contact with inmates pending the outcome of an investigation. Lawrenceville Correctional Center has no collective bargaining agreement. Virginia does not allow unions or collective bargaining. Review of investigations demonstrate that Lawrenceville Correctional Center will separate the victim from the accused staff member usually by placing the staff member in a position where there would be no contact. In nine cases the staff involved in the sexual harassment case was initially moved to a post away from the inmate, usually non-housing unit post, so there would be no contact with the inmate.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 require a staff member be designated to monitor for retaliation against staff or inmates who reported or had been sexually abused or harassed; provided multiple protection measures for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations; monitoring the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff; and conducting periodic status checks through interviews at least every 30 days. Monitoring will occur for at least 90 days following the report of the allegation and may go beyond the 90 days if the monitoring indicates a continuing need. Lawrenceville Correctional Center has designated its PREA Compliance Manager responsible for monitoring retaliation of inmates, no one was designated for monitoring staff, nor had anyone been monitoring the staff. Prior to the audit, Lawrenceville Correctional Center provided two examples of monitoring of the inmates. There is a monitoring log form that is used to monitor inmate from retaliation. Interviews of the Warden, PREA Compliance Manager, and inmates demonstrated monitoring of inmates was being

conducted. Lawrenceville Correctional Center uses multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. For at least 90 days following a report of sexual abuse, Lawrenceville Correctional Center monitors the conduct and treatment of inmates who reported the sexual abuse; and of inmates who were reported to have suffered sexual abuse.

Lawrenceville Correctional Center reported an inmate alleged verbal retaliation by staff had occurred in his case which they investigated and decided it was not happening.

The corrective action plan for monitoring staff for retaliation was to designate someone to monitor retaliation of staff, develop a form to document monitoring retaliation of staff; and then provide documentation that staff was being monitored. In April was provided copy of new GEO Employee Retaliation Log created in February 2016. Auditor also reviewed retaliation monitoring of a staff member who reported a PREA incident, retaliation was done monthly over a three month period. The form included instructions to ensure all monitoring requirements were accomplished. This standard is now meet standard.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 states involuntary segregated housing for inmates who have alleged to have suffered sexual abuse may be used only after an assessment of all available housing alternatives has shown there are no other means of protecting the inmate; and use of protective custody to protect alleged victim is only used as a last resort for a very short time. If placed in segregated housing involuntarily they shall have access to programs, privileges, education, and work opportunities to the extent possible; and that the institution shall document any access to programs, privileges, education, or work opportunities that was restricted and that every 30 days, the institution shall afford each such inmate a review to determine whether there is a continuing need for separation from the general population. There were no inmates who have alleged to have suffered sexual abuse in protective custody during the audit. Interviews of the Warden, PREA Compliance Manager, staff and inmates, there were no instances of using segregation housing to protect inmates who had alleged to have been sexually abused in the last 12 months. They also stated alternate protective measures would be used in lieu of protective custody and if they had to place an inmate in segregated housing involuntarily they would have access to programs, privileges, education, and work opportunities to the maximum extent possible.

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 on review of GEO policy 5.1.2-E and Lawrenceville Correctional Center policy 17.003; the 20 PREA investigations reviewed; interviews of Lawrenceville Correctional Center Warden, PREA Compliance Manager; and investigator it was determined an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Lawrenceville Correctional Center conducts its investigations using uniform evidence protocols. Lawrenceville Correctional Center investigator starts all investigations and conducts administrative investigations. When criminal conduct is suspected, the Lawrenceville Correctional Center investigator will notify the GEO Corporate Office and request assistance from the Virginia Department of Corrections, Special Investigations Unit. The Special Investigations Unit Investigators have the legal authority to conduct criminal investigations. The Lawrenceville Correctional Center and the Special Investigations Unit enjoy a very cooperative and professional relationship and remain informed during the entire investigation. GEO's Investigative policy is available on the company's Web site.

The auditor reviewed twenty investigations (13 closed and 7 pending) with the PREA Investigator. In reviewing the 20 investigations with the Lawrenceville PREA Investigator, the auditor found that some of the earliest investigations were not always completed "promptly," but since the current PREA Investigator has taken on this responsibility the investigations have been completed promptly, thoroughly, and objectively.

The PREA Investigator has received the GEO specialized training for PREA investigators. This is a very extensive training program.

The investigator stated that he collects the appropriate direct and circumstantial evidence, reviews the video tapes, interviews the alleged victim, suspected perpetrators, and witnesses. He also reviews prior complaints and reports of sexual abuse involving the suspected perpetrator. All investigations are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

The Investigator stated he does not conduct compelled interviews without consulting the Commonwealth Attorney. The Investigator also stated that the credibility of the victim, suspect, or witness is always assessed on an individual basis. Polygraphs are not used in PREA investigations.

When conducting administrative investigations, the Investigator always makes a determination whether staff actions or failures to act contributed to the abuse. The auditor read, in detail, several of the investigation reports and found them to include a description of the incident, the evidence collected, and summaries of interviews.

Substantiated allegations of conduct that appears to be criminal are referred by the SIU to the Commonwealth Attorney for prosecution.

Investigations are not ended because the victim or the abuser is no longer under the custody of the agency. This would also be the case if the alleged abuser was a staff member and resigned from the facility; the investigation would go in until its conclusion. This was demonstrated in one of the cases that was done following the audit and provided to the auditors to review as a corrective action plan for another standard. GEO policy and procedures state that PREA investigation files will retain all written PREA reports for ten years.

During the corrective action period the auditor received investigative packets to include investigative summaries; notice to the victim of the findings; monitoring for retaliation; and incident reviews for two allegations that was not closed and one new case as applicable. There was one inmate-inmate sexual harassment unfounded; one staff-inmate sexual harassment substantiated; and the new case was staff-inmate voyeurism through an anonymous report that was unfounded. The staff involved in the sexual harassment case was initially moved to a post away from inmate contact and then resigned as the investigation continued.

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.

A review of GEO policy 5.1.2-E and Lawrenceville Correctional Center policy 17.003 and investigations; and interviews with the investigator and administrative staff confirm the Lawrenceville Correctional Center has no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. When the investigator was asked what standard of evidence was used in determining if an allegation is substantiated, the agencies policy was recited confirming compliance with the standard.

Standard 115.73 Reporting to inmates

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

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

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires facilities to inform the inmate as to whether the allegation of sexual abuse has been determined to be substantiated, unsubstantiated, or unfounded; if investigated by an outside agency, request the outside investigative agency inform the inmate as to whether the allegation of sexual abuse has been determined to be substantiated, unsubstantiated, or unfounded; if the allegation is against a staff member, the facility shall inform the inmate whenever the staff member is no longer posted within the inmate's unit, no longer employed at the institution, has been indicted on a charge related to sexual abuse within the institution, or has been convicted on a charge related to sexual abuse within the institution; if the inmate allegation is against an inmate be whenever the alleged abuser has been indicted on a charge related to sexual abuse within the institution, or has been convicted on a charge related to sexual abuse within the institution; and that all notifications will be documented.

Prior to the audit, Lawrenceville Correctional Center provided copies of three notifications to the inmates. All notifications are done using the GEO notification form. During the audit, the auditor determined in allegations of sexual abuse inmates were not consistently informed in writing of the outcome of the investigations whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded; if the case had been referred for prosecution; if the abuser had been indicted; and if the staff member no longer worked at the institution till about four months prior to the audit. A corrective action plan was developed for Lawrenceville Correctional Center to do notifications on existing and future cases during the corrective action period. During the corrective action period the auditor received investigative packets to include investigative summaries; notice to the victim of the findings; monitoring for retaliation; and incident reviews for two allegations that was not closed and one new case as applicable. There was one inmate-inmate sexual harassment unfounded; one staff-inmate sexual harassment substantiated; and the new case was staff-inmate voyeurism through an anonymous report that was unfounded. The facility provided notifications as required in all three cases.

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.

Per GEO policy 5.1.2-E and Lawrenceville Correctional Center policy 17.003, GEO employee handbook, and interviews with staff: staff are subject to disciplinary sanctions for violating agency sexual abuse or sexual harassment policies; termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse; and disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. No staff have been terminated or disciplined during this audit period. In the only founded case the staff member resigned before the investigation into sexual harassment was completed.

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.

GEO policy 5.1.2-E and Lawrenceville Correctional Center policy 17.003 prohibit contractors or volunteers who engaged in sexual abuse to have contact with inmates and requires they be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. The Warden reported that there have been no allegations of sexual abuse by contractors or volunteers. Interviews with contractors and volunteers confirmed they knew the punishment for engaging in sexual abuse or sexual harassment of inmates or staff.

Standard 115.78 Disciplinary sanctions for inmates

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

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

Per review GEO policy 5.1.2-E, Lawrenceville Correctional Center policy 17.003, Virginia Department of Corrections OP 861.1 Inmate Discipline Institutions, and interviews with Lawrenceville Correctional Center staff, inmates are subject to disciplinary sanctions following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse; sanctions 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; and considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior. In the past 12 months there have been no disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. There were no inmate substantiated findings for sexual abuse or sexual harassment. Virginia Department of Corrections prohibit all sexual activity between inmates and discipline inmates for such activity. There one false reporting charge and conviction during the audit period.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires all new inmates receive a PREA screen upon arrival, along with a medical and mental health screen. If any of these identify someone as having experienced prior sexual victimization or previously perpetrated sexual abuse, whether in a prison/jail setting or in the community, they will be offered a medical and mental health follow-up meeting within 14 days. Prior to the audit, the audit reviewed four referrals (two who reported prior sexual victimization and two who previously perpetrated sexual abuse) within 14 days of the PREA screen. During the audit, through the review of additional PREA screens and medical and mental health records, it was determined inmates who reported prior sexual victimization or previously perpetrated sexual abuse were offered consults with medical and mental health practitioners within 14 days of the screen. Interviews of medical and mental health staff confirmed follow-up meetings would be scheduled and conducted. Interviews of inmates confirmed follow-up meetings were scheduled and conducted. Interviews of medical and mental health staff confirmed any information related to sexual victimization or abusiveness that occurred in the institution is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments. Interview of two inmates who previously experienced prior sexual victimization reported they were offered medical and mental health consultation; one refused because the event occurred seven to eight years ago; the other inmate was being seen by mental health staff.

Standard 115.82 Access to emergency medical and mental health services

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

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

Per GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003, inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment; inmate victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate; and qualified medical practitioners are on duty 24 hours. Upon returning from the hospital a registered nurse evaluates and documents the inmate's health status, and refers mental health services. The inmate is prioritized for sick call and if the emergency room complete testing sexually transmitted diseases, testing is done at the facility. Per GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires inmate victims of sexual abuse shall receive timely, unimpeded access to outside emergency medical exams without financial costs. The services at no costs are provided regardless of whether

the victim names the abuser or cooperates with any investigation arising out of the incident. Forensic exams are done for up to 96 hours since the time of the incident. Interviews of staff inmate victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Alleged sexual assaults were sent to medical, there has been no inmates sent for forensic exams and other emergency medical treatment.

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 review of GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003; and interviews with staff and inmates; and medical and mental health documentation demonstrate Lawrenceville Correctional Center offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse. Lawrenceville Correctional Center provides victims with medical and mental health services consistent with the community level of care. Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. Treatment is at no costs to the inmates and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Mental health evaluations are conducted on all known inmate on inmate abusers within 60 days of learning such abuse.

Standards 115.83 (d) and (e) are non-applicable as Lawrenceville Correctional Center is a male only facility.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 identifies the minimum members of the review team, and covers the process for sexual abuse incident reviews to include a form the review team uses that addresses whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the institution; whether physical barriers in the area may enable abuse; the adequacy of staffing levels in that area during different shifts; and whether monitoring technology should be deployed or augmented to supplement supervision by staff. The auditor reviewed two incident reviews prior to the audit, two during the audit, and three following the audit. The incident review was thorough in determining causes and better policies and practices to better prevent, detect, or respond to sexual abuse. All elements of the standard are reviewed. GEO has an excellent PREA after action review form that addresses all

elements of the standard. The PREA Coordinator may be and has been consulted as part of the incident reviews. Incident review team members were interviewed and were very knowledgeable of the process.

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.

GEO policy 5.1.2-A and Lawrenceville Correctional Center policy 17.003 requires the collection of uniform data that provides the minimum data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. The agency collects accurate uniform data for every allegation of sexual abuse at facilities under its control using a standardized instrument. GEO collects accurate uniform data for every allegation of sexual abuse at facilities under its control using standardized instruments. GEO facilities provide monthly reports and PREA surveys to GEO headquarters. A monthly PREA Incident Tracking log is used to collect and provide the GEO PREA Coordinator data on sexual abuse and harassment incidents. The same data is also provided to the Virginia Department of Corrections for counting data of private facilities. Per conversation with GEO staff the data is aggregated. Upon request from DoJ, GEO provides the data. The auditor reviewed the Lawrenceville Correctional Center monthly PREA tracking log, Lawrenceville Correctional Center PREA report, GEO 2014 annual PREA report, and the Virginia Department of Corrections BJS Census Survey. Review of previous DoJ Survey of Sexual Violence reports, annual agency PREA reports, and data submitted by the institution demonstrated the agency collects uniform data to be used by GEO and Virginia Department of Corrections.

GEO does not contract its inmates to other facilities (115. 87 (e)).

Standard 115.88 Data review for corrective action

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

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

GEO Policy 5.1.2-A requires GEO to review the data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies; and to identify problem areas and take corrective actions. It is then provided to the agency contracted with, who produces an annual report with comparisons from previous years and corrective actions, and posted on that agency website. The GEO annual report is very comprehensive in scope, provides data, an assessment of its PREA program and areas of focus, and includes the agency's progress in meeting the PREA Standards. The GEO home page has a PREA link to its PREA page that lists its PREA related policies, reporting information, and the GEO annual report. The auditor previously reviewed the GEO 2013 and 2014 PREA annual reports. The GEO PREA annual report is a very good report with comparison of current and previous year data; and an assessment GEO's effectiveness of its sexual abuse prevention, detection, and response policies and actions to eliminate sexual abuse and sexual harassment.

The GEO website PREA tab is easy to find, and is very informative. Note, during the report writing period, the GEO 2015 annual report was posted on the website; reviewed by the auditor and determined GEO continues to publish one of the better annual reports the audit team has reviewed.

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.

Review of GEO policy 5.1.2-A, website, storage of documents at the facility, and interviews of staff it is determined data is properly stored, maintained and secured. Access to data is controlled. Aggregate data on all its facilities is available to the public through its website. All GEO institution data is in the annual report and posted on the website, only the last report is posted. GEO maintains sexual abuse data collected pursuant to §115.87 for at least 10 years after the date of the initial collection in accordance with the GEO Retention Records Schedule. Before making aggregated sexual abuse data publicly available, GEO removes all personal identifiers.

AUDITOR CERTIFICATION

I certify that:

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


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5 OCT 2016
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Auditor Signature

Date