

PREA AUDIT REPORT Interim Final
ADULT PRISONS & JAILS

Date of report: July 31, 2016

Auditor Information			
Auditor name: Robert Lanier			
Address: P.O. Box 142, Blackshear, GA 31516			
Email: rob@diversifiedcorrectionalservices.com			
Telephone number: 912-281-1525			
Date of facility visit: July 11, 2016			
Facility Information			
Facility name: Effingham County Prison			
Facility physical address: 321 Hwy 119 South, Springfield, GA 31329			
Facility mailing address: <i>(if different from above)</i> P.O. Box 235, Springfield, GA 31329			
Facility telephone number: 912-754-2108			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input checked="" type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input 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: Victor Walker, Warden			
Number of staff assigned to the facility in the last 12 months: 32			
Designed facility capacity: 32			
Current population of facility: 192			
Facility security levels/inmate custody levels: Medium & Minimum			
Age range of the population: 18-58			
Name of PREA Compliance Manager: Mrs. Janet M. Robere		Title: Senior Counselor	
Email address: jrobere@effinghamcounty.org		Telephone number: 912-754-2108 x7007	
Agency Information			
Name of agency: Effingham County Board of Commissioners			
Governing authority or parent agency: <i>(if applicable)</i> Click here to enter text.			
Physical address: 601 N. Laurel Street, Springfield, GA 31329			
Mailing address: <i>(if different from above)</i> Click here to enter text.			
Telephone number: 912-754-2123			
Agency Chief Executive Officer			
Name: Toss Allen		Title: County Administrator	
Email address: TAllen@effinghamcounty.org		Telephone number: 912-754-2111	
Agency-Wide PREA Coordinator			
Name: Sharon Shaver		Title: State Administrator PREA	
Email address: Sharon.Shaver@gdc.ga.gov		Telephone number: 678-628-3128	

AUDIT FINDINGS

NARRATIVE

The audit of the Effingham County Prison was conducted on Monday, July 11, 2016. Six weeks prior to the PREA Audit the Auditor provided a Notice of PREA Audit to be posted throughout the facility, accessible to staff, visitors, contractors and inmates. The Facility provided photos to confirm that these were posted. The PREA Compliance Manager provided policies and procedures and additional documentation to support compliance. The auditor reviewed the information contained on the flash drive and requested additional documentation to clarify and issues or concerns. The PREA Compliance Manager of Effingham County Prison was attentive and responsive to all requests and provided information as requested.

The auditor arrived at the facility at 5:30AM, by prior agreement, to enable the auditor to interview staff from the overnight shift prior to their departure. The auditor was met by the shift supervisor and, following introductions, began interviews with randomly selected staff.

At approximately 8:00AM the PREA Compliance Manager arrived and discussed the audit process and logistics for conducting the audit, with the auditor. The Warden arrived and the PREA Compliance Manager and PREA Auditor met briefly with the Warden for introductions. The Warden pledged his support for PREA and for the process.

The tour was delayed to enable the auditor to continue interview

The entrance into the facility is controlled by a central control room staffed by a correctional officer. The administration area houses offices for the Warden, Deputy Warden, Human Resources Manager, Receptionist and a conference room. Cameras were observed in the administrative area providing coverage down the main administration hall.

This facility is well designed with three open bay dorms, each capable of housing 64 inmates each. Huge windows covering the width of each dorm enable complete viewing of the dorm area. At the rear of each housing unit is the toilet and showering area. Half walls provide a measure of privacy and limit viewing while using the restroom and showering. All three dorms, the kitchen/dining area and multipurpose room are strategically located around the control room. They too have large windows.

The main control room, housing equipment and items commonly associated with control rooms. The control room is centrally located and has wrap around windows enabling the control room staff to monitor all of the dorms, most of the kitchen and dining area and the multipurpose room. Control room staff also monitor the video cameras that were strategically located throughout the facility.

Blind spots are minimal. Several solid doors out of view of the cameras were observed. These were essentially storage closets. Although keys are restricted it was recommended that signs restricting access was recommended. Another blind in a right angle wall spot was observed in the kitchen. It was recommended that a mirror be considered and in the absence of a mirror or camera, increased surveillance by staff and especially during unannounced rounds. The auditor also recommended that staff performing unannounced rounds ensure they are opening storage closets and/or any areas outside of camera view where staff or inmates could be involved in any form of sexual activity.

The segregation unit consists of wet cells. The shower in this unit has a stall preventing viewing but there is a gate serving as the secure enclosure to prevent the segregated inmates from leaving the showers at will. Staff working in the unit have full view of the inmate if they walk to the end of the unit hall. The PREA Compliance Manager, Shift Supervisor and Warden agreed to install some sort a "privacy PREA curtain" to afford a measure of privacy.

Video cameras were observed in virtually all areas of the facility. Staff related that the administrative lieutenant viewed random videos from his office as another measure of supervision.

DESCRIPTION OF FACILITY CHARACTERISTICS

The mission of Effingham County Prison is to provide safe and secure prisoner housing primarily for state inmates under contract with the Georgia Department of Corrections, and for a limited number of county inmates; to provide an inmate labor force working daily for county departments including public works, solid waste, recreation and facilities management, and for other agencies on request.

This facility is used as a work camp primarily for state prisoners. Additional costs for these inmates are allocated through other budget divisions where correctional officers supervise their work. Therefore, this budget division principally reflects the costs for basic housing, in-house supervision and facility care. However, the camp does place additional focus on anti- recidivist behavior. These activities include the transport of prisoners, substance abusers and mental patients to and from medical care facilities. Such transport is mandated by the criminal justice system, as is the cost of inmate medical care. According to an internal inmate labor study, like the county jail, there are also increasing cost impacts related to inmate medical care.

It is our duty to protect the citizens of this County and the State of Georgia, while providing a safe and secure environment for staff and inmates. We accomplish this with a dedicated team of professionals who supervise inmates in the most effective manner possible. The Staff at Effingham County Prison has developed core values that we believe in and will abide by and they are as follows: Integrity First; Service before Self; and Excellence in all we do.

SUMMARY OF AUDIT FINDINGS

The auditor's approach to the PREA auditing process included reviewing all applicable Georgia Department of Corrections Policies, Effingham County Prison Policies and supporting information from the flash drive to become familiar with agency policy and local policies and practices. Where additional documentation was needed, it was requested and provided. Additionally, the process included interviewing both staff and inmates to verify Effingham County Prison's practices as well as staff and inmate's knowledge of PREA. The auditor also included an interview with staff at the Statesboro Sexual Assault Center where forensic examiners conduct forensic exams.

Ten randomly selected staff and specialized staff, including the Warden, Deputy Warden, Nurse, Staff responsible for intake and screening for victimization, staff who conduct unannounced rounds, staff who supervise segregation, staff responsible for monitoring retaliation and staff who serve on the incident review team and a staff person from the Statesboro Sexual Assault Center. The Nurse was also a contracted staff.

Ten (10) inmates representing all of the living units at the facility were also interviewed. There were no inmates who identified as gay, bisexual or transgender and none had reported prior victimization. Additional documents and supporting information was reviewed. Finally, observations during the tour of the facility and during the entire auditing process were made to assess such things as cross gender viewing, locations of cameras and mirrors and blind spots, phones, showers, PREA Posters, access to grievances and cross gender staff announcements

The auditor, in deciding on ratings for each standard, read the standard again and applied the standard as written.

Forty-three standards were reviewed and 43 were determined to "meet" the standard.

Number of standards exceeded: 0

Number of standards met: 43

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.

Summary:

On arrival at the facility a sign was observed prominently posted at the entrance to the facility in plain view of staff, visitors, contractors and volunteers. The sign was alerting anyone walking through those doors that this facility has a zero tolerance for any form of sexual misconduct or sexual harassment.

The State of Georgia Department of Corrections (DOC) Policy 208.06, Sexual Abusive Behavior Prevention and Intervention Program, and the Effingham County on (ECP) PREA Policy, requires a Zero Tolerance for all forms of sexual abuse and sexual harassment. The Effingham County Prison PREA Policy goes on to state that this zero tolerance includes not only any sexual abuse or sexual misconduct or sexual harassment within the prison but also at businesses and in the community where work details are assigned or operated. It also describes the agency's response to preventing, detecting, responding to and reporting all allegations of sexual abuse or sexual harassment. PREA definitions were provided in the reviewed documentation. Zero Tolerance is communicated to inmates during orientation and through continued education, in documents listed in standard 115.33.

Reviewed contracts and an interview with the agency contract director confirmed the presence of that language in agency contracts for housing offenders for the Department.

DOC and ECP Policies require that staff is trained on the Zero Tolerance Policy during new employee orientation and in their annual training.

DOC has demonstrated its commitment to PREA by designating an upper-level, agency-wide PREA Coordinator and requires each facility to designate a Facility PREA Compliance Manager/Coordinator, with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards within each facility. The agency's organizational chart identifies the Facility PREA Coordinator and the ECP Organizational chart indicates that the PREA Compliance Manager/Coordinator reports to the Warden of the facility.

The previous warden personally went to every contractor who supervises inmates on work details and trained them in the zero tolerance policy as well as on other relevant issues related to PREA, including reporting.

Interviews:

10 staff, randomly selected, described the training they had received related to PREA. All of them were aware of the facility's zero tolerance for any form of sexual misconduct, sexual abuse and sexual harassment. Specialized staff also articulated the zero tolerance policy at this facility.

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.

Summary:

The Georgia Department of Corrections Policy, 208.06 Effective Date 08/14/15, Prison Rape Elimination ACT – PREA. Zero Tolerance for Sexual Abuse and Sexual Harassment, requires that when contracts are prepared with agencies and organizations to house offenders for the Department, a provision must be included to ensure that the agency/organization maintains zero tolerance for sexual abuse and sexual harassment and has a mechanism in place to address allegations of sexual abuse and sexual harassment. The Pre-Audit Questionnaire (PAQ) indicated that the facility does not have any contracts for the confinement of offenders that the facility entered into with private entities or other government agencies on or after August 20, 2012. The Department of Corrections contracts for the confinement of offenders contained requirements that the contractor adopt and comply with all of the DOJ PREA Standards and also that they will allow the Georgia Department of Corrections to monitor compliance.

Interviews:

The ECP does not contract for the confinement of offenders. ECP is a county operated prison under contract with the Georgia Department of Correction. The contract with ECP contains the requirements to comply with Georgia Department of Correction PREA Policies and the PREA Standards.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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)

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Summary:

Staffing at the Effingham County Prison is predicated upon the designed Facility capacity of 192 inmates. The facility direct care/custody staffing is based on Facility Rated Capacity. The facility makes its best efforts to comply on a regular basis with the presented staffing pattern that provides for adequate levels of staffing with the use of video monitoring, to protect Effingham County Prison offenders against abuse. Policy requires each time the staffing pattern is not complied with, the facility documents and justifies in the log books and by incident report.

The staffing, according to the Warden, for each shift is a shift supervisor (a sergeant) and two (2) custody staff. There are three dorms with maximum capacities of 64 each and a segregation unit with eight (8) cells.

The facility currently has 30 staff members who may have contact with inmates. The average daily number of inmates during the audit period was 190 inmates.

Once per year the facility, or when deemed necessary the PREA Compliance Manager and the executive staff will assess, determine and document whether adjustments are needed to ensure compliance with staffing plans, video monitoring systems and resources to ensure the staffing plan is adhered to. The facility considers all of the elements required by the State DOC Policy in conducting their annual staffing plan review.

The ECP PREA Policy requires that intermediate or higher level staff conduct unannounced rounds to identify and deter sexual abuse and sexual harassment. Policy prohibits staff from alerting other staff when unannounced rounds are conducted. ECP Policy requires that unannounced rounds are implemented every shift and are documented in the control room logbook with rounds made in segregation documented in the segregation/isolation log.

The auditor had a discussion with the day shift supervisor and the PREA Compliance Manager about unannounced rounds recommending that staff while making those rounds check to see if doors required to be locked are indeed locked, open some of the solid doors that are out of view of cameras and check the storage areas of the kitchen.

Interviews:

The Warden related in an interview that his minimum staffing is one sergeant/shift supervisor and two (2) Correctional Officers however there are generally three (3) Correctional Officers and a Sergeant. Inmates live in one of the three (3) open bay dorms. Additional security is provided because of the design of the facility. A control room is located in the center of the hall surrounded by each of the dorms, the multipurpose room and the dining/kitchen area. Each of these units has large windows that enable easy viewing into each of the dorms and other areas. Someone in the central hall can quickly view what is going on in each of the dorms, multipurpose room and kitchen/dining area as well as the front entrance. The control room is located in the center of the hall. It too has windows all around the perimeter of the control room enabling the control room staff to view each living unit and all areas surrounding the control room. Too, video cameras strategically located throughout the facility can be viewed in the control room stated that they all conduct unannounced rounds. The Warden stated that all duty officers are required to be on site during the weekend when they are "pulling" Duty Officer. During that time, they are interacting with inmates and staff as well as conducting rounds. The Deputy Warden confirmed that process and articulated his process. Additional interviews with the PREA Compliance Manager, the Administrative Lieutenant and Sergeant confirmed that unannounced rounds are being conducted.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Unannounced PREA Round Completed Sheets
- ✓ Hussey, Gay, Bell & DeYoung Inc. Facility Layout of Cameras
- ✓ Log Book Pages

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.

Summary:

Georgia Department of Corrections Policy 01-08-101, Youth Incarcerated as Adults, VI. Classification, identifies the facilities where youthful offenders are to be assigned. Effingham County Prison does not house youthful inmates. There were no youthful offenders observed on the day of the on-site audit.

Interviews:

The Warden related, in an interview that youthful offenders are not appropriate for the program at ECP and are not accepted into the prison. Interviews with higher level and intermediate staff also indicated that this facility does not house youthful offenders.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures

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.

Summary:

Georgia Department of Corrections Policy 208.06, Sexual Abuse Prevention, XIV., Limits to Cross-Gender Viewing and Searches and the Effingham County Prison PREA Policy prohibits cross-gender strip or visual body cavity searches. Facility Policy states that the facility does not permit cross-gender pat-down searches of male inmates by female staff except as a result of exigent circumstances.

The facility prohibits staff from searching or physically examining a transgender or intersex inmates for the sole purpose of determine the inmate’s genital status. The PAQ indicated that no searches occurred during the audit period.

Policy requires the facility to implement procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttock, or genitalia.

Showers in the living units are obscured by a wall that is about shoulder high. Showers cannot be viewed from the control room or from a normal perspective in the housing unit. Toilets are also obscured by a wall partition between the two. Inmates are instructed to go to the showers dressed and come out dressed. The segregation unit shower consists of walled up shower with a heavy gauge wire gate enabling viewing. The Warden, PREA Compliance Manager and Sergeant agreed that a solid type barrier up past the waist or a PREA shower curtain needs to be installed. When completed, the facility will provide the auditor with a photo of the segregation shower. Female staff are not permitted in the shower area while showers are being conducted except in exigent circumstances. These circumstances would be documented.

Reviewed GDOC and the ECP Policy and provided post orders require officers of the opposite gender to announce their presence on the housing unit. During the tour of the facility the announcement was made.

Interviews:

Every interviewed staff including 10 randomly selected staff and specialized staff stated that females announce their presence. Virtually all of the interviewed staff stated that females announce, “female on deck”. One officer, a male officer stated that he often announces it before the female announces.

10 of 10 interviewed inmates stated they are able to shower without being viewed by staff of the opposite gender and more likely than not, without even being viewed by male staff. All of the inmates stated they are never naked in full view of female staff in any type of search.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA

- ✓ Warden's Report
- ✓ Effingham County Prison Local Operating Procedures

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.

Summary:

Georgia Department of Corrections Policy requires that the Effingham County Prison establish procedures to provide disabled inmates equal opportunity to participate in and benefit from all aspects of facility efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

ECP is a county work camp. Each inmate entering the facility must be able to perform a variety of physical tasks as well as take basic instruction in order to complete tasks. If the ECP medical provider determines that the inmate is unable to perform needed tasks, then the classification committee would be required to request the inmate be transferred to an appropriate facility.

ECP Policy prohibits the use of inmate interpreters, readers or other types of inmate assistants except under limited circumstances where an extended delay in obtaining an effective interpreter would compromise the inmate's safety, the performance of the first responder's duties or the investigation of inmates' allegations.

Effingham County Prison local policy ensures that inmates who are admitted with limited English proficiencies are provided information related to PREA, including the Zero Tolerance Policy and How to Report. The Language Line Solutions (1-866-874-3972) are utilized for communications with inmates with language barriers. A reference guide is placed in centralized areas for staff.

The PAQ documented that there have been no instances of any situations requiring interpretive services during the past 12 months.

Interviews:

Staff consistently stated that they would not use an inmate interpreter. They were less clear about who would provide interpretive services. Some stated they would use a bilingual staff while others said they would contact the jail next door for interpreters. A few were aware of the availability of Language Line Solutions. None of the interviewed inmates were either limited English proficient nor were there any who were noticeably disabled or impaired.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures

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.

Summary:

The Georgia Department of Corrections and the Effingham County Prison Policy prohibits hiring or promoting anyone who may have contact with inmates, and prohibits enlisting the services of any contractor who have contact with inmates, who engaged in sexual abuse, has been convicted of engaging or attempting to engage in sexual activity or has been civilly or administratively adjudicated to have engaged in the sexual abuse activities.

The Human Resource Staff explained the process of how the facility considers prior incidents of sexual harassment when determining whether to hire or promote.

State policy requires the facility, before it hires any new employees who may have contact with offenders complete a criminal background record check and consistent with Federal, State, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation sexual abuse before hiring. Policy also requires that either criminal background records checks be completed on current employees every 5 years.

If an employee omits material information regarding sexual misconduct or provides materially false information the agency will consider that as grounds for termination.

Interviews:

In an interview with the Human Resources staff hiring process was discussed. The prospective applicant consents to a criminal background check and one is conducted prior to their providing services. This prison is a part of county government and as such is subject to the Effingham County Personnel Policies and Procedures related to hiring as well as Georgia DOC’s. The background check process includes a check of the Georgia Crime Information Center (GCIC) and the National Crime Information Center (NCIC). Fingerprints are not required. When the background clearance or check comes back to the facility, the Warden and his Deputy make the decisions regarding hiring. The PREA Compliance Manger related that correction staff are background cleared annually prior to their annual weapons qualification. That check is primarily for the purpose of checking for domestic violence. All staff are now required to have 5-year background clearances we well.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ GCIC/NCIC Content Form

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.

Summary:

The Georgia Department of Corrections requires that the facility, when making a substantial expansion or modification to the existing facility, includes installed or updated video monitoring systems, electronic surveillance system, or other monitoring technology to be PREA compliant. Effingham County Prison has not had any expansions or modifications to the facility within the last 12 months.

Interviews:

The Warden and other interviewed staff confirmed that there have been no modifications or expansions to this facility since August 2012. The video camera system has not been expanded but has had some work to make the images much clearer. The Warden related that he and his staff would certainly have input in to any expansions or modifications or enhancements to video monitoring to ensure PREA Compliance.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures

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.

Summary:

The Effingham County Prison is responsible for conducting administrative sexual abuse investigations including offender-on-offender sexual abuse or staff sexual misconduct. In conducting the investigation, investigators arrange and conduct victim, suspect and witness interviews and perform all other duties normally associated with their respective duties. In cases of sexual abuse or more complicated cases of sexual harassment the facility may call in Internal Affairs Investigators from the Georgia Department of Corrections. Where applicable, they notify the local police department and Georgia Department of Corrections.

The facility's Investigator conducts the investigation of the incident. The facilities use a uniform evidence protocol when conducting sexual abuse investigations. The protocol adopted is similarly comprehensive and authoritative. The protocols used are national best practices in training sexual abuse investigators. These investigators have completed the NIC Specialized Training for Investigations in Confinement Settings and Sexual Assault Response Team (SART) Training.

Georgia Department of Corrections Policy and the facility offer offender victims of sexual abuse access to forensic medical examinations. Where possible, examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). Forensic medical examinations are offered without financial cost to the victim or victim's family. The facility has a memorandum of understanding with the Statesboro Regional Sexual Assault Center. This agency will provide forensic nurse examiners and counselors for emotional support as well as contact with advocates.

The PAQ indicated during the audit period there were no forensic medical exams conducted at either facility.

If requested by the victim, a victim advocate, or qualified facility staff member will accompany and support the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals. SART Team members receive advocacy training.

Interviews:

An interview with a facility investigator confirmed that he has been trained to conduct investigations and has completed the NIC Specialized Training for Conducting Investigations in confinement settings and provided a certificate to document that training. He was able to describe the investigatory process. He did state that if there were an actual case of sexual abuse that he would also contact the Georgia Department of Corrections Internal Affairs Investigators to conduct those investigations because of their experience in conducting those kinds of investigations and in collecting evidence. An interview with the facility nurse indicated that in the event of a sexual abuse case she would be responsible for rendering first aid as needed. She related the inmate would be taken to the Sexual

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Memorandum of Understanding Between Effingham County Prison and Effingham County Sheriff's Office (5/16/2016)

- ✓ Georgia Department of Corrections, Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures

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.

Summary:

Georgia Department of Corrections Policy requires all facilities to ensure that allegations of sexual abuse or sexual harassment are referred for investigation. The facility ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Georgia Department of Corrections Policy requires “a prompt, thorough and objective investigation of sexual abuse and/or sexual harassment”. Policy also identifies when an investigation begins, the roles of the investigators and evidence and case reporting procedures.

The PAQ indicated that there were no allegations of sexual abuse and sexual harassment reported during the audit period and 0 was referred for criminal investigation.

Interviews:

Interviews with the Warden, PREA Coordinator and randomly selected staff confirmed that the expectation for reporting at this facility is that all suspicions, allegations, knowledge or reports of sexual abuse, sexual harassment or any form of sexual misconduct are referred for investigation. One of the facility investigators who was interviewed indicated that he would investigate all allegations of sexual harassment and in cases of sexual abuse he would call in Georgia Department of Correction Internal Investigators who have had more experience in investigating sexual abuse allegations and collecting evidence. He described the investigatory process and identified the elements of an investigation.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections, Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

New Employees are provided a package containing Georgia Department of Corrections Standard Operating Procedures, IV014-0001, Employee Standards of Conduct, Georgia Department of Corrections, Standard Operating Procedures, IIA21-001, Prison Rape Elimination Act (PREA) -Sexual Assault of/Sexual Misconduct with Offenders and Georgia Department of Corrections, Standard Operating Procedures, IV013-003, Unlawful Harassment (Includes Sexual Harassment). Employees acknowledge reading and understanding the Employee Standards of Conduct. They also acknowledge that they have received training on the Department's Zero Tolerance Policy on Sexual Abuse and Sexual Harassment and that they have read and understand Georgia Department of Corrections Standard Operating Procedure.208.06, Sexually Abusive Behavior Prevention and Intervention Program, including the Zero Tolerance Policy. They also acknowledge DOC Policy Prohibiting Sexual Harassment, the Commissioner's Statement Prohibiting Unlawful Harassment including Sexual Harassment and lastly an acknowledgement regarding Sexual Assault/Sexual Misconduct. These acknowledgements also generally included potential sanctions for violating any of the policies mentioned.

Georgia Department of Corrections Policy 208.06, Sexual Abuse Prevention, and ECP Staff Orientation and Training, requires that employees receive training through new employee orientation and through annual in-service training. Department of Corrections Policies requires the Effingham County Prison to train all employees who may have contact with inmates on 11 different topics identified in the PREA Standards.

Between trainings the facility provides employees with refresher information in their yearly in-service. This training includes current policies regarding sexual abuse and harassment.

Corrections staff also receive PREA training as a part of Basic Correctional Officer Training for new correctional officers.

The PAQ indicated that 30 staff, currently employed, were trained or retrained on the PREA requirements. The facility provided a sample of Staff Acknowledgment of Receipt of Training "Sexual Assault Prevention" Forms indicating staff were trained in the Department Policy Sexual Abuse Prevention and understood the PREA Training that they received.

Interviews:

Interviewed staff were aware of and knowledgeable of the facility and agency's Zero Tolerance Policy. When asked about the training they received staff related they received initial PREA Training either at Basic Correctional Officers Training for newly hired Correctional Officers or at the facility. They also stated they receive PREA Training at annual in-service training. Staff were especially knowledgeable of their obligation to report any suspicion, allegation or report of sexual abuse or sexual

harassment. They were also confident in their response as first responders and when prompted discussed protection of the evidence, including sealing off the crime scene and ensuring that neither the alleged victim or perpetrator took any actions to degrade or eliminate any evidence that may be on them. Most staff were articulate in answering questions. They were not as confident about how they would access interpretive services for inmates who might be limited English proficient.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ NIC Certification: PREA – Your Role Responding to Sexual Abuse
- ✓ NIC Certification: PREA – Medical Health Care for Sexual Assault Victims in a Confinement Setting
- ✓ NIC Certification: PREA – Audit Process and Instrument Overview
- ✓ NIC Certification: PREA – Investigating Sexual Abuse in a Confinement Setting
- ✓ NIC Certification: PREA – Communicating Effectively and Professionally with LGBTI Offenders
- ✓ NIC Certification: PREA – PREA for Community Confinement Facilities
- ✓ NIC Certification: PREA – Preventing and Addressing Sexual Abuse in Tribal Detention Facilities
- ✓ NIC Certification: PREA – Respectful Communication with LGBTQI Youth
- ✓ NIC Certification: PREA – Coordinators’ Role and Responsibilities
- ✓ PREA Training Roster

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.

Summary:

The facility has a policy and procedure requiring that volunteers and contractors who have contact with offenders have been trained on their responsibilities for sexual abuse and sexual harassment prevention, detection, and response. The PAQ indicated that ECP has 9 volunteers and contractors who have been trained and notified of the facility's zero-tolerance policy. The facility provided documentation confirming that the volunteers and contractors understand the training they received.

Interviews:

Two contractors were interviewed. Each one indicated that they have received the same training that staff of the facility have received. They were aware of the Zero Tolerance Policy and how to report. The food services manager was very aware of the potential for sexual activity in and around the food services areas. He related that he had had to terminate several employees in other facilities for sexual misconduct but had not had that issue at this facility. The Human Resources staff related that contractors and volunteers receive the same policies and procedures as regular employees and are required to sign the same acknowledgements that staff sign indicating that they understand the requirements of the PREA Policy, Standards of Conduct Policy, Sexual Misconduct Policy and the Sexual Harassment policy.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Acknowledgement Statement for Supervised Visitors/Contractors/Volunteers

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.

Summary:

Georgia Department of Corrections Policy, 208.06, Sexual Abuse Prevention, Offender Education Program and the ECP PREA Policy requires that inmates are provided oral and written information regarding the following: the Zero Tolerance Policy for any sexual conduct, prevention and intervention, self-protection, reporting sexual conduct including abuse and/or assault and treatment and counseling available to offenders who are victims of sexual assault. Policy requires that this information is provided in a manner easily understandable for offenders. Offenders are required to receive the brochure created by the

Department advising the offender of the potential dangers of sexual conduct and the Department's Zero Tolerance for such behavior.

The offenders at Effingham County Prison receive information at the time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment at intake.

The facility requires inmates who are transferred from one facility to another receive PREA education regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding facility procedures for responding to incidents.

The facility maintains documentation of inmate's participation in PREA education sessions by having the offenders complete the sessions and the counselor documents the training by entering it into the SCRIBE data system. The facility also ensures that relevant information about PREA is continuously and readily available or visible through posters, and inmate handbook. Inmates also have signed acknowledgements of their PREA Training. A sample of inmate acknowledgment forms were provided for review.

Interviews:

An interview with a staff who conducts intake described how information about PREA is given to inmates on admission and during the orientation process. The Intake Staff stated that the Correctional Officers explain the Zero Tolerance Policy and gives them a handbook. The next day the Counselors have the inmates watch the PREA video and they have a question and answer session about the contents of the handbook. This staff related that this information is given to the inmate usually the next day and not later than 72 hours. Inmates who were interviewed indicated that they had received information about the Zero Tolerance Policy and how to report during the intake and admissions process. Inmates also watch a video that includes the topics required by the PREA Standard, including rights to be free from sexual abuse and sexual harassment, rights to be free from retaliation for reporting, how to report and other topics. Inmates were able to identify a number of ways in which they could report sexual abuse or sexual harassment if they ever needed to make a report for themselves or for others.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Inmate Handbook
- ✓ Posters
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Georgia Department of Corrections Policy requires that the Effingham County Prison's Investigators are trained in conducting sexual abuse investigations in confinement settings. Documentation was provided to confirm that the investigator has completed specialized training through the National Institute of Corrections (NIC) PREA: Investigating Sexual Abuse in A Confinement Setting. Topics required in the specialized training for investigators includes, Techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, evidence collection in confinement settings, criteria and evidence required to substantiate a case for administrative actions and criteria and evidence to refer a case for prosecution.

The investigator's training also included general training provided to all employees pursuant to 115.31. Training documentation was provided.

Interviews:

An interview with the facility investigator indicated that he is well versed in the investigatory process. He also related that he had completed the Specialized Training provided on-line by the National Institute of Corrections. An additional certificate was provided for another investigator at the facility.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ NIC: PREA Investigating Sexual Abuse in a Confinement Setting
- ✓ NIC: PREA Your Role Responding to Sexual Abuse
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ NIC Certification: PREA – Medical Health Care for Sexual Assault Victims in a Confinement Setting
- ✓ NIC Certification: PREA – Audit Process and Instrument Overview
- ✓ NIC Certification: PREA – Investigating Sexual Abuse in a Confinement Setting
- ✓ NIC Certification: PREA – Communicating Effectively and Professionally with LGBTI Offenders
- ✓ NIC Certification: PREA – PREA for Community Confinement Facilities
- ✓ NIC Certification: PREA – Preventing and Addressing Sexual Abuse in Tribal Detention Facilities
- ✓ NIC Certification: PREA – Respectful Communication with LGBTQI Youth
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

The facility has a policy related to the training of medical and mental health practitioners who work regularly with the inmates. The medical staff at the facility are contract employees and do not conduct forensic medical exams. The facility provided documentation showing that medical practitioners have completed the required training.

Interview

An interview with the contract healthcare provider confirmed that she has completed the online training for health care staff provided through the National Institute of Corrections. She also has completed PREA Training at the facility as well. She does not conduct forensic exams.

Documentation Reviewed:

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ NIC Certification: PREA – Medical Health Care for Sexual Assault Victims in a Confinement Setting
- ✓ NIC Certification: PREA – Behavioral Health Care for Sexual Assault Victims in a Confinement Setting
- ✓ NIC Certification: PREA – Communicating Effectively and Professionally with LGBTI Offenders
- ✓ NIC Certification: PREA – Respectful Communication with LGBTQI Youth

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.

Summary:

Effingham County Prison uses the PREA Sexual Victim/Sexual Aggressor Classification Tool to screen offenders upon admission for risk of sexual abuse victimization or sexual abusiveness toward other offenders. All inmates admitted to ECP are screened for the risk of sexual victimization and sexual abuse during the intake process. Information on any inmate who is identified during the screening as a potential or confirmed victim of sexual assault or as having a tendency to act out with sexually aggressive behavior is communicated to the shift supervisors, counseling department, medical department and documented in the inmate’s file.

The objective screening instrument includes all criteria required by the standard to assess inmates for risk of sexual victimization. Policy also requires that the Inmate’s risk level be reassessed periodically throughout the offender’s confinement. Risk reassessments are documented. The facility implements appropriate controls on the dissemination, within the facility, of responses to questions asked to ensure that sensitive information is not exploited to the inmate’s detriment by staff or other inmates.

The auditor randomly reviewed a sample of Sexual Violence Assessment for Adults, Potential Victim Factors, Potential Aggressor Factors.

Interviews:

A staff member who conducts screening for victimization was interviewed. The screening process was described as beginning with a review of the SCRIBE (the Offender database) prior to the inmate arriving at the facility. Information staff would be interested in would be the present offense, past offenses, personal history, case notes and other pertinent information. The screening would be conducted either on the same day as admission or the next day. The process would also consider prior abuse. If an inmate reported prior victimization the staff stated, the inmate would be offered a follow-up at Coastal State Prison where mental health staff are available and accessible. Staff related they have not had an inmate disclose prior sexual victimization in the past 12 months.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ PREA Sexual Victim/Sexual Aggressor Classification Screening Form
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

After conducting the screening, the facility uses this information to inform housing, bed, work, education, and program assignments with the goal of keeping all offenders safe and free from sexual abuse. Policy requires offenders at risk of sexual victimization be placed in isolation only as a last resort if less restrictive measures are inadequate to keep them and other inmates safe, and only until an alternative means of keeping all inmates safe can be arranged.

ECP Policy prohibits placing lesbian, gay, bisexual, transgender, or intersex inmates in particular housing, bed, or other assignments solely on the basis of such identification or status. The policy prohibits considering lesbian, gay, bisexual, transgender, or intersex identification or status as an indicator of likelihood of being sexually abusive. Housing and program assignments for transgender or intersex inmates are based on a cases-by-case basis. Transgender and intersex inmates are given the opportunity to shower separately from other inmates. The facility does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated housing unit, facility or wing solely on the basis of identification or status. An offender determined to be either a potential sexual aggressor or an offender at risk for sexual victimization is required to be identified, monitored and counseled.

Policy and Procedures requires if an inmate at risk of sexual victimization is held in isolation, the inmate is afforded a review every 30 days to determine whether there is a continuing need for separation from the general population.

The Pre-Audit Questionnaire indicated that during the past 12 months there were no Effingham County Prison offenders at risk of sexual victimization who were placed in isolation.

Interviews:

See interview for Standard 115.41.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ PREA Sexual Victim/Sexual Aggressor Classification Screening Form
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Georgia Department of Corrections Policy and ECP requires that offenders at high risk for sexual victimization are not to 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 the facility assigned an offender to involuntary segregated housing, the placement would be only until an alternative means of separation from likely abusers can be arranged and the assignment will ordinarily not exceed a period of 30 days. If it exceeds 30 days, the facility affords the offender a review to determine whether there is a continuing need for separation from the general population.

The PAQ indicated that there have been no inmates at risk of sexual victimization were held in involuntary segregated housing during the audit period.

Interviews:

The Warden, in an interview, related that he prefers that victims not be placed in involuntary segregation. He stated that he would talk with the inmate and see if he would feel more comfortable in another facility and if so he would arrange that. He stated that the perpetrator would be moved to another facility. Any use of segregation would be temporary and only until additional information could be ascertained.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Georgia Department of Corrections Policy requires Effingham County Prison to encourage offenders who have been the victims of abusive sexual contact, non-consensual sexual act, staff sexual misconduct or staff/offender harassment to report the incidents and to establish procedures allowing for multiple internal ways for inmates to report privately to officials regarding sexual abuse and sexual harassment; retaliation by other inmates and/or staff for reporting sexual abuse and sexual harassment; and staff neglect or violation of responsibilities that may have contributed to incident. The facility provided the following ways for inmates to report sexual abuse and sexual harassment or retaliation:

1. Verbally
2. To friend, a staff member or someone the offender trusts
3. Utilizing the Grievance Process
4. Georgia Department of Corrections Sexual Assault/Abuse Hotline (1-888-992-7849)
5. Anonymously
6. Counselor's Box
7. SART Member
8. Third Parties

ECP PREA Policy provides for reporting in the following ways:

Verbally

In Writing

Confidentially through anonymous communication of any incident concerning sexual misconduct to a staff member, medical personnel, any non-employee or the Warden

Georgia DOC Sexual Assault/Abuse Hotline on phones in the dormitory

Place a statement in any of the administrative boxes in the main hallway in the prison

File a grievance

Third Parties

Offenders are provided information encouraging them to report any incidents of sexual abuse or sexual harassment as well as how they can report it.

Staff is required to document verbal reports immediately and by the end of each shift.

The state requires inmates detained solely for civil immigration purposes be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security.

The Warden and Deputy Warden are very proactive and make themselves available to the inmates for informal conversations. They not only walk through the facility for the purpose of speaking to inmates and being available but they also go to the gate where the inmates are moving out to go to their work details several days a week, again for the purpose of speaking to inmates. The Warden also attends a weekly Bible Study with the inmates, again being available.

The facility installed a kiosk in each dorm to enable inmates to access the store and perform other functions. All of the details regarding what can be done with the KIOSK, inmates are able to file complaints/grievances using the KIOSK without any impediment.

Interviews:

Interviewed inmates were able to identify a number of ways they would be able to report allegations of sexual abuse and sexual harassment. These included, tell a staff, tell the warden, complete a request form and drop in staff's boxes in the hallway, use the hotline, tell a family member or another inmate. When asked if they could also file a grievance they said they could. Relatives are accessible via phone and through visitation. The Warden stated that he is available to talk with inmates. He also stated that he receives a number of request forms and that he sees each one rather than send a written response.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Inmates Handbook

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.

Summary:

The Georgia Department of Corrections Policy, Statewide Grievance Procedure, has an administrative procedure for dealing with offender grievances regarding sexual abuse. Offenders are allowed to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred. The reviewed policy does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. Inmates can submit a grievance without submitting it to a staff member who is the subject of the complaint.

Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing request for administrative remedies relating to allegations of sexual abuse, and are permitted to file request on behalf of inmates.

Retaliation or the threat of retaliation from any staff or contract employee toward any offender for using the grievance process is strictly prohibited.

Inmates are now able to access the grievance process via the KIOSK, filing a complaint or grievance or issue a request form without impediment.

The Pre-Audit Questionnaire indicated and staff confirmed that there were no grievances alleging sexual abuse filed during the audit period. The PAQ indicated that no emergency grievances alleging substantial risk of imminent sexual abuse were filed during this audit period.

The grievance process is included in the Offender Handbook.

Interviews:

Inmates related, after some prompting, that they could file a grievance to report sexual abuse but the dominant response was that they would report to a staff.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement
- ✓ Inmates Boxes

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.

Summary:

The Effingham County Prison provides offenders with access to outside victim advocates for emotional support services related to sexual abuse by doing the following:

The facility provides offenders with reasonable and confidential access to their attorneys and/or legal representation. For inmates detained solely for civil immigration purposes, immigrant services or contact numbers are posted.

Georgia Department of Corrections Policy requires facilities to maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse. The ECP has a Memorandum of Understanding with the Statesboro Sexual Assault Center. The center would arrange for an advocate to accompany an inmate throughout the forensic and investigatory process as well as any court hearings.

Inmates are now able to file a complaint or grievance using the KIOSK that is available in each dorm. They can do this at any time and without any delay or impediment.

Interviews:

Inmates related they could file a grievance if they wanted to or needed to. They related they use the grievance system for other things but if they had to report sexual abuse or sexual harassment they would tell a staff.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Consular Notification and Access (Civil Immigration Information) Two Consular Notification Books

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.

Summary:

Anyone who suspects or has knowledge that sexual abuse has occurred at the Effingham County Prison can report through the Georgia Department of Corrections website, which gives clear reporting instructions for reporting. Third Parties may also report sexual abuse or sexual harassment on behalf of an inmate by calling the Georgia Department of Corrections Call Center.

The ECP PREA Policy provides for third party reports and includes fellow inmates, staff members, volunteers, contractors, family members, attorneys, outside advocates and others.

Interviews:

All of the interviewed staff were aware of third party reporting. They stated they would accept a report from third parties and treat it just as they would any other allegation or report. Some of the inmates mentioned third parties as a source for reporting sexual abuse or sexual harassment. When third parties were not mentioned the auditor prompted the inmate by asking if they thought a family member or a friend could make a report for them. When prompted they stated that they could.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

ECP Policy requires all staff to immediately report any known or suspected act or allegation of sexual misconduct or retaliation to the Administration through the appropriate chain of command. All staff must also ensure the confidentiality of the victim (s) in incidents of sexual misconduct is not compromised.

Policy requires that all reports of sexual misconduct, sexual contact or sexual abuse must be considered credible and promptly investigated without regard to whether:

- The inmate named in the allegation is in custody or not
- Staff members named in an allegation are currently employed or not
- The report of the allegation was made in a timely manner or not
- The inmate reporting the allegation is known to have made past false allegations
- The source of the allegation recants the allegation
- The employee receiving the complaint believes or does not believe the allegations

Upon receiving any allegation of sexual abuse, the PREA Compliance Coordinator would promptly report the allegations to the Georgia Department of Corrections Agency PREA Coordinator, the GDC Field Operations Manager for County Facilities and the Effingham County Criminal Investigations Division.

Interviews:

Staff who were interviewed consistently related that they have been trained to take every allegation seriously and to report it. They also, when asked if they would report a suspicion, related that they would report even a suspicion. All of the interviewed staff were aware of the reporting process and indicated they would immediately make the report verbally followed by a written report. Most staff stated the written report would have to be completed as soon as possible but not later than the end of the shift.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Georgia Department of Corrections Policy and Procedures require that as soon as staff learn that an offender is subject to substantial risk of imminent sexual abuse, they take immediate action to protect the offender by housing unit reassignment or using a critical incident report for sexual assault.

ECP requires that when an inmate is identified as being at risk for sexual abuse on his current housing unit, the screening staff will request that the supervisor on duty immediately move the inmate to an alternate unit. If alternative placement cannot be arranged, the Warden and/or PREA Coordinator will develop a written plan of action that will provide a safe and secure environment for the victim and ensure the plan is implemented.

The Pre-Audit Questionnaire indicated that during the past 12 months there were no occasions in the facility in which an offender reported being subject to a substantial risk of imminent sexual abuse or in which the facility has determined that an inmate was subject to substantial risk of imminent sexual abuse.

Interviews:

Staff related that they would take an allegation or knowledge of an inmate being at risk of imminent sexual abuse seriously and would immediately remove the alleged potential victim from potential danger. Correctional Officer staff stated they would keep the potential victim either with them or where they could watch him until their supervisor arrived on the scene to make a determination of where the inmate needed to be housed or placed. An inmate could be moved to another dorm or possibly placed in administrative segregation until some determination could be made regarding the threat. Either the alleged potential perpetrator or the victim may be moved to another facility for safety.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

The facility has a procedure that requires upon receiving an allegation that an offender was sexually abused while confined at another facility, the Warden of the facility notifies the Warden of the sending facility that sexual abuse is alleged to have occurred at their facility. The receiving Warden notifies the appropriate investigative body. Notification is required within 72 hours after receiving the allegation. The notification will be documented. Any report filed by another agency to the Effingham County Prison will be investigated the same as any other incident that pertains to the PREA Policy and Procedures.

The PAQ indicated and staff confirmed in interviews that there were no allegations that the facility received indicating that a resident was abused while confined at another facility nor has the facility received any reports from other facilities that an inmate was allegedly abused at ECP.

Interviews:

The Warden indicated that he would report the allegation to the sending Warden and document the notification. He also related that all reports will be investigated just as any other report or allegation.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Georgia Department of Corrections Policy and Procedures require facilities to have a first responder procedure. The procedure includes actions that should be taken upon learning of an allegation that an offender was sexually abused. The first security staff member to respond is required to:

1. Separate the alleged victim and abuser;
2. Preserve and protect crime scene;
3. Collection of physical evidence;
4. Ensure that the alleged abuser does not take any actions that could destroy physical evidence.

The Effingham County Prison PREA Policy also describes the responses expected for first responders, including actions for non-security first responders.

If the abuse occurred within a time period that still allows for the collection of physical evidence, first responders should ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

Policy also requires that each facility establish a Sexual Assault Response Team (SART) to provide a coordinated, efficient and supportive response to victims of sexual assaults (see 115.65 – Coordinated Responses). The facility also utilizes their Sexual Assault Response Team (SART) consisting of staff who are trained to respond to incidents of sexual assault. Each staff is trained in their individual responsibilities. (Also see coordinated response).

The PAQ indicated and staff confirmed that there were no allegations that months. an inmate was sexually abused reported by a non-security staff member as the first responder during the past 12

Interviews:

Staff were aware of their responsibilities as first responders. All of the interviewed staff stated they would separate the victim and the perpetrator and report it immediately to their shift supervisor. They stated they would instruct both victim and perpetrator not to do anything to contaminate or degrade the evidence. They also stated they would secure the crime scene and keep it secured until the SART Team arrived to take control of the process and the scene.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Each facility, as required by Georgia Department of Corrections Policies, has established a Sexual Assault Response Team to provide a coordinated, efficient and supportive response to victims of sexual assault. This comprehensive response plan (coordinated response plan) delineates the duties of first responders, internal affairs investigators, sexual assault nurse examiners, victim advocates and local prosecutors. The goals of the Facility SART are the following: 1) Meet the needs of the victim with crisis intervention and support services 2) Arrange a comprehensive forensic examination for sexual abuse victims, without financial cost, where appropriate 3) Provide a joint, effective, sensitive approach to victims of sexual assault 4) Document and preserve forensic evidence for potential prosecution and 5) Conduct investigations of the crime from notification through prosecution. The responsibilities for each team member are detailed. SART Team members are provided specialized training for the treatment and investigation of sexual assault victims. SART Team members are available on each shift.

Interviews:

Interviews with a variety of staff who would be involved in a coordinated response to a sexual assault were interviewed and were able to describe the actions they would take in response to a sexual assault. Medical is only on site during regular business hours and there are no mental health staff at the facility. A member of the SART Team explained the role of the SART in a coordinated response.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Effingham County Prison Sexual Abuse Coordinated Team Response Sheet (Written Plan)
- ✓ SART Contact Information
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Employees at the Effingham County Prison are county employees. They are not members of a union and can be removed from the facility, placed on administrative leave or sanctioned in accordance with Thomas County personnel policies, procedures and rules. This facility is not involved in collective bargaining.

Documentation Reviewed:

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures

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.

Summary:

Effingham County Prison complies with Georgia DOC Policies to protect all offenders and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other offenders or staff.

The Facility Deputy Warden serves as retaliation monitor in this facility

The facility employs multiple protective measures against retaliation and include the following:

1. Housing changes or transfers for victims or abusers
2. Removal of alleged staff or offender abusers from contact with victims
3. Emotional support services for offender and staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

To document retaliation monitoring, the facility uses the Georgia Department of Corrections PREA Retaliation Monitoring form.

The Pre-Audit Questionnaire indicated and staff confirmed that there have been no incidents of retaliation that have occurred in either facility during the audit period.

There is a process that requires monitoring for retaliation at least 90 days following a report of sexual abuse. The facility monitors the conduct and treatment of inmates and/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.

Interviews:

The Deputy Warden related that he would meet with anyone making a report of sexual abuse or sexual harassment to let them know that retaliation is not tolerated at this facility. He also stated he would check in with that inmate or staff weekly. He also related that he is around the facility often and they would have multiple opportunities to talk with him if they needed too. He said he would be looking for signs of retaliation including increased disciplinary reports for inmates and if staff related, seeing an officer having to pull extra duty. Monitoring would continue for beyond 90 days if needed.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

When an offender alleges he has suffered sexual abuse policy requires that he may only be paced in isolation or segregation as a last resort if less restrictive measures are inadequate to keep them and other offenders safe, and only until an alternative means of keeping all offenders safe can be arranged.

The Pre-Audit Questionnaire indicated and staff confirmed that during the past twelve (12) months there were no offenders who alleged being in a substantial risk of being sexually abused.

Interviews

Interviews with staff indicated that the use of segregation in the case of an inmate as risk of imminent sexual abuse or who has been sexually abused would be only until the incident facts could be sorted out to enable staff to keep the inmate as safe as possible. Other options would be changing housing units and looking at work assignments.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

ECP policy requires that any reports (direct, indirect, third party) received involving sexual abuse and sexual harassment will be reviewed by the Warden and/or PREA Facility Coordinator immediately. The incident will be reviewed promptly, thoroughly and objectively. Once reviewed by the Warden and the PREA Facility Compliance Coordinator, the investigation will be turned over to the institution SART Team and the Thomas County CID for investigation. The allegations will also be

reported to the Georgia Department of Corrections PREA Facility Coordinator as well as the Georgia Department of Corrections Field Operations Manager for County Facilities.

The Effingham County Prison Investigator (s) will gather and preserve evidence, interview alleged victims, suspected perpetrators and witnesses and assist the Georgia Department of Corrections and /or Internal Affairs with reviewing prior reports if any of sexual abuse involving the suspected perpetrator. The County Prison cooperates with the Georgia Department Corrections and Internal Affairs and endeavor to remain informed about the progress of the investigation.

Georgia Department of Corrections and/or Internal Affairs Division will not terminate an investigation if the source of the allegation recants the allegation. Any departure of the alleged abuser or victim from employment or custody of the Effingham County Prison is not a basis for termination of the investigation.

The Internal Affairs Division documents in a written report through descriptions of physical, testimonial and documentary evidence when feasible and refers any substantiated allegations of conduct that appear to be criminal for prosecution.

Investigators use the preponderance of the evidence to make a determination in administrative investigations

Effingham County Prison retains all written reports for as long as long as the alleged abuser is in custody or employed by the institution plus five years.

If the Internal Affairs Division deems the act to be of a non-criminal nature, then an administrative investigation will occur. The incident review determines whether the staff actions or inactions contributed to the incident. The review is documented.

Interviews:

Interviews with randomly selected and specialized staff indicated that they have been trained to take all allegations, suspicions and reports of sexual abuse, sexual harassment and retaliation seriously and to report it. The SART Team who is called in to respond to allegations and incidents has an investigator on the team. Staff related that an investigation is initiated for all allegations, suspicions, reports or knowledge of an incident of sexual abuse. An interview with a facility Internal Affairs investigator confirmed that allegations are investigated, including reports from any source. He related that he would also most likely call in one of the DOC Internal Affairs Investigators because, he related, they have much more experience in conducting sexual abuse investigations.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Inmate Handbook
- ✓ Offender Disciplinary Codes Attachment #4
- ✓ GDC Policy Offender Discipline IIB02-0001 (209.01)

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.

Summary:

Georgia Department of Corrections Policies state that the facility’s standard of evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated is a preponderance of evidence or lower.

Interviews:

The internal affairs investigator at the facility related that the standard for substantiating cases of sexual abuse and sexual misconduct is a preponderance of the evidence.

Documentation Reviewed:

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

ECP policy requires that inmates who are currently in the custody of the Effingham County Prison are entitled to know the outcome of the investigation into their allegation. The notification procedures include the following:

“Following an investigation into an inmate allegation of sexual abuse in the institution, the PREA Facility Coordinator will inform the inmate whether the allegation was determined to be substantiated, unsubstantiated or unfounded. All notifications or attempted notifications will be documented.”

If the allegation involved a staff member, the PREA Facility Coordinator will inform the inmate whenever:

- The staff member is no longer posted in the institution
- The staff member is no longer employed at the institution
- The staff member has been indicted on a charge related to sexual abuse within the institution or the staff member has been convicted on a charge related to sexual abuse within the institution

If the allegation involved another inmate, the PREA Facility Coordinator will inform the alleged victim when the alleged abuser has been:

- Indicted on a charge related to sexual abuse within the institution or the alleged abuser has been convicted on a charge related to sexual abuse within the institution.

Interviews:

Staff related that the inmate would be notified of the results of an investigation at the conclusion and the notification would be documented. An interview with the PREA Compliance Manager confirmed she is responsible for reporting the results of an investigation to the inmate.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Effingham County Prison policy has a zero tolerance for sexual misconduct between inmates and any staff members. Sexual misconduct perpetrated by staff is contrary to the policies of Georgia Department of Corrections PREA policy and ECP policies and professional ethical principles that all employees are bound to uphold. Any such conduct is cause for disciplinary action up to and including termination.

There is no consensual sex in a custodial or supervisory relationship as matter of law. A sexual act with an inmate by a person in a position of authority over the inmate is a felony and subject to criminal prosecution.

Retaliation against an inmate who refuses to submit to sexual activity or retaliation against individuals (including witnesses) because of their involvement in the reporting or investigation of sexual misconduct is also prohibited and grounds for disciplinary actions including termination and criminal prosecution.

Failure of employees to report incidents of sexual misconduct is cause for disciplinary action up to and including termination.

The Pre-Audit Questionnaire and staff reported that there have been no staff from the facility that have been terminated for violating agency sexual abuse or sexual harassment polices during the audit period.

Interviews:

Staff related that disciplinary actions would be progressive discipline however if the allegations of sexual abuse were substantiated the presumptive sanction would be termination. They would also be referred for prosecution unless the action was clearly not criminal.

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.

Summary:

Georgia Department of Corrections and Effingham County Prison policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies and to relevant licensing bodies. The PAQ indicated and staff confirmed that there were no contractors or volunteers reported to law enforcement for engaging in sexual abuse of residents and there were no allegations that a volunteer or contractor was involved in any form of sexual misconduct, sexual abuse or sexual harassment.

Interviews:

Volunteers and contractors, according to staff, would be gaited and not allowed back in the facility pending an investigation. If the allegations were substantiated, the contractor and/or volunteer would be permanently gaited and referred for prosecution as indicated.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

The Effingham County Prison complies with Georgia DOC policy that requires that offenders are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the offender engaged in inmate on inmate sexual abuse. Sanctions commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

The disciplinary process considers whether an inmate’s mental disabilities or mental illness contributed to his or her behavior when determining the type of sanction.

The PAQ indicated and staff confirmed that there were no inmates placed in isolation as a disciplinary sanction for inmate-on-inmate sexual abuse and that there were no allegations of sexual abuse or sexual harassment during the past 12 months.

The facility prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Interviews:

Staff informed the auditor that inmates would be subject to the inmate disciplinary code. They could also be referred for prosecution.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures

- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Inmate Handbook
- ✓ Offender Disciplinary Codes Attachment #4
- ✓ GDC Policy Offender Discipline IIB02-0001 (209.01)

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.

Summary:

Effingham County Prison policy requires that if an inmate’s intake assessment indicates that he has experienced any prior victimization or has perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, the inmate will be offered a follow-up meeting within days of the intake screening. Documentation to confirm that the inmate was offered the services would be noted on the inmate’s intake screening instrument. Any information related to sexual victimization or abusiveness that occurred in an institutional setting will be strictly limited to necessary staff maintaining strict confidentiality.

The role of the nurse at ECP is to assess any lingering acute or non-acute physical injuries as well as any psychological impact of victimization. Follow-up medications, treatment, testing, etc. will be completed as ordered. This could include repeat HIV/STD testing and follow-up medication as needed/ordered for HIV/STD. All findings are required to be documented in the inmate’s medical record and strict confidentiality is to be maintained.

Medical and mental health staff obtains informed consent from inmate before reporting information about prior sexual victimization that did not occur in an institutional setting.

The PAQ indicated that 100 % of offenders reporting prior victimization were offered a follow up with medical or mental health. The PAQ also documented that 100% of all perpetrators who disclosed during screening or afterwards were offered a follow-up with medical or mental health.

None of the interviewed inmates reported prior sexual victimization. Also none of the sampled victimization screenings documented that an inmate reported prior sexual victimization.

Interviews:

The facility nurse described her role in sexual assault cases. She stated that her role would be to provide any first aid and protect the evidence. If on duty, she would help arrange transportation to the Statesboro Sexual Assault Center for a forensic exam. Following that exam, she would provide any follow-up care based on the inmate’s discharge orders.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Effingham County Prison medical and mental health staff would ensure that inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which is determined by medical and mental staff. There have been no cases or allegations of sexual abuse that were made in the past 12 months.

Policy requires medical first responders to provide care and treatment as outlined in the Sexual Assault Manual. Medical staff will provide immediate care and evaluate the victim for life threatening injuries. Policy also requires that medical staff can aid in the preservation of evidence by instructing the offender not to take any actions that could destroy physical evidence and assisting with the arrangement of a forensic exam by a SANE here at the institution at no cost to the offender.

Mental health treatment services are provided by the institutional Counselor and by Mental Health Staff from Coastal State Prison. These services are available to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. If the inmate desires and the claim is substantiated, then the Facility PREA Compliance Coordinator or Chief Counselor ensures continued Mental Health Services are rendered.

Interviews:

Interviews indicated that inmates would have access to emergency medical services through Coastal State Prison or the Statesboro Hospital. Staff related that ECP counselors or mental health staff from Coastal State Prison would provide emergency crisis intervention services at no cost to the inmates.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Georgia Department of Corrections and the ECP PREA Policy requires medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse to include past victimization. Victims of sexual abuse while at the facility are offered tests for sexually transmitted infection as medically appropriate. The facility attempts to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such history and offers treatment when deemed appropriate.

If an allegation is of actual sexual abuse, the victim is referred to the facility’s Health Care Staff for examination. Upon completion of the SANE nurse’s examination, the institution nurse is to assess for any lingering acute or non-acute physical injuries as well as any psychological impact of the victimization. Follow up medications, treatment, testing, etc. will be completed as ordered. This may include repeat HIV/STD testing and follow-up medication as needed/ordered for HIV/STD. All findings are documented in the inmate’s medical record and strict confidentiality will be maintained at all times.

Interviews:

Again, staff related that ongoing medical and mental health services are provided by ECP, either through the contract nurse or through Coastal State Prison. Follow-up treatment and care would be provided at the prison or at a facility most equipped to deal with the specific issue. Enhanced services are available to inmates via the Coastal State Prison.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Effingham County Prison has a process in place to conduct sexual abuse incident reviews at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. The review would occur within 30 days of the conclusion of the investigation. The SART Team reviews consider all the requirements listed in standard 115.86.

The sexual abuse incident review team includes upper-level management official and allows for input from line supervisors, investigators, and medical and mental health staff.

PAQ indicated and staff confirmed that there were no criminal and/ or administrative investigations of alleged sexual abuse completed at the facility, including only unfounded incidents during the audit period.

Interviews:

Although there have been no incidents requiring an incident review, members of the team were able to articulate the purpose of the review. They were able to articulate the different areas of consideration they would address. Essentially they understood the purposes of the incident review team.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Effingham County Prison Sexual Abuse Coordinated Team Response (Written Plan)
- ✓ Effingham County Prison Sexual Abuse Incident Review Team Meeting Minutes Sheet
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Effingham County Prison has a process in place to collect accurate, uniform data for every allegation of sexual abuse at the facilities under its direct control using a standardized instrument and set of definitions. A set of definitions is included in the policy. In addition, the facility uses the DOJ Form SSV-Survey of Sexual Violence Incident Report as their standardized instrument and for definitions.

Upon request, the facility provides all data from the previous calendar year to the Department of Justice no later than June 30 of each year on the U.S. Justice Department Survey of Sexual Violence Form SSV-

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Effingham County Prison reviews data collected and aggregated pursuant to 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response polices, and training, including problem areas, taking corrective action, and preparing an annual statement of its finding from its data review. The annual reports are approved by the agency. The facility redacts material from an annual report for publication; the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility.

Documentation Reviewed:

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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.

Summary:

Effingham County Prison policy requires that aggregated sexual abuse data is made readily available to the public at least annually through the agency website. The facility maintains sexual abuse data collected pursuant to 115.87 for at least 10 years after the date of initial collection, unless Federal, State, or local law requires otherwise.

Documentation Reviewed:

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Effingham County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ GDOC 101.04 (ID01-001) Records Management

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.

Robert G. Lanier

July 31, 2016

Auditor Signature

Date