

PREA AUDIT REPORT Interim Final
ADULT PRISONS & JAILS

Date of report: 9/16/2016

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: 8/26/2016 – 8/29/2016			
Facility Information			
Facility name: Harris County Prison			
Facility physical address: 9982 Georgia Highway 116, Hamilton, Georgia 31811			
Facility mailing address: <i>(if different from above)</i> Click here to enter text.			
Facility telephone number: (706) 628-4959			
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: Deputy Warden John Siks			
Number of staff assigned to the facility in the last 12 months: 27			
Designed facility capacity: 150			
Current population of facility: 138			
Facility security levels/inmate custody levels: Minimum and Medium			
Age range of the population: 18 - 63			
Name of PREA Compliance Manager: John Wesley Sikes		Title: Deputy Warden	
Email address: jsikes@harriscountyga.gov		Telephone number: (706) 888-0589	
Agency Information			
Name of agency: Harris County Prison			
Governing authority or parent agency: <i>(if applicable)</i> Click here to enter text.			
Physical address: 300 Patrol Road, Forsyth, Ga. 31029			
Mailing address: <i>(if different from above)</i> Click here to enter text.			
Telephone number: 478-992-2999			
Agency Chief Executive Officer			
Name: Homer Bryson		Title: Commissioner	
Email address: dcor.state.ga.us		Telephone number: 478-992-5261	
Agency-Wide PREA Coordinator			
Name: Sharon Shaver		Title: Statewide PREA Coordinator	
Email address: shaves01@dcor.state.ga.us		Telephone number: 678-628-3128	

AUDIT FINDINGS

NARRATIVE

The PREA Audit of the Harris County Prison, located in Hamilton, Georgia was conducted on August 26, 2016 and August 29, 2016. Notices of the PREA Audit were sent to the facility June 15, 2016 for posting in areas that were accessible to staff, inmates, volunteers, contractors and volunteers. The Deputy Warden, who also serves as the Facility PREA Compliance Manager forwarded the flash drive with policies, procedures and supporting documentation approximately 30 days prior to the PREA Audit. The original PREA Audit date had to be changed as a personnel issue at the prison. At the request of the facility the audit date was changed and rescheduled later by the Deputy Warden in consultation with the auditor. The audit was rescheduled for August 26, 2016. Additional supporting documentation was requested to be provided on the audit date. Communications with the PREA Compliance Manager were frequent and helpful. His responsiveness was always professional and expeditious.

The auditor arrived at the facility a little prior to 8:00AM on August 26, 2016 and was greeted by the Lieutenant and Deputy Warden. Following a brief introduction to the process, the auditor began interviewing staff, including those randomly selected and specialized. In addition to the 10 randomly selected staff, the auditor interviewed the following specialized staff: Agency Head Designee, Warden designee, PREA Compliance Manager, Human Resources, Medical, Intake, Staff responsible for victimization screening, staff conducting unannounced rounds, incident review team member, retaliation monitor and the Director of the Sexual Assault Support Center. Ten (10) randomly selected inmates were interviewed as well. There were no inmates alleging sexual abuse at the facility, no inmates alleging prior sexual victimization, identifying as gay, bisexual or transgender and no inmates who were disabled or limited English proficient.

A tour of the facility was conducted at the end of the second day of the audit. This facility is exceptionally clean and neat. There is a small security center located at the entrance to the facility. Visitors are met by a security officer who instructs them to sign in after which visitors are instructed to empty their pockets and go through a metal detector. After going through the metal detector security staff "wand" the visitor to detect contraband.

The dining room had four video cameras providing coverage in this area. The kitchen door had a window in the door as well as sign restricting access. There were two video cameras in this location. There is a camera inside the dry storage area and a huge window in the kitchen office. The Deputy Warden related that previously the window viewing was found to be obstructed with posters. He required that all posters be removed to enable anyone walking by to be able to see inside the office. There was no camera inside the barber shop however the Lieutenant advised that an officer is always present when an inmate is getting a haircut. The laundry room has a camera and the facility identified a blind spot behind a dryer and corrected it with a mirror enabling viewing behind the dryer. All of the living units are open bay. Delta Unit has a capacity of 50 inmates and a population of 43 on the day of the audit. There are three phones in the dorm, five cameras, a KIOSK, and four "community showers". Showers and toilets have half walls enabling the inmates to have a degree of privacy and the ability to shower and use the restroom without cross gender viewing. Charlie Unit has a capacity of 50 with a population on the day of the audit of 48. This unit has the same layout and features as Delta Dorm. Outside the living unit is a stair well going upstairs to a chemical room and property room. Previously there was nothing preventing inmates from going up the stairs except staff supervision. The Deputy Warden eliminated that potential by installing a chain link gate that is high and wide enough to prevent an inmate from negotiating around the gate. Bravo Dorm has a capacity of 52 and a population on the day of the audit of 48. There are seven (7) cameras in Bravo. This unit also has PREA Curtains installed, obstructing viewing while inmates shower and half walls providing privacy for the toilet area. A common area between Alpha and Bravo have six (6) phones. A main control room contains equipment typically seen in control rooms. There are multiple camera monitors. Some cameras maintain recordings for 10 days while others maintain them for 100 days. The Deputy Warden advised the auditor of current discussions for upgrades of cameras to include tilt and zoom and aerial cameras enabling viewing between bunks. The medical area has offices with windows and windows in doors. There are PREA Posters located throughout the facility including Sexual Assault Advocacy Posters. Notices of the PREA Audit were observed throughout the facility. It is obvious from this tour that the administration takes viewing and supervision seriously and are continuously trying to evaluate potential areas where sexual activity could take place. Outside of the control room in a hall are boxes mounted to the walls to enable inmates to communicate with the warden, deputy warden, Lieutenant, medical, administration, and the counselor.

Following the tour, the auditor conducted a very brief exit with the Deputy Warden during which the preliminary findings were discussed.

DESCRIPTION OF FACILITY CHARACTERISTICS

The Harris County Prison is located in Hamilton, Georgia, approximately ninety miles south of Atlanta, Georgia. The Harris County Prison only houses adult male offenders who have no sexual offense convictions on their record. The institution houses a maximum of 150 minimum to medium security inmates. Some of the inmates housed in this facility work inside of the institution on a variety of details. Most of the inmate population is assigned to outside details, providing services to the community such as maintaining the roads, the parks and trash collection throughout the county. Traditionally the Harris County Prison has one full time counselor who teaches motivation for change, reentry and has an instructor who comes to the facility to teach General Education (GED). Harris County Prison also provides the opportunity for the inmates to take the appropriate testing to receive their G.E.D. All of the inmates housed at this institution are housed under one roof, B,C,D dorm and an isolation and segregation area if needed. The Harris County Prison currently has 25 security positions, five of whom are outside detail officers while the other 20 work inside the institution. The Harris County Prison has one full time nurse and a part time doctor who visits the institution weekly. The institution is designed to have one Warden and one Deputy Warden over security of the institution.

SUMMARY OF AUDIT FINDINGS

The PREA Notices were posted in areas of the facility accessible to staff, inmates, visitors, volunteers and contractors. The auditor did not receive any communication from any inmate of staff as a result of the notices.

The auditor's approach and methodology to evaluating standard compliance consisted of reviewing the information provided on the flash drive, including policies, procedures and supporting documentation. Additionally, interviews were conducted with randomly selected staff and inmates, specialized staff and the director of the Sexual Assault Support Center. Observations made during the tour and during the audit were also vital components to the evaluation process. Additional documentation provided at the audit, during the audit and following the audit was reviewed. The auditor read each standard and applied the verbiage of the standard to determine compliance.

Forty-three standards were reviewed.

Number of standards exceeded: 1

Number of standards met: 42

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:

The State of Georgia Department of Corrections (DOC) Policy 208.06, Sexual Abusive Behavior Prevention and Intervention Program, and the Harris County Prison (HCP) PREA Policy, requires a Zero Tolerance for all forms of sexual abuse and sexual harassment. 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 HCP 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. A memo from the warden of the facility designated the Deputy Warden as the Facility PREA Compliance Manager. This position is also documented on the Harris County Prison Organizational Chart. The PREA Compliance Manager reports directly to the warden. An interview with the PREA Compliance Manager confirmed that this individual is sincerely dedicated to sexual safety. His knowledge of PREA and the PREA Standards is exceptional. Too, the fact that he has completed multiple training courses related to PREA including crisis intervention and NIC On-Line Training. He indicated that the Warden, when assigning him the PREA responsibilities, told him that he wanted this to be his sole focus.

Every interviewed staff and inmate was aware of the Facility's Zero Tolerance for any form of sexual activity. They also all stated they had received information and training related to the Zero Tolerance Policy and had signed acknowledgments that they understood it.

Documentation Reviewed:

- ✓ Harris County Prison Organizational Chart
- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Facility Organizational Chart
- ✓ Inmate Handbook
- ✓ Harris County Prison Local Operating Procedures
- ✓ Survey of Sexual Violence in Adult Correctional Facilities (SSV) – Definitions

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.

Documentation Reviewed:

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

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:

Staffing at the Harris County Prison is predicated upon the designed Facility capacity of 150 beds. The population on the day of the audit was 147. The facility direct care/custody staffing is based on Facility Rated Capacity. Minimally staffing consists

of the following on the day shift: Shift Supervisor, Control Room Officer, 3-4 Correctional Officers, 2 Lieutenants and the Deputy Warden (Monday through Friday). Minimums for the overnight shift are an officer in charge, a rover and a control room staff. When there are increased levels of contraband or for other needs, detail officers may be brought in to work inside the facility. 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 Harris County Prison of offenders against abuse. Interviews confirmed the facility does not go below the minimum adequate staffing. The Deputy Warden indicated that the facility maintains an "on-call" list for the day and night shifts. These may be called in as needed.

HCP provided information on the description of video monitoring technology. HCP has at the time of this audit 41 camera views that monitor movement on the interior and exterior of the Prison. Viewing for blind spots is enhanced through the use of mirrors and the repositioning of staff and/or equipment. Signs are placed on solid doors restricting access to authorized personnel only. The Control room is centrally located inside the Prison, with a satellite control room to monitor visitation on weekends and holidays. The cameras are located in areas that balance the privacy concerns of inmates with the need to maintain security, accountability and safety of all building occupants and the public. The retention of the video is 12 days for one operating system and 90 days for the 2nd operating system.

The annual staffing report indicated a thoughtful and serious process for evaluating staffing needs to ensure offenders and staff are safe. The Facility currently has 27 staff members who may have contact with inmates. The Pre-Audit Questionnaire (PAQ) stated that since August 20, 2012, or last PREA audit, the average daily number of inmates is 135.

Once per year the facility, in collaboration with the Facility PREA Compliance Manager/Coordinator, reviews the staffing plan to see whether adjustments are needed.

Policy prohibits staff from alerting other staff when unannounced rounds are conducted. Policy also requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment.

Upper management from the Officer in Charge, Lieutenants up to and including the Warden make unannounced PREA rounds. When conducting unannounced rounds staff indicated that they look into each room and check doors to make sure they are locked during rounds. Staff talks to offenders during their rounds through the dorms and ask questions to see if there are any PREA issues. Unannounced rounds are documented with the use of attachment "Unannounced PREA Rounds". Interviews with upper level staff confirmed that they made unannounced rounds. A lieutenant reported he cruises the facility daily and always drops in on the food services area.

This administration is attuned to and aware of potential areas/blind spots and are continuously thinking of how to enhance supervision and viewing of inmates.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Unannounced PREA Round Completed Sheets
- ✓ Harris County Prison Annual Staffing Report
- ✓ Memo: Ga. Statewide PREA Coordinator (6/14/2016)
- ✓ Memo: Staffing Plan Deviation (6/24/2016)
- ✓ Unannounced PREA Round (Review 30 copies)
- ✓ Harris County Prison POST Assignments Form

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. Harris County Prison does not house youthful inmates. There were no youthful offenders observed on the day of the on-site audit.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Memo: No Youthful Offenders (6/14/2016)

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, prohibits the Harris County Prison from conducting cross-gender strip or cross-gender visual body cavity searches of inmates except in emergency situations or when performed by medical personnel. According to PRE-Audit Questionnaire (PAQ) and confirmed by staff and inmate interviews, during the audit period, there were no cross-gender strip or cross-gender visual body cavity searches. Reviewed documentation indicated that the facility does not permit cross-gender pat-down searches of inmates, absent exigent circumstances. Interviews with staff indicated that cross gender pat searches do not occur and that there are always enough male staff to conduct them. Inmates related that they have never been searched by a female staff nor have they seen a female search an inmate.

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.

The facility prohibits staff from searching or physically examining a transgender or intersex inmates for the sole purpose of determining the inmate's genital status. The PAQ and staff indicated that no searches occurred during the audit period. Reviewed GDOC and the HCP Policy and provided post orders require officers of the opposite gender to announce their presence on the housing unit. Interviewed inmates indicated that most female staff do not work on the living units however they related that when a female staff does come on the units, they do announce their presence by saying, "female on the range".

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Incident Report #: 185304
- ✓ Sexual Abuse Incident Reviews (2/24/2016)
- ✓ Memo: To Ga. Statewide PREA Coordinator
- ✓ Memo: No Transgender Searchers (6/9/2016)
- ✓ Power Point Slide PREA In-Service Training (6/14/2016)
- ✓ Ga. Department of Corrections PREA Lesson Plan (2016)
- ✓ Ga. Department of Corrections Sexual Assault/Sexual Misconduct PREA Education Acknowledgement Statement

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 Harris 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.

The Harris County Prison local PREA 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) is utilized for communications with inmates with language barriers. A reference guide is placed in centralized areas for staff.

The Facility PAQ and interviews with staff indicated that the use of inmate interpreters, inmate readers, or other types of inmate assistants is prohibited except in limited circumstances where an extended delay would jeopardize an offender's

safety and well-being is prohibited. Interviewed staff indicated they would not use an inmate interpreter. Most were not sure about who provided the interpretive services but knew it would be provided by an outside entity.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Poster of Language Line Solutions
- ✓ To Access an Interpreter

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 Harris 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 inmate, 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.

State policy requires the facility, before it hires any new employees who may have contact with offenders complete a criminal background record check consistent with Federal, State, and local law, and 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. Documentation was provided to indicate that staff had background checks conducted again in August 2016.

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

An interview with the Facility Human Resources Staff indicated that potential employees complete an application, answer the PREA related questions and receive the paperwork authorizing their background checks. The background checks, conducted by the Harris County Sheriff’s Office, include the Georgia Crime Information System and the National Crime Information Checks as well a driver’s history. Once a potential employee is cleared the Acting County Manager reviews the background information received from the sheriff’s office. The Board of Commissioners then notifies the facility. Staff also related that annually corrections staff, who are certified by the Peace Officer’s Standards Training, have to undergo another NCIC background check and driver’s history check.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Criminal Background Checks
- ✓ Criminal Background Checks for 5 years Period
- ✓ PREA Questions

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. Harris County Prison has not had any expansions or modifications to the facility within the last 12 months. However, the PAQ indicated that the facility installed and updated video monitoring systems.

Interviews indicated that the facility is presently working with a vendor to install additional cameras in the facility. Five additional cameras with tilt and zoom capability and cameras with an aerial view to enable the control room staff to see between the bunks. To restrict access to a stairwell leading to the property and chemical rooms upstairs the facility installed a gate, high and wide enough to ensure an inmate cannot get around or over the gate.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Memo: Video or Electronic Monitoring Technology

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 Harris County Prison is responsible for conducting administrative sexual abuse investigations including offender-on-offender sexual abuse or staff sexual misconduct. If the investigation requires additional assistance of another law enforcement agency, the Harris County Prison Investigator will request this aid from the Harris County Sheriff's Office, the Georgia Bureau of Investigations or the Georgia Department of Corrections. The Georgia Department of Corrections is the primary point of contact with advisement is needed to/required to move forward with any investigation or if the investigation needs to be taken over from the Harris County Prison. In conducting the investigation, investigators arrange and conduct victim, suspect and witness interviews and perform all other duties normally associated with their respective duties. 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. The Deputy Warden, who is also the Facility Investigator, as well as the PREA Compliance Manager, reviewed five allegations that were investigated during the audit period with the auditor. Documentation indicated the investigations were thorough and professionally conducted, considering all of the available evidence.

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 would utilize the Columbus Midtown Medical Center for forensic exams. This was confirmed through interviews with the PREA Compliance Manager, the Harris County Prison Nurse and the Director of the Sexual Assault Support Center in Columbus.

The PAQ and staff interviews indicated during the audit period there were no forensic medical exams conducted at either facility. The investigations process was also described by staff who conduct investigations. The PREA Compliance Manager has completed the NIC On-Line Specialized Training for Conducting Sexual Assault Investigations in Confinement Settings.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Georgia Department of Corrections, Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ NIC Training Guide – c2s3p3-popup1
- ✓ MOU Harris County Prison and the Sexual Assault Support Center (SASCI) and Twin Cedars Youth and Family Services, Inc.
- ✓ Email: SANE (April 1, 2016)
- ✓ Email: Twin Cedars Youth Services, Inc.
- ✓ Certificate of Achievement: Staff Advocate (June 18, 2016)
- ✓ Certificate of Training: Sexual Assaults Support Center, Inc. (May 31, 2016)
- ✓ Certificate: NIC – Handling Difficult Conversations Effectively (February 26, 2016)

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 5 allegations of sexual abuse and sexual harassment reported during the audit period and none were referred for criminal investigation.

Staff, in their interviews, related that they are trained to accept reports or allegations from any source and to take all allegations, suspicions, reports or knowledge of sexual abuse or sexual harassment and to report it. Interviews with staff confirmed that they take allegations seriously and report them. A review of five investigations indicated they came about as a result of different kinds of reports. Two reports were through third parties, including the GDOC Hotline and three resulted from the grievance process.

The Harris County Prison Website provides information for anyone wishing to make a report of sexual abuse.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections, Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Incident Report #: 185304
- ✓ Sexual Abuse Incident Reviews (2/24/2016)
- ✓ Memo: To Ga. Statewide PREA Coordinator

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:

Georgia Department of Corrections Policy 208.06, Sexual Abuse Prevention, and HCP 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 Harris 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.

The PAQ indicated that 75 staff, currently employed, were trained or retrained on the PREA requirements. The facility provided a sample of Staff Acknowledgment of Statement for Training indicating staff was PREA trained and understood the PREA Training that they received.

Interviews with staff indicated they participate in annual training and PREA is a part of that training. Staff were knowledgeable of the zero tolerance policy. They were also aware of their responsibilities for reporting and as first responders.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Staff Acknowledgement Statement (129 Total Reviewed)
 - Employment Standards of Conduct
 - Employee Anti-Harassment Policy/Employee Grievance Procedure
 - Georgia Depart. Of Corrections PREA – Acknowledgement Statements for Supervised/Visitors/Contractors/Volunteers
 - PREA Policy Acknowledgement
 - PREA Acknowledgement Statement
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ In-Service 2016 Training Record (22 Reviewed)
- ✓ PREA Compliance Manger's Training (4/29/2016)
- ✓ Extra PREA In-Service Email
- ✓ Training: Department of Corrections Confirmation Code 295891
- ✓ Certificate of Achievement: Staff Advocate (June 18, 2016)
- ✓ Certificate of Training: Sexual Assaults Support Center, Inc. (May 31, 2016)
- ✓ Certificate: NIC – Handling Difficult Conversations Effectively (February 26, 2016)
- ✓ Power Point Slide PREA In-Service Training (6/14/2016)
- ✓ Ga. Department of Corrections PREA Lesson Plan (2016)

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 HCP has a total of 6 volunteers and 8 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. An interview with a contractor indicated that she was trained like any other employee at the facility. She understood the zero tolerance policy and how to report as well as how to respond as a non-security first responder.

Reviewed Documentation to determine compliance:

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

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, 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 Harris 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.

Inmate interviews indicated that these inmates have been informed about the zero tolerance policy, their rights related to sexual abuse, and how to report sexual abuse and sexual harassment. Two, inmates indicated that sexual abuse does not happen at this facility. They also were able to describe multiple ways to report and the majority stated they would just tell a staff.

Documentation Reviewed:

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

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 Harris 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 PREA Audit Report

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.

The PAQ indicated that 2 investigators currently employed who completed the required training.

The Deputy Warden, who serves as the Facility's PREA Compliance Manager is a Facility Investigator, along with one additional staff who conducts investigations. Together the auditor and the PCM reviewed five investigations conducted at the facility. The investigation process was thorough and indicated an objective and comprehensive process ending up with a detailed report.

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ NIC: PREA Investigating Sexual Abuse in a Confinement Setting
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ 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.

Reviewed Documentation to determine compliance:

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

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:

Harris 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 HCP 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.

Harris County Prison does not house sex offenders. Sex offenders have been determined to be inappropriate for this type of program. The staff responsible for screening for victimization/aggressiveness related that she begins examining the inmate's record in SCRIBE (the inmate database) as soon as she receives an order that an inmate is being transferred to the Harris County Prison. She said she would be examining things like the inmate's offense history, any medical or mental health issues or for any flags as a potential victim or aggressor. She would also review any victimization screens conducted at previous facilities. She related that all of this information is taken into account to inform housing and details and would be considered during the classification meeting. She also related that in the event an inmate reported prior sexual victimization, she would offer the inmate a follow up meeting with a mental health professional at Rutledge State Prison. The Deputy Warden, also in an interview, stated that newly arriving inmates are housed in "D" Dorm however he related that based upon the risk screening instrument results, inmates who were rated high for victimization would be housed in the C Dorm and bedded in the front portion of the dorm. This enabled the control room staff to also observe the inmate. C Dorm houses inmates who are adjusted well enough to work on "outside" work details. C Dorm also provides a better line of sight than any other dorm.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ PREA Sexual Victim/Sexual Aggressor Classification Screening
- ✓ Victim/Aggressor Classification Ratings
- ✓ Ga. Depart. Of Corrections – Receiving Health Screening Form
- ✓ Consent to Treatment Form
- ✓ Consent for Medication to Keep-on-Person
- ✓ Medical Classification Form
- ✓ Nurses Notes
- ✓ Contacts List (History for Offender)

- ✓ Offender Orientation Checklist
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris 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. Interviews indicated that inmates at risk for victimization as identified in the risk screening process would be placed in the dorm identified to house those inmates. That area is “C” Dorm, a dorm housing inmates who work on “outside” work details and are generally responsible inmates. But, in addition to housing the potential victim in Dorm “C”, the inmate would be placed in the front of that dorm. This enables the staff in the security station to monitor these inmates more effectively. Interviews indicated that segregation or protective custody would only be used as a last resort and then only until an alternative means for keeping the inmate safely could be arranged.

HCP 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 require 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 and interviews confirmed that during the past 12 months there were no Harris County Prison offenders at risk of sexual victimization who were placed in isolation.

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

- ✓ Harris County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Victim/Aggressor Classification Ratings
- ✓ Ga. Dept. Of Corrections – Receiving Health Screening Form
- ✓ Consent to Treatment Form
- ✓ Consent for Medication to Keep-on-Person
- ✓ Medical Classification Form
- ✓ Nurses Notes
- ✓ Contacts List (History for Offender)

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 HCP 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 and staff confirmed during interviews that there have been no inmates at risk of sexual victimization were held in involuntary segregated housing during the audit period.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris 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 Harris 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. SART Member
7. Third Parties
8. Sick Call Request
9. Sexual Assault Support Center Hotline – 706-571-6010
10. County Prison Inmates: 1-888-992-7849
11. Ga. Department of Corrections Statewide PREA Coordinator
12. Ombudsman Office
13. Ga. Department of Corrections – Office of Victim Services
14. PREA Hotline (Inmate Phone) *7732
15. Georgia Department of Corrections Tip Reporting Poster (478) 99205348 and Email: Tipreporting@gdc.ga.gov
16. Via the KIOSK

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

Inmates at this facility are provided multiple ways to report. Five reviewed allegations of sexual abuse and/or sexual harassment made during the audit period included 3 reported through the grievance process and two through third parties, including the "hotline". Interviews with inmates confirmed that they are aware of multiple ways to report including telling a staff, dropping a note to staff, family members, friends, through the "hotline", in a grievance or through emails on the KIOSK. Inmates indicated they can email anyone on their contact list as well as the Warden, Deputy Warden and other key institutional staff. During the tour the auditor observed boxes attached to the wall of the hall outside the main control room. These boxes were for inmates to drop notes or requests in. Boxes were labeled "Warden", "Deputy Warden", "Lieutenant", "medical", "Administration" and the "counselor". Posters throughout the facility informed inmates how to report. One poster described the "TIP" Line enabling inmates to make a report to the Georgia Department of Corrections. This was in addition to the hotline numbers posted throughout the facility. Interviews with all levels of staff indicated that these staff

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take allegations seriously and that they would report them immediately to their shift supervisor followed up with a written report. Inmates at this facility also have access to the “outside world” when they go out of the facility almost daily to work on work details in the community.

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.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Inmates Handbook
- ✓ MOU between HCP and Sexual Assault Support Center (4/10/2016)
- ✓ Posters

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.

The Pre-Audit Questionnaire and staff interviews indicated that there were 3 grievances alleging sexual abuse filed during the audit period. These three grievances resulted in investigations as required. The PAQ indicated that no emergency grievances alleging substantial risk of imminent sexual abuse were filed during this audit period.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement
- ✓ Memo: No Extension of Grievance
- ✓ Offender Grievance (3 Reviewed)
- ✓ Incident Reports

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 Harris County Prison provides offenders with access to outside victim advocates for emotional support services related to sexual abuse. Inmates are provided access to outside victim advocates for emotional support related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers, for the Sexual Assault Support Center. The facility has a Memorandum of Understanding with the agency to provide advocates who will meet the inmate at the hospital and provided, if requested, emotional support throughout the forensic exam process as well as interviews and investigations and telephonically, if needed. This organization also mans a 24-hour crisis line that is available to inmates for reporting as well as for securing the services of a victim advocate. The auditor contacted the director of the Sexual Assault Support Center who related that upon learning of an inmate assault, she would provide access to an advocate. She related that she has two advocates who are on staff and access to victim advocates who volunteer their services. Inmates would initially be taken to Midtown Medical Center in Columbus, GA for a forensic exam by a forensic nurse examiner and the advocate would meet the victim at the hospital. Additionally, the Sexual Assault Support Center provided advocacy training to 14 staff at the facility in 2016 with plans to train an additional 14 in the upcoming year. The Deputy Warden is considering seeking a MOU with the Twin Cedars Child Advocacy Center in LaGrange, Georgia, an agency with the capability of conducting forensic securing exams with advocates on the same campus who can respond expeditiously to the inmate to be examined.

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 facility provided several memos confirming their efforts to enter into a MOU with an outside organization for providing advocacy services.

The agency has MOUs with the Sexual Assault Support Center. Anytime an inmate alleges that a sexual misconduct act occurred, The Sexual Assault Support Center's Victim Advocate will be notified and will provide and outside Victim Advocate

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who will provide emotional support services related to sexual abuse and will provide support to the alleged victim.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ MOU between HCP and Sexual Assault Support Center (4/10/2016)
- ✓ Posters
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections

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 Harris County Prison can report through the Georgia Department of Corrections website or the Harris County Prison 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. Anyone can learn how to file a report of sexual abuse or sexual harassment through the Harris County Prison Website. All staff were knowledgeable of third parties as a source for reporting allegations of sexual abuse.

Inmates were well aware that they can make a report through a third party and that a third party may assist them in making a report. Reviewed investigations confirmed that two of the five allegations made during the audit period were made through third parties.

Documentation Reviewed:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ MOU between HCP and Sexual Assault Support Center (4/10/2016)
- ✓ Harris County Prison Website
- ✓ Ga. Department of Correction Website
- ✓ 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:

HCP 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 Harris County Criminal Investigations Division.

Documentation Reviewed:

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

HCP 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 was one occasion 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 with staff indicated that if an inmate was at substantial risk of imminent sexual abuse, staff related that they would take the report or allegations seriously and immediately remove the inmate from the threat and keep the inmate safe until the shift supervisor made a decision about that to do. Additional interviews indicated that inmates would be removed as far away from the threat as possible but that all allegations would be taken seriously.

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ SART Team Meeting Minutes (1/5/2016)
- ✓ 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.

The PAQ and interviews with staff indicated 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 HCP. The Deputy Warden, who is currently in charge of the facility in the absence of the Warden, was knowledgeable of the actions required by the standards.

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ MEMO: No Allegations (6/14/2016)

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.

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.

The Harris County Prison Local Operating Procedures require that the shift supervisor ensure that the victim and aggressor are physically separated. Then staff are required to advise the victim not to shower or clean themselves in any way, that they are not to eat, drink, brush their teeth or take any other measures that would damage or destroy evidence. Staff are to secure the scene if possible and secure any video footage of that area. The alleged victim should be immediately taken to the Medical Department, if medical staff are on duty and then to the Midtown Medical Center in Columbus, GA where a forensic exam is to be conducted.

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 PREA Audit Report

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.

First responder duties for non-security staff are the same as security. The PAQ indicated that there was 1 allegation that an inmate was sexually abused, reported by a non-security staff member as the first responder during the past 12 months. Staff were knowledgeable of their responsibilities as first responders. Additionally, the interviewed staff were equipped with a first responder card.

Reviewed Documentation to determine compliance:

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

The coordinated response plan is described in the Harris County Local Operating Procedures. It identifies and discusses the roles of the first responder, medical, the forensic examiner, the Sexual Assault Support Center, the Harris County Sheriff’s Office and the Muscogee County Sheriff’s Officer (for a forensic photographer).

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Harris County Prison Sexual Abuse Coordinated Team Response Sheet (Written Plan)
- ✓ Harris County Prison Sexual Abuse Incident Review Team Meeting Minutes

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris 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 Harris 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 Harris County personnel policies, procedures and rules. This facility is not involved in collective bargaining. This information was confirmed during interviews with the Deputy Warden.

Reviewed Documentation to determine compliance:

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris 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:

Harris 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’s Deputy Warden now serves as retaliation monitor in this facility however the plan includes up to four monitors. 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 and interviews with staff indicated 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.

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Harris County Prison PREA Retaliation Monitoring Sheet
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris 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 placed 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 and interviews with staff indicated that during the past twelve (12) months there were no offenders who alleged being in a substantial risk of being sexually abused. Interviews indicated that inmates would be placed in segregation only as a last resort. The first response would be to segregate the alleged offender and move the inmate as far away from the issue as possible. The default response would be to place the inmate in the “C” Dorm in a bunk close to the security station where inmates can be more easily viewed by security staff.

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ MEMO: No Occurrences (6/14/2016)

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:

HCP 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 Harris 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 Harris 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 Harris County Prison is not a basis for termination of the investigation.

The GDOC Investigators document in a written report thorough 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 Harris County Prison retains all written reports for as long as long as the alleged abuser is in custody or employed by the institution plus ten 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.

The Deputy Warden/PREA Compliance Manager reviewed, along with the PREA Auditor, five investigations conducted at the facility. His knowledge of the investigation process is comprehensive and thorough. He discussed how the referral was
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made, actions taken upon receiving the report/allegation. He then discussed the evidence gathering process and the evidence from each case. Reports were thorough and very detailed. He also related that if an allegation appears criminal he calls in the Harris County Sheriff's Office and/or the Georgia Department of Corrections Investigators. Investigations were the result of allegations made through third parties, including a hotline referral, and three were made through the grievance process.

Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris 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)
- ✓ Incident Report #: 185304
- ✓ Sexual Abuse Incident Reviews (2/24/2016)
- ✓ Memo: To Ga. Statewide PREA Coordinator

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 states 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. This was also confirmed through interviews with the PREA Compliance Manager and one facility investigator.

Reviewed Documentation to determine compliance:

- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ Incident Report #: 185304
- ✓ Sexual Abuse Incident Reviews (2/24/2016)
- ✓ Memo: To Ga. Statewide PREA Coordinator

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:

HCP policy requires that inmates who are currently in the custody of the Harris 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.

Reviewed Documentation to determine compliance:

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

Harris 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 HCP 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 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 indicated that sanctions would be approved by the Harris County Board of Commissioners. If an allegation against staff is substantiated the presumptive sanction would be termination. The employee most likely would be placed on administrative leave until the conclusion of an investigation.

One staff has been placed on leave during an investigation of an allegation into sexual abuse. Apart from that case there have been no allegations of staff on inmate sexual assault, abuse, misconduct or sexual harassment after the PAQ was submitted.

Reviewed Documentation to determine compliance:

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

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 Harris 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 and staff interviews indicated 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 indicated that upon receiving an allegation of sexual abuse or any violation of sexual abuse or sexual harassment policies against a volunteer or a contractor, the volunteer or contractor would be removed from the building, barred from entering the facility and referred for prosecution as indicated.

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ MEMO: Corrective Action for Contractors & Volunteers (6/14/2016)

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 Harris 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 and staff interviews indicated 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.

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris 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)
- ✓ MEMO: Disciplinary Sanctions for Inmates (6/14/2016)

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:

Harris 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.

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.

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 with staff indicated that if an inmate reported prior victimization or prior sexual abusiveness the inmate would be offered a follow-up with mental health staff at Rutledge State Prison in Columbus, Georgia.

Reviewed Documentation to determine compliance:

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

- ✓ PREA Sexual Victim/Sexual Aggressor Classification Screening (Reviewed 1)
- ✓ Victim/Aggressor Classification Ratings
- ✓ Ga. Depart. Of Corrections – Receiving Health Screening Form
- ✓ Consent to Treatment Form
- ✓ Consent for Medication to Keep-on-Person
- ✓ Medical Classification Form
- ✓ Nurses Notes
- ✓ Contacts List (History for Offender)
- ✓ Offender Orientation Checklist

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:

Harris 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.

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. 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. An interview with the Medical Staff indicated that her role would be to ensure that first aid was rendered as needed and that she would be careful to tell the inmate not to take any actions that would contaminate the evidence. Emergency mental health is available through the Rutledge State Prisons in Columbus, Georgia.

The staff at the Columbus Midtown Medical Center would provide STI prophylaxis and testing, Medical staff at Harris County Prison would provide follow-up in compliance with any discharge orders.

Reviewed Documentation to determine compliance:

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

Reviewed Documentation to determine compliance:

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

Harris 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 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. Documentation of incident reviews was however provided in some of the “unfounded” investigation report packages. Staff were able to articulate the incident review process and indicated that they use this information to determine if there was anything they could learn from the incident and if needed, change a policy, train staff or take whatever measures are necessary to attempt to prevent the same issues in the future.

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Harris County Prison Sexual Abuse Coordinated Team Response (Written Plan)
- ✓ Harris County Prison Sexual Abuse Incident Review Team Meeting Minutes Sheet
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris County Prison Local Operating Procedures
- ✓ Intergovernmental Agreement County Capacity with Department of Corrections
- ✓ MEMO: Sexual Abuse Incident Reviews (6/14/2016)
- ✓ Offender Grievance
- ✓ Offender Personal Data Summary
- ✓ Offender Notifications of Investigation Results (May 6, 2016)
- ✓ PREA Incident Report
- ✓ MEMO: Sexual Abuse Incident Review (6/14/2016)

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:

Harris 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-5.

Reviewed Documentation to determine compliance:

- ✓ Pre-Audit Questionnaire (PAQ) Adult Prisons & Jails
- ✓ Survey of Sexual Violence in Adult Correctional Facilities (SSV) Defining Sexual Victimization
- ✓ MEMO: Annual Data Collection
- ✓ Georgia Department of Corrections Policy 208.06, Prison Rape Elimination Act – PREA
- ✓ Harris 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:

Harris 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 policies, 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.

Reviewed Documentation to determine compliance:

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

Harris 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.

Reviewed Documentation to determine compliance:

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

R. Lanier

9/16/2016

Auditor Signature

Date