

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS

Interim Final Report

Auditor Information

Auditor name: Katherine Brown
Address: 12121 Little Road Suite 286 Hudson, Florida 34667
Email: kbrown2828@yahoo.com
Telephone number: 727-470-4123
Date of facility visit: May 4, 2016
Date report submitted: May 5, 2016

Facility Information

Name of facility: Colquitt County Correctional Institute
Physical address: 200 N. Veterans Parkway Moultrie, GA 31788
Telephone number:

Colquitt County Correctional Institute is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	

Name of facility's Chief Executive Officer: Billy Howell		Title:	Warden
Number of staff assigned to Colquitt County Correctional Institute in the last 12 months:			
Designed facility capacity: 190			
Current population of facility: 190			
Facility security levels/inmate custody levels: Medium			
Age range of the population: 18+			
Name of PREA Compliance Manager: James Stancil		Title:	Deputy Warden Care & Treatment
Email address: James.Stancil@gdc.ga.gov		Telephone #	

Agency Information

Name of agency: Colquitt County Correctional Institute
Governing authority or parent agency:
Physical address: 200 N. Veterans Parkway Moultrie, GA 31788
Mailing address: SAA
Telephone number: 229-616-7430

Agency Chief Executive Officer

Name: Billy Howell	Title:	Warden
Email address: Billy.Howell@gdc.ga.gov	Telephone number:	229-616-7430

AUDIT FINDINGS

NARRATIVE:

The audit of Colquitt County Correctional Institute was conducted on May 4, 2016 by Katherine Brown, Certified PREA auditor. Prior to the on-site I received all the policies and documentation on April 14, 2016 to review and requested additional documentation to satisfy the standards. Received additional documentation on April 21, 2016 and completed the initial review.

An entrance meeting was held with facility staff. The following people were in attendance: Billy Howell, Warden; Gene Williams, Deputy Warden of Security; James Stancil, Deputy Warden of Care and Treatment; Amber Norman, Prison Nurse Practitioner; Carol Stripling, Warden's Secretary.

Following the entrance meeting I toured the Colquitt County Correctional Institute from 0915 - 1000. On the tour with me was Billy Howell, Warden; Gene Williams, Deputy Warden of Security; James Stancil, Deputy Warden of Care and Treatment; Amber Norman, Prison Nurse Practitioner. The areas toured were a total of 4 general population dorms and one administrative detention/segregation unit containing 12 cells, plus the kitchen, laundry, programs area, and work areas.

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

I asked for an alpha listing of all inmates housed at Colquitt County Correctional Institute and randomly selected two inmates from each housing unit (8) as well as any inmates who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impairment inmates; limited English speaking inmate or transgender/intersex inmates at the facility at the time of the audit. I also asked for a shift roster selected all security staff present to interview (3). I conducted 12 specialized interviews.

There were 2 sexual assault/harassment allegation cases, all relatively recent (within the past year) 1 had been unfounded and 1 substantiated, that involved a contractor provider.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Colquitt County Prison is located at 200 S. Vanderberg Dr., Moultrie, GA which is approximately 35 miles west off Valdosta Georgia. The County prison took over the old Probation center four years ago. This building consists of 4 dormitory style housing units each containing beds to house up to 55 inmates. Each dorm as a multi-purpose room with showers and bathrooms in the back of each dorm. The dorms are monitored by cameras and a control room has viewing of each dorm. There are two officers and one supervisor assigned to each shift to conduct rounds. The prison has a recreation yard behind the building, a laundry kitchen /dining hall. All areas are in plain view of the control room and/or monitored by the camera security system or officer presence.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 3

Number of standards met: 38

Number of standards not met:

Number of standards not applicable: 2

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

Based on review of Colquitt County Correctional Institute Policy 4; Organizational Chart interviews with PREA compliance manager I find they meet this standard.

Colquitt County Correctional Institute has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Colquitt County Correctional Institute' approach to preventing, detecting, and responding to such conduct. Colquitt County Correctional Institute complies with this standard by utilizing CCCI PREA Policy. This policy mandates zero tolerance toward all forms of sexual misconduct and is used to prevent, detect, and respond to any form of sexual abuse and sexual harassment.

Colquitt County Correctional Institute designates an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards. Colquitt County Correctional Institute complies with this standard in that the Deputy Warden of Care and Treatment has been designated the PREA Coordinator for the agency by the Warden.

§115.12 Contracting with other agencies for confinement of inmates

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

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

Colquitt County Correctional Institute does not contract for the confinement of their inmates.

§115.13**Supervision and monitoring**

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

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

Based on review of Colquitt County Correctional Institute Policy; Staff Work Schedule; Staffing Plan; Annual review; logbooks documenting unannounced rounds and interview with Warden and PREA Coordinator I find they meet this standard.

Colquitt County Correctional Institute has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect inmates against sexual abuse. Colquitt County Correctional Institute complies with this standard by utilizing the staffing plan and shift rosters that were reviewed as part of this audit. The facility operates with overlapping shifts there are shifts from 11-11 and 7-7 that consists of 3 officers and a supervisor per shift.

In circumstances where the staffing plan was not complied with, Colquitt County Correctional Institute documented and justified all deviations from the plan. All deviations from the staffing plan were documented on the shift rosters.

Colquitt County Correctional Institute completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed. Colquitt County Correctional Institute complies with this standard based on review of the annual staffing report.

§115.14**Youthful inmates**

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

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

Colquitt does not house juveniles

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

Based on review of Colquitt County Correctional Institute Policy 4.7; Lesson Plan and In Service Training Roster I find they meet this standard.

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

Colquitt County Correctional Institute has policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit. During the tour and random inmate interviews it was confirmed that inmates have privacy to perform bodily functions and cross gender staff announcements are made.

Colquitt County Correctional Institute does not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. There were no transgender inmates at the prison at the time of the audit but based on staff interviews transgender/intersex inmates would not be searched for sole purpose of determining the inmate's genital status.

Colquitt County Correctional Institute trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Random staff interviews confirmed they have been trained in cross gender pat down searches. There is only one female officer working at the prison and she works in the control room.

§115.16	Inmates with disabilities and limited English speaking
----------------	---

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 4.8; MOU with Sheriff Office to provide interpret services; and PREA Pamphlet. Based on random inmate and staff interviews I find they meet this standard.

There were no limited English speaking inmates at the time of the audit but there are policies in place that address the following:

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

Colquitt County Correctional Institute does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. None have been used or required. The PREA Pamphlet is in both English/Spanish. Colquitt County Correctional Institute has an MOU with the Sheriff Office to provide translation for other languages.

§115.17	Hiring and promotion decisions
----------------	---------------------------------------

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 4.9; New Employee Application Form and annual background checks as well as interview with Warden's Secretary who is responsible for processing new hires I find they exceed this standard.

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

Colquitt County Correctional Institute considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

Colquitt County Correctional Institute performs a criminal background records check before enlisting the services of any contractor who may have contact with inmates performs a records check annually on all current employees/contractors and volunteers who may have contact with inmates. Review of personnel files confirmed the background checks are being done.

§115.18 Upgrades to facilities and technology

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

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

Based on review of Colquitt County Correctional Institute Policy 4.10 and interview with warden I find the meet this standard.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Colquitt County Correctional Institute considers how such technology may enhance Colquitt County Correctional Institute' ability to protect inmates from sexual abuse. There has been no substantial expansion or modifications to existing facilities. Colquitt County Correctional Institute currently utilizes cameras that are used to prevent sexual abuse and investigate allegations of wrongdoing. The Deputy Warden has access to the camera's from home. When installing new equipment, the Warden, Deputy Warden of Security, and facility SART will ensure it is used to protect inmates form sexual abuse. On May 12, 2016 they will open bids to replace all existing cameras and add a few more in the kitchen area.

§115.21 Evidence protocol and forensic medical exams

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

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

Based on review of Colquitt County Correctional Institute Policy 5; NIC Certificate for PREA-Behavioral Healthcare for Sexual Assault Victims in Confinement and telephone interview with SANE staff and PREA compliance manager I find they meet this standard.

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

Colquitt County Correctional Institute offers all victims of sexual abuse access to forensic medical examinations, at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations are be performed by Sexual Assault Nurse Examiners (SANEs) from Colquitt Regional Medical Center.

Colquitt County Correctional Institute makes available to the victim a victim advocate from the District Attorney's Office Special Victims unit.

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

To the extent Colquitt County Correctional Institute itself is not responsible for investigating allegations of sexual abuse, Colquitt County Correctional Institute requests that the investigating agency follow the requirements listed above. All investigators from the Colquitt County Sheriff Office have taken the NIC course for investigating allegations of sexual abuse in a confinement setting.

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

Based on review of Colquitt County Correctional Institute Policy 6.0 & 10.3 and interview with investigative staff I find they meet this standard

Colquitt County Correctional Institute ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Colquitt County Correctional Institute follows the standards set forth by the Colquitt County Correctional Institute in policy number 208.06. The Department's response to sexual assault follows "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents." When an incident is reported, a physical examination of the alleged victim is conducted and SANE protocol is initiated. The Warden will immediately ensure an investigation is referred to the GDC Internal Investigations Unit. Referrals to outside law enforcement agencies will be made with the cooperation of the Internal Investigations Unit.

Whenever an allegation is made, the Warden will notify the GDC Internal Investigations Unit. This notification will be made in writing and the notification will become part of the PREA investigation. The Warden OR his/her designee OR the Colquitt County Prison Facility PREA Coordinator/Compliance Manager will report all allegations of sexual assault with penetration and those with immediate and clear evidence of physical contact to the OPS Senior Investigator and the GDC PREA Coordinator immediately upon receipt of the allegation. Where sexual assault is alleged and cannot be cleared at the local level, the OPS Senior Investigator will determine the appropriate response upon notification. If this appropriate response is to open an official investigation, the OPS Senior Investigator will dispatch an investigator who has received special training in sexual abuse investigations. OPS Investigators will gather and preserve direct and circumstantial evidence including any available electronic monitoring data; will interview alleged victims, suspected perpetrators, and witnesses; and will review any prior complaints and reports of sexual abuse involving the suspected perpetrator. When the criminal investigation by OIC/OPS is completed at the GDC level, it will be turned over to local Colquitt County governing authorities to conduct any other necessary compelled administrative interviews. The credibility of the victim, suspect, or witness will be assessed on an individual basis and will not be determined by the person's status as inmate or staff. An inmate who alleges sexual abuse will not be required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

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

Based on review of Colquitt County Correctional Institute Policy 6.0; In Service Training Records; Sexual Assault/Sexual Misconduct Acknowledgement Statement; PREA Power Point; Training Roster – Sign In Sheet; Staff Guide on the Prevention & Reporting of Sexual Misconduct with Inmates and interview with random staff I find they meet this standard.

Colquitt County Correctional Institute trains all employees who have contact with inmates on:

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

All staff has received PREA training during in service training. Colquitt County Correctional Institute in compliance with this standard based on review of training records and random staff interviews.

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

Colquitt County Correctional Institute documents, through employee signing the training roster, attesting they understand the training they have received.

§115.32 Volunteer and contractors 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 comments, including corrective actions needed if does not meet standard

Based on review of Colquitt County Correctional Institute Policy 6.0 reviewed Sexual Assault/Sexual Misconduct Acknowledgement Statement for Supervised Visitors and interview with volunteer and contractors I find they exceed this standard.

Colquitt County Correctional Institute ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Colquitt County Correctional Institute’ sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Colquitt County CI also provides training to all areas around the county where work details are assigned with or without an officer. PREA posters have also been posted in those work areas around the county. The Deputy Warden of Care and Treatment also provides PREA training to vendors that have access to the facility i.e. phone repair etc.

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

Colquitt County Correctional Institute has documentation confirming that volunteers and contractors understand the training they have received. All volunteers sign a Sexual Assault/Sexual Misconduct Acknowledgement Statement. Volunteers and contractors interviewed confirmed they had received this training.

Based on the extensive training to all work sites I find they exceed in this 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 comments, including corrective actions needed if does not meet standard

Based on review of Colquitt County Correctional Institute Policy 6.3; PREA Sexual Victimization/Aggressor classification Screening; Inmate Handbook Attachment form; MOU with Colquitt County Sheriff Office; Brochure and PREA Pamphlet and interview with random inmates and intake staff I find they meet this standard.

During the intake process, inmates receive information explaining Colquitt County Correctional Institute’ zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. During the intake process all inmates receive the PREA pamphlet and watch the video, as was confirmed on the tour.

Within 24 hours of intake the PREA Coordinator meets with each inmate and provides a comprehensive education to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents.

Colquitt County Correctional Institute provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. There is documentation of inmate participation in these education sessions. The PREA Pamphlet is in both English/Spanish; Colquitt County Correctional Institute has a contract with the Colquitt County Sheriff Office to provide translation for other languages.

§115.34 Specialized training: Investigators

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

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

Based on review of Colquitt County Correctional Institute Policy 6.4 NIC Certificate PREA Investigating Sexual Abuse in a Confinement Setting; and interview with investigative staff I find they meet this standard.

In addition to the general training provided to all employees Colquitt County Correctional Institute ensures that the in house investigators have received training in conducting investigations in confinement settings.

Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Colquitt County Correctional Institute maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Colquitt County Correctional Institute personnel who are tasked with conducting investigations or acting in any capacity with a PREA investigative team are required to attend a specialized PREA training class using the NIC Specialized Training PREA Investigating Sexual Abuse in a Confinement Setting curriculum. At the conclusion of the class members are given a written exam to ensure their understanding of the class instruction and content delivered. Class attendance is documented locally by the GDC Training Division. All allegations of sexual misconduct are reported to the GDC Internal Investigations Unit. Staff of that unit has received specialized training regarding the techniques for investigating PREA-related issues. If it is a county inmate the investigation is conducted by the Colquitt County Sheriff Office. All investigators from the sheriff office have been trained in conducting sexual assault investigations in a confinement setting.

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

Based on review of Colquitt County Correctional Institute Policy 6.5 NIC Certificate – PREA Medical Health Care for Sexual Assault Victims in a Confinement Setting and Lesson Plan and interview with medical staff I find they meet this standard.

Colquitt County Correctional Institute ensures that all full time medical health care practitioners who work regularly in its facilities have been trained in how to: detect and assess signs of sexual abuse and sexual harassment; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment. Colquitt County Correctional Institute medical personnel are required to attend a specialized PREA training class using the NIC Specialized Training PREA Medical Health Care for Sexual Assault Victims in a Confinement Setting curriculum. At the conclusion of the class members are given a written exam to ensure their understanding of the class instruction and content delivered.

Colquitt County Correctional Institute maintains documentation that medical health practitioners have received the training.

Medical health care practitioners also receive the training mandated for employees, contractors and volunteers. All medical and mental health practitioners receive the same PREA training for regular staff. This was confirmed during the interviews and review of training records.

All forensic exams are performed at Colquitt County Regional Hospital.

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

Based on review of Colquitt County Correctional Institute Policy 7.0; PREA Sexual Victim/Sexual Aggressor Classification Screening and interview with random inmates and intake staff responsible for screening I find they exceed this standard.

All inmates are assessed during an intake screening and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. Colquitt County Correctional Institute uses The Victim/Aggressor Classification Screening which is an objective screening tool to conduct this intake.

Intake screenings take place immediately upon arrival at Colquitt County Correctional Institute.

Colquitt County Correctional Institute uses an objective screening instrument.

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

- (1) Whether the inmate has a mental, physical, or developmental disability;
- (2) The age of the inmate;
- (3) The physical build of the inmate;

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

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

Within 30 days from the inmate’s arrival at Colquitt County Correctional Institute, Colquitt County Correctional Institute reassesses the inmate’s risk of victimization or abusiveness based upon any additional, relevant information received by Colquitt County Correctional Institute since the intake screening.

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

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

Colquitt County Correctional Institute implements appropriate controls on the dissemination within Colquitt County Correctional Institute of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate’s detriment by staff or other inmates. Only the counselor and the Deputy Warden of Care and Treatment have access to this information.

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

Based on review of Colquitt County Correctional Institute Policy 7.2; 90 day Inmate Sexual Abuse Review Checklist; Sexual Assault Victim/Aggressor Classification Screening and interview with PREA compliance manager and staff responsible for risk screening I find they meet this standard.

Colquitt County Correctional Institute uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate

those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. All information received from the inmate during the intake process on the risk screening is used to determine housing, bed assignments, work, education and programming.

Colquitt County Correctional Institute makes individualized determinations about how to ensure the safety of each inmate. Each inmate's information is evaluated on a case by case basis to ensure the safety of the inmate.

Colquitt County Correctional Institute has not had a transgender/intersex inmate however there are policies in place that address the following:

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

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

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

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

Colquitt County Correctional Institute does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates.

§115.43	Protective custody
----------------	---------------------------

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 7.3 and interview with warden I find they meet this standard.

No inmates have been placed in involuntary segregation housing.

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

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

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

§115.51	Inmate reporting
----------------	-------------------------

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 8.0; Handbook Attachment; Staff Guide on the Prevention and Reporting of Sexual Misconduct with Inmates and interviews with random staff and inmates I find they meet this standard.

Colquitt County Correctional Institute provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Inmates can report verbally to any staff, write a kite or file a grievance. Inmates are encouraged to report allegations immediately and directly to staff at all levels. All reports are promptly documented and reported to the proper authority.

Colquitt County Correctional Institute provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of Colquitt County Correctional Institute, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Colquitt County Correctional Institute inmates' may make a report of sexual abuse, sexual harassment, or retaliation in writing, verbally, by utilizing the PREA hotline, and by phone or mail to the Department Ombudsman Office, and Pardons and Paroles.

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

Colquitt County Correctional Institute provides a method for staff to privately report sexual abuse and sexual harassment 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 comments, including corrective actions needed if does not meet standard

Based on review of Colquitt County Correctional Institute Policy 8.2 and interview with Warden I find they meet this standard.

Colquitt County Correctional Institute does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. Colquitt County Correctional Institute does not impose time restrictions upon residents in regard to filing grievances alleging sexual abuse prior to or upon completion of a SART investigation.

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

Colquitt County Correctional Institute ensures that an inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint. All grievances filed at Colquitt County Correctional Institute can be submitted to any staff member, there is also a locked box that the inmate can drop the grievance in and only supervisors have access to the box.

Colquitt County Correctional Institute issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance. Colquitt County Correctional Institute's policy establishes that the Warden will issue a final decision. Colquitt County Correctional Institute adheres to the policies set forth by the Colquitt County Correctional Institute in its Statewide Grievance Procedure Reference Number: IIB05-0001 to address PREA related grievances. A copy of this policy is attached. According to this policy:

At any time before the Warden's Grievance decision is delivered to the inmate, the Warden If an inmate files a grievance involving sexual assault or physical force involving non-compliance with Department policies; such actions automatically end the grievance process. These grievances are automatically forwarded through the Scribe application to the Internal Investigation Unit and/or the PREA Coordinator for review and whatever action is deemed appropriate.

Once a grievance is referred to the Internal Investigations Unit and/or the PREA Coordinator, this would be the final action that will be taken on the Grievance and terminates the grievance procedure.

Notice that the grievance was forwarded to the Internal Investigations Unit and/or the PREA Coordinator will be generated through the Scribe grievance application. That letter must be

handed to the inmate and the inmate must sign a copy, which will then be placed in the local file.

The inmate will be provided with a copy of this signed letter. GDC's Internal Investigations will issue a final agency decision on the merits of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

Computation of the 90 day time period shall not include time consumed by inmates in preparing any administrative appeal.

GDC may claim an extension of time to respond, up to 70 days, if the normal time period for response is insufficient to make an appropriate decision.

At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for a reply, including any properly noted extension, the inmate may consider the absence of a response to be a denial at that level.

Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, are permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and are also be permitted to file such requests on behalf of inmates. Colquitt County Correctional Institute accepts notification reports of sexual assault/harassment from third parties.

Colquitt County Correctional Institute has established procedures for the filing of an emergency grievance when the inmate is subject to a substantial risk of imminent sexual abuse. Colquitt County Correctional Institute adheres to the policies set forth by the Colquitt County Correctional Institute in its Statewide Grievance Procedure Reference Number: IIB05-0001 to address PREA related grievances. The Statewide Grievance Procedure includes a process for the handling of emergency grievance.

After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, Colquitt County Correctional Institute immediately forwards the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action is taken, and provides an initial response within 48 hours, and issues a final agency decision within 5 calendar days. The initial response and final agency decision documents Colquitt County Correctional Institute's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance. Colquitt County Correctional Institute adheres to the policies set forth by the Colquitt County Correctional Institute in its Statewide Grievance Procedure Reference Number: IIB05-0001 to address PREA related grievances. The Statewide Grievance Procedure includes a process for the handling of emergency grievance.

Colquitt County Correctional Institute may discipline an inmate for filing a grievance related to alleged sexual abuse only where Colquitt County Correctional Institute demonstrates that the inmate filed the grievance in bad faith. If it is determined that an inmate has filed a grievance related to an alleged sexual abuse and the grievance is filed in bad faith the inmate is subject to disciplinary sanctions (SOP IIB02-00, Attachment 5 – sanctions) as allowed by the Colquitt County Correctional Institute.

§115.53	Inmate access to outside confidential support services
----------------	---

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 8.1. and interview with random inmates I find they meet this standard.

Colquitt County Correctional Institute provides inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations. Colquitt County Correctional Institute enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. Colquitt County Correctional Institute inmates will have access to a victim advocate through the District Attorney's Office. In the event an inmate needs access to the victim advocate notification will be made for the inmate upon request.

Colquitt County Correctional Institute informs inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

Colquitt County Correctional Institute maintains memoranda of understanding with Colquitt County Regional Hospital who will provide all services associate for rape victims.

§115.54 Third party reporting

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Colquitt County Correctional Institute has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of an inmate. Visitors can go to www.ccboc.com/departments/corrections

§115.61 Staff and agency reporting duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on review of Colquitt County Correctional Institute Policy 9.0; PREA brochure and interviews with random staff; warden and medical health staff I find they meet this standard.

Colquitt County Correctional Institute requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of Colquitt County Correctional Institute; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. In accordance with the LOP, all personnel at Colquitt County Correctional Institute are provided with PREA training that instructs them on the proper procedure for reporting any incidents that are in any way related to PREA. This practice was confirmed during random staff interviews.

Apart from reporting to designated supervisors or officials, staff does not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions. Colquitt County Correctional Institute's staff is instructed through PREA training that any information obtained is limited to a need-to-know basis for staff, and only for the purpose of treatment, security, and management decisions, such as housing, work, education and programming assignments. Information is not to be indiscriminately discussed. Supervisors will always remind staff of this issue when staff report PREA-related issues to their supervisor.

If the alleged victim is considered a vulnerable adult under a State statute Chapter 5 of Title 30 of the Official Code of Georgia 1-10 Annotated, the " Disabled Adults and Elder Persons Protection Act, Colquitt County Correctional Institute reports the allegation to the designated State or local services agency under applicable mandatory reporting laws. Colquitt County Correctional Institute does not house Inmates under the age of 18.

Colquitt County Correctional Institute reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Colquitt County Correctional Institute's designated investigators. In accordance with the LOP, all allegations of sexual abuse and sexual harassment, including third party and anonymous reports, will be reported to the Colquitt County Correctional Institute SART, GDC Statewide PREA Coordinator, and the GDC Internal Investigations Unit. The Warden will be responsible for ensuring these notifications are made as soon as possible

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

Based on review of Colquitt County Correctional Institute Policy 9.2 and interviews with random staff and warden I find they meet this standard.

Immediate action is taken to protect inmates when Colquitt County Correctional Institute learns that an inmate is subject to a substantial risk of imminent sexual abuse. If an inmate at Colquitt County Correctional Institute is determined to be in imminent danger of sexual abuse, the Warden will be notified immediately and the inmate will be housed in Administrative Segregation immediately in order to protect them.

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 9.3 and **interview** with warden I find they meet this standard.

Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of Colquitt County Correctional Institute that received the allegation notify's the head of Colquitt County Correctional Institute or appropriate office of Colquitt County Correctional Institute where the alleged abuse occurred. Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. In cases where an inmate of Colquitt County Correctional Institute is sexually abused while confined at another facility the PREA Compliance Manager will immediately upon notification notify the head of that facility, Colquitt County Correctional Institute's Warden, SART, the GDC PREA Coordinator, and GDC Internal 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 comments, including corrective actions needed if does not meet standard

Based on review of Colquitt County Correctional Institute Policy 9.4 1st Responder duties and Guidelines for Staff 1st Responder and interview with security staff who are first responders, random staff I find they meet this standard.

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

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

§115.65 Coordinated response

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

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

Based on review of Colquitt County Correctional Institute Policy 9.5 Coordinated Response Plan and interview with warden I find they meet this standard.

Colquitt County Correctional Institute has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Colquitt County Correctional Institute as a written Coordinated Response plan that identifies the roles of each individual involved in the PREA investigations.

§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)
- Not applicable Standard

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

Colquitt County Correctional Institute does not have collective bargaining.

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

Based on review of Colquitt County Correctional Institute Policy 9.6 and interview with warden, designated staff member with monitoring retaliation I find they meet this standard.

Colquitt County Correctional Institute has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and designate which staff members or departments are charged with monitoring retaliation. Colquitt County Correctional Institute personnel will protect inmates and staff who report sexual abuse, sexual misconduct, or sexual harassment from retaliation. The Warden has identified Deputy Warden of Care/Treatment as the Retaliation Monitor. Anyone who retaliates against a staff member or an inmate who has reported in good faith an allegation of sexual abuse or sexual harassment in good faith shall be subject to disciplinary action.

Colquitt County Correctional Institute has multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Multiple protection measures are available at Colquitt County Correctional Institute which include inmate housing changes or transfers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, Colquitt County Correctional Institute monitors the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and act promptly to remedy any such retaliation. There is periodic status checks performed. Items Colquitt County Correctional Institute should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Colquitt County Correctional Institute continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

Based on interview with Deputy Warden of Care/Treatment retaliation monitor he **will** monitor for at least 90 days following a report of abuse, monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are any changes that may suggest possible retaliation, and will act promptly to remedy any such retaliation. This monitoring includes review of any inmate disciplinary reports, housing or program changes, or negative performance reviews or reassignments of staff. Such monitoring will continue beyond 90 days if the initial monitoring indicates a continuing need.

If any other individual who cooperates with an investigation expresses a fear of retaliation, Colquitt County Correctional Institute takes appropriate measures to protect that individual against retaliation. If any other individuals/inmates, who are cooperating with the investigation, feel a need for retaliation monitoring, the Deputy Warden of Care & Treatment will also serve in this capacity for these identified individuals.

§115.68

Post allegation protective custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on interview with warden I find they meet this standard.

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

§115.71

Criminal and administrative agency investigation

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 10 Staff Training Roster; NIC Certificate and In Service Training Record and interview with investigative staff I find they meet this standard.

When Colquitt County Correctional Institute conducts its own investigations into allegations of sexual abuse and sexual harassment, it does so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. All initial abuse and harassment allegation investigations will be conducted by Colquitt County Correctional Institute Sexual Abuse Response Team (SART). Substantiated SART investigations will immediately be referred to the Colquitt County Correctional Institute OIC Criminal Investigations Division and unsubstantiated SART investigations shall be referred to the Office of Professional Standards for an administrative review.

Where sexual abuse is alleged, Colquitt County Correctional Institute uses investigators who have received special training in sexual abuse investigations. All SART team members are required to attend additional PREA training.

Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. Colquitt County Correctional Institute follows the procedures set forth in policy number 208.06. Colquitt County Correctional Institute follows a uniform evidence protocol that maximizes the potential for obtaining usable (physical) evidence for administrative proceedings and criminal prosecutions. The response to sexual assault follows the U.S. Department of Justice's Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents, dated April 2013, or the most current version. SANE protocols and SART investigation procedures are initiated.

When the quality of evidence appears to support criminal prosecution, Colquitt County Correctional Institute conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. Colquitt County Correctional Institute complies with this standard by following policies and procedures as outlined in the Colquitt County Correctional Institute policy number 208.06 in regard to PREA Investigations concerning criminal prosecutions.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. No agency requires an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. Colquitt County Correctional Institute complies with this standard by following policies and procedures as outlined in the Colquitt County Correctional Institute policy number 208.06 in regard to PREA investigations regardless of the credibility of those individuals involved.

Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. Criminal investigation reports involving a PREA investigation will be maintained locally as part of the SART investigation for a period of no less than three years in the office of the Deputy Warden of Security.

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

Substantiated allegations of conduct that appears to be criminal are referred for prosecution.

Colquitt County Correctional Institute retains all written reports for as long as the alleged abuser is incarcerated or employed by Colquitt County Correctional Institute, plus five years. Colquitt County Correctional Institute complies with this standard by following policies and procedures as outlined in the Colquitt County Correctional Institute policy number 208.06 in regard to PREA Investigations concerning criminal prosecutions.

The departure of the alleged abuser or victim from the employment or control of Colquitt County Correctional Institute or agency does not provide a basis for terminating an investigation. Colquitt County Correctional Institute complies with this standard by following policies and procedures as outlined in the Colquitt County Correctional Institute policy number 208.06 in regard to PREA Investigations concerning criminal prosecutions.

§115.72

Evidentiary standard for administrative investigation

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 10.14 and interview with investigative staff I find they meet this standard.

Colquitt County Correctional Institute imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

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

Based on review of Colquitt County Correctional Institute Policy 10.15; PREA Allegation Notification Letter and interview with warden and investigative staff I find they meet this standard.

Following an investigation into an inmate's allegation that they suffered sexual abuse in an agency facility, Colquitt County Correctional Institute informs the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. Colquitt County Correctional Institute complies with this standard by following Colquitt County Correctional Institute LOP, which states, "Colquitt County Correctional Institute shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This will be completed by a member of the local SART unless the appointing authority delegates to another designee under certain circumstances. Such notifications or attempted notifications shall be documented. Following an inmate's allegation that a staff member has committed sexual abuse against the inmate and upon completion of the Internal Investigation, an assessment of the appropriateness of notification will be made by the Appointing Authority in consultation with Departments Legal Office. If determined that notification is appropriate, it will be made in accordance with 28 CFR § 115.73."

If Colquitt County Correctional Institute did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the inmate. Colquitt County Correctional Institute will obtain a copy of the investigation document and make proper notification to the inmate as defined by policy SOP 208.06.

Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, Colquitt County Correctional Institute subsequently informs the inmate (unless Colquitt County Correctional Institute has determined that the allegation is unfounded) whenever the staff member is no longer posted within the inmate's unit; the staff member is no longer employed at Colquitt County Correctional Institute; Colquitt County Correctional Institute learns that the staff member has been indicted on a charge related to sexual abuse within Colquitt County Correctional Institute; or Colquitt County Correctional Institute learns that the staff member has been convicted on a charge related to sexual abuse within Colquitt County Correctional Institute. Colquitt County Correctional Institute will comply with this directive by following Colquitt County Correctional Institute policy which states, "Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, and upon

completion of the Internal Investigation, an assessment of the appropriateness of notification will be made by the Appointing Authority in consultation with Department's Legal Office. If determined that notification is appropriate, it will be made in accordance with 28 CFR § 115.73."

Following an inmate's allegation that they had been sexually abused by another inmate, Colquitt County Correctional Institute subsequently informs the alleged victim whenever Colquitt County Correctional Institute learns that the alleged abuser has been indicted on a charge related to sexual abuse within Colquitt County Correctional Institute; or Colquitt County Correctional Institute learns that the alleged abuser has been convicted on a charge related to sexual abuse within Colquitt County Correctional Institute. Colquitt County Correctional Institute adheres to the policy defined above as provided for in Colquitt County Correctional Institute policy.

All such notifications or attempted notifications are documented. Colquitt County Correctional Institute adheres to the policy defined above as provided for in Colquitt County Correctional Institute policy.

An agency's obligation to report under this standard is terminated if the inmate is released from Colquitt County Correctional Institute's custody. Colquitt County Correctional Institute adheres to this standard by following Colquitt County Correctional Institute policy in which it states, "Colquitt County Correctional Institute shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This will be completed by a member of the local SART unless the appointing authority delegates to another designee under certain circumstances. Such notifications or attempted notifications shall be documented. A Department's obligation to report under this standard shall terminate if the inmate is released from the Department's custody."

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

Based on review of Colquitt County Correctional Institute Policy 11.0; Reviewed Sexual Assault/Sexual Misconduct Acknowledgment Statement I find they meet this standard.

Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who has engaged in sexual abuse. In accordance with LOP, staff who engage in sexual misconduct with inmates shall be banned from correctional institutions and subject to disciplinary action, up to and including termination, and may also be referred for criminal prosecution, when appropriate.

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

with LOP, disciplinary sanctions for violations of policy relating to sexual abuse or sexual harassment will be commensurate with the nature of the circumstances of the acts committed, the staff member's disciplinary history, and the sanctions

All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. All Colquitt County Correctional Institute's staff/contractors that do not adhere to the PREA standards set forth in Colquitt County Correctional Institute policy number 208.06 will be subject to the disciplinary standards as defined by that same policy. Staff members who are found to have engaged in sexual misconduct/abuse shall be banned from correctional institutions or subject to disciplinary sanctions up to and including termination. Staff may also be referred for criminal prosecution and the incident will be reported, as required, to the Georgia Peace Officers Standards and Training Council (POST). Contractors and Volunteers who engage in sexual abuse will be prohibited from contact with inmates and reported to the appropriate law enforcement agencies.

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

§115.77	Corrective action for contractors and volunteers
---------	---

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

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

Based on review of Colquitt County Correctional Institute Policy 11.2; Sexual Assault/ sexual Misconduct Acknowledgement Statement; Incident Report and interview with warden I find they meet this standard.

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

Colquitt County Correctional Institute takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. All Colquitt County Correctional Institute's volunteers and contractors that do not adhere to the PREA standards set forth in Colquitt County Correctional Institute policy number 208.06 will be subject to the disciplinary standards as defined by that same policy. Remedial measures may include

prohibiting contact with residents and reporting the incident to the appropriate law enforcement agency.

§115.78 Disciplinary sanctions for inmates

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

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

Based on review of Colquitt County Correctional Institute Policy 11.3 and interview with medical/mental health staff I find they meet this standard.

No inmate has received disciplinary charges for these offenses.

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

Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. Sanctions will be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

The disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his behavior when determining what type of sanction, if any, should be imposed. Policy requires staff to consider an inmate's mental disability or mental illness during the disciplinary hearing process and when determining appropriate sanctions.

Colquitt County Correctional Institute disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

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

Colquitt County Correctional Institute prohibits all sexual activity between inmates and may discipline inmates for such activity.

§115.81 Medical and Mental health screening; history of sexual abuse

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 12.0 and **interview** with staff responsible for risk screening and medical health staff I find they meet this standard.

If the screening indicates that an inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

If the screening indicates that an inmate has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.

Any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

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

§115.82	Access to emergency medical and mental health services
---------	---

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 12.1 and interview with medical health staff I find they meet this standard.

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

If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and immediately notify the appropriate medical and mental health practitioners. Inmates are transported to Colquitt Regional Medical Center for treatment. Further mental health services can be provided at Autry State Prison.

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

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

§115.83

Ongoing medical and mental health care for sexual abuse victims

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 12.2 and interview with medical/mental health staff I find they meet this standard.

Colquitt County Correctional Institute offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. All medical and mental health services for victim of sexual abuse are offered at Colquitt Regional Medical center. If further mental health services are needed the inmate is sent to Autry State Prison.

In providing ongoing medical treatment services, Colquitt County Correctional Institute will utilize the medical services of Colquitt County Correctional Institute medical staff. In providing ongoing mental health services Colquitt County Correctional Institute will utilize the services of Colquitt Regional medical Center or the catchment facility Autry State Prison. These services will be provided at no cost to the inmate in the case of sexual abuse victims or abusers.

The evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. In providing follow-up services, Colquitt County Correctional Institute will obtain the services from either Colquitt Regional Medical Center or the catchment facility Autry State Prison.

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

Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. All Colquitt County Correctional Institute's inmates who are victims of Sexual assault are treated by the Sexual Assault Nurse Examiner (SANE). Depending on the circumstances of the abuse, testing for sexually transmitted infections is conducted at Colquitt County Regional Medical Center.

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

Colquitt County Correctional Institute shall attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners. All Colquitt County Correctional Institute's inmates that have been identified as having PREA concerns are interviewed by the local PREA Coordinator as part of the intake process. Any inmates who are known to be inmate-on-inmate abusers will be referred for mental health treatment immediately. Treatment will be provided, at no cost to the inmate, as long as the mental health professionals deem it necessary.

§115.86	Sexual abuse incident reviews
---------	--------------------------------------

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

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

Based on review of Colquitt County Correctional Institute Policy 13.0; 90 day Employee Sexual Abuse Review Checklist, 90 day Inmate Sexual Abuse Review Checklist and interview with warden, PREA compliance manager; incident review team I find they meet this standard.

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

The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at Colquitt County Correctional Institute; and they examine the area in Colquitt County Correctional Institute where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

§115.87	Data collection
---------	------------------------

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 13.3 I find they meet this standard.

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

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

Colquitt County Correctional Institute maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Colquitt County Correctional Institute obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.

Upon request, Colquitt County Correctional Institute provides all such data from the previous calendar year to the Department of Justice no later than June 30.

§115.88	Data review for corrective action
---------	--

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 13.4

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

Such reports includes a comparison of the current year’s data and corrective actions with those from prior years and provide an assessment of Colquitt County Correctional Institute’ progress in addressing sexual abuse.

Colquitt County Correctional Institute’ report is approved by Colquitt County Correctional Institute head and made readily available to the public through its website www.ccboc.com/departments/county_prison

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Colquitt County Correctional Institute Policy 13.4 I find they meet this standard.

Colquitt County Correctional Institute makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website www.ccboc.com/departments/county_prison

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

AUDITOR CERTIFICATION:

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

Katherine Brown

May 5, 2016

Auditor Signature

Date