

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS

Interim Final Report

Auditor Information

Auditor name: Katherine Brown

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Telephone number: 727-470-4123

Date of facility visit: June 13, 2016

Date report submitted: June 16, 2016

Facility Information

Name of facility: Rogers State Prison

Physical address: 1978 Georgia Highway 147, Reidsville, Georgia 30453

Telephone number: 912-557-7771

Rogers State Prison 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
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Name of facility's Chief Executive Officer: Clay Tatum	Title:	Warden
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Number of staff assigned to Rogers State Prison in the last 12 months: 248

Designed facility capacity: 1391

Current population of facility: 1354

Facility security levels/inmate custody levels: Medium, Minimum

Age range of the population: 18-79

Name of PREA Compliance Manager: Christopher Johnson	Title:	Unit manager
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Email address: Christopher.Johnson@gdc.ga.gov	Telephone #	912-557-7146
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Agency Information

Name of agency: Georgia Department of Corrections

Governing authority or parent agency: Georgia Department of Corrections

Physical address: 300 Patrol Road, Forsyth, GA 31029

Telephone number: 478-992-5211

Agency Chief Executive Officer

Name: Homer Bryson	Title:	Commissioner
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Email address: Homer.Bryson@gdc.ga.gov	Telephone number:	478-992-5261
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Agency-Wide PREA Coordinator

Name: Sharon Shaver	Title:	Agency PREA Coordinator
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Email address: Sharon.Shaver@gdc.ga.gov	Telephone #	678-628-3128
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AUDIT FINDINGS

NARRATIVE:

The audit of Rogers State Prison was conducted on June 13-14, 2016 by Katherine Brown, Certified PREA auditor. Prior to the on-site I received all the policies and documentation on May 25, 2016 to review and I requested additional documentation to satisfy the standards. Received additional documentation on May 31, 2016 and completed the initial review.

An entrance meeting was held with facility staff. The following people were in attendance: Clay Tatum, Warden; Chris Johnson, Compliance Manager; Gail Howell, Mental Health nurse; Jennifer Clark, Deputy Warden; Melissa Register, Mental Health Unit Director; Roy Odum, Lieutenant/Investigator; Patricia Williams, Counselor; Shameeka Kent, Counselor; Hilary McCall, Admin Assistant; Tena Medlin Maulden, Mental Health Secretary; Stephen Sloan, MHC; Annetia Tory, Deputy Warden Security and Melvin Butts, Assistant Statewide PREA Coordinator.

Following the entrance meeting I toured Rogers State Prison from 0915 – 1100 am. On the tour with me was Clay Tatum, Warden; Chris Johnson, Compliance Manager; Jennifer Clark, Deputy Warden; Roy Odum, Lieutenant/Investigator; Annetia Tory, Deputy Warden Security and Melvin Butts, Assistant Statewide PREA Coordinator.

The areas toured were a total of seven (7) housing units. There are 5 general population units containing 4 dorms and two administrative detention/segregation unit. I toured each of the general population unit's and segregation units 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 areas, cross gender announcements were made.

I asked for an alpha listing of all inmates housed at Rogers State Prison and randomly selected one inmate from each housing unit (26) 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 there, I did interview one limited English speaking inmate. I also asked for any inmate who was transgender/intersex, I interviewed two transgender. I also asked for a shift roster and randomly selected 16 staff to interview. I conducted 17 specialized interviews.

There were 44 sexual assault/harassment allegation cases, all relatively recent (within the past year) 19 had been unfounded; 24 unsubstantiated and 1 is pending investigation by the Office of Inspector General.

DESCRIPTION OF FACILITY CHARACTERISTICS:

Rogers State Prison is located at 1978 Georgia Highway 147, Reidsville, Georgia 30453 and has four (4) inmate housing units on the main compound and two (2) housing units on the Fast Track. Dormitories A-1,A-2, B,C, and F are on the main compound housing general population inmates that are Medium or Minimum Security. The beds are designated as medium security. A-3 and A-4 are Administrative Segregation, which is also on the main compound. G and H

buildings are stratified for outside detail inmates and Food Service inmates. G-1 is designated as the Admission and orientation dormitory. A1-A2 are classified Medium security – each dormitory contains four (4) rooms with a total of 16 inmates per room for a total of 64 inmates per dormitory. Each room consists of 8 double bunks. A2 is designated as a PREA safe dorm. There is a control booth in the middle of A building that separates A-1; A-2; A-3 and A-4. A1 is for PREA Aggressors and A-2 houses only PREA victims.

A-3 and A-4 are classified Medium Security Administrative Segregation – A-3 has 23 rooms that contain double bunks to house a total of 46 inmates. There is one bed that is utilized for mental Health and Medical Observation that brings the total beds in A-3 to 47. A-4 has 24 rooms that contain double bunks to house a total of 48 inmates.

B building is classified as medium security – has a total of four (4) dormitories with four (4) rooms per dormitory. Each room has 8 double bunks for a total of 16 inmates per room. Each dormitory can house a total of 64 inmates. The total number of inmates that can be housed in B Building is 256 inmates. There is a control booth in the middle of B Building that separates B-1, B-2, B-3 and B-4. B-1 houses only PREA Aggressors, B-2 house only PREA Aggressors, B-3 houses only PREA Victims, B-4 houses only PREA Victims.

C-Building, classified as Medium Security -has a total of four (4) dormitories with four (4) rooms per dormitory. Each room has 8 double bunks for a total of 16 inmates per room.

Each dormitory can house a total of 64 inmates. The total number of inmates that can be housed in C-Building is 256 inmates. There is a Control Booth in the middle of C-Building that separates C-1, C-2, C-3 and C-4. C-1 houses only PREA Aggressors, C-2 houses no PREA, C-3 houses only PREA Aggressors, C-4 houses only PREA Victims.

F-Building, classified as Medium Security -has a total of four (4) dormitories with four (4) rooms per dormitory. Each room has 6 double bunks for a total of 12 inmates per room.

Each dormitory can house a total of 48 inmates. The total number of inmates that can be housed in F-Building is 192 inmates. There is a Control Booth in the middle of F-Building that separates F-1, F-2, F-3 and F-4. F-1 houses only PREA Aggressors, F-2 houses no PREA, F-3 houses only PREA Victims, F-4 houses only PREA Aggressors.

G-Building, classified as Medium Security -has a Control Booth in the center of the building with a total of four (4) dormitories with four (4) rooms per dormitory. Each room has 29 double bunks for a total of 58 inmates per room. G-1 houses Admission and Orientation inmates. G-2 is designated as a PREA safe dorm. The total number of inmates that can be housed in G Building is 232 inmates. G-Building houses the majority of Food Service inmates. G-Building has reconditioned air. G-1 houses only PREA Aggressors, G-2 houses only PREA Victims, G-3 houses only PREA Aggressors, G-4 houses only PREA Aggressors.

H-Building, classified as Medium Security -has a Control Booth in the center of the building with a total of four (4) dormitories with four (4) rooms per dormitory. Each room has 29 double bunks for a total of 58 inmates per room. The total number of inmates that can be housed in H Building is 232 inmates. H-Building houses outside

detail inmates. H- Building has reconditioned air. H-1houses only PREA Aggressors, H-2 houses only PREA Victims, H-3 houses only PREA Aggressors, H-4 houses only PREA Aggressors.

G and H Buildings were originally built as Rogers State Prison PDC. There is a chow hall located in G-Building. F-Building has a library. There are counselors and programs in each building.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 4

Number of standards met: 38

Number of standards not met:

Number of standards not applicable: 2

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 GDOC SOP 208.06 IV A.1; Georgia Organizational Chart and Organizational Chart and interviews with PREA Coordinator and PREA compliance manager I find they meet this standard.

Georgia Department of Corrections has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Georgia Department of Corrections' approach to preventing, detecting, and responding to such conduct. Rogers State Prison complies with this standard by utilizing GDC SOP 208.06. 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.

Georgia Department of Corrections employs or 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. The Georgia Department of Corrections Statewide PREA Coordinator also has an Assistant Statewide PREA Coordinator to assist in the efforts of ensuring all Georgia Department of Corrections prisons are PREA compliant.

Georgia Department of Corrections operates more than one facility; each facility has designated a PREA compliance manager with sufficient time and authority to coordinate Rogers State Prison's efforts to comply with the PREA standards. Rogers State Prison complies with this standard in that one of the unit managers has been designated the PREA Coordinator for the agency by the Warden.

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 GDOC SOP 208.06 IV A.2. and interview with agency's contract compliance manager I find they meet this standard.

Rogers State Prison does not contract for the confinement of their inmates however, Georgia Department of Corrections does have contracts with private entities and county prisons for the confinement of their inmates. Based on review of those contracts I find they meet this standard.

All contracts include the entity's obligation to adopt and comply with the PREA standards.

Any new contract or contract renewal provides for agency contract monitoring to ensure that the contractor is complying with the PREA standards.

§115.13	Supervision and monitoring
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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 GDOC SOP 208.06 IV A. 3; SOP II. A. 07-0012; Staffing Plan; Staffing Analysis 2014; Security Staff Rosters and logbooks and interview with Warden; PREA Compliance Manager and PREA Coordinator I find they meet this standard.

Georgia Department of Corrections 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. Rogers State Prison complies with this standard by utilizing the staffing plan and shift rosters that were reviewed as part of this audit.

In circumstances where the staffing plan was not complied with, Rogers State Prison documented and justified all deviations from the plan. All deviations from the staffing plan were documented on the shift rosters.

Georgia Department of Corrections completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed. Rogers State Prison complies with this standard based on review of the annual staffing report.

§115.14	Youthful inmates
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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

Based on review of GDOC SOP 208.06 IV A. 6. (a-c) I .

§115.15

Limits to cross gender viewing and searches

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 GDOC SOP 208.06 IV A. 7 (a-g); SOP II. B. 01-0013 and In Service Training Rosters I find they meet this standard.

Rogers State Prison 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 Rogers State Prison documents all cross-gender strip searches and cross-gender visual body cavity searches. During random staff and offender interviews it was confirmed staff do not perform cross gender strip searches.

Rogers State Prison 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 random offender interviews it was confirmed that offenders have privacy to perform bodily functions and cross gender staff announcements are made. Also during the tour cross gender announcements were made and I verified viewing of offenders was limited.

Rogers State Prison 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 are six (6) transgender offenders at the prison at the time of the audit and based on interviews with transgender/intersex offenders they confirmed they were not searched for sole purpose of determining the inmate's genital status.

Georgia Department of Corrections 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.

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 GDOC SOP 208.06 IV A. 8 (a & b); Language Line contract; PREA Pamphlet English/Spanish; Staff Interpreters Memo and random inmate and staff interviews and interview with limited English speaking inmates I find they meet this standard.

Georgia Department of Corrections 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 Georgia Department of Corrections' 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.

Georgia Department of Corrections 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. Rogers State Prison has a contract with the Language Line to provide translation for other languages as well as sign language for the deaf.

X 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 GDOC SOP 208.06 IV A. 9 (a-d); SOP IV. O. 03-0012; SOP IV. O. 05-0001; Applicant Verification Form; Background check- verification form Multiple Employees; Staff Guide on the Prevention and Reporting of Sexual Misconduct with Offenders and interview with Human Resource Director Review of personnel files verifying background checks are run on all staff annually I find they exceed this standard.

Georgia Department of Corrections 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 human resources 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.

Georgia Department of Corrections 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.

Georgia Department of Corrections 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 current employees and contractors who may have contact with inmates. Review of personnel files confirmed the background checks are being done annually on all staff, based on that I find they exceed this standard.

§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 GDOC SOP 208.06 IV A. 10. and interview of Commissioner and warden I find they meet this standard.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Georgia Department of Corrections considers how such technology may enhance Georgia Department of Corrections' ability to protect inmates from sexual abuse. There have been no substantial expansion or modifications to existing facilities. Rogers State Prison currently utilizes 35 cameras that are used to prevent sexual abuse and investigate allegations of wrongdoing. When installing new equipment, the Warden, Deputy Warden of Security, and facility SART will ensure it is used to protect inmates from sexual abuse.

§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 GDOC SOP 208.06 IV B. 1 (a-f); SOP IK01-0006; SANE Callout; NIC Certificate for PREA-Behavioral Healthcare for Sexual Assault Victims in Confinement; Sexual Abuse Response Checklist; Medication Guidelines; Medical PREA Log; Procedure for SANE nurse Evaluation/Forensic Collection and interview with SANE/SAFE staff and PREA compliance manager I find they meet this standard.

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

Georgia Department of Corrections 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 performed by Sexual Assault Nurse Examiners (SANEs) through Global Diagnostic.

Georgia Department of Corrections makes available to the victim a victim advocate from the Rape Crisis Center of the Coastal Empire.

As requested by the victim, either a victim advocate from Rape Crisis Center of the Coastal Empire or a qualified agency staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals.

§115.22

Policies to ensure referrals of allegations for investigations

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 GDOC SOP 208.06 IV G; SOP IK01-0005 and SOP IK01-0006 and interview with Commissioner and investigative staff I find they meet this standard.

Georgia Department of Corrections ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Rogers State Prison follows the standards set forth by the Georgia Department of Corrections 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.

Georgia Department of Corrections has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. Georgia Department of Corrections publishes such policy on its website www.dcor.state.ga.us. Georgia Department of Corrections documents all such referrals. 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.

Rogers State Prison documents all such referrals. 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.

§115.31

Employee training

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 GDOC SOP 208.06 IV C. 2; In Service Training Records; Sexual Assault/Sexual Misconduct Acknowledgement Statement; Lesson Plan; Power Point; In Service Training Record; Staff Guide on the Prevention & Reporting Sexual Misconduct with Offenders; NIC Training on Communicating Effectively & Professionally with LGTBI; PREA Video "What you Need to Know"; NIC PREA Investigating Sexual Abuse in a Confinement Setting; PREA Staff Meeting; Training Roster – Sign In Sheet and interview with random staff I find they meet this standard.

Georgia Department of Corrections 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 have received PREA training during in service training. Rogers State Prison is 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 Rogers State Prison. 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 receive training based on the population of Rogers State Prison they are assigned to.

Georgia Department of Corrections documents, through employee signature on the Training Roster, those employees 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 GDOC SOP 208.06 IV C. 3 (a-c); Lesson Plan and reviewed Sexual Assault/Sexual Misconduct Acknowledgement Statement for Supervised Visitors and interview with volunteer and contractors I find they meet this standard.

Georgia Department of Corrections ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Georgia Department of Corrections’ sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

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 Georgia Department of Corrections’ zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Georgia Department of Corrections 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.

§115.33

Inmate education

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 GDOC SOP 208.06 IV C.4; SOP II B18-0001; Sexual Abuse Review Checklist; PREA Sexual Victimization/Aggressor classification Screening; Inmate Handbook; PREA Handout Acknowledgement; Offender Orientation checklist 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 Georgia Department of Corrections' 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, as was confirmed during the specialized interview with the intake staff and counselor.

Within a few days of intake, Georgia Department of Corrections provides a comprehensive education to inmates either in person and showing the PREA 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.

Georgia Department of Corrections 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; Rogers State Prison has a contract with the Language Line to provide translation for other languages as well as sign language for the deaf.

§115.34

Specialized training: Investigators

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 GDOC SOP 208.06 IV C. 5; In Service Training Records; NIC Certificate PREA Investigating Sexual Abuse in a Confinement Setting; Compliance Manager Training and PowerPoint Lesson Plan and interview with investigative staff I find they meet this standard.

In addition to the general training provided to all employees Georgia Department of Corrections 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. Georgia Department of Corrections maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Rogers State Prison 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.

§115.35

Specialized training: Medical and mental health care

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 GDOC SOP 208.06 IV. C. 6.; NIC Certificate – PREA Behavioral Health Care for Sexual Assault Victims in a Confinement Setting; NIC PREA Medical Health Care for Sexual Assault Victims in a Confinement Setting and Lesson Plan and interview with medical and mental health I find they meet this standard.

Georgia Department of Corrections ensures that all full and part-time medical and mental 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. Rogers State Prison 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.

Georgia Department of Corrections maintains documentation that medical and mental health practitioners have received the training.

Medical and mental 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.

§115.41	Screening for risk of victimization and abusiveness
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X 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 GDOC SOP 208.06 IV D. 1 (a-h); Victim/Aggressor Classification Rating; Offender PREA Classification Detail; PREA Re-assessment Classification screening; PREA Sexual Victim/Sexual Aggressor Classification Screening and interview with random inmates and intake staff responsible for screening I find they in 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. Rogers State Prison uses The Victim/Aggressor Classification Screening which is an objective screening tool to conduct this intake.

Intake screenings take place immediately upon arrival at Rogers State Prison.

Rogers State Prison 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 Georgia Department of Corrections, in assessing inmates for risk of being sexually abusive.

Within 30 days from the inmate's arrival at Rogers State Prison, Rogers State Prison reassesses the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Rogers State Prison 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.

Georgia Department of Corrections implements appropriate controls on the dissemination within Rogers State Prison 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 limited staff has access to the risk screening form only Medical, Mental Health, Counselors and SART members.

Based on screening taking place immediately upon arrival I find they exceed this standard.

§115.42

Use of screening information

X 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 GDOC SOP 208.06 IV D. 2 (a-d); 90 day Offender Sexual Abuse Review Checklist; Receiving Health Screening form; NIC Training on Communicating Effectively & Professionally with LGTBI; PREA Re-assessment Classification Screening and interview with PREA compliance manager and staff responsible for risk screening I find they exceed this standard.

Georgia Department of Corrections 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.

Georgia Department of Corrections makes individualized determinations about how to ensure the safety of each inmate. Each inmates' information is evaluated on a case by case basis to ensure the safety of the inmate.

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, Georgia Department of Corrections 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.

Georgia Department of Corrections 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. All of this was confirmed during the interviews with the transgender offenders.

During the interviews with the transgenders assigned to this facility they stated the facilities Mental Health staff was excellent and the transgenders have seen a change in the staff's attitude toward them. The staff are responsive to their needs and have made remarkable strides in the past 2 years. I interviewed both the Mental Health Director and her assistant and found them to be very caring and compationate individuals who are very proactive in their approach. The facility has put all staff through the NIC Training on Communicating Effectively & Professionally with LGTBI.

§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 GDOC SOP 208.06 IV D. 3. (a-d); case notes and interview with warden I find they meet this standard.

No inmates have been placed in involuntary segregation housing, however there are policies in place that address the following:

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 Rogers State Prison restricts access to programs, privileges, education, or work opportunities, Rogers State Prison documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.

Rogers State Prison 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 Rogers State Prison clearly documents the basis for Rogers State Prison’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
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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 GDOC SOP 208.06 IV E. 1. (a-e) Offender Handbook; Staff Guide on the Prevention and Reporting of Sexual Misconduct with Offenders; PREA Pamphlet English/Spanish; Offender Handbook and interviews with random staff and inmates I find they meet this standard.

Georgia Department of Corrections 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. Rogers State Prison 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. 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.

Georgia Department of Corrections 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 Georgia Department of Corrections, 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. Information is provided on the posters and Offender Handbooks of the ways to report abuse.

Staff accepts reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports. Rogers State Prison staff have 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. This was confirmed during random staff interviews.

Georgia Department of Corrections provides a method for staff to privately report sexual abuse and sexual harassment of inmates at PREA.reports@gdc.ga.gov.

§115.52

Exhaustion of administrative remedies

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDC 208.06 IV. E. 1.2.; SOP IIB05-0001 and Offender Handbook I find they meet this standard.

Georgia Department of Corrections does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. Rogers State Prison does not impose time restrictions upon residents in regard to filing grievances alleging sexual abuse prior to or upon completion of a SART investigation.

Georgia Department of Corrections 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.

Georgia Department of Corrections 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 Rogers State Prison can be submitted to any counselor. In a case where the inmate's counselor is the subject of the complaint, any other counselor can be utilized to submit the grievance.

Georgia Department of Corrections 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. Rogers State Prison's policy establishes that the Warden will issue a final decision. Rogers State Prison adheres to the policies set forth by the Georgia Department of Corrections in its Statewide Grievance Procedure Reference Number: IIB05-0001 to address PREA related grievances.

At any time before the Warden's Grievance decision is delivered to the offender, the Warden If an offender 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 offender and the offender must sign a copy, which will then be placed in the local file.

The offender 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. Rogers State Prison accepts notification reports of sexual assault/harassment from third parties.

Georgia Department of Corrections has established procedures for the filing of an emergency grievance when the inmate is subject to a substantial risk of imminent sexual abuse. Rogers State Prison adheres to the policies set forth by the Georgia Department of Corrections 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, Georgia Department of Corrections 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 Georgia Department of Corrections' determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance. Rogers State Prison adheres to the policies set forth by the Georgia Department of Corrections 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.

Georgia Department of Corrections may discipline an inmate for filing a grievance related to alleged sexual abuse only where Georgia Department of Corrections 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 Georgia Department of Corrections.

§115.53

Inmate access to outside confidential support services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDC SOP 208.06 IV. E. 3; PREA Pamphlet English/Spanish; and interview with random inmates I find they meet this standard.

Rogers State Prison 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. Rogers State Prison enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. Rogers State Prison inmates will be notified of the Rape Crisis Center of the Coastal Empire during Orientation. This information is available to them on the bulletin boards in the housing units and upon request. An inmate may make a verbal or written request to staff to contact a victim service advocate or agency at any time. All reasonable measures will be taken to allow for as much privacy as possible.

Rogers State Prison 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. If inmates of Rogers State Prison request to contact a Rape Crisis Center of the Coastal Empire, staff will make every effort to offer the inmate reasonable privacy while maintaining visual security if located in restricted or sensitive areas within Rogers State Prison. Inmates will typically utilize the phone in their counselor's office. The counselor will ensure privacy while the resident is contacting the rape crisis counseling provider.

§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

Based on review of GDOC SOP 208.06 IV E. 4 I find they meet this standard.

Georgia Department of Corrections 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.PREA.report@gdc.ga.gov

§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 GDOC SOP 208.06 IV F. 1. (g-i); PREA brochure and interviews with random staff; warden and medical/mental health staff I find they meet this standard.

Georgia Department of Corrections 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 Georgia Department of Corrections; 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 GDC SOP 208.06, all personnel at Rogers State Prison are provided with PREA training that instructs them on the proper procedure for reporting any incidents that are in any way related to PREA.

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.

Rogers State Prison'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, Georgia Department of Corrections reports the allegation to the designated State or local services agency under applicable mandatory reporting laws. Rogers State Prison does not house Inmates under the age of 18. However, the Rogers State Prison follows all State and Federal PREA policies and will comply with this standard in the event offenders under the age of 18 or inmate considered vulnerable are involved in a PREA-related issue. This will be done in accordance with GDC SOP 208.06 and in coordination with GDC Internal Investigations.

Rogers State Prison reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Rogers State Prison's designated investigators. In accordance with GDC SOP 208.06, all allegations of sexual abuse and sexual harassment, including third party and anonymous reports, will be reported to the Rogers State Prison, 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
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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 GDOC 208.06 IV.F.2 and interviews with random staff, and warden I find they meet this standard.

Immediate action is taken to protect inmates when Georgia Department of Corrections learns that an inmate is subject to a substantial risk of imminent sexual abuse. If an inmate at Rogers State Prison 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.

§115.63 Reporting to other confinement facilities

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 GDOC SOP 208.06 IV F. 3 (a-d) and interview with Commissioner and 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 Rogers State Prison that received the allegation notifies the head of the other facility or appropriate office of Georgia Department of Corrections 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 Rogers State Prison is sexually abused while confined at another facility the PREA Compliance Manager will immediately upon notification notify the head of that facility, Rogers State Prison's Warden, SART, the GDC PREA Coordinator, and GDC Internal Investigations.

§115.64 Staff first responder duties

X 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 GDOC SOP 208.06 IV F. 4; Sexual Abuse Response checklist; Local Procedure Directive and interview with security staff who are first responders, random staff I find they exceed this standard. All staff are issued a 1st Responder Card that each officer I interviewed had in their possession to ensure all steps are taken in a PREA related incident.

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. Rogers State Prison 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)

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 GDOC SOP 208.06 IV F.5.; Local Procedure Directive; Sexual Abuse Response checklist and interview with warden I find they meet this standard.

Rogers State Prison 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. Rogers State Prison 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)

X Not applicable Standard

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

Based on review of GDC SOP 208.06 IV. F. 4 and interview with Commissioner I find this standard does not apply.

Georgia Department of Corrections does not have collective bargaining.

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 GDOC SOP 208.06 IV F. 6 (a-e); 90 day Offender Sexual Abuse Review checklist and interview with Commissioner, warden, designated staff member with monitoring retaliation I find they meet this standard.

Georgia Department of Corrections 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. Rogers State Prison personnel will protect inmates and staff who report sexual abuse, sexual misconduct, or sexual harassment from retaliation. The appointing authority has identified one of the counselors as the Retaliation Monitor as outlined in the Local Procedure Directive (GDC SOP IIA21-0001 Attachment 9-Local Procedure Directive) to monitor for retaliation. Anyone who retaliates against a staff member or an offender who has reported in good faith an allegation of sexual abuse or sexual harassment in good faith shall be subject to disciplinary action.

Georgia Department of Corrections 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 Rogers State Prison 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, Georgia Department of Corrections 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 Georgia Department of Corrections should monitor include any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Georgia Department of Corrections continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

Based on interview with counselor charged with monitoring retaliation, she 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, Georgia Department of Corrections takes appropriate measures to protect that individual against retaliation. If any other individuals/offenders, who are cooperating with the investigation, feel a need for retaliation monitoring, the counselor for the victim 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 review of GDC SOP 208.06 IV. F. 13; SOP II B09-0001 Administrative Segregation; PREA 30 day Team Review and 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 GDOC SOP 208.06 IV G. 3; Staff Training Roster; NIC Certificate PREA Investigating Sexual Abuse in a Confinement Setting and interview with investigative staff I find they meet this standard.

When Georgia Department of Corrections 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 Rogers State Prison Sexual Abuse Response Team (SART). Substantiated SART investigations will immediately be referred to the Georgia Department of Corrections 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, Georgia Department of Corrections 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. Rogers State Prison follows the procedures set forth in policy number 208.06. Rogers State Prison 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, Georgia Department of Corrections conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. Rogers State Prison complies with this standard by following policies and procedures as outlined in the Georgia Department of Corrections 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. Rogers State Prison complies with this standard by following policies and procedures as outlined in the Georgia Department of Corrections 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.

Georgia Department of Corrections retains all written reports for as long as the alleged abuser is incarcerated or employed by Georgia Department of Corrections, plus five years. Rogers State Prison complies with this standard by following policies and procedures as outlined in the

Georgia Department of Corrections 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 Rogers State Prison or agency does not provide a basis for terminating an investigation. Rogers State Prison complies with this standard by following policies and procedures as outlined in the Georgia Department of Corrections 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)

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 GDOC SOP 208.06 IV G. 14 and interview with investigative staff I find they meet this standard.

Georgia Department of Corrections 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
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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 GDOC SOP 208.06 IV G. 15; PREA Allegation Notification Letter and interview with warden; 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, Georgia Department of Corrections informs the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. Rogers State Prison complies with this standard by following Georgia Department of Corrections policy number 208.06, which states, "Rogers State Prison 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 Georgia Department of Corrections did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the inmate. Rogers State Prison 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, Georgia Department of Corrections subsequently informs the inmate (unless Georgia Department of Corrections 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 Rogers State Prison; Georgia Department of Corrections learns that the staff member has been indicted on a charge related to sexual abuse within Rogers State Prison; or Georgia Department of Corrections learns that the staff member has been convicted on a charge related to sexual abuse within Rogers State Prison. Rogers State Prison will comply with this directive by following Georgia Department of Corrections policy 208.06 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, Georgia Department of Corrections subsequently informs the alleged victim whenever Georgia Department of Corrections learns that the alleged abuser has been indicted on a charge related to sexual abuse within Rogers State Prison; or Georgia Department of Corrections learns that the alleged abuser has been convicted on a charge related to sexual abuse within Rogers State Prison. Rogers State Prison adheres to the policy defined above as provided for in Georgia Department of Corrections policy SOP 208.06.

All such notifications or attempted notifications are documented. Rogers State Prison adheres to the policy defined above as provided for in Georgia Department of Corrections policy SOP 208.06. All PREA documentation is restricted to only necessary staff as clearly outlined in GDC policy.

An agency's obligation to report under this standard is terminated if the inmate is released from Georgia Department of Corrections' custody. Rogers State Prison adheres to this standard by following Georgia Department of Corrections policy SOP 208.06 in which it states, "Rogers State Prison 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."

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 GDOC SOP 208.06 IV H. and 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 GDC SOP 208.06, staff that engage in sexual misconduct with offenders 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. One staff member resigned under a PREA Investigation. This investigation is still pending.

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 GDC SOP 208.06, disciplinary sanctions for violations of GDC 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 Rogers State Prison's staff/contractors that do not adhere to the PREA standards set forth in Georgia Department of Corrections 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.

§115.77 Corrective action for contractors and volunteers

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 GDOC SOP 208.06 IV H. 2; Sexual Assault/ sexual Misconduct Acknowledgement Statement and interview with warden I find they meet this standard.

No contractor or volunteers have been involved in any incidents of sexual assault/harassment.

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. Rogers State Prison’s staff will immediately remove any contractor or volunteer from Rogers State Prison if they engage in sexual abuse. The contractor/volunteer will be prohibited from contact with residents and will reported to the appropriate law enforcement agency. The relevant licensing body will also be notified.

Rogers State Prison 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 Rogers State Prison’s volunteers and contractors that do not adhere to the PREA standards set forth in Georgia Department of Corrections 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.

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.

§115.78 Disciplinary sanctions for inmates

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 GDOC SOP 208.06 IV H.3. and SOP II. B 02-0001 and interview with medical/mental health staff I find they meet this standard.

No inmate has been disciplined for inmate on inmate sexual abuse.

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. Rogers State Prison 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. These sanctions will be imposed in accordance with GDC SOP IIB02-0001 and 208.06.

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. Sanctions are covered by GDC SOP IIB02-0001.

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. GDC SOP IIB02-0001 requires staff to consider an inmate's mental disability or mental illness during the disciplinary hearing process and when determining appropriate sanctions. GDC SOP VG34-0001 also addresses this issue.

Therapy, counseling or other interventions can be offered to address and correct underlying reasons or motivations for the abuse.

Georgia Department of Corrections 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.

Georgia Department of Corrections prohibits all sexual activity between inmates and may discipline inmates for such activity.

§115.81	Medical and Mental health screening; history of sexual abuse
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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 SOP 208.06 IV. C.6 and SOP VG30-0001 Program Services Health Services and Mental Health Services I find they meet this standard.

Based on interview with staff responsible for risk screening and medical/mental 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
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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 SOP IIA21-0001; SANE nurse Call Roster and interview with medical and mental 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. Medical staff are on duty 14 hours a day and are on call after hours.

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.

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 Rogers State Prison.

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
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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 SOP VG55-0001 Mental Health Management of Suspected Sexual Abuse, Contact or Harassment; SOP VH85-0001 Forensic Information; SOP VH85-0002 Medical Management of Suspected Sexual Assault, Abuse or Harassment and Medical PREA Log and interview with medical/mental health staff and inmates who reported sexual assault I find they meet this standard.

Rogers State Prison 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.

In providing ongoing medical treatment services, Rogers State Prison will utilize the medical services of Georgia Department of Corrections medical staff. In providing ongoing mental health services Rogers State Prison will utilize the services of Mental Health Management who provides mental health services to Rogers State Prison. There is a full time Mental Health director; 4 Mental Health Counselors; a Psychologist; a Sexologist and a Psychiatrist 2 days per week. 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, Rogers State Prison medical and mental health staff will utilize treatment plans, referrals and, if necessary, placement in other facilities, including facilities outside GDC upon the victim's release from custody.

Rogers State Prison 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. This is consistent with GDC SOP VH-08-0002.

Inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. All Rogers State Prison'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 may be conducted at Rogers State Prison or at Tattnall General Hospital at no cost to the resident.

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. Rogers State Prison does not charge residents for PREA related treatments or services.

Rogers State Prison 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 Rogers State Prison's inmate's 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)

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 GDOC SOP 208.06 IV J.; Sexual Abuse Incident Review Checklist and interview with warden, PREA compliance manager, incident review team I find they meet this standard.

Rogers State Prison 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 Rogers State Prison; and they examine the area in Rogers State Prison 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

Georgia Department of Corrections 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.

Georgia Department of Corrections maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Georgia Department of Corrections obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.

Upon request, Georgia Department of Corrections 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 annual report and interview with PREA coordinator I find they meet this standard.

Georgia Department of Corrections 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 Georgia Department of Corrections 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 Georgia Department of Corrections' progress in addressing sexual abuse.

Georgia Department of Corrections' report is approved by Georgia Department of Corrections head and made readily available to the public through its website www.dcor.state.ga.us/pdf/GDC-Annual-PREA-Report-CY2015.pdf

§115.89	Data storage, publication and destruction
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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

Georgia Department of Corrections 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 or www.dcor.state.ga.us/pdf/GDC-Annual-PREA-Report-CY2015.pdf

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 Georgia Department of Corrections under review.

Katherine Brown

June 16, 2016

Auditor Signature

Date