

PREA AUDIT: AUDITOR'S SUMMARY REPORT

Community Confinement Facilities

Name of facility: Valdosta Transition Center	
Physical address: 363 Gill Harbin Industrial Blvd., Valdosta, GA 31601	
Date report submitted: January 24,2016	
Auditor Information Katherine Brown	
Address:	12121 Little Road Suite 286 Hudson, Florida 34667
Email:	kbrown2828@yahoo.com
Telephone	727-470-4123
Date of visit: January 20, 2016	
Facility Information	
Mailing address: SAA	
Telephone number: 229-293-6280	
Valdosta Transition Center 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
Facility Type:	<input type="checkbox"/> Community treatment center <input type="checkbox"/> Halfway House <input type="checkbox"/> Restitution Center <input type="checkbox"/> Mental Health Facility <input type="checkbox"/> Alcohol or drug rehabilitation center <input checked="" type="checkbox"/> Other Community Center
Name of PREA Compliance Manager: Andy Nash	Title: Employment Manager
Email address: Andy.nash@gdc.gov	Telephone #
Agency Information	
Name of agency: Georgia Department of Corrections	
Governing authority: Georgia Department of Corrections	
Physical address: 300 Patrol Rd, Forsyth, GA 31029	
Mailing address: SAA	
Telephone #: 478-992-5101	
Number of staff assigned in last 12 months 32	
Designed facility capacity 164	
Designed population Males	
Security level Minimum, Medium, Close	
Age range of population 19-64	
Agency Chief Executive Officer	
Name: Homer Bryson	Title: Commissioner
Email address: homer.bryson@gdc.ga.gov	Telephone number: 478-992-5261
Agency-Wide PREA Coordinator	
Name: Sharon Shaver	Title: GDC Statewide PREA Coordinator
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AUDIT FINDINGS

NARRATIVE:

The audit of Valdosta Transition Center was conducted on January 20, 2016 by Katherine Brown, Certified PREA auditor. The areas toured were a total of four housing units. I also toured the satellite kitchen (all food is transported over from Valdosta State Prison), laundry, and programs area.

An entrance meeting was held with facility staff. The following people were in attendance: Shirlyn Thomas, Superintendent; Oscar Humphries, Counselor; Jeff Hall, Security Chief; Melissa Stephenson, RN; Andy Nash, PREA Compliance Manager; Melvin Butts, Assistant Statewide PREA Coordinator.

Following the entrance meeting I toured the Valdosta Treatment Center from 1:00 pm to 1:30 pm. On the tour with me was, Shirlyn Thomas, Superintendent; Jeff Hall, Chief of Security; Andy Nash, PREA Compliance Manager; Melvin Butts, Assistant Statewide PREA Coordinator.

I asked for an alpha listing of all residents housed at Valdosta Transition Center and randomly selected 10 resident to interview as well as any residents who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impairment residents there. There were no Limited English speaking residents or transgender/intersex residents. I also asked for a shift roster and interviewed all officers on duty.

There was one sexual assault/harassment allegation cases, all relatively recent (within the past year) that had been unfounded.

DESCRIPTION OF FACILITY CHARACTERISTICS:

Valdosta Transitional Center is a 164 bed male Community Transitional Facility. The physical layout of Valdosta Transition Center consists of two (2) wings that house approximately 75 residents each with one dorm (14) beds designed to house residents with disciplinary issues to improve their behavior. Valdosta Transition Center has a recreation yard behind the building. The administration area contains six (6) offices along with institutional and business records.

The resident population at Valdosta Transitional Facility is made up of adult males who are serving felony prison sentences. Georgia inmates are eligible for transitional center placement once they are within 15 months of their earliest release date. VTC also has eleven residents designated as Long Term Maintenance. Georgia inmates are eligible for the LTM program when they are within 24 months of their earliest release date.

SUMMARY OF AUDIT FINDINGS: (39)

Number of standards exceeded: 3

Number of standards met: 35

Number of standards not met:

Number of standards not applicable: 1

Standard number here	§115.211 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
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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 interviews with PREA Coordinator and PREA compliance manager. Reviewed GDOC SOP 208.06 IV A.1; SOP 104.02 Local Procedure Directive; State Organizational Chart; Facility Organizational Chart.

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.

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.

Standard number here	§115.212 Contracting with other agencies for confinement of residents
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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 interview with agency's contract compliance manager. GDOC SOP 208.06 IV. A. 2

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.

Only in emergency circumstances in which all reasonable attempts to find a private agency or other entity in compliance with the PREA standards have failed, may Georgia Department of Corrections enter into a contract with an entity that fails to comply with these standards.

Standard number here	§115.213 Supervision and monitoring
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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 interview with Superintendent; PREA Compliance Manager and PREA Coordinator. Reviewed GDOC SOP 208.06 IV. A. 3; SOP IIA.07-0012; staffing plan; logbook entries; Annual Staffing Plan Review.

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 residents against sexual abuse.

In circumstances where the staffing plan was not complied with, Valdosta Transition Center documented and justified all deviations from the plan.

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.

Standard number here §115.215 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

Reviewed GDOC SOP 208.06 IV. A. 5 (a-g); SOP IIB01-0013; PREA Training sign in Sheet; PREA Power Point; PREA Acknowledgement.

Valdosta Transition Center 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. Valdosta Transition Center documents all cross gender strip searches and cross gender visual body cavity searches, pat down searches of female residents.

Valdosta Transition Center has policies and procedures that enable residents 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 a resident housing unit.

Valdosta Transition Center does not search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status. If the resident's genital status is unknown, it is determined during conversations with the resident, 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.

Georgia Department of Corrections trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex residents, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

Standard number here §115.216 Residents with disabilities and limited English speaking
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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 random resident and staff interviews. Reviewed GDOC SOP 208.06 IV. A. 6 (a&b); PREA brochure English/Spanish; Language Line contract.

Georgia Department of Corrections takes appropriate steps to ensure residents with disabilities (including, for example, residents 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 resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety. None have been used or required.

Standard number here §115.217 Hiring and promotion decisions
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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 interview with Human Resource Director at Valdosta State Prison Review of personnel files. Reviewed GDOC SOP 208.06 IV. A. 7 (a-d); SOP IV003-0012; SOP IV 005-0001.

Georgia Department of Corrections does not hire or promote anyone who may have contact with residents, and does not enlist the services of any contractor who may have contact with residents, 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.

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 residents.

Georgia Department of Corrections performs a criminal background records check before enlisting the services of any contractor who may have contact with inmates and performs a records check annually on all current employees, contractors and volunteers who may have contact with inmates. Reviewed annual background check. Based on the annual review of all staff, volunteers and contractors I find Valdosta Treatment Center exceeds in this standard.

Standard number here §115.218 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 interview of agency head and Superintendent. Reviewed GDOC SOP 208.06 IV. A. 8.

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 residents from sexual abuse. There have been no substantial or modifications to existing facilities.

I suggest a camera be added to the area behind the maintenance shed and garden area. This area presents a blind spot and should be covered with cameras if at all possible.

Standard number here §115.221 Evidence protocol and forensic medical exams
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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 interview with SANE/SAFE staff and PREA compliance manager. Reviewed GDOC SOP 208.06 IV. B.1 (a-f); VH 01-0004; VH07-0001; Georgia Network to End Sexual Assault – Sexual Violence Victim Advocacy Training Certificate; SOP IIA21-0001; IK01-0006; Satilla SANE nurse call out and In house victim advocate memo.

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 Satilla Sexual Assault Nurse Examiners (SANEs).

Georgia Department of Corrections makes available to the victim a trained staff member who has been trained as a victim advocate. Valdosta Treatment Center does not have a rape crisis center available to provide victim advocate services at this time.

As requested by the victim, 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.

Standard number here §115.222 Policies to ensure referrals of allegations for investigations
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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 interview with agency head and investigative staff. Reviewed GDOC SOP 208.06 IV. B.1; IK01-0006 and policy information bulletin.

Georgia Department of Corrections ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

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.

Standard number here §115.231 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 interview with random staff. Reviewed GDOC SOP 208.06 IV. C.2; SOP II A 21-0001 Training curriculum; In Service Training Roster; NIC On Line Training Certificate; Power Point; SART Training and Staff Review curriculum and roster.

Georgia Department of Corrections trains all employees who have contact with residents 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) Residents' right to be free from sexual abuse and sexual harassment;
- (4) The right of residents 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 residents;
- (9) How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The training is tailored to the gender of the residents at Valdosta Transition Center. The employees receive additional training if the employee is reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa.

Georgia Department of Corrections documents, through employee signature, those employees understand the training they have received.

Standard number here §115.232 Volunteer and contractors training
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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 interview with volunteer and contractors. Reviewed GDOC SOP 208.06 IV. C.3 (a-c).

Georgia Department of Corrections ensures all volunteers and contractors who have contact with residents 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 residents, but all volunteers and contractors who have contact with residents 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.

Standard number here §115.233 Resident education
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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 interview with random residents and intake staff. Reviewed GDOC SOP 208.06 IV. C.4; SOP IIB18-0001; PREA resident brochure distribution receipt; Offender Orientation Checklist.

During the intake process, residents 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.

Georgia Department of Corrections provides refresher information whenever a resident is transferred to a different facility.

Georgia Department of Corrections provides resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to residents who have limited reading skills. There is documentation of resident participation in these education sessions.

These residents are the best trained residents this auditor has ever interviewed. All the residents interviewed were extremely knowledgeable in the PREA process, based on that I find Valdosta Treatment Center exceeds in this standard.

Standard number here §115.234 Specialized training: Investigators

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on interview with investigative staff. Reviewed GDOC SOP 208.06 IV. C.5; Investigators Training.

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. GDC Internal Investigations Unit investigates all allegations of sexual assault.

Standard number here §115.235 Specialized training: Medical and mental health care
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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

Reviewed GDOC SOP 208.06 IV. C. 6; SOP VG17-0001; VH 04-0001; VH05-0001; VH05-0002; Medical and Mental Health Training Attendance roster; PREA Compliance Manager Training Workshop 1-3.

Georgia Department of Corrections ensures that all full and part-time medical 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.

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

Medical care practitioners also receive the training mandated for employees, contractors and volunteers.

Standard number here §115.241 Screening for risk of victimization and abusiveness

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

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

Based on interview with random residents and intake staff responsible for screening. Only limited staff has access to the risk screening form only Medical, Intake Staff, Superintendent as well as PREA Manager. Reviewed GDOC SOP 208.06 IV. D.1. (a-h); SCRIBE Risk Assessment Case Notes; TC Screening for Risk of Victimization and Abusiveness.

All residents are assessed during an intake screening and upon transfer to another facility for risk of being sexually abused by other residents or sexually abusive toward other residents.

Intake screenings take place immediately upon arrival at Valdosta Transition Center.

Valdosta Transition Center uses an objective screening instrument.

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

- (1) Whether the resident has a mental, physical, or developmental disability;
- (2) The age of the resident;
- (3) The physical build of the resident;
- (4) Whether the resident has previously been incarcerated;
- (5) Whether the resident's criminal history is exclusively nonviolent;
- (6) Whether the resident has prior convictions for sex offenses against an adult or child;
- (7) Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- (8) Whether the resident has previously experienced sexual victimization;
- (9) The resident's own perception of vulnerability; and

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 residents for risk of being sexually abusive.

Within 30 days from the resident's arrival at Valdosta Transition Center, Valdosta Transition Center reassesses the resident's risk of victimization or abusiveness based upon any additional, relevant information received by Valdosta Transition Center since the intake screening.

A resident'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 resident's risk of sexual victimization or abusiveness.

Residents are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked.

Georgia Department of Corrections implements appropriate controls on the dissemination within Valdosta Transition Center of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents.

Based on the intake screenings being completed immediately upon arrival I find Valdosta Treatment Center exceeds in this standard.

Standard number here §115.242 Use of screening information
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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 interview with PREA compliance manager and staff responsible for risk screening. Reviewed GDOC SOP 208.06 IV. D.2.; room assignment sheet.

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 residents at high risk of being sexually victimized from those at high risk of being sexually abusive.

Georgia Department of Corrections makes individualized determinations about how to ensure the safety of each resident.

Valdosta Treatment Center has not had any transgender/intersex residents but there are policies in place that address the following:

In deciding whether to assign a transgender or intersex resident to a facility for male or female residents, 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 resident's health and safety, and whether the placement would present management or security problems.

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

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

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

Georgia Department of Corrections does not place lesbian, gay, bisexual, transgender, or intersex residents 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 residents.

Standard number here §115.251 Resident 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 interviews with random staff and residents. Reviewed GDOC SOP 208.06 IV. E.1 (a-e); PREA brochure; Resident Handbook; Staff brochure.

Georgia Department of Corrections provides multiple internal ways for residents to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

Georgia Department of Corrections provides at least one way for residents 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 resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request. Valdosta TC is working on an MOU with The Haven to provide these services. Currently the residents can contact the Office of Parole or Pardons or the Ombudsmen offices.

Staff accepts reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports.

Georgia Department of Corrections provides a method for staff to privately report sexual abuse and sexual harassment of residents.

Standard number here §115.252 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

Reviewed GDOC SOP 208.06 IV. E.2.; SOP II B05-0001; SOP II B02-0001.

Georgia Department of Corrections does not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse.

Georgia Department of Corrections does not require a resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

Georgia Department of Corrections ensures that an resident 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.

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.

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

Georgia Department of Corrections has established procedures for the filing of an emergency grievance when the resident is subject to a substantial risk of imminent sexual abuse.

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 resident is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Georgia Department of Corrections may discipline a resident for filing a grievance related to alleged sexual abuse only where Georgia Department of Corrections demonstrates that the resident filed the grievance in bad faith.

Standard number here §115.253 Resident access to outside confidential support 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 interview with random residents.

The facility provides inmates with access to a staff trained victim advocate for emotional support services related to sexual abuse. There are currently no victim advocate services available in the community.

The facility 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.

Georgia Department of Corrections is attempting to find a victim advocate service for the inmates.

Standard number here §115.254 Third party reporting

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

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

Reviewed GDOC SOP 208.06 IV. E.4.; PREA brochure English/Spanish; PREA poster.

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 a resident.

Standard number here §115.261 Staff and agency reporting duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on interviews with random staff; Superintendent and medical staff. Reviewed GDOC SOP 208.06 IV. E.4.; Local Procedure directive Action Plan.

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 residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

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.

If the alleged victim is considered a vulnerable adult under a State or local vulnerable person's statute, Georgia Department of Corrections reports the allegation to the designated State or local services agency under applicable mandatory reporting laws.

Valdosta Transition Center reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Valdosta Transition Center's designated investigators.

Standard number here §115.262 Agency protection duties
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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 interviews with random staff, and Superintendent. Reviewed GDOC SOP 208.06 IV. F.2; SOP II A-21-0001; Room Change procedure.

Immediate action is taken to protect residents when Georgia Department of Corrections learns that a resident is subject to a substantial risk of imminent sexual abuse.

Standard number here §115.263 Reporting to other confinement facilities

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

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

Based on interview with agency head and Superintendent. Reviewed GDOC SOP 208.06 IV. F.3 (a-d).

Upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of Valdosta Transition Center that received the allegation notifies the head of Valdosta Transition Center 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.

Standard number here §115.264 Staff first responder duties

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

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

Based on interview with security staff who is first responders and random staff. Reviewed GDOC SOP 208.06 IV. F.4.

Upon learning of an allegation that an resident 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.

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.

Standard number here §115.265 Coordinated response
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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 interview with Superintendent. Reviewed GDOC SOP 208.06 IV. E.5.; Coordinated Response Plan.

Valdosta Transition Center 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.

Standard number here §115.266 Preservation of ability to protect residents from contact with abusers
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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)
- Not Applicable Standard

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

Based on interview with agency head. Georgia Department of Corrections does not have Collective Bargaining.

Standard number here §115.267 Agency protection against retaliation

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

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

Based on interview with agency head, Superintendent, designated staff member with monitoring retaliation. Reviewed GDOC SOP 208.06 IV. F.6. (a-e); Memo regarding VTC Retaliation.

Georgia Department of Corrections has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff, and designate which staff members or departments are charged with monitoring retaliation.

Georgia Department of Corrections has multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, Georgia Department of Corrections monitors the conduct and treatment of residents or staff who reported the sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents 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 resident 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.

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.

Standard number here §115.271 Criminal and administrative agency investigation
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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 interview with investigative staff. Reviewed GDOC SOP 208.06 IV. G.3. Investigator Training.

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.

Where sexual abuse is alleged, Georgia Department of Corrections uses investigators who have received special training in sexual abuse investigations.

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.

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. Sexual Assault investigations are conducted by GDOC Internal Affairs investigators.

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 resident or staff. No agency requires a resident 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.

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.

The departure of the alleged abuser or victim from the employment or control of Valdosta Transition Center or agency does not provide a basis for terminating an investigation.

Standard number here §115.272 Evidentiary standard for administrative investigation

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

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

Based on interview with investigative staff. Reviewed GDOC SOP 208.06 IV. G.14.

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.

Standard number here §115.273 Reporting to residents
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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 interview with Superintendent and investigative staff. Reviewed GDOC SOP 208.06 IV. G. 15; PREA letter.

Following an investigation into a resident’s allegation that they suffered sexual abuse in an agency facility, Georgia Department of Corrections informs the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

If Georgia Department of Corrections did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the resident.

Following an resident’s allegation that a staff member has committed sexual abuse against the resident, Georgia Department of Corrections subsequently informs the resident (unless Georgia Department of Corrections has determined that the allegation is unfounded) whenever the staff member is no longer posted within the resident’s unit; the staff member is no longer employed at Valdosta Transition Center; Georgia Department of Corrections learns that the staff member has been indicted on a charge related to sexual abuse within Valdosta Transition Center; or Georgia Department of Corrections learns that the staff member has been convicted on a charge related to sexual abuse within Valdosta Transition Center.

Following an resident’s allegation that they had been sexually abused by another resident, 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 Valdosta Transition Center; or Georgia Department of Corrections learns that the alleged abuser has been convicted on a charge related to sexual abuse within Valdosta Transition Center.

All such notifications or attempted notifications are documented.

An agency’s obligation to report under this standard is terminated if the resident is released from Georgia Department of Corrections’ custody.

Standard number here §115.276 Disciplinary sanctions for staff

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

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

Reviewed GDOC SOP 208.06 IV. H.

No staff has been disciplined for a PREA related incident.

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.

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.

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.

Standard number here §115.277 Corrective action for contractors and volunteers
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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 interview with Superintendent. Reviewed GDOC SOP 208.06 IV. H.2.

Any contractor or volunteer who engages in sexual abuse is prohibited from contact with residents and are reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

Valdosta Transition Center takes appropriate remedial measures, and considers whether to prohibit further contact with residents, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

Standard number here §115.278 Disciplinary sanctions for residents
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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 interview with medical staff. Reviewed GDOC SOP 208.06 IV. H.3.

No resident has been disciplined for a PREA related incident.

Residents are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse.

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

The disciplinary process considers whether a resident's mental disabilities or mental illness contributed to his behavior when determining what type of sanction, if any, should be imposed.

All mental health services are provided by Mental Health Staff at Valdosta State Medical Prison.

Georgia Department of Corrections disciplines a resident 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 residents and may discipline residents for such activity.

**Standard
number here**

§115.282 Access to emergency medical and mental health services

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

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

Based on interview with medical staff. Local Procedure Directive.

Resident 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. Mental Health Services are provided at Valdosta State Medical Prison.

If no qualified medical 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. Emergency medical services are handled by University Hospital.

Resident 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.

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.

Standard number here §115.283 ongoing medical and mental health care for sexual abuse victims

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

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

Based on interview with medical staff. Reviewed Local Procedure Directive and SOP VH08-0002.

Valdosta Transition Center offers medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. All mental health services are provided at Valdosta State Prison.

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.

Valdosta Transition Center provides such victims with medical and mental health services consistent with the community level of care.

Resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

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.

Standard number here §115.286 Sexual abuse incident reviews

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

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

Based on interview with Superintendent, PREA compliance manager; incident review team. Reviewed GDOC SOP 208.06 IV. J.; PREA resident letter and example of Incident Review.

Valdosta Transition Center 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 Valdosta Transition Center; and they examine the area in Valdosta Transition Center 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.

Standard number here §115.287 Data collection

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

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

Reviewed GDOC SOP 208.06 IV. J. and Annual Report.

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 residents.

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.

Standard number here §115.288 Data review for corrective action

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

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

Based on interview with PREA coordinator.

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.

Standard number here §115.289 Data storage, publication and destruction

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

Auditor 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 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
2016

January 24,

Auditor Signature

Date