

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS

Interim Final Report

Auditor Information

Auditor name: Katherine Brown

Address: 12121 Little Road Suite 286 Hudson, Florida 34667

Email: kbrown2828@yahoo.com

Telephone number: 727-470-4123

Date of facility visit: June 22, 2016

Date report submitted: June 24, 2016

Facility Information

Name of facility: Athens-Clark County Correctional Institute

Physical address: 2825 County Farm Road, Athens, Georgia

Telephone number: 706-613-3400

Athens Clarke County Correctional Institution is:	<input type="checkbox"/> Military	<input checked="" type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		

Facility Type:	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison
-----------------------	-------------------------------	--

Name of facility's Chief Executive Officer:	Ray Covington	Title:	Warden
--	---------------	---------------	--------

Number of staff assigned to Athens Clarke County Correctional Institution in the last 12 months:

Designed facility capacity: 115

Current population of facility: 114

Facility security levels/offender custody levels: Medium

Age range of the population: 18-68

Name of PREA Compliance Manager:	Charles Mason	Title:	Deputy Warden
---	---------------	---------------	---------------

Email address:	Charles.Mason@athensclarkcounty.com	Telephone #	706-613-3400
-----------------------	-------------------------------------	--------------------	--------------

Agency Information

Name of agency:

Governing authority or parent agency: Unified Government of Athens-Clarke County, Georgia

Physical address: 2825 County Farm Road, Athens, GA 30605

Telephone number:

Agency-Wide PREA Coordinator

Name:	Ray Covington	Title:	Agency PREA Coordinator
--------------	---------------	---------------	-------------------------

Email address:	Ray.Covington@athensclarkcounty.com	Telephone #	
-----------------------	--	--------------------	--

AUDIT FINDINGS

NARRATIVE:

The audit of Athens Clarke County Correctional Institute was conducted on June 22, 2016 by Katherine Brown, Certified PREA auditor. Prior to the onsite I received all the policies and documentation on June 17, 2016 to review and requested additional documentation to satisfy the standards. Based on short notice and the fact I was scheduled to leave for another audit the facility did not have time to send me the requested documentation. Upon arriving at the facility I discussed with the Warden the need for their own local policy and they could not use the GDC state policy. This is going to require some time to write the policy. The facility is following all the state policies as outlined in GDOC PREA policy 208.06 and they are in compliance with the standards however the county facilities are required to have their own policies which they have written as of July 14, 2016. Review of the policy confirms they have policies in place that address all standards.

An entrance meeting was held with facility staff. The following people were in attendance: Warden Ray Covington and Superintendent Daniel Young.

Following the entrance meeting I toured the Athens Clarke County Correctional Institute from 0930 - 1000. On the tour with me was: Warden Ray Covington; Superintendent Daniel Young and James Piper. The areas toured were a total of 3 dorms plus the kitchen, laundry, programs area, and work areas. There are four general population dorms and one administrative detention/segregation unit containing 4 cells.

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

I asked for an alpha listing of all offenders housed at Athens Clark Correctional Institute and randomly selected 10 offenders to interview. I also asked for any offenders who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impairment offenders or limited English Speaking offenders. I also asked for any offender who was transgender/intersex, which there were none. I asked for a shift roster and randomly selected all 4 staff on duty to interview.

There were no sexual assault/harassment allegation cases

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Athens-Clark County Correctional Institute is located at 2825 County Farm Road, Athens GA which is approximately 73 miles north east of Atlanta. It was constructed in 1987 and is a medium security facility. This is a work release center where the offenders work within the community during the day and return at night. It consists of 3 dormitories with a total of 115 beds each, 4 isolation/segregation cells. Dorm A houses 54; Dorm B houses 48 and Dorm C is the new Intake dorm and safe dorm and can house 14.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 2

Number of standards met: 38

Number of standards not met:

Number of standards not applicable: 3

§115.11 Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of LOP 208.06 V.A pg. 3; GDOC SOP 208.06 IV A.1; and Organizational Chart and interviews with PREA Coordinator I find they meet this standard.

Athens Clarke County Correctional Institution has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Athens Clarke County Correctional Institution' approach to preventing, detecting, and responding to such conduct. Athens Clarke County Correctional Institution complies with this standard by utilizing Local Procedure Directive 208.06 and 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.

Athens Clarke County Correctional Institution employs 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. Athens Clark Correctional Institute complies with this standard in that the Warden has been designated the PREA Coordinator for the agency. The Superintendent of the Diversion Center is the PREA Compliance Manager.

§115.12 Contracting with other agencies for confinement of offenders

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

Athens Clark County Correctional Institution does not contract with a private entity for the confinement of their offenders.

§115.13 Supervision and monitoring

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of LOP 208.06 V.A pg. 4; GDOC SOP 208.06 IV A. 3; SOP II. A. 07-0012; Staffing Plan; Annual Staffing review; post Assignments; logbooks and interview with Warden I find they meet this standard.

Athens Clarke County Correctional Institution has develop, 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 offenders against sexual abuse. Athens Clark Correctional Institute complies with this standard by utilizing the staffing plan and shift rosters that were reviewed as part of this audit. 10 officers are assigned to the CI and 3-4 work per shift.

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

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

§115.14 Youthful offenders

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

Athens Clarke County Correctional Institution does not house youthful offenders.

§115.15 Limits to cross gender viewing and searches

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Athens Clark LOP 208.06 V.A pg. 5; Limits to cross gender searches III; GDOC SOP 208.06 IV A. 7. (a-g) and SOP II. B. 01-0013; Lesson Plan; I find they meet this standard.

Athens Clarke County Correctional Institution 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 Athens Clarke County Correctional Institution 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.

Athens Clarke County Correctional Institution has policies and procedures that enable offenders 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 offender 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.

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

Athens Clarke County Correctional Institution trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex offenders, 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.

§115.16 Offenders with disabilities and limited English speaking

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

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

Based on review of Athens LOP 208.06 V.A pg. 5; Athens Policy Equal Opportunity Educations III; GDOC SOP 208.06 IV A. 8 (a & b); Lesson Plan; Power Point; Language Services Plus agreement; PREA Pamphlet; PREA Posters and random offender and staff interviews I find they meet this standard.

Athens Clarke County Correctional Institution takes appropriate steps to ensure offenders with disabilities (including, for example, offenders 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 Athens Clarke County

Correctional Institution' 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.

Athens Clarke County Correctional Institution does not rely on offender interpreters, offender readers, or other types of offender assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the offender's safety. None have been used or required. The PREA Pamphlet is in both English/Spanish. Athens Clarke County Correctional Institution has an agreement with Language Services Plus to provide translation for other languages as well as sign language for the deaf.

§115.17 Hiring and promotion decisions

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

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

Based on review of Athens LOP 208.06 V.A pg. 6 Hiring and Promotions; GDOC SOP 208.06 IV A. 9 (a-d); SOP IV. O. 03-0012; SOP IV. O. 05-0001; GCIC Criminal Background Log; Applicant Verification Form and interview with Human Resource Director Review GCIC Criminal History log I find they meet this standard.

Athens Clarke County Correctional Institution does not hire or promote anyone who may have contact with offenders, and does not enlist the services of any contractor who may have contact with offenders, 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.

Athens Clarke County Correctional Institution 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 offenders.

Athens Clarke County Correctional Institution performs a criminal background records check before enlisting the services of any contractor who may have contact with offenders performs a records check annually on all security staff and at least every five years on contractors who may have contact with offenders. Review of GCIC log confirmed the background checks are being done.

§115.18 Upgrades to facilities and technology

- 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 LOP 208.06 V.A pg. 7; 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, Athens Clarke County Correctional Institution considers how such technology may enhance Athens Clarke County Correctional Institution's ability to protect offenders from sexual abuse. There has been no substantial expansion or modifications to existing facilities. Athens Clarke County Correctional Institution currently utilizes 42 cameras at the ACCCI that are used to prevent sexual abuse and investigate allegations of wrongdoing. When installing new equipment, the Warden, Deputy and facility SART will ensure it is used to protect offenders from sexual abuse.

§115.21 Evidence protocol and forensic medical exams

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 LOP 208.06 V.B pg. 7; GDOC SOP 208.06 IV B. 1 (a-f); SOP IK01-0006; NIC Certificate for PREA-Behavioral Healthcare for Sexual Assault Victims in Confinement; Staff Victim Advocate Training through GNESEA (Georgia Network to End Sexual Assault) Sexual Violence Victim Advocacy; MOU with Cottage Sexual Assault Center & Children's Advocacy Center; Sexual Abuse Response Checklist; 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 Athens Clarke County Correctional Institution is responsible for investigating allegations of sexual abuse; Athens Clarke County Correctional Institution follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

Athens Clarke County Correctional Institution 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) from Cottage Sexual Assault Center & Children's Advocacy Center.

Athens Clarke County Correctional Institution makes available to the victim a victim advocate from Cottage Sexual Assault Center & Children's Advocacy Center.

As requested by the victim, a victim advocate from Cottage Sexual Assault Center & Children's Advocacy Center or qualified agency staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides 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 LOP 208.06 V.B pg. 8; GDOC SOP 208.06 IV G; SOP IK01-0005 and SOP IK01-0006 and interview with Warden and investigative staff I find they meet this standard.

Athens Clarke County Correctional Institution ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Athens Clarke County Correctional Institution follows the standards set forth by the Athens Clarke County Correctional Institution 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, if it is a state offender. Referrals to outside law enforcement agencies will be made with the cooperation of the Internal Investigations Unit. County offenders cases are referred to Athens Clark County Sheriff Office.

Athens Clarke County Correctional Institution 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. Athens Clarke County Correctional Institution publishes such policy on its website www.athensclarkcounty.com/356/Corrections. Athens Clarke County Correctional Institution 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.

Athens Clarke County Correctional Institution 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 LOP 208.06 V.C pg. 8; GDOC SOP 208.06 IV C. 2; Lesson Plan; Power Point; Trainee Register Sign in Sheet; Training Records; Sexual Assault/Sexual Misconduct Acknowledgement Statement and interview with random staff I find they meet this standard.

Athens Clarke County Correctional Institution employees who have contact with offenders have been trained on NIC: Role Responding to Sexual Abuse which covers the following:

- (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) Offenders' right to be free from sexual abuse and sexual harassment;
- (4) The right of offenders 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 offenders;
- (9) How to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming offenders; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

All staff receive PREA training during in service training. Athens Clarke County Correctional Institution 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 offenders at Athens Clarke County Correctional Institution. The employees receive additional training if the employee is reassigned from a facility that houses only male offenders to a facility that houses only female offenders, or vice versa. Staff receives training based on the population of Athens Clarke County Correctional Institution they are assigned to.

Athens Clarke County Correctional Institution documents, through employee electronic verification, 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 LOP 208.06 V.C pg. 8; GDOC SOP 208.06 IV C. 3 (a-c); Lesson Plan; Power Point; Sexual Assault/Sexual Misconduct Acknowledgement Statement for Supervised Visitors and interview with volunteer and contractors I find they meet this standard.

Athens Clarke County Correctional Institution ensures all volunteers and contractors who have contact with offenders have been trained on their responsibilities under Athens Clarke County

Correctional Institution' 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 offenders, but all volunteers and contractors who have contact with offenders are notified of Athens Clarke County Correctional Institution' zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Athens Clarke County Correctional Institution 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	Offender education
----------------	---------------------------

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of LOP 208.06 V.C pg. 10 ; GDOC SOP 208.06 IV C.4; SOP II B18-0001; Sexual Abuse Review Checklist; PREA Sexual Victimization/Aggressor classification Screening; PREA Orientation Checklist; PREA Orientation Acknowledgement; Offender Handbook; Video "What You Need to Know" and PREA Pamphlet and interview with random offenders and intake staff I find they exceed this standard.

During the intake process, offenders receive information explaining Athens Clarke County Correctional Institution' 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 offenders receive the PREA pamphlet and watch the video, as was confirmed on the tour and during random inmate interviews.

Athens Clarke County Correctional Institution provides a comprehensive education to offenders in person and shows 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. This comprehensive training is completed either immediately upon arrival or within 24 hours of arrival as was confirmed during random offender interviews and observation of an intake taking place where the offender had just arrived the day of the audit.

Athens Clarke County Correctional Institution provides offender education in formats accessible to all offenders, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to offenders who have limited reading skills. There is documentation of offender participation in these education sessions. The PREA Pamphlet is in both English/Spanish; Athens Clarke County Correctional Institution has an agreement with the Language Services Plus to provide translation for other languages as well as sign language for the deaf.

Based on the comprehensive training being completed either immediately upon arrival or within 24 hours of arrival and the fact that PREA Zero Tolerance and ways to report is printed on the back of each offenders ID cards I find they exceed in this standard.

§115.34 Specialized training: Investigators

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

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

Based on review of LOP 208.06 V.C pg. 10; GDOC SOP 208.06 IV C. 5; In Service Training Records; NIC Certificate PREA Investigating Sexual Abuse in a Confinement Setting and interview with investigative staff I find they meet this standard.

In addition to the general training provided to all employees Athens Clarke County Correctional Institution 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. Athens Clarke County Correctional Institution maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Athens Clarke County Correctional Institution 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 if they are a state offender. Staff of that unit has received specialized training regarding the techniques for investigating PREA-related issues. County offenders are investigated by Athens Clarke Sheriff Office.

§115.35 Specialized training: Medical and mental health care

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

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

Based on review of LOP 208.06 V.C pg. 10; GDOC SOP 208.06 IV. C. 6.; NIC Certificate – PREA Behavioral Health Care for Sexual Assault Victims in a Confinement Setting; NIC Certificate – 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.

Athens Clarke County Correctional Institution ensures that all full time medical practitioners who work regularly in its facility has 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. Athens Clarke County Correctional Institution 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. Mental Health services can be provided via tele psych with the Psychiatrist employed by Correct Health which is the health care provider.

Athens Clarke County Correctional Institution maintains documentation that medical and mental health practitioners have received the training.

Medical staff 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

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 LOP 208.06 V.D pg. 11; GDOC SOP 208.06 IV D. 1 (a-h); Victim/Aggressor Classification Rating; PREA Sexual Victim/Sexual Aggressor Classification Screening; PREA Action Recording Log and interview with random offenders and intake staff responsible for screening I find they exceed this standard.

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

Intake screenings take place immediately upon arrival or within 24 hours at Athens Clarke County Correctional Institution.

Athens Clarke County Correctional Institution uses an objective screening instrument.

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

- (1) Whether the offender has a mental, physical, or developmental disability;
- (2) The age of the offender;
- (3) The physical build of the offender;
- (4) Whether the offender has previously been incarcerated;
- (5) Whether the offender's criminal history is exclusively nonviolent;
- (6) Whether the offender has prior convictions for sex offenses against an adult or child;

- (7) Whether the offender is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- (8) Whether the offender has previously experienced sexual victimization;
- (9) The offender's own perception of vulnerability; and
- (10) Whether the offender 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 Athens Clarke County Correctional Institution, in assessing offenders for risk of being sexually abusive.

Within 30 days from the offender's arrival at Athens Clarke County Correctional Institution, Athens Clarke County Correctional Institution reassesses the offender's risk of victimization or abusiveness. Athens Clarke County Correctional Institution conduct a 30 day evaluation on all offenders regardless of receiving any additional information.

An offender'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 offender's risk of sexual victimization or abusiveness. Any offender who has been identified as needing further evaluation due to additional information received will be reassessed when warranted.

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

Athens Clarke County Correctional Institution implements appropriate controls on the dissemination within Athens Clarke County Correctional Institution of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the offender's detriment by staff or other offenders.

Only limited staff has access to the risk screening form Warden, Deputy Warden, Counselor.

Based on screening being done immediately upon arrival and the fact they reassess all offenders within 30 days I find they exceed this standard.

§115.42	Use of screening information
----------------	-------------------------------------

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

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

Based on review of LOP 208.06 V.D pg. 12; GDOC SOP 208.06 IV D. 2 (a-d); PREA Sexual Victim/Sexual Aggressor Classification Screening; Offender Orientation Checklist; PREA Orientation Acknowledgment and interview with PREA compliance manager and staff responsible for risk screening I find they meet this standard.

Athens Clarke County Correctional Institution uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those offenders at high risk of being sexually victimized from those at high risk of being sexually abusive. All information received from the offender during the intake process on the risk screening is used to determine housing, bed assignments, work, education and programming.

Athens Clarke County Correctional Institution makes individualized determinations about how to ensure the safety of each offender. Each offender's information is evaluated on a case by case basis to ensure the safety of the offender. C Dorm is for Potential Victims and A Dorm is for Potential Aggressors.

Athens Clarke County Correctional Institution has not had any Transgender however there are policies in place that address the following:

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

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

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

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

Athens Clarke County Correctional Institution does not place lesbian, gay, bisexual, transgender, or intersex offenders 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 offenders.

§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 LOP 208.06 V.D pg. 13; GDOC SOP 208.06 IV D. 3. (a-d); SOP IIB09-0001 and interview with warden I find they meet this standard.

No offenders have been placed in involuntary segregation housing.

Offenders 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.

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

Athens Clarke County Correctional Institution assigns such offenders 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 Athens Clarke County Correctional Institution clearly documents the basis for Athens Clarke County Correctional Institution's concern for the offender'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	Offender reporting
----------------	---------------------------

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

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

Based on review of LOP 208.06 V.E pg. 14;GDOC SOP 208.06 IV E. 1. (a-e) Offender Handbook; ACC PREA Pamphlet; and interviews with random staff and offenders I find they meet this standard.

Athens Clarke County Correctional Institution provides multiple internal ways for offenders to privately report sexual abuse and sexual harassment, retaliation by other offenders or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Athens Clarke County Correctional Institution offenders' 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 Director of Victim Services. Offenders are encouraged to report allegations immediately and directly to staff at all levels. All reports are promptly documented and reported to the proper authority.

Athens Clarke County Correctional Institution provides at least one way for offenders to report abuse or harassment to a public or private entity or office that is not part of Athens Clarke County Correctional Institution, and that is able to receive and immediately forward offender reports of sexual abuse and sexual harassment to agency officials, allowing the offender to remain anonymous upon request. Athens Clarke County Correctional Institution staff provides offenders at orientation with information from Cottage Sexual Assault & Children Advocacy Center.

Staff accepts reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports. Athens Clarke County Correctional Institution staff has been trained to forward all reports or observations of sexual assault/harassment to their immediate supervisor

and/or designated SART member promptly. These reports may be made in writing, verbally, anonymously, or from third parties.

Athens Clarke County Correctional Institution provides a method for staff to privately report sexual abuse and sexual harassment of offenders 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)
- Exempt from this standard

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

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

Athens Clarke County Correctional Institution is exempt from this standard. They do not require an offender to submit a PREA report on a grievance. If an offender submits a report on a grievance form the report is handle as a PREA incident and does not go through the formal grievance process

§115.53 Offender 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 LOP 208.06 V.E pg. 15;GDC SOP 208.06 IV. E. 3; PREA Pamphlet; Offender Handbook; PREA Poster and interview with random offenders I find they meet this standard.

Athens Clarke County Correctional Institution provides offenders with access to outside victim advocates for emotional support services related to sexual abuse by giving offenders mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations. Athens Clarke County Correctional Institution enables reasonable communication between offenders and these organizations and agencies, in as confidential a manner as possible. Athens Clarke County Correctional Institution offenders are notified of the Cottage Sexual Assault Center during Orientation. The staff provides the contact information for a rape victim advocacy from Cottage Sexual Assault Center located in the community. This information is also available to them upon request. An offender 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.

Athens Clarke County Correctional Institution informs offenders, 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 offenders of Athens Clarke County Correctional Institution request to contact Cottage Sexual Assault Center staff will make every effort to offer the offender reasonable privacy while maintaining visual security if located in restricted or sensitive areas within Athens Clarke County Correctional Institution. Offenders 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.

Athens Clarke County Correctional Institution maintains memoranda of understanding with Cottage Sexual Assault Center.

§115.54 Third party reporting

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

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

Based on review of LOP 208.06 V.E pg. 15;GDOC SOP 208.06 IV E. 4; PREA Pamphlet I find they meet this standard.

Athens Clarke County Correctional Institution 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 offender. Visitors can go to www.report@gdc.ga.gov

§115.61 Staff and agency reporting duties

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

Based on review of LOP 208.06 V.F pg. 16; GDOC SOP 208.06 IV F. 1. (g-i); PREA pamphlet and interviews with random staff; warden and medical/mental health staff I find they meet this standard.

Athens Clarke County Correctional Institution 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 Athens Clarke County Correctional Institution; retaliation against offenders 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 Athens Clarke County Correctional Institution 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. Athens Clarke County Correctional Institution'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, Athens Clarke County Correctional Institution reports the allegation to the designated State or local services agency under applicable mandatory reporting laws. Athens Clarke County Correctional Institution does not house Offenders under the age of 18. However, the Athens Clarke County Correctional Institution follows all State and Federal PREA policies and will comply with this standard in the event offenders under the age of 18 or offender considered vulnerable are involved in a PREA-related issue. This will be done in accordance with GDC SOP 208.06 & LOCAL OPERATING PROCEDURE and in coordination with GDC Internal Investigations.

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

§115.62	Agency protection duties
---------	---------------------------------

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

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

Based on review of LOP 208.06 V.F pg. 18; GDOC 208.06 IV.F.2; SOP IIB09-0001 and interviews with random staff, and warden I find they meet this standard.

No inmate has required protective custody.

Immediate action is taken to protect offenders when Athens Clarke County Correctional Institution learns that an offender is subject to a substantial risk of imminent sexual abuse. If an offender at Athens Clarke County Correctional Institution is determined to be in imminent danger of sexual abuse, the Warden will be notified immediately and the offender will be at the Diversion Center immediately in order to protect them.

§115.63	Reporting to other confinement facilities
---------	--

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

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

Based on review of LOP 208.06 V.F pg. 18; GDOC SOP 208.06 IV F. 3 (a-d) and interview with warden I find they meet this standard.

One report has been made or received.

Upon receiving an allegation that an offender was sexually abused while confined at another facility, the head of Athens Clarke County Correctional Institution that received the allegation notifies the head of the facility or appropriate office of Athens Clarke County Correctional Institution where the alleged abuse occurred. Such notification was made to the warden immediately after receiving the allegation, and all actions are thoroughly documented. In cases where an offender of Athens Clarke County Correctional Institution is sexually abused while confined at another facility the PREA Compliance Manager will immediately upon notification notify the head of that facility, Athens Clarke County Correctional Institution’s Warden, SART, the GDC PREA Coordinator, and GDC Internal Investigations.

§115.64	Staff first responder duties
---------	-------------------------------------

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

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

Based on review of LOP 208.06 V.F pg. 19; GDOC SOP 208.06 IV F. 4; Sexual Abuse Response checklist; Local Procedure Directive and interview with security staff who are first responders and random staff I find they meet this standard.

Upon learning of an allegation that an offender 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. Athens Clarke County Correctional Institution uses the Sexual Abuse Response Checklist which outlines the steps to take as a first responder.

If the first staff responder is not a security staff member, the responder request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

All non-security staff interviewed acknowledged they had been trained on what to do in the event a sexual assault was reported to them.

§115.65

Coordinated response

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of LOP 208.06 V.F pg. 19; GDOC SOP 208.06 IV F.5.; Coordinated Response; SART Contact and interview with warden I find they meet this standard.

Athens Clarke County Correctional Institution 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. Athens Clarke County Correctional Institution 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 offenders from contact with abusers

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Not applicable Standard

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

Based on review of LOP 208.06 V.F pg. 19; GDC SOP 208.06 IV. F. 4 and interview with Commissioner I find this standard does not apply.

Athens Clarke County Correctional Institution does not have collective bargaining.

§115.67

Agency protection against retaliation

Exceeds Standard (substantially exceeds requirement of standard).

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

Does Not Meet Standard (requires corrective action)

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

Based on review of G LOP 208.06 V.F pg. 20; DOC SOP 208.06 IV F. 6 (a-e) 90 day Offender Retaliation Monitoring and 90 day Staff Retaliation Monitoring interview with Warden, designated staff member with monitoring retaliation I find they meet this standard.

Athens Clarke County Correctional Institution has a policy to protect all offenders and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other offenders or staff, and designate which staff members or departments are charged with monitoring retaliation. Athens Clarke County Correctional Institution personnel will protect offenders and staff who report sexual abuse, sexual misconduct, or sexual harassment from retaliation. The Warden has identified two of the supervisors 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.

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

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

Based on interview with the person charged with monitoring retaliation, they will monitor for at least 90 days following a report of abuse, monitor the conduct and treatment of offenders 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 offender 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, Athens Clarke County Correctional Institution 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 supervisor 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 LOP 208.06 V.F pg. 20 GDC SOP 208.06 IV. F. 13 and interview with warden I find they meet this standard.

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

§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 LOP 208.06 V.G pg. 22; GDOC SOP 208.06 IV G. 3; SOP IK01-0006; and interview with investigative staff I find they meet this standard.

When Athens Clarke County Correctional Institution 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 Athens Clarke County Correctional Institution Sexual Abuse Response Team (SART). Substantiated SART investigations will immediately be referred to the GDC OIC Criminal Investigations Division and unsubstantiated SART investigations shall be referred to the Office of Professional Standards for an administrative review. Substantiated allegations of sexual abuse involving county offenders will be referred to Athens Clarke County Sheriff Office for investigation.

Where sexual abuse is alleged, Athens Clarke County Correctional Institution 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. Athens Clarke County Correctional Institution follows the procedures set forth in policy number 208.06. Athens Clarke County Correctional Institution 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, Athens Clarke County Correctional Institution refers to the GDC OIC Criminal Investigations Division and substantiated allegations of sexual abuse involving county offenders will be referred to Athens Clarke County Sheriff Office for investigation.

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 offender or staff. No agency requires an offender 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. Athens Clarke County Correctional Institution complies with this standard by following policies and procedures as outlined in the Athens Clarke County Correctional Institution Local Operating Procedure 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.

Athens Clarke County Correctional Institution retains all written reports for as long as the alleged abuser is incarcerated or employed by Athens Clarke County Correctional Institution, plus five years. Athens Clarke County Correctional Institution complies with this standard by following policies and procedures as outlined in the Athens Clarke County Correctional Institution 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 Athens Clarke County Correctional Institution or agency does not provide a basis for terminating an investigation. Athens Clarke County Correctional Institution complies with this standard by following policies and procedures as outlined in the Athens Clarke County Correctional Institution Local Operating Procedure in regard to PREA Investigations concerning criminal prosecutions.

§115.72

Evidentiary standard for administrative investigation

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

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

Based on review of LOP 208.06 V.G pg. 22; GDOC SOP 208.06 IV G. 14; SOP IK01-0006 and interview with investigative staff I find they meet this standard.

Athens Clarke County Correctional Institution 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 offenders

- 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 LOP 208.06 V.G pg. 22; GDOC SOP 208.06 IV G. 15; Closed Investigation Notification Letter and interview with warden and investigative staff I find they meet this standard.

Following an investigation into an offender’s allegation that they suffered sexual abuse in an agency facility, Athens Clarke County Correctional Institution informs the offender as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. Athens Clarke County Correctional Institution complies with this standard by following Athens Clarke County Correctional Institution policy number 208.06, which states, “Athens Clarke County Correctional Institution shall inform the offender 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 offender’s allegation that a staff member has committed sexual abuse against the offender 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 Athens Clarke County Correctional Institution did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the offender. Athens Clarke County Correctional Institution will obtain a copy of the investigation document and make proper notification to the offender as defined in Local Operating Procedure.

Following an offender’s allegation that a staff member has committed sexual abuse against the offender, Athens Clarke County Correctional Institution subsequently informs the offender (unless Athens Clarke County Correctional Institution has determined that the allegation is unfounded) whenever the staff member is no longer posted within the offender’s unit; the staff member is no longer employed at Athens Clarke County Correctional Institution; Athens Clarke County Correctional Institution learns that the staff member has been indicted on a charge related to sexual abuse within Athens Clarke County Correctional Institution; or Athens Clarke County Correctional Institution learns that the staff member has been convicted on a charge related to sexual abuse within Athens Clarke County Correctional Institution. Athens Clarke County Correctional Institution will comply with this directive by following Athens Clarke County Correctional Institution policy 208.06 which states, “Following an offender’s allegation that a staff member has committed sexual abuse against the offender, 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 offender's allegation that they had been sexually abused by another offender, Athens Clarke County Correctional Institution subsequently informs the alleged victim whenever Athens Clarke County Correctional Institution learns that the alleged abuser has been indicted on a charge related to sexual abuse within Athens Clarke County Correctional Institution; or Athens Clarke County Correctional Institution learns that the alleged abuser has been convicted on a charge related to sexual abuse within Athens Clarke County Correctional Institution. Athens Clarke County Correctional Institution adheres to the policy defined above as provided for in Athens Clarke County Correctional Institution Local Operating Procedure.

All such notifications or attempted notifications are documented. Athens Clarke County Correctional Institution adheres to the policy defined above as provided for in Athens Clarke County Correctional Institution 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 offender is released from Athens Clarke County Correctional Institution' custody. Athens Clarke County Correctional Institution adheres to this standard by following Athens Clarke County Correctional Institution Local Operating Procedure in which it states, "Athens Clarke County Correctional Institution shall inform the offender 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 offender is released from the Department's custody."

§115.76	Disciplinary sanctions for staff
---------	---

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

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

Based on review of LOP 208.06 V.G pg. 22; GDOC SOP 208.06 IV H. and Sexual Assault/Sexual Misconduct Acknowledgment Statement I find they meet this standard.

No staff have been disciplined; however there are policies in place that address the following:

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 Local Operating Procedure, 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.

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 Local Operating Procedure, disciplinary sanctions for violations of JCCCI 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 Athens Clarke County Correctional Institution's staff/contractors that do not adhere to the PREA standards set forth in Athens Clarke County Correctional Institution Local Operating Procedure 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 offenders and reported to the appropriate law enforcement agencies.

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

§115.77

Corrective action for contractors and volunteers

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

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

Based on review of LOP 208.06 V.G pg. 23; 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 volunteer has been disciplined; however there are policies in place that address the following:

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

Athens Clarke County Correctional Institution takes appropriate remedial measures, and considers whether to prohibit further contact with offenders, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. All Athens Clarke County

Correctional Institution's volunteers and contractors that do not adhere to the PREA standards set forth in Athens Clarke County Correctional Institution policy number 208.06 will be subject to the disciplinary standards as defined by that same policy. Remedial measures may include prohibiting contact with residents and reporting the incident to the appropriate law enforcement agency.

§115.78	Disciplinary sanctions for offenders
---------	---

- 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 LOP 208.06 V.G pg. 23; 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 offender has been disciplined however, there are policies in place that address the following:

Offenders are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the offender engaged in offender-on-offender sexual abuse or following a criminal finding of guilt for offender-on-offender sexual abuse. Athens Clarke County Correctional Institution will subject offenders to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the offender engaged in offender-on-offender sexual abuse or a criminal finding of guilt for offender-on-offender 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 offender's disciplinary history, and the sanctions imposed for comparable offenses by other offenders with similar histories. Sanctions will be commensurate with the nature and circumstances of the abuse committed, the offender's disciplinary history, and the sanctions imposed for comparable offenses by other offenders with similar histories. Sanctions are covered by GDC SOP IIB02-0001.

The disciplinary process considers whether an offender'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 offender's mental disability or mental illness during the disciplinary hearing process and when determining appropriate sanctions. GDC SOP VG34-0001 also addresses this issue.

Athens Clarke County Correctional Institution disciplines an offender 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.

Athens Clarke County Correctional Institution prohibits all sexual activity between offenders and may discipline offenders for such activity.

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 LOP 208.06 V.H pg. 24; interview with staff responsible for risk screening and medical staff I find they meet this standard.

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

If the screening indicates that an offender has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the offender is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. Medical does the initial screening and offers mental health services to all offender who have perpetrated sexual abuse in the past, if an inmate request mental health services they are referred to Phillips State Prison which is the catchment facility where mental health services are provided.

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 offenders before reporting information about prior sexual victimization that did not occur in an institutional setting.

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; and interview with medical staff I find they meet this standard.

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

If no qualified medical 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.

Offender 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 Athens Clarke County Correctional Institution.

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. Offenders are never charged for incidents arising out of a sexual assault.

§115.83

Ongoing medical and mental health care for sexual abuse victims

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

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

Based on review of LOP 208.06 V.H pg. 25; 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 I find they meet this standard.

Athens Clarke County Correctional Institution offers medical and, as appropriate, treatment to all offenders who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

In providing ongoing medical treatment services, Athens Clarke County Correctional Institution will utilize the medical services of Athens Clarke County Correctional Institution medical staff. In providing ongoing mental health services Athens Clarke County Correctional Institution will utilize the services of Phillips State Prison's mental health professionals. These services will be provided at no cost to the offender 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, Athens Clarke County Correctional Institution medical will utilize treatment plans, referrals and, if necessary, placement in other facilities, including facilities outside GDC upon the victim's release from custody.

Athens Clarke County Correctional Institution 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.

Offender victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. All Athens Clarke County Correctional Institution's offenders

who are victims of Sexual assault are treated by the Cottage Sexual Assault Center & Children Advocacy Center. Depending on the circumstances of the abuse, testing for sexually transmitted infections may be conducted at Athens Clarke County Correctional Institution or at Athens Regional Medical Center 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. Athens Clarke County Correctional Institution does not charge residents for PREA related treatments or services.

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

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of LOP 208.06 V.H pg. 25; 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.

Athens Clarke County Correctional Institution 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 Athens Clarke County Correctional Institution; and they examine the area in Athens Clarke County Correctional Institution 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)
- 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 LOP 208.06 V.H pg. 26 and Monthly data report I find they meet this standard.

Athens Clarke County Correctional Institution 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.

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

Athens Clarke County Correctional Institution obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its offenders.

Upon request, Athens Clarke County Correctional Institution 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)
- 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 LOP 208.06 V.H pg. 26 ; annual report and interview with PREA coordinator I find they meet this standard.

Athens Clarke County Correctional Institution 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 Athens Clarke County Correctional Institution 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 Athens Clarke County Correctional Institution’ progress in addressing sexual abuse.

Athens Clarke County Correctional Institution' report is approved by Athens Clarke County Correctional Institution head and made readily available to the public through its website www.athensclarkcounty.com/356/Corrections.

§115.89	Data storage, publication and destruction
---------	--

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

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

Based on review of LOP 208.06 V.H pg. 27; annual report and interview with PREA Coordinator I find they meet this standard.

Athens Clarke County Correctional Institution 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.athensclarkcounty.com/356/Corrections.

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 Athens Clarke County Correctional Institution under review.

Katherine Brown

Auditor Signature

July 24, 2016

Date