

**Prison Rape Elimination Act (PREA) Audit Report
Adult Prisons & Jails**

Interim Final

Date of Report January 7, 2019

Auditor Information

Name: **Wynnie Testamark**

Email: [REDACTED]

Company Name: **WTS Consultant Services, Inc.**

Mailing Address: [REDACTED]

City, State, Zip: [REDACTED]

Telephone: [REDACTED]

Date of Facility Visit: **May 21 - 24, 2018**

Agency Information

Name of Agency:
The GEO Group Inc.

Governing Authority or Parent Agency (If Applicable):

Physical Address: **One Park Place,
Suite 700, 621 Northwest 53rd Street**

City, State, Zip: **Boca Raton, FL 33487**

Mailing Address: **One Park Place, Suite 700, 621
Northwest 53rd Street**

City, State, Zip: **Boca Raton, FL 33487**

Telephone: **561-999-5827**

Is Agency accredited by any organization? Yes No

The Agency Is:

Military

Private for Profit

Private not for Profit

Municipal

County

State

Federal

Agency mission: **GEO's mission is to develop innovative public-private partnerships with government agencies around the globe that deliver high quality, cost-efficient correctional, detention, community reentry, and electronic monitoring services while providing industry leading rehabilitation and community reintegration programs to the men and women entrusted to GEO's care.**

Agency Website with PREA Information:

[http://www. Geogroup.com/PREA](http://www.Geogroup.com/PREA)

Agency Chief Executive Officer

Name: George C. Zoley

Title: Chairman of the Board, CEO and Founder

Email: [REDACTED]

Telephone: [REDACTED]

Agency-Wide PREA Coordinator

Name: Phebia Moreland

Title: Director, Contract Compliance, PREA Coordinator

Email: [REDACTED]

Telephone: [REDACTED]

PREA Coordinator Reports to:

Daniel Ragsdale, Executive Vice President,
Contract Compliance

Number of Compliance Managers who report to the PREA Coordinator

54 (US Corrections), 46 (Reentry Services)
8 (Youth Services) , 3 (Lockups) = **111**

Facility Information

Name of Facility: Central Arizona Correctional Facility

Physical Address: 1401 East Diversion Dam Road
Florence, AZ 85132

Mailing Address (if different than above): P.O. Box 9044 Florence, AZ 85132

Telephone Number: (520) 868-4809

The Facility Is:

Military

Private for profit

Private not for profit

Municipal

County

State

Federal

Facility Type:

Jail

Prison

Facility Mission:

In partnership with our Corporate Office and our Client, Central Arizona Correctional facility will strive for meaningful public service by providing the highest quality security, basic education programs, sex offender treatment programs, self-improvement classes, mental health counseling and job seeking skills. We are committed to preparing offenders for release and reintegration into our communities as productive members of society.

Facility Website with PREA Information: www.azcorrections.gov & <http://www.geogroup.com/PREA>

Warden/Superintendent

Name: **Frank Strada**

Title: **Warden**

Email: [REDACTED]

Telephone: [REDACTED]

Facility PREA Compliance Manager

Name: [REDACTED]

Title: **Substance Abuse Counselor**

Email: [REDACTED]

Telephone: [REDACTED]

Facility Health Service Administrator

Name: [REDACTED]

Title: **Health Service Administrator**

Email: [REDACTED]

Telephone: [REDACTED]

Facility Characteristics

Designated Facility Capacity: **1280**

Current Population of Facility: **1277**

Number of inmates admitted to facility during the past 12 months **323**

Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 30 days or more: **313**

Number of inmates admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more: **323**

Number of inmates on date of audit who were admitted to facility prior to August 20, 2012: **436**

Age Range of Population: Youthful Inmates Under 18: **N/A** Adults: **18 and older**

Are youthful inmates housed separately from the adult population? Yes No NA

Number of youthful inmates housed at this facility during the past 12 months: **0**

Average length of stay or time under supervision: **272 days**

Facility security level/inmate custody levels: **Medium Custody**

Number of staff currently employed by the facility who may have contact with inmates: **198**

Number of staff hired by the facility during the past 12 months who may have contact with inmates: **48**

Number of contracts in the past 12 months for services with contractors who may have contact with inmates: **0**

Physical Plant

Number of Buildings: 10	Number of Single Cell Housing Units: 1
Number of Multiple Occupancy Cell Housing Units:	5
Number of Open Bay/Dorm Housing Units:	20
Number of Segregation Cells (Administrative and Disciplinary):	40 total

Description of any video or electronic monitoring technology (including any relevant information about where cameras are placed, where the control room is, retention of video, etc.):

Currently, the Central Arizona Correctional Facility has an electronic monitoring system. Central Arizona CF has 180 cameras strategically placed throughout the facility to enhance inmate monitoring and safety.

Medical

Type of Medical Facility:	24/7 onsite medical care
Forensic sexual assault medical exams are conducted at:	Honor Health Osborne

Other

Number of volunteers and individual contractors, who may have contact with inmates, currently authorized to enter the facility:	31 contractors 36 volunteers
Number of investigators the agency currently employs to investigate allegations of sexual abuse:	110

Audit Findings

Audit Narrative

Wynn R. Testamark, CEO of WTS Consultant Services, Inc., Department of Justice (DOJ) Certified PREA Auditor, conducted the PREA Audit of Central Arizona Correctional Facility (Central Arizona CF), a privately owned prison facility operated by the GEO Group, Inc. under contract with the Arizona Department of Corrections (ADOC), on May 21 – 24, 2018.

Approximately four weeks prior to the audit, agency wide and facility specific supplemental documentation was mailed to this auditor via U S Express Mail, which was received, on April 25, 2018. The documentation arrived in digital format (on a flash drive). The documentation consisted of agency policies, directives and facility specific procedures responding to policy, samples of supporting documentation to each standard and the completed Pre-Audit Questionnaire.

Prior to the audit, the facility was provided with a memorandum noting the scheduled date of the facility audit and tour, contact information to be posted throughout the facility for inmates and staff to view. The facility onsite audit and tour was scheduled for, and conducted on, May 21-24, 2018.

The PREA Resource Audit Instrument used for Adult Prisons and Jails was provided by the National PREA Resource Center. There are seven sections: A) Pre-Audit Questionnaire; B) the Auditor Compliance Tool; C) Instructions for the PREA Audit Tour; D) the Interview Protocols; E) the Auditor's Summary Report; F) the Process Map; and G) the Checklist of Documentation.

The Auditor met with Phebia Moreland, Director, Contract Compliance, PREA Coordinator Monday, May 21, 2018 and discussed the PREA audit process and what to be expected during the on-site portion of the audit.

On May 22, 2018, Phebia Moreland, Director, Contract Compliance, PREA Coordinator, transported the auditor to Central Arizona Correctional Facility daily. There the auditor met with Warden Frank Strada, Assistant Warden [REDACTED], the Central Arizona CF executive team and Cammie Burke, Auditor 3, PREA Coordinator, Arizona Department of Corrections for an entrance briefing. Shortly thereafter, we began with a tour of the facility. The tour began at 09:45 a.m. and concluded at 12:00 noon. Accompanying on the tour was Assistant Warden [REDACTED], [REDACTED], PREA Compliance Manager, Cammie Burke, Auditor 3, PREA Coordinator, Arizona Department of Corrections and Phebia Moreland, Director, Contract Compliance, PREA Coordinator.

On day one of the audit, Central Arizona Correctional Facility reported an inmate count of (1277). The Central Correctional Arizona CF is a complex comprised of ten (10) buildings; inclusive of which includes one (1) detention center (RHU), 12 infirmary beds in the Medical Unit consisting of 4 isolation rooms and an 8-bed ward. The facility also has 16 wheel chair accessible cells, a Close Supervision Unit and the 64-bed residential Sex Offender Counseling & Treatment Program.

A facility tour was conducted and the auditor interacted with both staff and inmates at that time. Additional areas toured were housing units, medical, intake, reception screening, recreation, laundry, kitchen, inmate mess hall (s), library, program areas, visitation, commissary, storehouse, maintenance, and various work areas. The auditor had the opportunity to observe the operations of the facility, and the interaction between staff and inmates. While touring, informal interviews with staff and inmates; observation of log-book entries of unannounced rounds being conducted by intermediate and higher level facility staff were made; and visually reviewed view of toilet and shower areas.

Following the tour, the auditor began formal random interviews of inmates and staff; inclusive of specialized staff and inmates present at the facility during the time of the audit. Interviews were conducted in areas of relative privacy. Everyone interviewed participated willingly and appeared to have a good understanding of the PREA standards and the agency's response and requirements regarding the standards, zero tolerance policy and reporting procedures. All inmates expressed a thorough understanding of their right to be free from sexual abuse, harassment, and retaliation. They also knew the appropriate channels in which to report allegations and they were aware of the medical and counseling services available to them.

The auditor reviewed the documentation provided by the facility prior to the facility visit. During the tour, the auditor randomly reviewed additional documentation throughout the facility in order to verify that the samples provided was consistent with routine facility practice. This included viewing postings, pamphlets, investigative files, inmates' files, employee personnel files, medical and mental health files, and training documentation for staff, contractors, volunteers, and inmates.

The auditor observed signage posted in English, Spanish, and other languages throughout the facility-explaining inmates' rights to be free from sexual abuse and how to report allegations of sexual abuse and harassment. The agency's PREA Coordinator in collaboration with facility PREA Compliance Manager, and facility staff, has done an impressive job ensuring the information is disseminated (in multiple languages) throughout the facility for everyone to have access.

No forensic medical exams are conducted at Central Arizona CF, but can provide emergency medical healthcare if needed. Forensic examinations by SANE/SAFE staff are provided at the outside hospital, Honor Health Scottsdale Shea Medical Center.

The auditor conducted formal interviews with (2) Volunteer; (2) Investigative staff; (1) Agency Contract Administrator's designee, (0) SANE/SAFE staff; (64) random inmates; (1) Disabled inmates; (1) Hard of hearing inmate; (2) LGBT inmates; (0) Transgender inmates, (3) Limited

English Proficient inmates; (0) Inmates with cognitive disorders, (0) inmate in restrictive housing, (0) inmates who report sexual abuse or harassment, (0) High risk of victimization inmate and (0) inmates who reported previous abuse or harassment during the intake screening.

Central Arizona Correctional Facility does not house youthful inmates.

There was no inmate who reported sexual abuse; who disclosed sexual victimization during risk screening; nor housed in segregation for risk of sexual victimization at Central Arizona Correctional Facility. As previously stated, all inmates interviewed demonstrated knowledge of the agency's zero tolerance policy for sexual abuse, harassment and retaliation, and were able to identify how to report allegations of sexual abuse, harassment & retaliation.

Central Arizona Correctional Facility employs (198) staff at the time of the audit.

The auditor formally interviewed (32) random staff; comprised of all shifts. (1) Contractor Administrator (HR); (1) Medical staff; (1) Mental Health staff (Contract); (1) Volunteers (via telephone); (1) Investigator; (1) Staff who perform screening for risk of victimization and abusiveness; (2) Staff member on the incident review team; (2) staff member in charge with monitoring retaliation; (17) staff first responders, both security and non-security staff interviewed; (5) Intake staff members; PREA Compliance Manager, Shift Supervisors.

In conclusion, a total of (32) staff from all three shifts, and (64) inmates' formal interviews were conducted. Formal interviews were conducted utilizing the approved PREA questionnaires from the PREA Resource Center. The random sample of inmates was selected from the general housing population.

Central Arizona CF has not undergone any significant renovations or modifications during the past 12 months. However, 20 new cameras has been installed and strategically placed throughout the facility. Every area of the facility was observed as the standard requires and the auditor observed inmates being supervised throughout the audit.

There was two (2) areas identified during the tour that needed security enhancement to cover blind spots: (kitchen & D Corridor). As a result, the administrator submitted a purchase order for security mirrors before the audit concluded.

After the on-site audit was completed, the auditor conducted an exit briefing with Facility Warden Frank Strada, and his executive team and provided a preliminary status of the audit findings. Phebia Moreland, Director, Contract Compliance, PREA Coordinator; and Cammie Burke, Auditor 3, PREA Coordinator, Arizona Department of Corrections also was in attendance from The GEO Group Corporate Office.

The auditor thanked Central Arizona Correctional Facility staff and commended them on their hard work and commitment to the creating a sexually safe environment and the Prison Rape Elimination Act. During the exit meeting, during the exit meeting, I explained the process that would follow the on-site visit to include corrective action measures required for standard 115.41 subsections, (a) (d) (f) and 115.42 subsection (a).

During the interim report writing period the auditor reviewed additional policies, procedures and supplementary documentation that was received during the audit.

Facility Characteristics

The Central Arizona Correctional Facility (Central Arizona CF), is a privately owned prison facility operated by the GEO Group, Inc. under contract with the Arizona Department of Corrections (ADOC) to provide custody, programming and treatment to 1,280 medium-custody adult male sex offenders.

Central Arizona CF is located in Florence Arizona. Florence is a town located in the county seat of Pinal County, Arizona. The 2015 Census shows a population of 30,770. The oldest functioning State Prison complex is located in Florence with a total of sixteen (16) facilities in including county, state, federal, and private prisons housing some 17,000 inmates.

Central Arizona CF opened in December 11, 2006. The typical length of stay for offenders ranges from 12 months to 24 months depending on the individual's risk factors. The housing in the institution is dormitory in style with the exception of the disciplinary detention unit; it is built of concrete and cinder block at a cost of \$42.5 million and was renovated to its current capacity. It is medium custody and is located immediately beside the companion institution, the Arizona State Prison.

All housing is dormitory style with individual cubicles except for the detention or segregation unit, which has two pods of 20 individual, cells each. There are five housing units, which are contiguous to each other in one long building on the north side of the facility property. Each of the five housing units has four individual housing areas {pods} which houses up to 64 inmates, making the total capacity for each housing unit, 256 inmates.

There is a double perimeter fence surrounding the majority of the institution. The outer fence is 14 feet chain link with "no-climb" fabric as well. On a portion of the perimeter the rear wall of the housing dormitories and the program services building provides the inner perimeter security barrier. The outer fence is lined with razor wire and there is portion at the top curved inward with razor wire.

All meals are prepared in the facility kitchen. There is a central preparation area and two dining halls. The kitchen is staffed and operates with security, civilian and inmate workers.

There are 180 CCTV cameras throughout the institution monitoring the grounds and perimeter and recorded by DVR. There are high mast lights with perimeter lights and impact lighting on the fence, which light a violated microwave zone with the zones immediately on either side. There is a mobile perimeter patrol 24/7.

The primary mission of this institution is the housing and treatment of sex offenders. The Sex Offender Treatment Program (SOETP) currently treats 240 inmates with a goal of graduating approximately 100 inmates annually into community-based treatment (probation & parole) as they release from prison. For all participants, the key components of the sex offender treatment program focus on assessment, psycho-education, and relapse prevention. Programs include employability skills, parenting, substance abuse education and counseling, nutrition/diet education, education, GED classes, ABE classes, case management, individual/group counseling, stress management, facility work programs, job placement, and prison works/ prison labor.

SOETP also provides advanced treatment groups addressing broader criminal and anti-social behavior (Moral Recognition Therapy), training for healing interaction with family members and others victimized by past offenses (Emotional Restitution Therapy), more intensive relapse prevention planning, impulse management and support network building (Vigilant Re-integration) and more detailed training in interpersonal skills, conflict resolution and intimacy building (MyNewLife).

The SOETP staff includes an evaluation specialist and six licensed therapists with a combined 60+ years of experience providing treatment for both sex offenders and sex abuse survivors.

Educational services are provided in three basic program areas: Functional Literacy, GED Preparation and Work-Based Education. Vocational training is offered in Contemporary Business Essentials, and Beginning Business. The Arizona Correctional Industries also employs approximately 40 inmates in furniture upholstery and restoration, which also provide a vocational learning experience.

The functional literacy program targets offenders with very limited functional skills and/or limited English language development. It is designed to develop reading, writing, mathematics and others skills necessary to function in a working environment.

The GED Preparation Program provides instruction for those offenders who do not have a high school diploma or GED to assist them in successfully passing the GED test. The GED test is the same test given to the general public per A.R.S. 31-201.01. Upon successful completion of the GED testing procedure, an official diploma is prepared by the Arizona Department of Education.

Pursuant to A.R.S. 15-1372 and Federal Statutes, including the Individuals with Disabilities Education Act (IDEA), ADOC provides educational services to minors adjudicated as adults and sentenced to prison, as well as to offenders less than 22 years of age without a high school diploma or GED who are found to be eligible for services. Inmates are evaluated upon enrollment in education programs. Inmates so affected are sent to another institution for special education services.

Healthcare services are provided for Central Arizona Correctional Facility (CACF) through a contract with Correct Care Solutions. Under the direction of the Facility Health Services Director, with the assistance of the Nurse Administrator and a staff of Registered Nurses, the Health Unit provided 24-hour medical coverage. The staffing pattern consists of seven full time

and six as needed (PRN) RNs, one Physician, one Physician's Assistant and one Medical Records Clerk.

All medical staff is CPR certified. All staff is trained annually. All staff carries a CPR kit with a face shield and gloves. In addition, all medical staff receives annual PREA refresher training.

The Medical Provider is on call 24/7. The Medical Provider provides direction based upon assessment. Inmates are scheduled after the initial assessment by the provider based upon their medical history. Inmates are triaged by nursing staff upon arrival. Mental Health sees the inmate upon referral that day, if necessary. The Mental Health providers are on call 24/7.

There is one observation cell in Medical. The Correctional staff provides observation. The area of the observation and medical cells has a shower, which is handicap accessible.

In addition to the on-site staff, the medical unit has Tele-medicine equipment, which is used to provide ER services 24 hours/day, as well as medical specialist appointments, which enhances their services to the population, while reducing outside medical trips.

Central Arizona CF has a Chaplain that oversees volunteers providing religious services and activities throughout the week. The Chaplain works Monday thru Friday. The Chaplain and volunteers coordinate and provide religious services, and ensure that inmates are provided access to religious activities, materials, diets, and other legitimate tenets of their faith. Inmates are also provided the opportunity to connect with a community or religious leader willing to assist them upon release. Connections are facilitated by the chaplains and include telephone contacts, correspondence, and scheduling personal pastoral visits.

Recreation programs operate daily. One group gets to rec in the a.m. and the other in the p.m. There is one full time recreation staff member and the program employee's 16 inmates. There are a variety of programs, there is a sequential exercise course, there are no free weights permitted. There is a large pavilion type structure under room with basketball courts and other open air space for soccer etc. The segregation unit has outdoor exercise areas under roof where one inmate at a time can recreate. The leisure area in the housing pods is also used for recreation, primarily table games. Inmates have televisions and music players.

Central Arizona CF Library is open seven days a week. Inmates have the ability to check out up to three books during a two-week period. Inmates come to the Library during their recreation time. Inmates are allowed to read newspapers and magazines while in the Library. The library also has a reference section that is only available in the library. Books are delivered to the Central Detention Unit (CDU) through inmate letter requests.

Mission Statement

The mission of Central Arizona Correctional Facility (CACF) is to provide a meaningful public service by providing the highest quality security, basic education programs, sex offender treatment programs, self-improvement classes, mental health counseling and job seeking skills to prepare offenders for release and reintegration into our communities.

GEO's mission is to develop innovative public-private partnership with government agencies around the globe that deliver high quality, cost efficient correctional, detention, community reentry and electronic monitoring service while providing industry leading rehabilitation and community reintegration programs to men and women entrusted to GEO's care.

Summary of Audit Findings

Number of Standards Exceeded: 4

Standard 115.17: Hiring and promotion decisions

Standard 115.31: Employee training

Standard 115.33: Inmate education

Standard 115.35: Specialized training: Medical and mental health care

Number of Standards Met: 38

Number of Standards Not Met: 2

Standard 115.41: Screening for risk of victimization and abusiveness

Standard 115.42: Use of screening information.

Summary of Corrective Action (if any)

Standard 115.41: Screening for risk of victimization and abusiveness

The standard requires that all inmates be re-screened upon transfer within 30 days after arrival; and for the facility to affirmatively asks the inmate about his sexual orientation and gender identity AND make a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be GBTI.

Recommended corrective action:

Central Arizona CF needs to either allow GEO to implement its protocols to bring this standard into compliance or auditor is willing to work with ADOC on appropriate ways to bring this standard into compliance.

Documentation of revised directive, staff training, and inmates' re-assessment must be provided to auditor upon completion.

Standard 115.42: Use of screening information.

Based ADOC DO #811, page 4, section 1.10.5, the facility uses information from the risk screening to make housing, bed, work, education and program assignments to keep inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. The AIMS automatically generates points based on the answers provided from the screening questions.

A score of 10 points triggers an action alert and the inmate will be referred for an interview with designated staff to be assessed for being at high risk for victimization or abusiveness. If the review of the inmate recommends high risk, a referral will be made to the Assistant Warden who will review all information regarding the inmate's screening and make a determination and then reviewed by the Offender Services Bureaus for the final decision of high risk or not.

Per my interview with the Correctional Programs Supervisor who conducts the screenings, although the system will automatically triggers these action alerts. These additional reviews are not conducted within 72 hours or prior to the inmate being housed and although the inmate scores at risk based on the 10 point system, the reviewing staff frequently overrides the system alert as all inmates that triggered in the past 12 months were determined not "at risk".

Therefore, the information from the risk assessment is not being utilized to inform housing, bed, work, education, and program assignments.

Recommended corrective action:

Central Arizona CF needs to either allow GEO to implement its protocols to bring this standard into compliance or auditor is willing to work with ADOC on appropriate ways to bring this standard into compliance.

Documentation of revised directive, screening tool, and staff training must be provided to auditor upon completion.

Pursuant to PREA standard **115.404 (a-e) Audit Corrective Action Plan**, A finding of “Does Not Meet Standard” with one or more standards to the audited facility triggers a corrective action period, which may last up to 180 days. **Central Arizona Correctional Facility 180-day period commenced July 9, 2018 and will end on January 9, 2019.**

After the corrective action period ends or upon completion of the above mentioned, I will verify implementation, review updated policies and procedures.

On December 7, 2018, I received updated information via email from The GEO Corporate PREA Coordinator. Central Arizona CF (Arizona Department of Corrections) Administrators, pursuant to Standard 115.405; which provides agencies with the option to appeal any findings of an audit that they believe are incorrect; elected to appeal auditor findings. Therefore, PREA Standards 115.41 and 115.42 remains non-compliant.

PREVENTION PLANNING

Standard 115.11: Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

All Yes/No Questions Must Be Answered by The Auditor to Complete the Report

115.11 (a)

- Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment? Yes No
- Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? Yes No

115.11 (b)

- Has the agency employed or designated an agency-wide PREA Coordinator? Yes No
- Is the PREA Coordinator position in the upper-level of the agency hierarchy? Yes No
- Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?
 Yes No

115.11 (c)

- If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.) Yes No NA
- Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)
 Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADOC Policy 125: Sexual Offense Reporting has a written plan mandating zero tolerance towards all forms of sexual abuse and sexual harassment and outlines the agency's approach to preventing, detecting and responding to such conduct. Both policies include definitions of prohibited behaviors and sanctions for those found to participate in these prohibited behaviors outlines the definitions of prohibited behaviors for inmates and staff.

GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), outline the responsibilities of the PREA Coordinator and the PREA Compliance Manager. In interview with the agency's PREA Coordinator, at an earlier audit date, and the PREA Compliance Manager, they both stated that they have sufficient time and authority to manage their PREA-related responsibilities.

Random staff interviewed, knew clearly the agency's' zero tolerance policy on sexual abuse and assault and the reporting process for PREA incidents. Inmates interviewed were aware of the Central Arizona CF Zero Tolerance Policy on Sexual Abuse, Harassment, and Assault. This information is included in the issued Inmate Handbook and they are shown the PREA Orientation Video upon arrival.

Based upon review of GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADOC Policy 125: Sexual Offense Reporting, observations of PREA postings, pamphlets, and interviews with facility Warden, Assistant Warden, agency PREA Coordinator, PREA Compliance Manager and random staff and inmates, Central Arizona CF meets this standard.

Standard 115.12: Contracting with other entities for the confinement of inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.12 (a)

- If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) Yes No NA

115.12 (b)

- Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates OR the response to 115.12(a)-1 is "NO".) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO is a private provider and does not contract with other agencies for the confinement of inmates; therefore, this standard is not applicable.

Standard 115.13: Supervision and monitoring

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.13 (a)

- Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? Yes No
- Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring? Yes No

- Does the agency ensure that each facility’s staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility’s staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility’s staffing plan takes into consideration all components of the facility’s physical plant (including “blind-spots” or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility’s staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility’s staffing plan takes into consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility’s staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring? Yes No NA
- Does the agency ensure that each facility’s staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility’s staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring? Yes No
- Does the agency ensure that each facility’s staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring? Yes No

115.13 (b)

- In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.)
 Yes No NA

115.13 (c)

- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section? Yes No
- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies? Yes No
- In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan? Yes No

115.13 (d)

- Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? Yes No
- Is this policy and practice implemented for night shifts as well as day shifts? Yes No
- Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Central Arizona Correctional Facility has an established staffing plan, which provides for adequate levels of staffing and, facility utilizes direct supervision model to protect inmates against sexual abuse. According to documentation provided, the agency has made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring to protect inmates against sexual abuse. A "PREA Annual

Facility Assessment” is completed by the PREA Compliance Manager and the Compliance Administrator and forwarded to the PREA Coordinator and the Corporate Divisional Vice President for review and signature.

Additionally, according to the Assistant Warden, the staffing plan was developed considering the generally acceptable correctional practices; any judicial findings, any findings of inadequacy from federal investigative agencies, any findings of inadequacy from internal or external oversight bodies, all components of the physical plant, the inmate population, the number and placement of supervisory staff, institutional programs and the shifts they occur on applicable state or local laws or regulations, the prevalence of substantiated and unsubstantiated incidents of sexual abuse and any other relevant information.

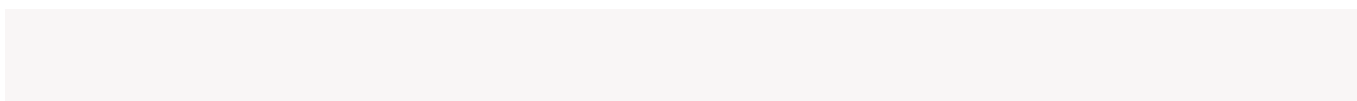
Agency’s policies also mandate that facility management staff and mid-level supervisors will conduct and document unannounced PREA rounds within their respective areas to deter employee sexual abuse and sexual harassment. This practice was confirmed by interview with inmates and staff who reported frequent rounds being conducted on a daily basis.

The last PREA Facility Assessment completed on 9/14/2017, noted no deviations from the staffing plan and no recommendations were made for any changes to the current staffing levels. Central Arizona CF has a contract mandated staffing plan and currently maintain the amount of staff required by the ADOC. The facility covers any vacancies of security posts by utilizing overtime. Staffing reports are submitted to and monitored by ADOC to ensure contract requirements are being met. The Chief of Security reviews the staffing roster on a daily basis as well as ADOC.

Central Arizona CF has an electronic monitoring system and have 180 cameras strategically placed throughout the facility.

During the past 12 months, according to documentation presented and reviewed, Central Arizona CF had no deviations from the staffing plan.

Based on my review of GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC Policy 703: Security, Facility Inspections, Annual PREA Assessment , Statement of Fact, GEO Contract with Arizona Department of Corrections, CACF Staffing Pattern, CACF Shift Rosters, Inspections/Tour Reports (703), Camera Lists and interviews with Assistant Warden, Captain, PREA Compliance Manager, Shift Supervisors staff and inmates, Central Arizona CF meets this standard.



Standard 115.14: Youthful inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.14 (a)

- Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA

115.14 (b)

- In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA
- In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA

115.14 (c)

- Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA
- Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA
- Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates [inmates <18 years old].) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Central Arizona CF does not house youthful inmates; therefore, this standard does not apply.

Standard 115.15: Limits to cross-gender viewing and searches

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.15 (a)

- Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?
 Yes No

115.15 (b)

- Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.) Yes No NA

Females are not housed at this facility

- Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A here for facilities with less than 50 inmates before August 20, 2017.) Yes No NA

Females are not housed at this facility

115.15 (c)

- Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches? Yes No
- Does the facility document all cross-gender pat-down searches of female inmates?
 Yes No NA

Females are not housed at this facility

115.15 (d)

- Does the facility implement a policy and practice that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? Yes No
- Does the facility require staff of the opposite gender to announce their presence when entering an inmate-housing unit? Yes No

115.15 (e)

- Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status? Yes No
- If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner? Yes No

115.15 (f)

- Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? Yes No
- Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Agency's policies and procedures addresses inmate pat searches, strip searches, body cavity searches and the limits to cross gender viewing and searches. Policy also states that staff members of the same gender may perform strip searches and specifying searches of transgender and intersex inmates. The facility does not conduct cross gender pat down searches, strip searches or body cavity searches. A staff member of the same gender conduct pat searches and these searches are documented on a "Unit Strip Search Log".

All security staff at Central Arizona CF has received training in how to conduct cross-gender pat down searches and how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible; consistent with security needs.

Central Arizona CF houses only male inmates.

No cross-gender strip-searches or cross gender visual body cavity searches have been performed at Central Arizona CF during the past 12 months.

Based upon review of ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 704: Inmate Regulations, ADOC Policy 708: Searches, ADOC Policy 810: Management of LGBTI Inmates, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Training Logs, Training Curriculum, and interviews with Assistant Warden, PREA Compliance Manager, Supervisors and staff, Central Arizona CF meets this standard.

Standard 115.16: Inmates with disabilities and inmates who are limited English proficient

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.16 (a)

- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing? Yes No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision? Yes No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect,

and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities? Yes No

- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities? Yes No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities? Yes No
- Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes)? Yes No
- Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing? Yes No
- Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? Yes No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities? Yes No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills? Yes No
- Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Are blind or have low vision? Yes No

115.16 (b)

- Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient? Yes No
- Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?
 Yes No

115.16 (c)

- Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

The Central Arizona CF takes all necessary steps to ensure inmates with limited English proficiency have an opportunity to participate in and benefit from the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

A contract with Language Line Services, Inc. provides translation services of any other languages. Inmates with literacy problems or visual impairments will be provided oral translations of PREA training material. The agency does not use inmates as interpreters, readers of other types of inmate assistants. A list of staff identified as interpreters is provided by facility Warden.

Bilingual Posters were observed throughout the facility and in inmate housing units, library, and program areas. During the past 12 months, there were no instances where inmate interpreters, readers, or other types of inmate assistants have been used.

Based on my review of GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC Policy 108: Americans with Disabilities Act, ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 704: Inmate Regulations, ADOC Policy 906: Inmate recreation/Art and Crafts, Unit Interpreters Memo, Language Line Contract, Material for PREA Communication, ADOC PREA Training Curriculum, Statement of Fact, posters, and signs throughout the facility, housing units, the PREA orientation video, pamphlets, and interviews with staff and inmates, Central Arizona CF meets this standard.

Standard 115.17: Hiring and promotion decisions

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.17 (a)

- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? Yes No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who 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? Yes No
- Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? Yes No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? Yes No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who 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? Yes No
- Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the question immediately above? Yes No

115.17 (b)

- Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates? Yes No

115.17 (c)

- Before hiring new employees, who may have contact with inmates, does the agency: perform a criminal background records check? Yes No

- Before hiring new employees, who may have contact with inmates, does the agency: consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse? Yes No

115.17 (d)

- Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates? Yes No

115.17 (e)

- Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees? Yes No

115.17 (f)

- Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions? Yes No
- Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees? Yes No
- Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? Yes No

115.17 (g)

- Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination? Yes No

115.17 (h)

- Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

According to ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 106: Contract Beds, ADOC Policy 602: Background Investigations, ADOC Policy 601: Administrative Investigations and Employee Discipline, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Central Arizona CF do not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor or volunteer who may have contact with inmates, who has engaged in sexual abuse in prison, jail, lockup, community confinement facility, juvenile facility, or other institution, has been convicted of engaging or attempting to engage in sexual activity in the community.

Human Service Bureau screens all applicants for the Department. Criminal background checks are completed before hiring any new employee. ADOC performs NCIC background checks and checks on all potential employees. In addition, for private prisons, The Contract Beds Operations Director ensures employees undergo background checks by the Department Background Unit. Applicants, who answer on their application for employment that they have worked previously in a confinement setting, receive PREA Verification by Accurate Backgrounds, Inc. For consideration for promotions or transfers, employees complete a "PREA Disclosure and Authorization Form Promotions – PREA Related.

At the time of annual performance evaluations, employees complete a PREA Disclosure and Authorization Form Annual Performance Evaluation". Background checks for medical staff that are contracted by ADOC with Correct Care Solutions (CCS) conducts background checks on all CCS staff prior to being hired. Background checks are completed on all employees and contractors every five years.

In the past 12 months, there have been forty-eight (48) persons hired at Central Arizona CF who may have contact with inmates who have had criminal background record checks.

In the past 12 months, there have been eleven (11) contracts for services at Central Arizona CF, where criminal background record checks were conducted on all staff covered in the contract that might have contact with inmates.

Based upon: ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 106: Contract Beds,

ADOC Policy 602: Background Investigations, ADOC Policy 601: Administrative Investigations and Employee Discipline, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Background Check of Contractor 5 years, Background Check of New Hire, Promotional Information, Correction Officer Application reviewed; and interview with Assistant Warden, PREA Compliance Manager, HR staff, CIU Supervisor, and random staff, Central Arizona CF exceeds this standard.

Standard 115.18: Upgrades to facilities and technologies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.18 (a)

- If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)
 Yes No NA

115.18 (b)

- If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)
 Yes No NA

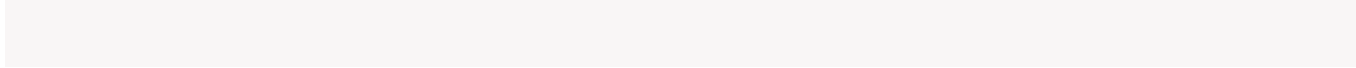
Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Currently, the Central Arizona CF has an electronic monitoring system; and uses effectively placed security mirrors, see through wall partitions/windows, privacy screens and security staffing to enhance inmate monitoring and safety.

Central Arizona CF has not installed or updated no video monitoring system, electronic surveillance system, or other monitoring technology since the last PREA audit.

The Central Arizona CF meets this standard.



RESPONSIVE PLANNING

Standard 115.21: Evidence protocol and forensic medical examinations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.21 (a)

- If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)
 Yes No NA

115.21 (b)

- Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA

- Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) Yes No NA

115.21 (c)

- Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate? Yes No
- Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? Yes No
- If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)? Yes No
- Has the agency documented its efforts to provide SAFEs or SANEs? Yes No

115.21 (d)

- Does the agency attempt to make available to the victim a victim advocate from a rape crisis center? Yes No
- If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member? Yes No
- Has the agency documented its efforts to secure services from rape crisis centers? Yes No

115.21 (e)

- As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews? Yes No
- As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals? Yes No

115.21 (f)

- If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.) Yes No NA

115.21 (g)

- Auditor is not required to audit this provision.

115.21 (h)

- If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? [N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.] Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

According to ADOC Policy 125: Sexual Offense Reporting, ADC Policy 608: Criminal Investigations, Correct Care Solutions Policy B-05: Response to Sexual Abuse, GEO Policy 5.1.2-E: Sexual Abusive Behavior Prevention & Intervention Program (PREA) Investigations, the facility follows a uniform evidence protocol for the collection and preservation of evidence for administrative and criminal investigations of sexual abuse. It is the responsibility of the ADOC Criminal Investigation Unit (CIU) to conduct investigations and to ensure that all evidence is collected and preserved according to evidence protocol established by the Department of Justice.

At Central Arizona CF, the SOETP Therapist and PREA Compliance Manager are trained victim advocates. Inmates may request their services or any of the service providers from the information provided by the Arizona State Coalition to end Sexual and Domestic Violence by submitting a request to their Correctional Program Officer or to the PREA Compliance Manager. Both employees received victim advocacy training on 2/4/15 from the Arizona Coalition to End Sexual and Domestic Violence. Calls to any of these agencies are toll free and will not be monitored.

No forensic medical exams are conducted at Central Arizona CF but; emergency medical healthcare is provide if needed. Forensic examinations by SANE/SAFE staff are provided at Honor Health Scottsdale Shea Medical Center.

These services are provided at no cost to the inmate. A victim advocate is provided to the inmate upon request to provide emotional support.

Interview conducted with the CIU Supervisor confirmed that PREA investigations are completed as outlined by ADOC policies and procedures, and PREA standards. The Investigator was very knowledgeable of the investigation process, and evidence collection protocols.

During the past 12 months, there were no forensic medical exams performed by SANE/SAFE staff.

In the past 12 months, there were no incidents that required the use of a victim advocate.

Based upon on, Investigative, Medical, Mental Health staff interviews, and ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 608: Criminal Investigations, Correct Care Solutions Policy B-05: Response to Sexual Abuse, GEO policy 5.1.2-E: Sexual Abusive Behavior Prevention & Intervention Program (PREA) Investigations, Statement of Fact, and Victim Advocates training certificates, Central Arizona CF CF meets this standard.

Standard 115.22: Policies to ensure referrals of allegations for investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.22 (a)

- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse? Yes No
- Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment? Yes No

115.22 (b)

- Does the agency have a policy and practice in place to ensure that 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? Yes No

- Has the agency published such policy on its website or, if it does not have one, made the policy available through other means? Yes No
- Does the agency document all such referrals? Yes No

115.22 (c)

- If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? [N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).] Yes No NA

115.22 (d)

- Auditor is not required to audit this provision.

115.22 (e)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

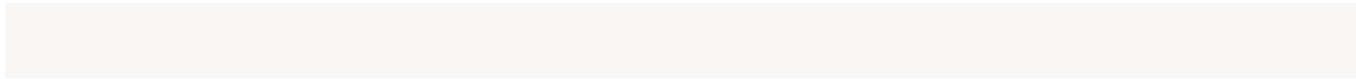
GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 601: Administrative Investigations and Employee Discipline, ADOC Policy 608: Criminal Investigations outlines the agency's policy and procedure for investigating and documenting incidents of sexual abuse. All allegations of sexual abuse shall be investigated. In addition, procedures outline evidence protocols for administrative investigations and criminal prosecutions.

The ADOC Criminal Investigation Unit investigates all PREA allegations. When notified of an allegation of sexual abuse or sexual harassment, ADOC CIU ensures that a Significant Incident Report (SIR) is generated. A GEO "PREA Incident Tracking Log" is used to track all incidents that occur at the facility.

The agency's policy regarding referral of allegations for sexual abuse and sexual harassment is available on the agency website at: www.geogroup.com (Social Responsibility Section), and ADOC website at www.azcorrections.gov (Reports and Documents Section); which was reviewed by this auditor.

During the past 12 months, there have been nine (9) (7 abuse/ 2 harassment) allegations of sexual abuse and sexual harassment; zero allegations resulting in an administrative investigation; and nine (9) allegations were referred for criminal investigation.

Based on the Warden, Assistant Warden, Special Investigator, PREA Compliance Manager interviews, and reviewed policies/procedures: ADC Policy 125: Sexual Offense Reporting, ADC Policy 601: Administrative Investigations and Employee Discipline, ADC Policy 608: Criminal Investigations, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), agency website: www.geogroup.com (Social Responsibility Section), ADOC website: www.azcorrections.gov (Reports and Documents Section), PREA Incident Tracking Log, and CIU Investigative Report, Central Arizona CF meets this standard.



TRAINING AND EDUCATION

Standard 115.31: Employee training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.31 (a)

- Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment? Yes No
- Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures? Yes No
- Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment? Yes No
- Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment? Yes No

- Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement? Yes No
- Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims? Yes No
- Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse? Yes No
- Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates? Yes No
- Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates? Yes No
- Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities? Yes No

115.31 (b)

- Is such training tailored to the gender of the inmates at the employee's facility? Yes No
- Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa? Yes No

115.31 (c)

- Have all current employees who may have contact with inmates received such training? Yes No
- Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures? Yes No
- In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies? Yes No

115.31 (d)

- Does the agency document, through employee signature or electronic verification, that employees understand the training they have received? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADOC Policy 125: Sexual Offense Reporting, addresses the agency's training requirements. All CACF employees, contractors and volunteers receive ADOC and GEO PREA training on the agency's zero-tolerance policy for sexual abuse and sexual harassment at pre-service for all correctional staff, New Employee Orientation for non-correctional staff and annually as part of in-service training. The training curriculum was reviewed and found to contain all the requirements of the requirements of this standard.

Staff interviewed at Central Arizona CF was very knowledgeable about the agency zero-tolerance policy for sexual abuse and sexual harassment; How to fulfill their responsibilities concerning prevention, detection, reporting, and response concerning sexual abuse and sexual harassment; The inmates' rights to be free from sexual abuse and sexual harassment; Inmate and employee's rights to be free from retaliation for reporting sexual abuse and sexual harassment; The dynamics of sexual abuse and harassment in confinement; The common reaction of victims to sexual abuse and sexual harassment; How to detect signs of sexual abuse and sexual harassment; How to avoid inappropriate relationships; How to communicate effectively and professionally with inmates (LGBTI); and how to comply with relevant laws related to mandatory reporting.

Employees who may have contact with inmates; receive refresher training on PREA requirements annually at in-service training and were knowledgeable of the zero tolerance policy and of their responsibilities related to the prevention, detection and response to sexual abuse and sexual harassment.

Training records are maintained electronically for each employee. Training records assessed of 42 employees (31 security/11medical), confirmed staff are receiving the mandated PREA training. Employees acknowledged receiving and understanding this training by their signature on the ADOC "PREA Training Acknowledgement" form as well as being documented in the employee's electronic training record.

During the past 12 months, 221 employees at Central Arizona CF employees, who may have

contact with inmates, were trained or retrained on the PREA requirements.

Based on random staff interviews, inmate interviews, PREA Compliance Manager interview, staff training records, information packets, posters throughout the facility, and the following policies/procedures: ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 106: Contract Beds, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC PREA Curriculum, ADOC PREA Training Acknowledgment and Electronic Verification reviewed, Central Arizona CF exceeds this standard.

Standard 115.32: Volunteer and contractor training

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.32 (a)

- Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures? Yes No

115.32 (b)

- Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)? Yes No

115.32 (c)

- Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)

- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

All contractors and volunteers who have contact with inmates at the Central Arizona CF receive PREA Orientation training prior to assuming their responsibilities. Orientation includes the agency's policy and procedures regarding sexual abuse and sexual harassment prevention, detection, reporting, and response including zero tolerance.

There are 31 contractors and 36 volunteers, who have contact with inmates, who have been trained in agency policies and procedures regarding sexual abuse/harassment prevention, detection, and response. Upon completion of orientation, the volunteer/contractor signs the Acknowledgment Form. Signed forms are maintained at the facility.

Based upon interviews with the PREA Compliance Manager, Assistant Warden, and the following documentation: ADOC PREA Curriculum, Current Roster for Volunteers, ADOC PREA Training Acknowledgment and Electronic Verification for Contractors, ADOC PREA Curriculum, ADOC PREA Training Acknowledgment and Electronic Verification , Central Arizona CF meets this standard.

Standard 115.33: Inmate education

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.33 (a)

- During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment? Yes No
- During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment? Yes No

115.33 (b)

- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment? Yes No

- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents? Yes No
- Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents? Yes No

115.33 (c)

- Have all inmates received such education? Yes No
- Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?
 Yes No

115.33 (d)

- Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who are deaf? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled? Yes No
- Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills? Yes No

115.33 (e)

- Does the agency maintain documentation of inmate participation in these education sessions?
 Yes No

115.33 (f)

- In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADOC 125: Sexual Offense Reporting, outlines the agency's requirements on inmate education. Incoming inmates receive information explaining GEO's and ADOC zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Upon arrival, all inmates sign a form acknowledging receipt of the Inmate Handbook, which contains PREA information.

In addition, all inmates receive the ADOC "Sexual Assault Awareness" pamphlet and receive comprehensive PREA education as part of the institutional orientation process that is held once a week for all incoming inmates. Inmates sign a "Turnout List for New Inmate Orientation/PREA/EIP" roster and training information is stored electronically.

Information provided is in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired or otherwise disabled as well as to inmates who have limited reading skills. Posters in both English and Spanish were notably displayed in various locations the housing units and throughout the facility.

Central Arizona CF admitted 323 inmates during past 12 months who were given PREA information at intake.

During the past 12 months, 323 inmates at Central Arizona CF (whose length of stay in the facility was for 30 days or more) received comprehensive education on their rights to be free from both sexual abuse/harassment and retaliation for reporting such incidents and on agency policies and procedures for responding to such incidents within 30 days of intake.

All inmates interviewed acknowledged receiving the training and were knowledgeable of the methods of reporting allegations of sexual abuse and sexual harassment available to them.

Based upon random interviews with staff/inmates, review of ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 108: Americans With Disabilities Act Compliance, ADOC Policy 704: Inmate Regulations, ADOC Policy 802: Inmate Grievance Procedure, GEO policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Documentation of PREA Educational Materials and Lesson Plan for Inmates, Inmate Orientation Handbook, and PREA Posters, Central Arizona CF exceeds this standard.

Standard 115.34: Specialized training: Investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.34 (a)

- In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) Yes No NA

115.34 (b)

- Does this specialized training include techniques for interviewing sexual abuse victims? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] Yes No NA
- Does this specialized training include proper use of Miranda and Garrity warnings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] Yes No NA
- Does this specialized training include sexual abuse evidence collection in confinement settings? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] Yes No NA
- Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).] Yes No NA

115.34 (c)

- Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? [N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).]
 Yes No NA

115.34 (d)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- 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 ADOC Policy 125: Sexual Offense Reporting, and GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), mandates that all agency investigators receive specialized training in addition to the general PREA training provided to all employees. The ADOC Criminal Investigation Unit investigates all PREA allegations. CIU investigators receive National Institute of Corrections (NIC) training; and Prosecutorial Collaboration: by the MOSS Group. Completion of this training is maintained electronically in the investigators' Employee Training History.

The CIU Investigator Supervisor was interviewed. He acknowledged receiving specialized investigations training and was knowledgeable of his duties in conducting investigations, sexual abuse evidence collection and the evidence required to substantiate a case for administrative action or prosecution referral.

Based on my review of: ADOC Policy 125: Sexual Offense Reporting, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Statement of Fact , PREA Specialized Investigator Training Curriculum, Certificate of Completion (February 2014 and January 2018), the interview with CIU Investigator Supervisor, and the PREA Compliance Manager, Central Arizona CF meets this standard.

Standard 115.35: Specialized training: Medical and mental health care

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.35 (a)

- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? Yes No
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? Yes No
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? Yes No
- Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? Yes No

115.35 (b)

- If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.) Yes No NA

115.35 (c)

- Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? Yes No

115.35 (d)

- Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31? Yes No
- Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

All full and part time medical and mental health staff is required to complete all training outlined in this standard. ADOC Policy 125: Sexual Offense Reporting, and GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), states that each facility will train all full-time and part-time medical and mental health staff to detect signs of sexual abuse and sexual harassment, preserving physical evidence and responding effectively and professionally to victims of sexual abuse and sexual harassment.

Medical and mental health staff receives specialized training in addition to training provided to all staff. Power Point Presentation: outlines how the agency shall ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment; How to preserve physical evidence of sexual abuse; How to 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.

Forensic examinations by SANE/SAFE staff are provided at Honor Health Scottsdale Shea Medical Center.

These services are at no cost to the inmate.

Interviews with medical and mental staff revealed that they are knowledgeable of their duties and responsibilities under PREA and know how to properly respond to or report an allegation of sexual abuse or assault.

Based on ADOC Policy 125: Sexual Offense Reporting, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Specialized Medical and Mental Health

PREA Training, CCS Certificate of Completion-Medical, Statement of Fact, ADOC PREA Curriculum, ADOC PREA Training Acknowledgment and Electronic Verification, Central Arizona CF meets this standard.

SCREENING FOR RISK OF SEXUAL VICTIMIZATION AND ABUSIVENESS

Standard 115.41: Screening for risk of victimization and abusiveness

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.41 (a)

- Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? Yes No
- Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates? Yes No

115.41 (b)

- Do intake screenings ordinarily take place within 72 hours of arrival at the facility?
 Yes No

115.41 (c)

- Are all PREA screening assessments conducted using an objective screening instrument?
 Yes No

115.41 (d)

- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate? Yes No

- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability? Yes No
- Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes? Yes No

115.41 (e)

- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse? Yes No
- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses? Yes No

- In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?
 Yes No

115.41 (f)

- Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening? Yes No

115.41 (g)

- Does the facility reassess an inmate's risk level when warranted due to a: Referral?
 Yes No
- Does the facility reassess an inmate's risk level when warranted due to a: Request?
 Yes No
- Does the facility reassess an inmate's risk level when warranted due to a: Incident of sexual abuse? Yes No
- Does the facility reassess an inmate's risk level when warranted due to a: Receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?
 Yes No

115.41 (h)

- Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section? Yes No

115.41 (i)

- Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates? Yes No

Auditor Overall Compliance Determination

Exceeds Standard (*Substantially exceeds requirement of standards*)

- 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 GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA) and ADOC Policy 811: Individual Inmate Assessments and Reviews, all inmates are assessed during intake at the Alhambra Reception Center within 72 hours for risk of being sexually abused by other inmates or sexually abusive toward other inmates.

This information is maintained in the ADOC Adult Inmate Management System (AIMS). AIMS is an automated computerized system containing information regarding all inmates confined in the Arizona Department of Corrections. This information follows the inmate as long as they are in the custody of ADOC.

The screening instrument includes whether the inmate has a mental, physical, or developmental disability, the age and physical build of the inmate, previously incarceration history, whether the inmate's criminal history is exclusively nonviolent, prior convictions for sex offenses whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming, past sexual victimization, self-perception of vulnerability.

Inmates are not disciplined for refusing answer questions during the screening process. Information obtained during the initial assessment and reassessment is placed in the inmate's classification file. Only authorized staff has access to these files.

During the past 12 months, there were 893 inmates at Central Arizona CF (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the facility.

Within the past 12 months, there was no inmates at Central Arizona CF (whose length of stay in the facility was for 30 days or more) who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake.

Conversely, subsection (a) (b) (d: 7) & (f) of this standard, Central Arizona CF is not compliant.

Central Arizona CF does not conduct risk screenings upon transfer to CACF. Based on ADOC policy, documentation provided and interview with the Correctional Programs Supervisor who conducts the screenings, GEO was instructed by client on April 20, 2018 to cease practice of conducting PREA risk screenings when inmates arrive at their facility as this is done at the ADC reception center. No assessments were completed upon transfer as of that date on new arrivals.

Based on the FAQ dated 10/26/15, an initial PREA screening must be conducted during all intake screenings, which should ordinarily occur within 72 hours, and upon transfer to another facility. However, according to the preamble of the PREA standards Notice of Final Rule, a facility “is free to rely on information previously gathered with regard to a returning inmate” if the facility ensures “that its assessment captures any changes in risk factors that may have occurred subsequent to the facility’s prior gathering of information regarding that inmate.” See Vol. 77, Federal Register, No. 119, p. 37150. Questions such as gender identity, history of victimization or being sexually abusive, perception of their own safety at a minimum should be asked as these things could change since the screening conducted at the reception center.

Also, the screening form in AIMS was reviewed and revealed it did not allow the screener to indicate his or her own perception if the inmate appears to be gender non-conforming. This requirement was outlined by the PREA Resource Center in an FAQ dated 10/21/16.

In addition, ADOC does not require that the facility complete reassessment screenings within 30 days of inmates’ arrival to the facility, although ADOC’s DO #811, page 3, section 1.10.3, states that inmates will be reassessed for risk of victimization or abusiveness no later than 30 days from their arrival at a permanent facility.

Based on FAQ dated 6/20/14 - While standard 115.41(f) requires an affirmative reassessment within 30 days, the reassessment need not “start from scratch.” For example, as noted in the PREA Notice of Final Rule, a facility may generally rely upon information previously gathered, so long as the reassessment “captures any changes in risk factors that may have occurred subsequent to the facility’s prior gathering of information regarding that inmate.”

While a facility may (and should) have a system in place for capturing additional or new information from a variety of sources (e.g., mental health assessment, disciplinary history, or allegations of relevant threats or victimization), the 30-day affirmative reassessment requires, at a minimum, that screening staff consult available sources to determine whether any previously unknown triggering event or information has become available and to document such review. If, after consulting all relevant sources, no new relevant information is present, then further reassessment under the standards may not be necessary. In short, as opposed to the “passive” requirements under standards 115.41(g) and 115.41(f) requires screening staff to affirmatively “look.”

Based on interviews with Assistant Warden, PREA Compliance Manager, Correctional Programs Supervisor, random staff and random inmates as well as review of policies/procedures and supporting documentation: ADOC Policy 811: Individual Inmate Assessments and Reviews, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC Screening Process Overview, DC91 Inmate Victimization and Abusiveness Screenings, ADOC Screening Report and facility PAQ, Central Arizona CF **does not** meet this standard.

Recommended corrective action:

Central Arizona CF needs to either allow GEO to implement its protocols to bring this standard into compliance or auditor is willing to work with ADOC on appropriate ways to bring this standard into compliance.

Documentation of revised directive, staff training, and inmates' re-assessment must be provided to auditor upon completion.

On December 7, 2018, I received updated information via email from The GEO Corporate PREA Coordinator. Central Arizona CF (Arizona Department of Corrections) Administrators, pursuant to Standard 115.405; which provides agencies with the option to appeal any findings of an audit that they believe are incorrect; elected to appeal auditor findings. Therefore, PREA Standards 115.41 remains non-compliant.

Standard 115.42: Use of screening information

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.42 (a)

- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments? Yes No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments? Yes No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments? Yes No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments? Yes No
- Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments? Yes No

115.42 (b)

- Does the agency make individualized determinations about how to ensure the safety of each inmate? Yes No

115.42 (c)

- When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)? Yes No
- When making housing or other program assignments for transgender or intersex inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems? Yes No

115.42 (d)

- Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate? Yes No

115.42 (e)

- Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments? Yes No

115.42 (f)

- Are transgender and intersex inmates given the opportunity to shower separately from other inmates? Yes No

115.42 (g)

- Unless 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 lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? Yes No
- Unless 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 lesbian, gay,

bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? Yes No

- Unless 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 lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Central Arizona CF: ADOC Policy 810: Management of LGBTI Inmates, ADOC Policy 704: Inmate Regulations, ADOC Policy 801: Inmate Classification, provides guidelines on housing and program assignments and for the management of transgender and intersex inmates. Policy also states that all inmates transferred into its facility be screened.

Initial process is completed at the Alhambra Reception Center.

Transgender or intersex (TI) inmate's housing is considered on a case-by-case basis, placement considers the inmate's health and safety, and whether the placement would present management or security problems; placement is reassessed as needed; TI inmate's own view with respect to his or her own safety is given consideration; TI inmates are given the opportunity to shower separately from other inmates.

Central Arizona CF does not house gay, bisexual, transgender or intersex inmates in dedicated units.

Central Arizona CF had two (2) transgender inmates at the time of the audit.

At the time of the audit, there were eighteen (18) inmates at Central CF that identified as being gay. This Auditor interviewed five (5) of them.

Based ADOC DO #811, page 4, section 1.10.5, the facility uses information from the risk screening to make housing, bed, work, education and program assignments to keep inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. The AIMS automatically generates points based on the answers provided from the screening questions.

A score of 10 points triggers an action alert and the inmate will be referred for an interview with designated staff to be assessed for being at high risk for victimization or abusiveness. If the review of the inmate recommends high risk, a referral will be made to the Assistant Warden who will review all information regarding the inmate's screening and make a determination and then reviewed by the Offender Services Bureaus for the final decision of high risk or not.

Per my interview with the Correctional Programs Supervisor who conducts the screenings, although the system will automatically triggers these action alerts. These additional reviews are not conducted within 72 hours or prior to the inmate being housed and although the inmate scores at risk based on the 10 point system, the reviewing staff frequently overrides the system alert as all inmates that triggered in the past 12 months were determined not "at risk".

Therefore, the information from the risk assessment is not being utilized to inform housing, bed, work, education, and program assignments.

Based on documentation reviewed: ADOC Policy 810, Management of LGBTI Inmates, ADOC Policy 704, Inmate Regulations, ADOC Policy 801, Inmate Classification, LGBTI unit housing, AIMS Screens for TI Committee, Inmate Showers, and interviews conducted, Central Arizona CF **does not meet** this standard.

Recommended corrective action:

Central Arizona CF needs to either allow GEO to implement its protocols to bring this standard into compliance or auditor is willing to work with ADOC on appropriate ways to bring this standard into compliance.

Documentation of revised directive, screening tool, and staff training, must be provided to auditor upon completion.

On December 7, 2018, I received updated information via email from The GEO Corporate PREA Coordinator. Central Arizona CF (Arizona Department of Corrections) Administrators, pursuant to Standard 115.405; which provides agencies with the option to appeal any findings of an audit that they believe are incorrect; elected to appeal auditor findings. Therefore, PREA Standards 115.42 remains non-compliant.

Standard 115.43: Protective Custody

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.43 (a)

- Does the facility always refrain from placing inmates at high risk for sexual victimization 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? Yes No
- If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment? Yes No

115.43 (b)

- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible? Yes No
- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible? Yes No
- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible? Yes No
- Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible? Yes No
- If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited? Yes No
- If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation? Yes No
- If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations? Yes No

115.43 (c)

- Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged?
 Yes No
- Does such an assignment not ordinarily exceed a period of 30 days? Yes No

115.43 (d)

- If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety? Yes No
- If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? Yes No

115.43 (e)

- In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 804: Inmate Behavior Control, ADOC Policy 805: Protective Custody, GEO policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA); outlines the process for involuntary placement of inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made

that there is no available alternative means of separation from likely abusers.

If an assessment cannot be made immediately, the inmate may be placed in involuntary segregated housing for no more than 24 hours. Agency's policy further states that if involuntary segregated housing is used for the safety of the inmate as a means of separation, it can be used for no more than 30 days and a review will be completed every 30 days to determine whether there is a continuing need for separation from the general population.

In the past 12 months at Central Arizona CF, there were no inmates at risk of sexual victimization who were held in involuntary segregated housing for one to 24 hours awaiting completion of assessment.

During this audit period, Central Arizona CF has not placed any inmate in Involuntary or Voluntary protective custody solely due to being a high risk for victimization.

Based upon interviews conducted with the Warden, Assistant Warden, PREA Compliance Manager, ADOC Policy 125: Sexual Offense Reporting , ADOC Policy 804: Inmate Behavior Control, ADOC Policy 805: Protective Custody, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and Statement of Fact, Central Arizona CF meets this standard.

REPORTING

Standard 115.51: Inmate reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.51 (a)

- Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment? Yes No
- Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment? Yes No
- Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents? Yes No

115.51 (b)

- Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency? Yes No
- Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials? Yes No
- Does that private entity or office allow the inmate to remain anonymous upon request? Yes No
- Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security? Yes No NA

115.51 (c)

- Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties? Yes No
- Does staff promptly document any verbal reports of sexual abuse and sexual harassment? Yes No

115.51 (d)

- Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Central Arizona CF procedures: ADOC Policy 125: Sexual Offense Reporting, Statement of Fact, Inmate handbook, FY2015 PREA Training Curriculum, Employee Handbook
Photographs of Phones and Bulletin Boards convey multiple internal and external ways for

inmates to report sexual abuse, sexual harassment, and retaliation. PREA reporting methods are given to inmates at intake, during orientation, in the PREA brochure, and on posters throughout the facility.

Inmates can also call the PREA hotline by dialing 7732. This number accesses the Arizona DOC PREA Coordinator at the ADC's Central Office in Phoenix, AZ who in turn notifies the CIU Investigator, the Inspector General and the Assistant Inspector General. They are also advised that they can report allegations through a third party or send an anonymous report. In addition, agency's policy mandates that staff accept all reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties.

Random inmate interviews confirmed inmates knew the various ways in which they can report allegations and; random staff interviews confirmed staff was aware of the multiple ways in which inmates may report.

Agency does not detained solely for civil immigration purposes. However, Consular Official contact information is available to inmates.

Based upon review of the ADOC Policy 125: Sexual Offense Reporting, Statement of Fact, Inmate handbook, FY2015 PREA Training Curriculum, Employee Handbook, Photographs of Phones and Bulletin Boards, observations and interviews with staff and inmates, Central Arizona CF meets this standard.

Standard 115.52: Exhaustion of administrative remedies

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.52 (a)

- Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse. Yes No NA

115.52 (b)

- Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.) Yes No NA
- Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (c)

- Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) Yes No NA
- Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (d)

- Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.) Yes No NA
- If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.) Yes No NA
- At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (e)

- Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.) Yes No NA
- Are those third parties also permitted to file such requests on behalf of inmates? (If a third-party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.) Yes No NA
- If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (f)

- Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.) Yes No NA

- After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)
 Yes No NA
- After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.) Yes No NA
- After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)
 Yes No NA
- Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.) Yes No NA
- Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) Yes No NA
- Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.) Yes No NA

115.52 (g)

- If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

According to agency's policy ADOC 802: Inmate Grievance Procedure, Inmate Handbook; Inmates are not required to file grievances concerning alleged incidents of sexual abuse and sexual harassment. There is no time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. The agency does not require an inmate to use any

informal grievance process or attempt to resolve with staff an alleged incident of sexual abuse.

Policy also states when an emergency grievance is received, the agency shall provide an initial response within 48 hours. Thereafter, after receiving said emergency grievance; the agency will provide a decision within 5 calendar days. Moreover, the Warden or designee issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing.

The agency may discipline an inmate for filing a grievance related to alleged sexual abuse if the agency determines that the inmate filed the grievance with malicious intent.

In the past 12 months, there have been no grievances related to sexual abuse or sexual harassment filed.

Based on ADOC Policy 802: Inmate Grievance Procedure, Statement of Fact, Inmate Orientation Handbook, and interviews with Assistant Warden, PREA Compliance Manager, Supervisors, staff and inmates; Central Arizona CF meets this standard.

Standard 115.53: Inmate access to outside confidential support services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.53 (a)

- Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations? Yes No
- Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? Yes No
- Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible? Yes No

115.53 (b)

- Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws? Yes No

115.53 (c)

- Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse? Yes No
- Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 914: Inmate Mail, ADOC Policy 915: Inmate Phone Calls, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ensures that inmates are provided with access to outside victim advocates for emotional support. Currently inmates have access to outside advocacy services by access to addresses and telephone numbers of state and national crisis centers. The Arizona State Coalition provides information to End Sexual and Domestic Violence. Inmates are made aware of this information in the Inmate Orientation Handbook, on posters, and also available in the inmate library.

At Central Arizona CF, the SOETP Therapist and PREA Compliance Manager are trained victim advocates. Inmates may request their services or any of the service providers from the information provided by the Arizona State Coalition to end Sexual and Domestic Violence by submitting a request to their Correctional Program Officer or to the PREA Compliance Manager. Calls to any of these agencies are toll free and will not be monitored.

CACF does not house inmates solely for immigration purposes.

Based upon review of ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 914: Inmate Mail, ADOC Policy 915: Inmate Phone Calls, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Inmate Victim Advocate Posting, Statement of

Fact, Memo of SANE Nurse, Inmate Orientation Handbook, observations of posters/brochures and interviews with inmates and staff, Central Arizona CF meets this standard.

Standard 115.54: Third-party reporting

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.54 (a)

- Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment? Yes No
- Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), confirmed the agency has a method to receive third party reports of sexual abuse and sexual harassment. Family members or other individuals may report verbally or in writing anytime they have knowledge or suspect an inmate has been sexually abused, sexually harassed, or requires protection.

Outside parties can report verbally or in writing to the Criminal Investigations Supervisor of the

facility. This information is available on the ADOC website at www.azcorrections.gov, under (Reports and Documents Section). Information for third party reporting is also available on the GEO website at www.geogroup.com.

This information was observed posted throughout the facility and available in housing units.

Based upon above-mentioned documentations, facility specific examples, and interviews with Assistant Warden, PREA Compliance Manager, PREA Coordinator, random staff and inmates, Central Arizona CF meets this standard.

OFFICIAL RESPONSE FOLLOWING AN INMATE REPORT

Standard 115.61: Staff and agency reporting duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.61 (a)

- Does the agency require 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 the agency? Yes No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment? Yes No
- Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation? Yes No

115.61 (b)

- Apart from reporting to designated supervisors or officials, does staff always refrain from revealing 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? Yes No

115.61 (c)

- Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?
 Yes No
- Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services? Yes No

115.61 (d)

If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws? Yes No

115.61 (e)

- Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADO #125: Sexual Offense Reporting, provides clear guidelines to all staff regarding their obligation 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 the alleged incident took place at the inmates' current facility or not; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Based on review of employee training curriculum, 42 training files (31 security/11 medical), all staff, contractors and volunteers are to report immediately any knowledge or information regarding an incident of sexual abuse or sexual harassment or any inmate subject to risk of imminent sexual abuse. Any retaliation or suspected retaliation against inmates or staff is to be reported immediately.

Agency policies also, require all reports and information related to allegations remain confidential to the extent necessary for treatment, investigation and for other management decisions.

Interviews with random staff all confirmed compliance and all articulated the reporting process and what is required of them when doing so. Staff was also aware of the requirement to immediately report all allegations of sexual abuse and/or harassment as well as the requirement to document the report in writing as soon as possible. Each staff also knew the importance of confidentiality.

Based upon review of GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADOC Policy 125: Sexual Offense Reporting, Statement of Fact, training curriculum, employee training files, and interviews with Assistant Warden, Captain, PREA Compliance Manager, random staff and medical/mental health staff, Central Arizona CF meets this standard.

Standard 115.62: Agency protection duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.62 (a)

- When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADOC Policy 125: Sexual Offense Reporting, both addresses this standard and specifically states all staff shall take immediate action to protect inmates at risk of imminent sexual abuse. The interviews with the Assistant Warden, PREA Coordinator, PREA Compliance Manager, Captain, supervisors, and staff all confirmed when an inmate is subject to substantial risk; the inmate will be located, assessed and take the appropriate action.

In the past 12 months, there were zero (0) instances where the facility determined that an inmate was subject to a substantial risk of imminent sexual abuse.

Based upon reviewed GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADOC Policy 125: Sexual Offense Reporting, Statement of Fact, and interviews conducted, Central Arizona CF meets this standard.

Standard 115.63: Reporting to other confinement facilities

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.63 (a)

- Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred? Yes No

115.63 (b)

- Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation? Yes No

115.63 (c)

- Does the agency document that it has provided such notification? Yes No

115.63 (d)

- Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 608: Criminal Investigations, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), addresses upon receiving an allegation that an inmate was the victim of sexual violence or staff sexual misconduct while confined at another institution or facility, Warden or designee where the allegation was received shall notify the head of the institution or appropriate office of the agency where the alleged incident occurred within 72 hours after receiving the allegation. Notification is to be made utilizing the Significant Information Report (SIR).

This information is to be shared with the PREA Coordinator and the PREA Compliance Manager who ensures that the allegation is investigated in accordance with the PREA standards.

During the past 12 months, Central Arizona CF received one (1) report that claimed or alleged that inmate was sexually abused while in the custody of an outside correctional facility, city or county jail, or any other law enforcement agency.

During the past 12 months, Central Arizona CF received zero (0) report from an outside facility that reported an inmate in their custody had been allegedly sexually abused while in the custody of Central Arizona CF.

Based upon review of ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 608: Criminal Investigations, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Information Reports, Significant Incident Reports and Criminal Investigations Reports, and interviews with the Assistant Warden, Investigator Supervisor, Supervisors, and staff, Central Arizona CF meets this standard.

Standard 115.64: Staff first responder duties

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.64 (a)

- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?
 Yes No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence? Yes No

- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: 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, if the abuse occurred within a time period that still allows for the collection of physical evidence? Yes No
- Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? Yes No

115.64 (b)

- If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Agency policies GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA); and ADOC Policy 125: Sexual Offense Reporting, Statement of Fact; provide information explaining the duties of staff that are first responders to allegations of sexual abuse or acts of sexual abuse.

The policies require all staff to follow the protocol as dictated by this standard, including the separation of the alleged victim from the alleged abuser, preservation of evidence and the crime scene and to not allow the victim or abuser to take any action that would destroy physical evidence if the alleged incident took place within a time frame that would still allow for collection of that evidence.

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

Security and non-security staff interviewed was knowledgeable of the policy and the practice to follow. They reported that they knew that the alleged victim and abuser must be separated and how to preserve the crime scene and the evidence. They further reported that they would initiate a Level 5 response from the Incident Command System for the backup of five other officers for assistance.

In the past 12 months, there were seven (7) numbers of allegations that an inmate was sexually abused. Of those allegations, four (4), incidents required implementing first responder duties.

Based upon random staff interviews and review of the following policies/procedures: GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA); and ADOC Policy 125, Sexual Offense Reporting, and Statement of Fact, Central Arizona CF meets this standard.

Standard 115.65: Coordinated response

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.65 (a)

- Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Central Arizona CF's Coordinated Response Plan to an Incident of Inmate Sexual abuse and ADOC Policy: 125 was reviewed and the plan coordinates actions taken in response to an incident of sexual abuse among first responders, security, medical and mental health practitioners, Office of Inspector General, Investigations. Part of the response plan is to fill out an ADOC "Sexual Assault Procedures Checklist" and an "ASP CACF PREA Incident Checklist" to ensure that all steps of the plan are carried out.

The facility specific plan also addresses, SAFE/SANE hospitals, third party and anonymous reports, victim advocates, and notifications.

Based upon review of ADOC Policy 125: Sexual Offense Reporting, Facility Coordinated Response Plan and interviews with Warden, Assistant Warden, PREA Compliance Manager, Investigative Supervisor, Medical staff, and random staff; Central Arizona CF meets this standard.

Standard 115.66: Preservation of ability to protect inmates from contact with abusers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.66 (a)

- Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted? Yes No

115.66 (b)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Review of Based on GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA); GEO shall not enter into or renew any collective bargaining agreement or other agreement that limits a facility's ability to remove alleged employee sexual abusers from contact with inmates of GEO facilities or program pending the outcome an investigation.

Central Arizona Correctional Facility has a collective bargaining agreement between GEO Group, Inc. and the International Union, Security, Policy and Fire Professionals of America (SPFPA), local 827.

The last agreement was signed on 11/29/2015 and in effective 10/6/15 – 10/6/18. Agreement agrees to follow the guidelines for the agency’s progressive discipline process, which includes sanctions up to, and including termination.

In the past 12 months, there have not been any incidents where staff had to be separated from an inmate.

Based upon GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA); Bargaining Agreement Contract, Statement of Fact reviewed, and interviews with the Warden, Assistant Warden, and PREA Compliance Manager, Central Arizona CF meets this standard.

Standard 115.67: Agency protection against retaliation

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.67 (a)

- Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff? Yes No
- Has the agency designated which staff members or departments are charged with monitoring retaliation? Yes No

115.67 (b)

- Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations? Yes No

115.67 (c)

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct

and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? Yes No

- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff? Yes No
- Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff? Yes No
- Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need? Yes No

115.67 (d)

- In the case of inmates, does such monitoring also include periodic status checks?
 Yes No

115.67 (e)

- If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?
 Yes No

115.67 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 811: Individual Inmate Assessments and Reviews, and GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA); specifically states retaliatory measures against employees and inmates who report incidents of sexual violence, staff sexual misconduct or sexual harassment as well as retaliatory measures against those who cooperate with investigations shall not be tolerated and shall result in disciplinary action and/or criminal prosecution.

Inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations will be protected from retaliation from other inmates and staff. Housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims and emotional support services for inmates who fear retaliation will be protection measures used as per agency and ADOC policy.

The Correctional Programs Supervisor, the Chief of Security and the inmate's assigned Correctional Program Officer conduct monitoring for retaliation. Monitoring for retaliation is documented in the Arizona Inmate Management System (AIMS).

There have been no incidents of retaliation during this audit period.

Based upon review of the ADOC Policy 125, Sexual Offense Reporting, ADOC Policy 811, Individual Inmate Assessments and Reviews, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA); AIMS DI21 Reviews, Statement of Fact and interview with the Warden, Assistant Warden, and PREA Compliance Manager, Central Arizona CF meets this standard.

Standard 115.68: Post-allegation protective custody

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.68 (a)

- Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 804: Inmate Behavior Control, ADOC Policy 805: Protective Custody policy specifies that inmates will not be placed in involuntary segregation unless an assessment of all available alternatives has been made and a determination is made that no alternative is available. The facility will assess any inmate in these circumstances immediately but no more than 24 hours.

Also, inmates that are placed in protective custody on this basis shall have access to programs privileges, education, and work opportunities as stipulated in PREA Standard 115.43. If an inmate is placed in involuntary protective custody; inmate status is then reviewed every thirty days.

There were no inmates who alleged sexual abuse or were victims of sexual abuse held in involuntary segregation housing in the past twelve months.

Based on review of ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 804: Inmate Behavior Control, ADOC Policy 805: Protective Custody, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Statement of Fact, and interviews with the, Warden, Assistant Warden, PREA Compliance Manager, and random sample of staff, Central Arizona CF meets this standard.

INVESTIGATIONS

Standard 115.71: Criminal and administrative agency investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.71 (a)

- When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).] Yes No NA
- Does the agency conduct such investigations for all allegations, including third party and anonymous reports? [N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).] Yes No NA

115.71 (b)

- Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34? Yes No

115.71 (c)

- Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data? Yes No
- Do investigators interview alleged victims, suspected perpetrators, and witnesses? Yes No
- Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator? Yes No

115.71 (d)

- When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution? Yes No

115.71 (e)

- Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff? Yes No
- Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding? Yes No

115.71 (f)

- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? Yes No
- Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings? Yes No

115.71 (g)

- Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible? Yes No

115.71 (h)

- Are all substantiated allegations of conduct that appears to be criminal referred for prosecution? Yes No

115.71 (i)

- Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years? Yes No

115.71 (j)

- Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation? Yes No

115.71 (k)

- Auditor is not required to audit this provision.

115.71 (I)

- When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Central Arizona CF policies and procedures address investigations of sexual abuse and sexual harassment in its facility. The policies dictate that ADOC Criminal Investigation Unit conduct investigations into allegations of sexual abuse and harassment immediately upon becoming aware of the allegation, regardless of how the report is received.

Agency guidelines also states that inmates who allege sexual abuse are not required to submit to a polygraph examination as a condition for proceeding with the investigation of such an allegation. Additionally, the departure of the alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation.

The facility refers all allegations of sexual abuse and sexual harassment to the ADOC Criminal Investigation Unit. Since the last audit cycle, there were no allegations that were referred for prosecution.

During interview, the CIU Supervisor stated that a referral to the Pinal County District Attorney would be made if an incident were found to be prosecutable. The agency retains all written reports pertaining to all investigations for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

The review of twelve (12) investigation files during the audit revealed all allegations received were immediately addressed.

Based upon review of ADOC Policy 106: Contract Beds, ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 501: Employee Professionalism, Ethics and Conduct, ADOC Policy 601: Administrative Investigations and Employee Discipline, ADOC Policy 608: Criminal Investigations, GEO Policy 5.1.2-E: Sexual Abusive Behavior Prevention & Intervention Program (PREA) Investigations, PREA Tracking Logs, PREA Investigative Reports (12), Statement of Fact and interviews with CIU Supervisor, Assistant Warden, PREA Compliance Manager, Central Arizona CF meets standard requirements.

Standard 115.72: Evidentiary standard for administrative investigations

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.72 (a)

- Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

A review of ADOC Policy 125: Sexual Offense Reporting, and GEO policy 5.1.2-E: Sexual Abusive Behavior Prevention & Intervention Program (PREA) Investigations, clearly states no standard greater than a preponderance of the evidence for determining whether allegations of Sexual Abuse or Harassment are substantiated. This was confirmed during my interview with CIU Supervisor.

ADOC Criminal Investigations Unit conducts all investigations.

Based upon review of the ADOC Policy 125: Sexual Offense Reporting, GEO Policy 5.1.2-E: Sexual Abusive Behavior Prevention & Intervention Program (PREA) Investigations, CIU Reports, After Action Reviews, and interviews with Assistant Warden, CIU Supervisor, and PREA Compliance Manager, Central Arizona CF meets this standard.

Standard 115.73: Reporting to inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.73 (a)

- Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded? Yes No

115.73 (b)

- If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.) Yes No NA

115.73 (c)

- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit? Yes No
- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility? Yes No
- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility? Yes No
- Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility? Yes No

115.73 (d)

- Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility? Yes No

- Following an inmate’s allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?
 Yes No

115.73 (e)

- Does the agency document all such notifications or attempted notifications? Yes No

115.73 (f)

- Auditor is not required to audit this provision.

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO Policy 5.1.2-E: Sexual Abusive Behavior Prevention & Intervention Program (PREA) Investigations, and ADOC Policy 608: Criminal Investigations, all conveyed that all inmates who make allegations of sexual abuse shall be informed whether the allegations have been substantiated, unsubstantiated, or unfounded; and the process in reporting to inmates as required in said standard.

The ADOC CIU Investigator provides a “Notice of Outcome” to inmates through regular mail and notes this action on their case closure.

During the past twelve months, seven (7) notifications were made and documented to inmates at Central Arizona CF. Interviews with the Assistant Warden, PREA Compliance Manager and CIU Supervisor verified that the facility is following the procedures.

Based upon review of the ADOC Policy 608: Criminal Investigations, GEO Policy 5.1.2-E: Sexual Abusive Behavior Prevention & Intervention Program (PREA) Investigations, Statement of Fact, Case Closure and interviews with the Warden, Assistant Warden, PREA Compliance Manager, and CIU Supervisor, Central Arizona CF meets this standard.

DISCIPLINE

Standard 115.76: Disciplinary sanctions for staff

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.76 (a)

- Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies? Yes No

115.76 (b)

- Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse? Yes No

115.76 (c)

- Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) 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? Yes No

115.76 (d)

- Are 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, reported to: Law enforcement agencies (unless the activity was clearly not criminal)? Yes No
- Are 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, reported to: Relevant licensing bodies? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADOC Policy 125: Sexual Offense Reporting outlines disciplinary standards for employees, volunteers and contractors and meet the requirements set by the standard. Agency procedures define termination as the presumptive sanction and that disciplinary history, circumstances of the act and sanctions of similar offenses will be considered. Staff who would have been terminated if not for their resignation will be reported to law enforcement agencies, unless the activity was not criminal, and to any applicable licensing bodies.

Staff is made aware of the zero-tolerance policy in the Employee Handbook and the penalties for violating that policy.

In the past twelve months, there have been no terminations or discipline imposed on any staff member for sexual abuse or sexual harassment at Central Arizona CF.

Based on review of: GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC Policy 125: Sexual Offense Reporting, PREA Incident Involving Staff, interviews with Warden, Assistant Warden, PREA Coordinator, PREA Compliance Manager, and random staff interviews, Central Arizona CF meets this standard.

Standard 115.77: Corrective action for contractors and volunteers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.77 (a)

- Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates? Yes No
- Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)? Yes No
- Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies? Yes No

115.77 (b)

- In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Reviewed ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 204: Volunteer Services, ADOC Policy 205: Contractor Security, and GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), prohibit contractors or volunteers who engaged in sexual abuse to have contact with inmates and require they be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

The CIU Supervisor, confirmed they will investigate allegations reported against contractors/volunteers as any other PREA case and would refer allegations for criminal prosecution if warranted.

Review of facility volunteer package acknowledgement/ orientation forms verified that volunteers were knowledgeable of policies and procedures. There have been no insurances in the past twelve months involving contractors or volunteers being accused of PREA violations with inmates.

Based upon reviewed ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 204: Volunteer Services, ADOC Policy 205: Contractor Security, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Statement of Fact, Contractor/Investigation Report and interviews with Assistant Warden, PREA Compliance Manager, and CIU Supervisor, Central Arizona CF meets this standard.

Standard 115.78: Disciplinary sanctions for inmates

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.78 (a)

- Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process? Yes No

115.78 (b)

- Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories? Yes No

115.78 (c)

- When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior? Yes No

115.78 (d)

- If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits? Yes No

115.78 (e)

- Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? Yes No

115.78 (f)

- For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? Yes No

115.78 (g)

- Does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.)
 Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

GEO Policy 5.1.2-E: Sexual Abusive Behavior Prevention & Intervention Program (PREA) Investigations, ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 801: Inmate Classification, ADOC Policy 803: Inmate Disciplinary Procedure, ADOC Policy 809: Earned Incentive Program, ADOC Policy 923: Sex Offender Education and Treatment Program outlines disciplinary sanctions that may be imposed on inmates who engage in sexual abuse and sexual harassment. Inmates are subject to discipline internally for inmate on inmate sexual abuse. Inmates are only disciplined for sexual relations with staff in cases where it is determined to be without consent from staff.

Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. Furthermore, it shall be determined whether the inmate's mental disabilities or mental illness contributed to the individuals' behavior.

In the past 12 months, there have been four (4) administrative findings of inmate on inmate sexual abuse that have occurred at Central Arizona CF.

In the past 12 months, there have been one (1) criminal findings of guilt for inmate on inmate sexual abuse that occurred Central Arizona CF.

Based upon GEO Policy 5.1.2-E: Sexual Abusive Behavior Prevention & Intervention Program (PREA) Investigations ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 801: Inmate Classification, ADOC Policy 803: Inmate Disciplinary Procedure, ADOC Policy 809: Earned Incentive Program, ADOC Policy 923: Sex Offender Education and Treatment Program, reviewed; Statement of Fact and interviews with Assistant Warden, PREA Compliance Manager, CIU Supervisor, random staff and inmates, Central Arizona CF meets this standard.

MEDICAL AND MENTAL CARE

Standard 115.81: Medical and mental health screenings; history of sexual abuse

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.81 (a)

- If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? Yes No

115.81 (b)

- If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.) Yes No NA

115.81 (c)

- If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? Yes No

115.81 (d)

- Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law? Yes No

115.81 (e)

- Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Central Arizona CF screens all inmates for risk of victimization and abusiveness upon arrival. At the initial intake screening, if the inmate has disclosed prior sexual victimization and/or previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, the inmate is referred for medical and mental health services.

Additionally, routine medical and mental health referrals will be seen within 14 days. All information about sexual victimization or abusiveness is strictly limited to medical and mental health staff and other staff as needed.

Also, medical screening information is shared with appropriate staff, as needed, to make housing, bed, work, education, and program assignments. Informed consents are obtained before reporting prior sexual victimization that did not occur in an institutional setting. Inmate interviews confirmed that medical and mental health services are available as needed.

Interviews with medical staff indicate that they are knowledgeable of their duties and responsibilities under PREA and know how to properly respond to or report an allegation of sexual abuse or assault.

In the past 12 months, 100% percent of inmates at Central Arizona CF who disclosed prior victimization during screening were offered a follow-up meeting with a medical or mental health practitioner.

In the past 12 months, 100% percent of inmates at Central Arizona CF who previously perpetrated sexual abuse, as indicated during the screening, were offered a follow up meeting with a mental health practitioner.

No forensic medical exams are conducted at Central Arizona CF. Forensic examinations by SANE/SAFE staff are provided at the outside hospital, Honor Health Scottsdale Shea Medical Center.

These services are provided at no cost to the inmate.

Based upon documentation reviewed: GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 1104: Inmate Medical Records, AIMS Screens and Mental Health Referral; and interviews with medical and mental health staff and PREA Compliance Manager, Central Arizona CF meets this standard.

Standard 115.82: Access to emergency medical and mental health services

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.82 (a)

- Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?
 Yes No

115.82 (b)

- If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62? Yes No
- Do security staff first responders immediately notify the appropriate medical and mental health practitioners? Yes No

115.82 (c)

- Are inmate victims of sexual abuse 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? Yes No

115.82 (d)

- Are treatment services 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?
 Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Central Arizona CF policies require that inmates who are victims of sexual abuse be afforded access to forensic medical examinations at an outside facility without financial cost where evidentiary or medically appropriate. Also, inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services.

Forensic examinations by SANE/SAFE staff are provided at Honor Health Scottsdale Shea Medical Center.

These services are at no cost to the inmate.

In the past 12 months, there has been no access to emergency medical and mental health services required.

Based upon reviewed ADOC Policy 125, Sexual Offense Reporting, ADOC Policy 608, Criminal Investigations, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Statement of Fact and, interviews with the Health Service Administrator and PREA Compliance Manager, Central Arizona CF meets this standard.

Standard 115.83: Ongoing medical and mental health care for sexual abuse victims and abusers

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.83 (a)

- Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility? Yes No

115.83 (b)

- Does 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? Yes No

115.83 (c)

- Does the facility provide such victims with medical and mental health services consistent with the community level of care? Yes No

115.83 (d)

- Are inmate victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.) Yes No NA

115.83 (e)

- If pregnancy results from the conduct described in paragraph § 115.83(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.) Yes No NA

115.83 (f)

- Are inmate victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate? Yes No

115.83 (g)

- Are treatment services 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? Yes No

115.83 (h)

- If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

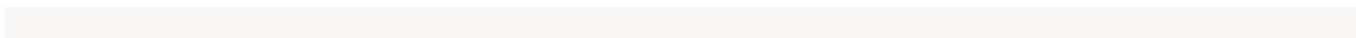
Central Arizona CF policies address all elements of the standards. Medical and mental treatment including evaluations, on-going care, and treatment to all inmates that have been identified as victims and/or abusers are provided at no cost to the inmates and are consistent with the community level of care.

In addition, inmate victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. Victims of sexual abuse or sexual harassment are offered mental health services and referrals for long-term continuity of care and treatment upon release from the facility and documented in the inmate's medical record.

Interviews with medical and medical health staff, and inmates, all verified agency's process.

Section (d) & (e) of this standard are non- applicable as Central Arizona CF houses only male inmates.

Based on my review of ADOC Policy 125, Sexual Offense Reporting, GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), Statement of Fact, interviews with Health Service Administrator and Mental Health Manager, and interviews with inmates, Central Arizona CF meets this standard.



DATA COLLECTION AND REVIEW

Standard 115.86: Sexual abuse incident reviews

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.86 (a)

- Does the facility conduct 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? Yes No

115.86 (b)

- Does such review ordinarily occur within 30 days of the conclusion of the investigation? Yes No

115.86 (c)

- Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners? Yes No

115.86 (d)

- Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse? Yes No
- Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility? Yes No
- Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse? Yes No
- Does the review team: Assess the adequacy of staffing levels in that area during different shifts? Yes No
- Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff? Yes No
- Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1) - (d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager? Yes No

115.86 (e)

- Does the facility implement the recommendations for improvement, or document its reasons for not doing so? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

At Central Arizona CF, policies and procedures requires the facility conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including whether the allegation has not been substantiated, unless the allegation was determined to be unfounded within 30 workdays of the conclusion of an investigation.

The incident review team is comprised of the Assistant Warden, Chief of Security, Captain, PREA Compliance Manager, with input from the investigator, mental health, medical, line staff,

and others as deemed appropriate to complete the review.

A “Sexual Abuse Incident Review” form (125-2) is used to document incident review and upon completion is forwarded to the Warden for his review and signature and to the PREA Compliance Manager who then forwards the form to the Inspection General and the PREA Coordinator.

The standard requires agency to look at the different factors that possibly motivated the incident. The Incident Review Team makes recommendations based on their review of the incident. The facility shall then implement recommendations that result from the review, or document the reasons for not making the implementations.

Based on my review of ADOC Policy 125: Sexual Offense Reporting, GEO policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), CIU Investigative Report/Sexual Abuse Incident Review; Sexual Abuse Incident Reviews, and interviews with the Assistant Warden, Chief of Security, Captain, PREA Compliance Manager, CIU Supervisor, and Health Service Administrator, Central Arizona CF meets this standard.

Standard 115.87: Data collection

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.87 (a)

- Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions? Yes No

115.87 (b)

- Does the agency aggregate the incident-based sexual abuse data at least annually? Yes No

115.87 (c)

- Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice? Yes No

115.87 (d)

- Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?
 Yes No

115.87 (e)

- Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.) Yes No NA

115.87 (f)

- Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)
 Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

Central Arizona CF collects data related to sexual abuse and this data is aggregated at least annually according to GEO Policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), and ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 105: Information Reporting. It is the responsibility PREA Compliance Manager to compile data collected on sexual activity, sexual harassment and sexual abuse incidents and forward this information to the PREA Coordinator on a monthly basis using the Monthly PREA Incident Tracking Log.

In addition, the Inspector General provides a written report semi-annually to the Director and Deputy Director. The ADOC Inspector General maintains the record retention system to track all incidents for state and private prisons.

The agency provides data collected to the Department of Justice from the previous calendar year upon request. The agency collects the uniform data using a standardized instrument and data dictionary based on the most recent definitions provided by the Bureau of Justice Statistics,

The latest Annual Report on Sexual Victimization report covering the period 2016 is available on the agency website at: www.geogroup.com (Social Responsibility Section), and ADOC website at www.azcorrections.gov (Reports and Documents Section); was reviewed by this auditor.

Based on GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 105: Information Reporting, ADOC 2016 Yearly PREA Report, Central Arizona CF Census Bureau Survey, GEO 2016 Annual DATA Report, PREA Monthly Incident Tracking Logs, and interviews with Agency PREA Coordinator, and PREA Compliance Manager, Central Arizona CF meets the standard.

Standard 115.88: Data review for corrective action

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.88 (a)

- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas? Yes No
- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis? Yes No
- Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole? Yes No

115.88 (b)

- Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse Yes No

115.88 (c)

- Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means? Yes No

115.88 (d)

- Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 201: Legal Services- Information Release, and GEO policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), requires review of all data collected in order to assess and improve the effectiveness of its sexual abuse prevention and intervention program.

The PREA Coordinator prepares an annual report, which includes findings and corrective actions taken for each GEO facility. The annual report includes a comparison of the current year's data and corrective action with those from prior years. The report does not address any case specific information. Policy also allows for data to be redacted if it presents a threat to safety and security.

In addition, the ADOC Inspector General provides a written report semi-annually to the Director and Deputy Director. The Inspector General maintains the record retention system to track all incidents for state and private prisons.

The latest Annual Report on Sexual Victimization report covering the period 2016 is available on the agency website at: www.geogroup.com (Social Responsibility Section); and ADOC website at: www.azcorrections.gov (Reports and Documents Section); was reviewed by this auditor.

Based on ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 201: Legal Services-Information Release, GEO policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC 2016 Yearly PREA Report, Central Arizona CF Census Bureau Survey, GEO 2016 Annual DATA Report,

Standard 115.89: Data storage, publication, and destruction

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.89 (a)

- Does the agency ensure that data collected pursuant to § 115.87 are securely retained?
 Yes No

115.89 (b)

- Does the agency make 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, if it does not have one, through other means? Yes No

115.89 (c)

- Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available? Yes No

115.89 (d)

- Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)

Does Not Meet Standard (*Requires Corrective Action*)

Per ADOC Policy 125: Sexual Offense Reporting, ADOC Policy 201: Legal Services-Information Release, and GEO Policy 5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), all data collected is securely retained for 10 years or longer as required by state statute. Policies also provides guidance for the control and management of all ADOC records. Prior to publishing the annual report, on the GEO and ADOC website, all personal identifiers are removed.

The 2016 Annual Report is made available to the public through the agency's website: <http://www.geogroup.com> (Social Responsibility Section); and ADOC website at: www.azcorrections.gov (Reports and Documents Section), which was reviewed by this auditor.

Based on ADC Policy 125: Sexual Offense Reporting, ADOC Policy 201: Legal Services-Information Release, GEO policy #5.1.2-A: Sexual Abusive Behavior Prevention & Intervention Program (PREA), ADOC 2016 Yearly PREA Report, Central Arizona CF Census Bureau Survey, and GEO 2016 Annual DATA Report, Central Arizona CF meets this standard.

AUDITING AND CORRECTIVE ACTION

Standard 115.401: Frequency and scope of audits

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.401 (a)

- During the three-year period starting on August 20, 2013, and during each three-year period thereafter, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (N/A before August 20, 2016.)
 Yes No NA

115.401 (b)

- During each one-year period starting on August 20, 2013, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited? Yes No

115.401 (h)

- Did the auditor have access to, and the ability to observe, all areas of the audited facility?
 Yes No

115.401 (i)

- Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)? Yes No

115.401 (m)

- Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?
 Yes No

115.401 (n)

- Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel? Yes No

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- 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 GEO Corporate Policy 5.1.2-A, during the three-year period starting on August 20, 2013, and each three-year period thereafter, GEO's Contract Compliance Department ensures that a PREA auditor who has been certified through the Department of Justice audits each facility at least once.

According to GEO's PREA Coordinator, during the three-year period beginning on August 20, 2013, GEO ensured that each of its facilities were audited at least once and continues to ensure that its facilities are audited every three years.

During the audit, the facility administration and staff provided the Auditor access to all areas of Central Arizona Correctional Facility. Any relevant documents or information requested was provided; and a private area and access to randomly selected inmates and staff for interviews was provided.

Additionally, posted signs advising how inmates could send confidential information or correspondence to the Auditor like legal counsel was observed throughout the facility and inmate housing units. The Auditor did not receive any PREA-related correspondence from any inmates of Central Arizona CF.

To date, GEO has successfully certified and/or recertified 101 of their 108 facilities. Three facilities are new activations, which have not yet been audited (Folkston, Eagle Pass and Montgomery ICE Processing Facility). Four facilities have all been audited and under appeal through Department Of Justice: Arizona DOC Kingman, Arizona Central Arizona Correctional Facility, Moore Haven Correctional & Rehabilitation Facility and Bay Correctional & Rehabilitation Facility.

The Auditor reviewed The GEO Group web page:
https://www.geogroup.com/PREA_Certification_Information

ADOC website at: www.azcorrections.gov (Reports and Documents Section) was reviewed also.

Based on information above mentioned, Central Arizona CF meets the standard.

Standard 115.403: Audit contents and findings

All Yes/No Questions Must Be Answered by the Auditor to Complete the Report

115.403 (f)

- The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.) Yes No NA

Auditor Overall Compliance Determination

- Exceeds Standard** (*Substantially exceeds requirement of standards*)
- Meets Standard** (*Substantial compliance; complies in all material ways with the standard for the relevant review period*)
- Does Not Meet Standard** (*Requires Corrective Action*)

To date, The GEO Group has successfully certified and/or recertified 101 of their 108 facilities. Three facilities are new activations, which have not yet been audited (Folkston, Eagle Pass and Montgomery ICE Processing Facility). Four facilities have all been audited and under appeal through Department Of Justice: Arizona DOC Kingman, Arizona Central Arizona Correctional Facility, Moore Haven Correctional & Rehabilitation Facility and Bay Correctional & Rehabilitation Facility.

The GEO Group PREA Coordinator ensures that all PREA Reports are published on the agency's website within 90 days of the completion of the report. Reports for all facilities for all reporting periods are posted on the agency's website and easily accessible to the public.

The Auditor reviewed The GEO Group web page:

https://www.geogroup.com/PREA_Certification_Information

ADOC website at: www.azcorrections.gov (Reports and Documents Section) was reviewed also.

Based on information above mentioned, Central Arizona CF meets the standard.

AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.

Auditor Instructions:

Type your full name in the text box below for Auditor Signature. This will function as your official electronic signature. Auditors must deliver their final report to the PREA Resource Center as a searchable PDF format to ensure accessibility to people with disabilities. Save this report document into a PDF format prior to submission.¹ Auditors are not permitted to submit audit reports that have been scanned.² See the PREA Auditor Handbook for a full discussion of audit report formatting requirements.

Wynnie R. Testamark

January 7, 2019

Auditor Signature

Date

¹ See additional instructions here: <https://support.office.com/en-us/article/Save-or-convert-to-PDF-d85416c5-7d77-4fd6-a216-6f4bf7c7c110>.

² See *PREA Auditor Handbook*, Version 1.0, August 2017; Pages 68-69.