

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS

Interim Final Report

Auditor Information

Auditor name: Katherine Brown

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Telephone number: 727-470-4123

Date of facility visit: June 21, 2016

Date report submitted: June 24, 2016

Facility Information

Name of facility: Paulding Residential Substance Abuse Treatment Center

Physical address: 1296 Industrial Blvd. N. Dallas GA 30132

Telephone number: 770-443-7807

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| Paulding Residential Substance Abuse and Treatment Center is: | <input type="checkbox"/> Military | <input type="checkbox"/> County | <input type="checkbox"/> Federal |
| | <input type="checkbox"/> Private for profit | <input type="checkbox"/> Municipal | <input checked="" type="checkbox"/> State |
| | <input type="checkbox"/> Private not for profit | | |

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| Facility Type: | <input type="checkbox"/> Jail | <input checked="" type="checkbox"/> Prison |
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| Name of facility's Chief Executive Officer: Willie Singleton | Title: | Superintendent |
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Number of staff assigned to Paulding Residential Substance Abuse and Treatment Center in the last 12 months: 52

Designed facility capacity: 243

Current population of facility: 229

Facility security levels/Detainee custody levels: Minimum

Age range of the population: 18-69

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| Name of PREA Compliance Manager: Leigh Wiles | Title: | Counselor |
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| Email address: Leigh.wiles@gdc.ga.gov | Telephone # | 770-443-7807 |
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Agency Information

Name of agency: Georgia Department of Corrections

Governing authority or parent agency: Georgia Department of Corrections

Physical address: 300 Patrol Road, Forsyth, GA 31029

Telephone number: 478-992-5211

Agency Chief Executive Officer

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

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

NARRATIVE:

The audit of Paulding RSAT was conducted on June 21, 2016 by Katherine Brown, Certified PREA auditor. Prior to the on-site I received all the policies and documentation on May 30, 2016 to review and was able to complete the initial review without requesting any additional documentation.

An entrance meeting was held with facility staff. The following people were in attendance: Willie Singleton, Superintendent; Leigh Wiles, Counselor/PREA Compliance Manager and Melvin Butts, Assistant Statewide PREA Coordinator.

Following the entrance meeting I toured the Paulding RSAT from 0915 -0945. On the tour with me was Willie Singleton, Superintendent; Leigh Wiles, Counselor/PREA Compliance Manager; Sgt. Payne and Melvin Butts, Assistant Statewide PREA Coordinator. The areas toured were a total of 4 open bay dorms. There are 3 dorms for RSAT and 1 dorm for PDC plus an 8 cells for administrative detention/segregation. We toured each of the dorms plus the kitchen, laundry, programs area, and work areas.

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

I asked for an alpha listing of all Detainees housed at Paulding Residential Substance Abuse and Treatment Center and randomly selected three Detainee from each housing unit as well as any Detainees who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impairment or limited English speaking Detainees there. I also asked for any Detainee who was transgender/intersex, there were none. I also asked for a shift roster and randomly selected all 4 security staff working to interview.

There have been no sexual assault/harassment allegation cases within the past year.

DESCRIPTION OF FACILITY CHARACTERISTICS:

Paulding Residential Substance Abuse and Treatment Center is located at 1296 Industrial Blvd. N. Dallas GA 30132, which is located 32 miles northwest of Atlanta Georgia. Consists of four separate dorms with each dorm housing a total of 63 beds. There is a separate Administrative/Segregation Unit, which houses eight beds.

Other than a number of inside details that are utilized for the operation of the facility, there are 24 outside details: (1) City of Austell, (3) Bartow County, (3) Cobb County, (1) Department of Natural Resources, (1) Department of Transportation Bartow County, (1) Department of Transportation Chester Ave, (1) Department of Transportation Cobb County, (3) City of Dallas, (1) Paulding County, (1) City of Hiram, (2) City of Rockmart, (2) City of Tallapoosa, (1) Polk County, (1) Rockmart Police Department, (1) DPS and (1) City of Douglasville.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 5

Number of standards met: 36

Number of standards not met:

Number of standards not applicable: 2

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

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

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

Based on review of GDOC SOP 208.06 IV A.1; Georgia Organizational Chart; Organizational Chart; Staff Guide on the Prevention & Reporting of Sexual Misconduct with Detainees and interviews with PREA Coordinator and PREA compliance manager I find they meet this standard.

Georgia Department of Corrections has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Georgia Department of Corrections' approach to preventing, detecting, and responding to such conduct. Paulding Residential Substance Abuse and Treatment Center complies with this standard by utilizing GDC SOP 208.06. This policy mandates zero tolerance toward all forms of sexual misconduct and is used to prevent, detect, and respond to any form of sexual abuse and sexual harassment.

Georgia Department of Corrections employs or designates an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards. The Georgia Department of Corrections Statewide PREA Coordinator also has an Assistant Statewide PREA Coordinator to assist in the efforts of ensuring all Georgia Department of Corrections prisons are PREA compliant.

Georgia Department of Corrections operates more than one facility; each facility has designated a PREA compliance manager with sufficient time and authority to coordinate Paulding Residential Substance Abuse and Treatment Center's efforts to comply with the PREA standards. Paulding Residential Substance Abuse and Treatment Center complies with this standard in that one of the Counselors has been designated the PREA Compliance Manager for the facility by the Superintendent.

§115.12 Contracting with other agencies for confinement of Detainees

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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

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

Paulding Residential Substance Abuse and Treatment Center does not contract for the confinement of their Detainees however, Georgia Department of Corrections does have contracts with private entities and county prisons for the confinement of their Offenders/Detainees. Based on review of those contracts I find they meet this standard.

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

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

§115.13 Supervision and monitoring

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV A. 3; SOP II. A. 07-0012; Staffing Plan; Staffing Analysis 2014; Post Assignments; logbooks and interview with Superintendent; PREA Compliance Manager and PREA Coordinator I find they meet this standard.

Georgia Department of Corrections has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect Detainees against sexual abuse. There are currently 70 security positions with 4 vacancies. Paulding Residential Substance Abuse and Treatment Center complies with this standard by utilizing the staffing plan and shift rosters that were reviewed as part of this audit.

In circumstances where the staffing plan was not complied with, Paulding Residential Substance Abuse and Treatment Center documented and justified all deviations from the plan. All deviations from the staffing plan were documented on the shift rosters.

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

§115.14 Youthful Detainees

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

X Not applicable Standard

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

Paulding Residential Substance Abuse and Treatment Center does not house juveniles.

§115.15 Limits to cross gender viewing and searches

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV A. 7. (a-g); SOP II. B. 01-0013 and Lesson Plan on Searches I find they meet this standard.

Paulding Residential Substance Abuse and Treatment Center does not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances. In the event a cross gender search is done Paulding Residential Substance Abuse and Treatment Center documents all cross-gender strip searches and cross-gender visual body cavity searches. During random staff and Detainee interviews it was confirmed staff do not perform cross gender strip searches.

Paulding Residential Substance Abuse and Treatment Center has policies and procedures that enable Detainees to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering a Detainee housing unit. During the tour cross gender announcements were made. During the random Detainee interviews it was confirmed that Detainees have privacy to perform bodily functions and cross gender staff announcements are made.

Paulding Residential Substance Abuse and Treatment Center does not search or physically examine a transgender or intersex Detainee for the sole purpose of determining the Detainee's genital status. If the Detainee's genital status is unknown, it is determined during conversations with the Detainee, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. There was no transgender Detainee s at the prison at the time of the audit but based on staff interviews transgender/intersex Detainee s would not be searched for sole purpose of determining the Detainee's genital status.

Georgia Department of Corrections trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex Detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Random staff interviews confirmed they have been trained in cross gender pat down searches.

§115.16 Detainees with disabilities and limited English speaking

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

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

Based on review of GDOC SOP 208.06 IV A. 8 (a & b); Language Line contract; PREA Pamphlet; staff interpreter list and random Detainee and staff interviews I find they meet this standard.

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

Georgia Department of Corrections does not rely on Detainee interpreters, Detainee readers, or other types of Detainee assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the Detainee's safety. None have been used or required. The PREA Pamphlet is in both English/Spanish. Paulding Residential Substance Abuse and Treatment Center has a contract with the Language Line to provide translation for other languages as well as sign language for the deaf. During the interview with the intake officer he told me that he did have one individual come in that was unable to read and he had another officer come down and sit and read the PREA pamphlet to him.

§115.17 Hiring and promotion decisions

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

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

Based on review of GDOC SOP 208.06 IV A. 9 (a-d); SOP IV. O. 03-0012; SOP IV. O. 05-0001; Applicant Verification Form; Sexual Assault/Sexual Misconduct Acknowledgment and interview with Human Resource Technician Supervisor and review of personnel files I find they exceed this standard.

Georgia Department of Corrections does not hire or promote anyone who may have contact with Detainees, and does not enlist the services of any contractor who may have contact with Detainees, who has engaged in sexual abuse in any criminal justice facility, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to

consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. Based on interview with human resources all applicants have a background check done prior to job offer, if any sexual activity is discovered during the background screening they would not be offered a job.

Georgia Department of Corrections considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with Detainees.

Georgia Department of Corrections performs a criminal background records check before enlisting the services of any contractor who may have contact with Detainees performs a records check annually on all current employees and contractors who may have contact with Detainees. Review of personnel files confirmed the background checks are being done. Based on the annual background checks I find they exceed this standard.

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| §115.18 Upgrades to facilities and technology |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV A. 10. and interview of Commissioner and Superintendent I find they meet this standard.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Georgia Department of Corrections considers how such technology may enhance Georgia Department of Corrections' ability to protect Detainees from sexual abuse. There has been no substantial expansion or modifications to existing facilities. Paulding Residential Substance Abuse and Treatment Center currently utilizes 36 cameras that are used to prevent sexual abuse and investigate allegations of wrongdoing. When installing new equipment, the Superintendent, Deputy Superintendent of Security, and facility SART will ensure it is used to protect Detainees from sexual abuse. Cameras are going to be added to the new trailer that they received for RSAT classrooms. At the present time there is an officer assigned to the trailer whenever class is in session the cameras will augment the officer's position.

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| §115.21 Evidence protocol and forensic medical exams |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV B. 1 (a-f); SOP IK01-0006; SANE Callout; NIC Certificate for PREA-Behavioral Healthcare for Sexual Assault Victims in Confinement; GNEA

Sexual Violent Victim Advocacy Training Certificate; Nursing Assessment form for Alleged Sexual Assault; Procedure for SANE nurse Evaluation/Forensic Collection and interview with SANE/SAFE staff and PREA compliance manager I find they meet this standard

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

Georgia Department of Corrections offers all victims of sexual abuse access to forensic medical examinations, at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Nurse Examiners (SANEs) from Global Diagnostics.

Georgia Department of Corrections makes available to the victim either a staff trained Victim Advocate or a victim advocate from YWCA of NW Georgia.

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

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| §115.22 | Policies to ensure referrals of allegations for investigations |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

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

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

Georgia Department of Corrections has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. Georgia Department of Corrections publishes such policy on its website [or www.dcor.state.ga.us](http://www.dcor.state.ga.us). Georgia Department of Corrections documents all such referrals. Whenever an allegation is made, the Superintendent will notify the GDC Internal Investigations Unit. This notification will be made in writing and the notification will become part of the PREA investigation.

Paulding Residential Substance Abuse and Treatment Center documents all such referrals. Whenever an allegation is made, the Superintendent will notify the GDC Internal Investigations Unit. This notification will be made in writing and the notification will become part of the PREA investigation.

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| §115.31 | Employee training |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV C. 2; Lesson Plan; Power Point; In Service Training Records; Sexual Assault/Sexual Misconduct Acknowledgement Statement; Sexual Assault Response Team Training Power Point; PREA Staff Meeting; Training Roster – Sign In Sheet and interview with random staff I find they meet this standard.

Georgia Department of Corrections trains all employees who have contact with Detainees on:

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

All staff has received PREA training during in service training. Paulding Residential Substance Abuse and Treatment Center is in compliance with this standard based on review of training records and random staff interviews.

The training is tailored to the gender of the Detainees at Paulding Residential Substance Abuse and Treatment Center. The employees receive additional training if the employee is reassigned from a facility that houses only male Detainees to a facility that houses only female Detainees, or vice versa. Staff receives training based on the population of Paulding Residential Substance Abuse and Treatment Center they are assigned to.

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

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| §115.32 | Volunteer and contractors training |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV C. 3 (a-c); Sexual Assault/Sexual Misconduct Acknowledgement Statement for Supervised Visitors; Staff Guide on the Prevention and Reporting of Sexual Misconduct; Lesson Plan; Power Point; Volunteer Sign in Sheet and interview with volunteer and contractors I find they exceed this standard.

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

The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with Detainees, but all volunteers and contractors who have contact with Detainees are notified of Georgia Department of Corrections' zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Georgia Department of Corrections has documentation confirming that volunteers and contractors understand the training they have received. All volunteers sign a Sexual Assault/Sexual Misconduct Acknowledgement Statement. Volunteers and contractors interviewed confirmed they had received this training. All contracted people that come to the facility for any reason i.e. bug spray company; vending machine; yard maintenance; AC contractor all receive a PREA Pamphlet and are instructed by staff at the front control room on how to report a PREA incident and they sign a log book acknowledging they have received the pamphlet and have been instructed on reporting procedures. Based on this I find they exceed this standard.

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| §115.33 | Detainee education |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV C.4; SOP II B18-0001; Sexual Abuse Review Checklist; PREA Sexual Victimization/Aggressor classification Screening; Detainee Handbook; Inmate Detainee PREA Acknowledgment form and PREA Pamphlet and interview with random Detainees and intake staff I find they exceed this standard.

During the intake process, Detainees receive information explaining Georgia Department of Corrections' zero-tolerance policy regarding sexual abuse and sexual harassment and how to

report incidents or suspicions of sexual abuse or sexual harassment. During the intake process all Detainees receive the PREA pamphlet and watch the video, as was confirmed on the tour.

Paulding RSAT provides a comprehensive education to Detainees in person and shows a video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents immediately upon arrival as was confirmed during random detainee interviews. The detainees also told me during the interviews that staff quiz them on PREA when they come through on their rounds.

Georgia Department of Corrections provides Detainee education in formats accessible to all Detainees, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to Detainees who have limited reading skills. There is documentation of Detainee participation in these education sessions. The PREA Pamphlet is in both English/Spanish; Paulding Residential Substance Abuse and Treatment Center has a contract with the Language Line to provide translation for other languages as well as sign language for the deaf.

Based on the level of training provided I find they exceed this standard.

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| §115.34 | Specialized training: Investigators |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV C. 5; In Service Training Records; NIC Certificate PREA Investigating Sexual Abuse in a Confinement Setting; Sexual Assault Response Team Training Power Point and interview with investigative staff I find they exceed this standard.

In addition to the general training provided to all employees Georgia Department of Corrections ensures that the in house investigators have received training in conducting investigations in confinement settings.

Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Georgia Department of Corrections maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Paulding Residential Substance Abuse and Treatment Center personnel who are tasked with conducting investigations or acting in any capacity with a PREA investigative team are required to attend a specialized PREA training class using the NIC Specialized Training PREA Investigating Sexual Abuse in a Confinement Setting curriculum. At the conclusion of the class members are given a written exam to ensure their understanding of the class instruction and content delivered. Class attendance is documented locally by the GDC Training Division. All allegations of sexual misconduct are reported to the GDC Internal Investigations Unit. Staff of

that unit has received specialized training regarding the techniques for investigating PREA-related issues.

During the interview with the investigator I found him to be extremely knowledgeable in the investigation process and was thorough in process and articulate based on his training and level of expertise I find they exceed in this standard.

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| §115.35 | Specialized training: Medical and mental health care |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV. C. 6.; NIC Certificate – PREA Behavioral Health Care for Sexual Assault Victims in a Confinement Setting and Lesson Plan; NIC PREA Your Role Responding to Sexual Abuse and interview with medical and mental health I find they meet this standard.

Georgia Department of Corrections ensures that all full and part-time medical practitioners who work regularly in its facilities have been trained in how to: detect and assess signs of sexual abuse and sexual harassment; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment. Paulding Residential Substance Abuse and Treatment Center medical personnel are required to attend a specialized PREA training class using the NIC Specialized Training PREA Medical Health Care for Sexual Assault Victims in a Confinement Setting curriculum. At the conclusion of the class members are given a written exam to ensure their understanding of the class instruction and content delivered. Medical staff are present Monday – Friday from 0800-1700 hours. After hours the staff would call the on call doctor from Hays State Prison and would be directed as to what steps to take with the detainee. Emergency care is provided by Well star Paulding Hospital which is 3.5 miles away.

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

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

There are no Mental Health Staff at Paulding RSAT. All detainees would be seen by Mental Health staff from Hays State Prison.

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| §115.41 | Screening for risk of victimization and abusiveness |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV D. 1 (a-h); Victim/Aggressor Classification Rating; PREA Sexual Victim/Sexual Aggressor Classification Screening; Case Notes; Detainee PREA Classification Details and interview with random Detainees and intake staff responsible for screening I find they exceed this standard.

All Detainees are assessed during an intake screening and upon transfer to another facility for risk of being sexually abused by other Detainees or sexually abusive toward other Detainees. Paulding Residential Substance Abuse and Treatment Center uses The Victim/Aggressor Classification Screening which is an objective screening tool to conduct this intake.

Intake screenings take place immediately upon arrival at Paulding Residential Substance Abuse and Treatment Center.

Paulding Residential Substance Abuse and Treatment Center uses an objective screening instrument.

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

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

The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Georgia Department of Corrections, in assessing Detainees for risk of being sexually abusive.

Within 30 days from the Detainee's arrival at Paulding Residential Substance Abuse and Treatment Center, Paulding Residential Substance Abuse and Treatment Center reassesses the Detainee's risk of victimization or abusiveness based upon any additional, relevant information received by Paulding Residential Substance Abuse and Treatment Center since the intake screening.

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

Detainees are not disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked. No Detainee is ever disciplined for refusing to participate in the intake process; if a Detainee refuses to answer the questions during intake the counselor will meet with that Detainee at a later time to conduct the rest of the screening. Those

Detainees would be placed in appropriate housing until a proper classification screening could be done.

Georgia Department of Corrections implements appropriate controls on the dissemination within Paulding Residential Substance Abuse and Treatment Center of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the Detainee's detriment by staff or other Detainees.

Only limited staff has access to the risk screening form only Medical, Counselor and Superintendent as well as PREA Manager. Based on the screening being done immediately upon arrival I find they exceed this standard.

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| §115.42 | Use of screening information |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV D. 2 (a-d); 90 day Detainee Sexual Abuse Review Checklist; Detainee Intake Data and interview with PREA compliance manager and staff responsible for risk screening I find they meet this standard.

Georgia Department of Corrections uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those Detainees at high risk of being sexually victimized from those at high risk of being sexually abusive. All information received from the Detainee during the intake process on the risk screening is used to determine housing, bed assignments, work, education and programming.

Paulding RSAT makes individualized determinations about how to ensure the safety of each Detainee. Each Detainee's information is evaluated on a case by case basis to ensure the safety of the Detainee.

Paulding RSAT did not have any transgender/intersex detainees at the time of the audit, however they have policies in place that address the following:

In deciding whether to assign a transgender or intersex Detainee to a facility for male or female Detainees, and in making other housing and programming assignments, Georgia Department of Corrections considers on a case-by-case basis whether a placement would ensure the Detainee's health and safety, and whether the placement would present management or security problems.

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

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

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

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

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| §115.43 | Protective custody |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV D. 3. (a-d) and interview with Superintendent I find they meet this standard.

No Detainees have been placed in involuntary segregation housing.

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

Detainees placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If Paulding Residential Substance Abuse and Treatment Center restricts access to programs, privileges, education, or work opportunities, Paulding Residential Substance Abuse and Treatment Center documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.

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

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| §115.51 | Detainee reporting |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV E. 1. (a-e) Detainee Handbook; Staff Guide on the Prevention and Reporting of Sexual Misconduct with Detainees; Detainee Pamphlet and interviews with random staff and Detainees I find they meet this standard.

Paulding RSAT provides multiple internal ways for Detainees to privately report sexual abuse and sexual harassment, retaliation by other Detainees or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Paulding Residential Substance Abuse and Treatment Center Detainees’ may make a report of sexual abuse, sexual harassment, or retaliation in writing, verbally, by utilizing the PREA hotline, and by phone or mail to the Department Ombudsman Office, and Pardons and Paroles. Detainees are encouraged to report allegations immediately and directly to staff at all levels. All reports are promptly documented and reported to the proper authority.

Georgia Department of Corrections provides at least one way for Detainees to report abuse or harassment to a public or private entity or office that is not part of Georgia Department of Corrections, and that is able to receive and immediately forward Detainee reports of sexual abuse and sexual harassment to agency officials, allowing the Detainee to remain anonymous upon request.

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

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

§115.52 Exhaustion of administrative remedies

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

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

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

Georgia Department of Corrections does not impose a time limit on when a Detainee may submit a grievance regarding an allegation of sexual abuse. Paulding Residential Substance Abuse and Treatment Center does not impose time restrictions upon residents in regard to filing grievances alleging sexual abuse prior to or upon completion of a SART investigation.

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

Georgia Department of Corrections ensures that a Detainee who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint. All grievances filed at Paulding Residential Substance Abuse and Treatment Center can be submitted to any counselor. In a case where the Detainee's counselor is the subject of the complaint, any other counselor can be utilized to submit the grievance.

Georgia Department of Corrections issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance. Paulding Residential Substance Abuse and Treatment Center's policy establishes that the Superintendent will issue a final decision. Paulding Residential Substance Abuse and Treatment Center adheres to the policies set forth by the Georgia Department of Corrections in its Statewide Grievance Procedure Reference Number: IIB05-0001 to address PREA related grievances.

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

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

Notice that the grievance was forwarded to the Internal Investigations Unit and/or the PREA Coordinator will be generated through the Scribe grievance application. That letter must be handed to the Detainee and the Detainee must sign a copy, which will then be placed in the local file.

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

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

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

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

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

on behalf of Detainees. Paulding Residential Substance Abuse and Treatment Center accepts notification reports of sexual assault/harassment from third parties.

Georgia Department of Corrections has established procedures for the filing of an emergency grievance when the Detainee is subject to a substantial risk of imminent sexual abuse. Paulding Residential Substance Abuse and Treatment Center adheres to the policies set forth by the Georgia Department of Corrections in its Statewide Grievance Procedure Reference Number: IIB05-0001 to address PREA related grievances. The Statewide Grievance Procedure includes a process for the handling of emergency grievance.

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

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

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| §115.53 | Detainee access to outside confidential support services |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDC SOP 208.06 IV. E. 3 and interview with random I find they meet this standard.

There have been no incidents of sexual assault at Paulding Residential Substance Abuse and Treatment Center but there are policies in place that address the following:

Paulding Residential Substance Abuse and Treatment Center provides Detainees with access to outside victim advocates for emotional support services related to sexual abuse by giving Detainees mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations. Paulding Residential Substance Abuse and Treatment Center enables reasonable communication between Detainees and these organizations and agencies, in as confidential a manner as possible. Paulding Residential Substance Abuse and Treatment Center Detainees will be notified of the community Sexual Assault Center during Orientation. The staff provides the contact information

for a YWCA of NW Ga. located in the community if services are required. This information is also available to them upon request. A Detainee may make a verbal or written request to staff to contact a victim service advocate or agency at any time. All reasonable measures will be taken to allow for as much privacy as possible.

Paulding Residential Substance Abuse and Treatment Center informs Detainees, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. If Detainees of Paulding Residential Substance Abuse and Treatment Center request to contact YWCA of NW GA. staff will make every effort to offer the Detainee reasonable privacy while maintaining visual security if located in restricted or sensitive areas within Paulding Residential Substance Abuse and Treatment Center. Detainees will typically utilize the phone in their counselor's office. The counselor will ensure privacy while the resident is contacting the rape crisis counseling provider.

Georgia Department of Corrections maintains a memoranda of understanding with The Haven or YWCA of NW GA. thru Hays State Prison.

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| §115.54 Third party reporting |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

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

Georgia Department of Corrections has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of a Detainee. Visitors can go to www.dcor.state.ga.us

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| §115.61 Staff and agency reporting duties / |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Georgia Department of Corrections requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of Georgia Department of Corrections; retaliation against Detainees or staff who reported such an incident; and any staff

neglect or violation of responsibilities that may have contributed to an incident or retaliation. In accordance with GDC SOP 208.06, all personnel at Paulding Residential Substance Abuse and Treatment Center are provided with PREA training that instructs them on the proper procedure for reporting any incidents that are in any way related to PREA.

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

If the alleged victim is considered a vulnerable adult under a State statute Chapter 5 of Title 30 of the Official Code of Georgia 1-10 Annotated, the " Disabled Adults and Elder Persons Protection Act, Georgia Department of Corrections reports the allegation to the designated State or local services agency under applicable mandatory reporting laws. Paulding Residential Substance Abuse and Treatment Center does not house Detainees under the age of 18. However, the Paulding Residential Substance Abuse and Treatment Center follows all State and Federal PREA policies and will comply with this standard in the event Detainee s under the age of 18 or Detainee considered vulnerable are involved in a PREA-related issue. This will be done in accordance with GDC SOP 208.06 and in coordination with GDC Internal Investigations.

Paulding Residential Substance Abuse and Treatment Center reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Paulding Residential Substance Abuse and Treatment Center's designated investigators. In accordance with GDC SOP 208.06, all allegations of sexual abuse and sexual harassment, including third party and anonymous reports, will be reported to the Paulding Residential Substance Abuse and Treatment Center, SART, GDC Statewide PREA Coordinator, and the GDC Internal Investigations Unit. The Superintendent will be responsible for ensuring these notifications are made as soon as possible

§115.62

Agency protection duties

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

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

Based on review of GDOC 208.06 IV.F.2; PREA Employee Checklist and interviews with random staff, and Superintendent I find they meet this standard.

Immediate action is taken to protect Detainees when Georgia Department of Corrections learns that a Detainee is subject to a substantial risk of imminent sexual abuse. If a Detainee at Paulding Residential Substance Abuse and Treatment Center is determined to be in imminent

danger of sexual abuse, the Superintendent will be notified immediately and the Detainee will be housed in Administrative Segregation immediately in order to protect them.

§115.63 Reporting to other confinement facilities

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV F. 3 (a-d) and interview with Commissioner and Superintendent I find they meet this standard.

No such incidents have occurred at Paulding Residential Substance Abuse and Treatment Center.

Upon receiving an allegation that and Detainee was sexually abused while confined at another facility, the head of Paulding Residential Substance Abuse and Treatment Center that received the allegation notifies the head of Paulding Residential Substance Abuse and Treatment Center or appropriate office of Georgia Department of Corrections where the alleged abuse occurred. Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. In cases where an Detainee of Paulding Residential Substance Abuse and Treatment Center is sexually abused while confined at another facility the PREA Compliance Manager will immediately upon notification notify the head of that facility, Paulding Residential Substance Abuse and Treatment Center 's Superintendent , SART, the GDC PREA Coordinator, and GDC Internal Investigations.

§115.64 Staff first responder duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV F. 4; PREA Incident Checklist; PREA Employee Checklist and interview with security staff who are first responders, random staff I find they meet this standard.

Upon learning of an allegation that a Detainee was sexually abused, the first security staff member to respond separates the alleged victim and abuser; preserves and protects any crime scene until appropriate steps can be taken to collect any evidence; and if the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking,

drinking, or eating; and if the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. Paulding Residential Substance Abuse and Treatment Center uses the PREA Incident Checklist which outlines the steps to take as a first responder.

If the first staff responder is not a security staff member, the responder request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff. All non-security staff interviewed acknowledged they had been trained on what to do in the event a sexual assault was reported to them. Based on interviews with security staff who would be first responders and non-security staff members I find they meet this standard.

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| §115.65 | Coordinated response |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV F.5.; PREA Employee Checklist and interview with Superintendent I find they meet this standard.

Paulding Residential Substance Abuse and Treatment Center has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Paulding Residential Substance Abuse and Treatment Center as a written PREA Employee Checklist that identifies the roles of each individual involved in the PREA investigations.

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| §115.66 | Preservation of ability to protect Detainees from contact with abusers |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Not applicable Standard

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

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

Georgia Department of Corrections does not have collective bargaining.

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

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

Based on review of GDOC SOP 208.06 IV F. 6 (a-e); 90 Day Offender Sexual Abuse Review Checklist; 90 Day Employee Sexual Abuse Review Checklist and interview with Commissioner, Superintendent, designated staff member with monitoring retaliation; Detainees in segregation for risk of sexual victimization I find they meet this standard.

Georgia Department of Corrections has a policy to protect all Detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other Detainees or staff, and designate which staff members or departments are charged with monitoring retaliation. Paulding Residential Substance Abuse and Treatment Center personnel will protect Detainees and staff who report sexual abuse, sexual misconduct, or sexual harassment from retaliation. The Superintendent has identified one of the CO II as the Retaliation Monitor as outlined in the Local Procedure Directive (GDC SOP IIA21-0001 Attachment 9-Local Procedure Directive) to monitor for retaliation. Anyone who retaliates against a staff member or a Detainee who has reported in good faith an allegation of sexual abuse or sexual harassment in good faith shall be subject to disciplinary action.

Georgia Department of Corrections has multiple protection measures, such as housing changes or transfers for Detainee victims or abusers, removal of alleged staff or Detainee abusers from contact with victims, and emotional support services for Detainees or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Multiple protection measures are available at Paulding Residential Substance Abuse and Treatment Center which include Detainee housing changes or transfers, removal of alleged staff or Detainee abusers from contact with victims, and emotional support services for Detainees or staff who fear retaliation for reporting or for cooperating with investigations.

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

Based on interview with CO II charged with monitoring retaliation, he will monitor for at least 90 days following a report of abuse, monitor the conduct and treatment of Detainees or staff who reported the sexual abuse to see if there are any changes that may suggest possible retaliation, and will act promptly to remedy any such retaliation. This monitoring includes review of any Detainee disciplinary reports, housing or program changes, or negative performance

reviews or reassignments of staff. Such monitoring will continue beyond 90 days if the initial monitoring indicates a continuing need.

If any other individual who cooperates with an investigation expresses a fear of retaliation, Georgia Department of Corrections takes appropriate measures to protect that individual against retaliation. If any other individuals/Detainees, who are cooperating with the investigation, feel a need for retaliation monitoring, the *CO II* for the victim will also serve in this capacity for these identified individuals.

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| §115.68 | Post allegation protective custody |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDC SOP 208.06 IV. F. 13 and interview with Superintendent I find they meet this standard.

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

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| §115.71 | Criminal and administrative agency investigation |
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV G. 3; Staff Training Roster; NIC Certificate and In Service Training Record; Incident 1-380-16-0019 and interview with investigative staff I find they meet this standard.

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

Where sexual abuse is alleged, Georgia Department of Corrections uses investigators who have received special training in sexual abuse investigations. All SART team members are required to attend additional PREA training.

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

When the quality of evidence appears to support criminal prosecution, Georgia Department of Corrections conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. Paulding Residential Substance Abuse and Treatment Center complies with this standard by following policies and procedures as outlined in the Georgia Department of Corrections policy number 208.06 in regard to PREA Investigations concerning criminal prosecutions.

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

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

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

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

Georgia Department of Corrections retains all written reports for as long as the alleged abuser is incarcerated or employed by Georgia Department of Corrections, plus five years. Paulding Residential Substance Abuse and Treatment Center complies with this standard by following policies and procedures as outlined in the Georgia Department of Corrections policy number 208.06 in regard to PREA Investigations concerning criminal prosecutions.

The departure of the alleged abuser or victim from the employment or control of Paulding Residential Substance Abuse and Treatment Center or agency does not provide a basis for terminating an investigation. Paulding Residential Substance Abuse and Treatment Center complies with this standard by following policies and procedures as outlined in the Georgia Department of Corrections policy number 208.06 in regard to PREA Investigations concerning criminal prosecutions.

§115.72 Evidentiary standard for administrative investigation

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

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

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

Georgia Department of Corrections imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

§115.73 Reporting to Detainees

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

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

Based on review of GDOC SOP 208.06 IV G. 15; PREA Allegation Notification Letter; 90 day Offender Sexual Abuse Review Checklist and interview with Superintendent ; investigative staff; Detainee who reported sexual assault I find they meet this standard.

Following an investigation into a Detainee’s allegation that they suffered sexual abuse in an agency facility, Georgia Department of Corrections informs the Detainee as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. Paulding Residential Substance Abuse and Treatment Center complies with this standard by following Georgia Department of Corrections policy number 208.06, which states, “Paulding Residential Substance Abuse and Treatment Center shall inform the Detainee as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This will be completed by a member of the local SART unless the appointing authority delegates to another designee under certain circumstances. Such notifications or attempted notifications shall be

documented. Following a Detainee's allegation that a staff member has committed sexual abuse against the Detainee and upon completion of the Internal Investigation, an assessment of the appropriateness of notification will be made by the Appointing Authority in consultation with Departments Legal Office. If determined that notification is appropriate, it will be made in accordance with 28 CFR § 115.73."

If Georgia Department of Corrections did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the Detainee. Paulding Residential Substance Abuse and Treatment Center will obtain a copy of the investigation document and make proper notification to the Detainee as defined by policy SOP 208.06.

Following an Detainee's allegation that a staff member has committed sexual abuse against the Detainee, Georgia Department of Corrections subsequently informs the Detainee (unless Georgia Department of Corrections has determined that the allegation is unfounded) whenever the staff member is no longer posted within the Detainee's unit; the staff member is no longer employed at Paulding Residential Substance Abuse and Treatment Center ; Georgia Department of Corrections learns that the staff member has been indicted on a charge related to sexual abuse within Paulding Residential Substance Abuse and Treatment Center ; or Georgia Department of Corrections learns that the staff member has been convicted on a charge related to sexual abuse within Paulding Residential Substance Abuse and Treatment Center . Paulding Residential Substance Abuse and Treatment Center will comply with this directive by following Georgia Department of Corrections policy 208.06 which states, "Following an Detainee's allegation that a staff member has committed sexual abuse against the Detainee, and upon completion of the Internal Investigation, an assessment of the appropriateness of notification will be made by the Appointing Authority in consultation with Department's Legal Office. If determined that notification is appropriate, it will be made in accordance with 28 CFR § 115.73."

Following an Detainee's allegation that they had been sexually abused by another Detainee, Georgia Department of Corrections subsequently informs the alleged victim whenever Georgia Department of Corrections learns that the alleged abuser has been indicted on a charge related to sexual abuse within Paulding Residential Substance Abuse and Treatment Center ; or Georgia Department of Corrections learns that the alleged abuser has been convicted on a charge related to sexual abuse within Paulding Residential Substance Abuse and Treatment Center . Paulding Residential Substance Abuse and Treatment Center adheres to the policy defined above as provided for in Georgia Department of Corrections policy SOP 208.06.

All such notifications or attempted notifications are documented. Paulding Residential Substance Abuse and Treatment Center adheres to the policy defined above as provided for in Georgia Department of Corrections policy SOP 208.06. All PREA documentation is restricted to only necessary staff as clearly outlined in GDC policy.

An agency's obligation to report under this standard is terminated if the Detainee is released from Georgia Department of Corrections' custody. Paulding Residential Substance Abuse and Treatment Center adheres to this standard by following Georgia Department of Corrections policy SOP 208.06 in which it states, "Paulding Residential Substance Abuse and Treatment Center shall inform the Detainee as to whether the allegation has been determined to be

substantiated, unsubstantiated, or unfounded. This will be completed by a member of the local SART unless the appointing authority delegates to another designee under certain circumstances. Such notifications or attempted notifications shall be documented. A Department's obligation to report under this standard shall terminate if the Detainee is released from the Department's custody."

§115.76

Disciplinary sanctions for staff

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

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

Based on review of GDOC SOP 208.06 IV H. and Sexual Assault/Sexual Misconduct Acknowledgment Statement; Letter of Concern to a staff member regarding staff violating Employee Standards of conduct I find they meet this standard.

No staff have been involved in any PREA related incident however there are policies in place that address the following:

Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who has engaged in sexual abuse. In accordance with GDC SOP 208.06, staff who engage in sexual misconduct with Detainees shall be banned from correctional institutions and subject to disciplinary action, up to and including termination, and may also be referred for criminal prosecution, when appropriate.

Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. In accordance with GDC SOP 208.06, disciplinary sanctions for violations of GDC policy relating to sexual abuse or sexual harassment will be commensurate with the nature of the circumstances of the acts committed, the staff member's disciplinary history, and the sanctions

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

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

§115.77

Corrective action for contractors and volunteers

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV H. 2; Sexual Assault/Sexual Misconduct Acknowledgement Statement; lesson plan and interview with Superintendent I find they meet this standard.

No contractor or volunteer have been involved in any PREA related incident however there are policies in place that address the following:

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

Paulding Residential Substance Abuse and Treatment Center takes appropriate remedial measures, and considers whether to prohibit further contact with Detainees, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. All Paulding Residential Substance Abuse and Treatment Center's volunteers and contractors that do not adhere to the PREA standards set forth in Georgia Department of Corrections policy number 208.06 will be subject to the disciplinary standards as defined by that same policy. Remedial measures may include prohibiting contact with residents and reporting the incident to the appropriate law enforcement agency.

§115.78

Disciplinary sanctions for Detainees

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDOC SOP 208.06 IV H.3. and SOP II. B 02-0001 and interview with medical staff I find they meet this standard.

Paulding Residential Substance Abuse and Treatment Center has had no incidents of Sexual Abuse Reported.

Detainees are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the Detainee engaged in Detainee-on-Detainee sexual abuse or following a criminal finding of guilt for Detainee-on-Detainee sexual abuse. Paulding Residential Substance Abuse and Treatment Center will subject Detainees to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the Detainee engaged in Detainee-on-Detainee sexual abuse or a criminal finding of guilt for Detainee-on-Detainee sexual abuse. These sanctions will be imposed in accordance with GDC SOP IIB02-0001 and 208.06.

Sanctions are commensurate with the nature and circumstances of the abuse committed, the Detainee's disciplinary history, and the sanctions imposed for comparable offenses by other Detainees with similar histories. Sanctions will be commensurate with the nature and circumstances of the abuse committed, the Detainee's disciplinary history, and the sanctions imposed for comparable offenses by other Detainees with similar histories. Sanctions are covered by GDC SOP IIB02-0001.

The disciplinary process considers whether a Detainee's mental disabilities or mental illness contributed to his behavior when determining what type of sanction, if any, should be imposed. GDC SOP IIB02-0001 requires staff to consider a Detainee's mental disability or mental illness during the disciplinary hearing process and when determining appropriate sanctions. GDC SOP VG34-0001 also addresses this issue.

Paulding Residential Substance Abuse and Treatment Center does not offer mental health services. All mental health services are provided at Hays State Prison.

Georgia Department of Corrections disciplines a Detainee for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

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

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

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| §115.81 | Medical and Mental health screening; history of sexual abuse |
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on interview with staff responsible for risk screening and medical staff I find they meet this standard.

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

If the screening indicates that an Detainee has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the Detainee is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. This can be done via tele psych with the mental health staff at Hays State Prison. No such incident has occurred.

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

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

§115.82

Access to emergency medical and mental health services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of SOP IIA21-0001; SANE nurse Call Roster and interview with medical and mental health staff I find they meet this standard.

Detainee victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. If no medical staff are on duty at the time of the incident the facility contacts the on-call doctor from Hays State Prison who makes the decision on what actions to take. If emergency care is required the detainee would be transported to Well star Paulding Medical hospital.

If no qualified medical practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and immediately notify the appropriate medical practitioners.

Detainee victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. All doctors' orders received from the hospital are carried out at Paulding Residential Substance Abuse and Treatment Center.

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

§115.83

Ongoing medical and mental health care for sexual abuse victims

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

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

Based on review of SOP VG55-0001 Mental Health Management of Suspected Sexual Abuse, Contact or Harassment; SOP VH85-0001 Forensic Information; SOP VH85-0002 Medical Management of Suspected Sexual Assault, Abuse or Harassment and Medical PREA Log and interview with medical staff and I find they meet this standard.

Paulding Residential Substance Abuse and Treatment Center offers medical and mental health evaluation and, as appropriate, treatment to all Detainees who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

In providing ongoing medical treatment services, Paulding Residential Substance Abuse and Treatment Center will utilize the medical services of Georgia Department of Corrections medical staff. In providing ongoing mental health services Paulding Residential Substance Abuse and Treatment Center will utilize the services of Hay State Prison mental health professionals. These services will be provided at no cost to the Detainee in the case of sexual abuse victims or abusers.

The evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. In providing follow-up services, Paulding Residential Substance Abuse and Treatment Center medical, GDC medical staff will utilize treatment plans, referrals and, if necessary, placement in other facilities.

Paulding Residential Substance Abuse and Treatment Center provides such victims with medical and mental health services consistent with the community level of care. This is consistent with GDC SOP VH-08-0002.

Detainee victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. All Paulding Residential Substance Abuse and Treatment Center's Detainees who are victims of Sexual assault are treated by the Sexual Assault Nurse Examiner (SANE). Depending on the circumstances of the abuse, testing for sexually transmitted infections may be conducted at Paulding Residential Substance Abuse and Treatment Center at no cost to the resident.

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Paulding Residential Substance Abuse and Treatment Center does not charge residents for PREA related treatments or services.

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

§115.86 Sexual abuse incident reviews

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

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

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

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

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

§115.87 Data collection

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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

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

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

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

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

Upon request, Georgia Department of Corrections provides all such data from the previous calendar year to the Department of Justice no later than June 30.

§115.88 Data review for corrective action

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of annual report and interview with PREA coordinator I find they meet this standard.

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

Such reports includes a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of Georgia Department of Corrections' progress in addressing sexual abuse.

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

§115.89 Data storage, publication and destruction

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Georgia Department of Corrections makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or www.dcor.state.ga.us/pdf/GDC-Annual-PREA-Report-CY2015.pdf

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

AUDITOR CERTIFICATION:

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

Katherine Brown

Auditor Signature

June 24, 2016

Date