

# PREA AUDIT: AUDITOR'S SUMMARY REPORT

## ADULT PRISONS & JAILS

Interim     Final Report

### Auditor Information

**Auditor name:** Katherine Brown

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**Email:** kbrown2828@yahoo.com

**Telephone number:** 727-470-4123

**Date of facility visit:** January 27 & 28, 2016

**Date report submitted:** January 30, 2016

### Facility Information

**Name of facility:** Spalding County Correctional Institution

**Physical address:** 295 Justice Blvd., Griffin, GA 30223

**Facility mailing address:** N/A

**Telephone number:** 770-467-4760

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

<b>Facility Type:</b>	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison
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<b>Name of facility's Chief Executive Officer:</b> Carl Humphrey	<b>Title:</b>	Warden
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**Number of staff assigned to Spalding County Correctional Institution in the last 12 months:** 84

**Designed facility capacity:** 384

**Current population of facility:** 366

**Facility security levels/inmate custody levels:** Minimum, Medium

**Age range of the population:** 18-60

<b>Name of PREA Compliance Manager:</b> Beth Griffin	<b>Title:</b>	Deputy Warden
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<b>Email address:</b> <a href="mailto:bgriffin@spaldingcounty.com">bgriffin@spaldingcounty.com</a>	<b>Telephone #</b>	770-467-4760
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### Agency Information

**Name of agency:** Spalding County Board of Commissioners

**Physical address:** 119 E. Solomon Street Griffin, Georgia 30223

**Mailing address:** P.O. Box 1087 Griffin, Georgia 30224

**Telephone number:** (770) 467-4233

### Agency Chief Executive Officer

<b>Name:</b> Carl Humphrey	<b>Title:</b>	Warden
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<b>Email address:</b> <a href="mailto:chumprey@spaldingcounty.com">chumprey@spaldingcounty.com</a>	<b>Telephone number:</b>	770-467-4760 Ext. 222
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### Agency-Wide PREA Coordinator

<b>Name:</b> N/A	<b>Title:</b>	
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<b>Email address:</b>	<b>Telephone #</b>	
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# AUDIT FINDINGS

## **NARRATIVE:**

The audit of Spalding County Correctional Institution was conducted on January 27 & 28, 2016 by Katherine Brown, Certified PREA auditor. The areas toured were a total of seven housing units. There are six general population units and one administrative detention/segregation unit. I toured each of the general population unit's plus the kitchen, laundry, programs area, and work areas.

An entrance meeting was held with facility staff. The following people were in attendance: Carl Humphrey, Warden; Beth Griffin, Deputy Warden; Carlton Granger, Captain; John Holland, Sergeant; Randy Bogan, Lieutenant; Tracey Cross, Counselor, Vickie Wilson, Nurse and Happy Johnson, Chief counselor.

Following the entrance meeting I toured the Spalding County Correctional Institute from 12:30 to 1:00pm. On the tour with me was, Carl Humphrey, Warden; Beth Griffin, Deputy Warden; Carlton Granger, Captain; John Holland, Sergeant; Randy Bogan, Lieutenant.

I asked for an alpha listing of all inmates housed at Spalding County Correctional Institution and randomly selected eleven inmates to interview. I also asked for any inmates who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impairment inmates there, I did interview two limited English speaking inmate. I also asked for any inmate who was transgender/intersex, there were no transgender/intersex inmates. I asked for a shift roster and randomly selected staff to interview.

There were no sexual assault/harassment allegation cases.

## **DESCRIPTION OF FACILITY CHARACTERISTICS:**

The original Spalding County Correction Institute (C.I.) began as a "work camp" in 1952 on the site of the present day Spalding County Public Works Department, just down the road from our present location which was built in 2001. The Spalding County Correctional Institution (SCCI), serves to meet the workforce needs of local governments while fulfilling a contractual obligation to the Georgia Department of Corrections by providing safe and secure housing for approximately 384 inmates in compliance with all applicable policies and procedures. They are governed by the Spalding County Board of Commissioners thru the County Manager and also by the standard operating procedures of the Georgia Department of Corrections.

There are six housing units which hold 64 inmates and a segregation unit that as 16 cells. There are 5 two man cells and 11 single man cells in the segregation unit. There is a small nurse's station that has coverage 12 hours a day and then the two staff nurses are on call after hours and on weekends.

There are approximately 65 inmate details with about 320 medium or minimum security state inmates assigned to work outside of the prison for a variety of local government departments as well as several in other nearby jurisdictions. State inmates at a county camp will almost always be within a few months or years of their release from prison. To that end, the Georgia Parole Board places requirements on inmates about certain classes and groups that they either must attend to satisfy some parole requirements or that they can elect to attend in order to help themselves.

**SUMMARY OF AUDIT FINDINGS:**

Number of standards exceeded: 2

Number of standards met: 39

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)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 4.0; memo designating PREA Compliance Manager and Organizational Chart. Based on interviews with PREA compliance manager.

Spalding County Correctional Institution has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Spalding County Correctional Institution's approach to preventing, detecting, and responding to such conduct.

Spalding County Correctional Institution 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.

**§115.12 Contracting with other agencies for confinement of inmates**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA policy Section 4.4 and Contract with Georgia Department of Corrections. Based on interview with agency's contract compliance manager.

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**

Reviewed PREA Policy section 4.5; Staffing plan and logbooks showing unannounced rounds. Command Staff Meeting minutes. Based on interview with Warden and PREA Compliance Manager.

Spalding County Correctional Institution has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect inmates against sexual abuse.

In circumstances where the staffing plan was not complied with, Spalding County Correctional Institution documented and justified all deviations from the plan.

Spalding County Correctional Institution completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed.

#### **§115.14 Youthful inmates**

- 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**

Spalding County Correctional Institution does not house juveniles.

#### **§115.15 Limits to cross gender viewing and searches**

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

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

Reviewed PREA Policy section 4.7.

Spalding County Correctional Institution does not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances. In the event a cross gender search is done Spalding County Correctional Institution documents all cross-gender strip searches and cross-gender visual body cavity searches.

Spalding County Correctional Institution has policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when

such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit.

Spalding County Correctional Institution does not search or physically examine a transgender or intersex inmate for the sole purpose of determining the inmate's genital status. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

Spalding County Correctional Institution trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

<b>§115.16</b>	<b>Inmates with disabilities and limited English speaking</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 4.8; Language Line; Inmate Handbook; Video and pamphlet. Based on random inmate and staff interviews and based on interview with limited English speaking inmates using a staff interrupter.

Spalding County Correctional Institution takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of Spalding County Correctional Institution's 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.

Spalding County Correctional Institution does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. None have been used or required.

<b>§115.17</b>	<b>Hiring and promotion decisions</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 4.9. Based on interview with Human Resource Director review of criminal histories.

Spalding County Correctional Institution does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor who may have contact with inmates, who has engaged in sexual abuse in any criminal justice facility, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above.

Spalding County Correctional Institution considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

Spalding County Correctional Institution performs a criminal background records check before enlisting the services of any contractor who may have contact with inmates and performs an annual records check on all sworn staff at least every five years of current employees and contractors who may have contact with inmates. Reviewed annual background checks and procedure for tracking 5 year background checks.

<b>§115.18</b> <b>Upgrades to facilities and technology</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 4.10. Based on interview of warden.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Spalding County Correctional Institution considers how such technology may enhance Spalding County Correctional Institution's ability to protect inmates from sexual abuse. There have been no substantial or modifications to existing facilities. There are bids out for the installation of a new camera system in the future.

<b>§115.21</b> <b>Evidence protocol and forensic medical exams</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 5.0; and Certificate from Office for Victims of Crimes Training & Technical Assistance Center for staff trained victim advocate. Based on telephone interview with SANE/SAFE staff and PREA compliance manager.

To the extent Spalding County Correctional Institution is responsible for investigating allegations of sexual abuse; Spalding County Correctional Institution follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions

Spalding County Correctional Institution offers all victims of sexual abuse access to forensic medical examinations, at Spalding Regional Hospital, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Nurse Examiners (SANEs) from Southern Crescent Sexual Assault and Child Advocacy Center.

Spalding County Correctional Institution has a trained staff victim advocate as well as a victim advocate from the Southern Crescent Sexual Assault and Child Advocacy Center.

As requested by the victim, either a qualified agency staff member or a victim advocate from Southern Crescent Sexual Assault and Child Advocacy Center accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals.

To the extent Spalding County Correctional Institution itself is not responsible for investigating allegations of sexual abuse, Spalding County Correctional Institution requests that the investigating agency follow the requirements listed above. Criminal Investigation are handled either by Spalding County Sheriff and GDOC Internal Investigations Unit.

<b>§115.22</b>	<b>Policies to ensure referrals of allegations for investigations</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 5.4 – 5.6.1. Based on interview with warden and investigative staff.

Spalding County Correctional Institution ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Spalding County Correctional Institution has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. Spalding County Correctional Institution publishes such [www.spaldingcounty.com](http://www.spaldingcounty.com) Spalding County Correctional Institution documents all such referrals.

**§115.31 Employee training**

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

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

Reviewed PREA Policy 6.1; training roster; PREA Sexual Assault/Sexual Misconduct Acknowledgement Statement and PREA Lesson. Based on interview with random staff.

Spalding County Correctional Institution trains all employees who have contact with inmates on:

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

The training is tailored to the gender of the inmates at Spalding County Correctional Institution. The employees receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa.

Spalding County Correctional Institution documents, through employee signature, those employees understand the training they have received.

**§115.32 Volunteer and contractors training**

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

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

Reviewed PREA policy section 6.3; Acknowledgment Statement for Supervised Visitors; PREA Acknowledgment Unsupervised Employees/Contractor/Volunteers. Based on interview with volunteer and contractors.

Spalding County Correctional Institution ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Spalding County Correctional Institution's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

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

Spalding County Correctional Institution has documentation confirming that volunteers and contractors understand the training they have received.

<b>§115.33</b>	<b>Inmate education</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 6.4; Inmate Handbook; PREA Video "Speaking Up" and Inmate Brochure. Based on interview with random inmates and intake staff.

During the intake process, inmates receive information explaining Spalding County Correctional Institution's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

Immediately upon arrival Spalding County Correctional Institution provides a comprehensive education to inmates either in person or through 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. Each inmates is given a training packet that has all information that the staff train them on for them to take to the units. This is a very thorough packet.

Spalding County Correctional Institution provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. There is documentation of inmate participation in these education sessions.

Based on the comprehensive training performed immediately upon arrival and the training packet given to all inmates I find Spalding County Correctional Institution exceeds in this standard.

<b>§115.34</b>	<b>Specialized training: Investigators</b>
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- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 6.5 and NIC training PREA: Investigating Sexual Abuse in a Confinement Setting. Based on interview with investigative staff.

In addition to the general training provided to all employees Spalding County Correctional Institution ensures that the in house investigators have received training in conducting investigations in confinement settings.

Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Spalding County Correctional Institution maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

**§115.35 Specialized training: Medical and mental health care**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy Section 6.6 and NIC Certificate PREA: Medical Health Care for Sexual Assault Victims in a Confinement Setting.

Spalding County Correctional Institution ensures that all full time medical health care practitioners who work regularly in its facilities have been trained in how to: detect and assess signs of sexual abuse and sexual harassment; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

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

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

**§115.41 Screening for risk of victimization and abusiveness**

X Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 7.1 and Victim/Aggressor Classification Instrument – SCRIBE and email sent regarding safe housing for inmate who scored as a potential victim. Based on interview with random inmates and intake staff responsible for screening. Only limited staff has access to the risk screening form only Medical, Deputy Warden, Warden and counselors.

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

Intake screenings take place immediately upon arrival at Spalding County Correctional Institution.

Spalding County Correctional Institution uses an objective screening instrument.

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

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

The initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to Spalding County Correctional Institution, in assessing inmates for risk of being sexually abusive.

Within 30 days from the inmate's arrival at Spalding County Correctional Institution, Spalding County Correctional Institution reassesses all inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Spalding County Correctional Institution since the intake screening.

An inmate's risk level is reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness.

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

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

Based on the intake screening being completed immediately upon arrival I find Spalding County Correctional Institute exceeds in this standard.

**§115.42 Use of screening information**

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

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

Reviewed PREA Policy section 7.3. Based on interview with PREA compliance manager and staff responsible for risk screening.

Spalding County Correctional Institution uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.

Spalding County Correctional Institution makes individualized determinations about how to ensure the safety of each inmate.

Spalding County Correctional Institution has not had any transgender/intersex inmates however there are policies in place the address the following:

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

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

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

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

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

**§115.43 Protective custody**

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 7.4. Based on interview with warden.

No inmates have been placed in involuntary segregation housing.

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

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

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

<b>§115.51</b>	<b>Inmate reporting</b>
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 8.1. Based on interviews with random staff and inmates.

Spalding County Correctional Institution provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Inmates can dial \*7 to get the Georgia County Prisons hotline number, they can write to someone or tell a staff member.

Spalding County Correctional Institution provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of Spalding County Correctional Institution, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Inmates can contact Georgia County Prison hotline 1-888-992-7849. Inmates can also write the Georgia State Ombudsmen Office or Board of Pardon and Parole Office of Victim Services.

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

Spalding County Correctional Institution provides a method for staff to privately report sexual abuse and sexual harassment of inmates.

<b>§115.52</b> <b>exhaustion of administrative remedies</b>
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 8.2.

Spalding County Correctional Institution does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.

Spalding County Correctional Institution does not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

Spalding County Correctional Institution ensures that an inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint.

Spalding County Correctional Institution issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

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

Spalding County Correctional Institution has established procedures for the filing of an emergency grievance when the inmate is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, Spalding County Correctional Institution 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 Spalding County Correctional Institution's determination whether the inmate is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Spalding County Correctional Institution may discipline an inmate for filing a grievance related to alleged sexual abuse only where Spalding County Correctional Institution demonstrates that the inmate filed the grievance in bad faith.

No inmate has filed a grievance.

**§115.53 Inmate access to outside confidential support services**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 8.3; Certificate from Office of Victims of Crime Training and Technical Assistance Center for Victim Advocate. Based on interview with random inmates.

Spalding County Correctional Institution provides inmates with access to outside victim advocates through Southern Crescent Sexual Assault and Child Advocacy, for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations. Spalding County Correctional Institution enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible.

Spalding County Correctional Institution informs inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

Spalding County Correctional Institution maintains a memoranda of understanding with Southern Crescent Sexual Assault and Child Advocacy.

**§115.54 Third party reporting**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Spalding County Correctional Institution has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of an inmate. Visitors can go to [www.spaldingcounty.com](http://www.spaldingcounty.com) or contact Georgia State Ombudsman Office or Board of Pardons & Paroles Office of Victim Services.

**§115.61 Staff and agency reporting duties**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Reviewed PREA Policy section 9.1. Based on interviews with random staff; warden and medical staff.

Spalding County Correctional Institution requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of Spalding County Correctional Institution; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Apart from reporting to designated supervisors or officials, staff do not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.

If the alleged victim is considered a vulnerable adult under a State or local vulnerable person's statute, Spalding County Correctional Institution reports the allegation to the designated State or local services agency under applicable mandatory reporting laws.

Spalding County Correctional Institution reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Spalding County Correctional Institution's designated investigators.

§115.62	<b>Agency protection duties</b>
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 9.2. Based on interviews with random staff and warden.

Immediate action is taken to protect inmates when Spalding County Correctional Institution learns that an inmate is subject to a substantial risk of imminent sexual abuse.

§115.63	<b>Reporting to other confinement facilities</b>
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 9.3. Based on interview with warden.

Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of Spalding County Correctional Institution that received the allegation notifies the head of Spalding County Correctional Institution or appropriate office of Spalding County Correctional Institution 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.

§115.64	<b>Staff first responder duties</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 9.4. Based on interview with security staff who are first responders and random staff.

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

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.

§115.65	<b>Coordinated response</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 9.5.1. Based on interview with warden.

Spalding County Correctional Institution has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

§115.66

**Preservation of ability to protect inmates from contact with abusers**

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

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

Based on interview with Warden.

Spalding County Correctional Institution does not have collective bargaining.

§115.67

**Agency protection against retaliation**

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

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

Reviewed PREA Policy section 9.6. Based on interview with warden and designated staff member with monitoring retaliation.

Spalding County Correctional Institution has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and designate which staff members or departments are charged with monitoring retaliation.

Spalding County Correctional Institution has multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, Spalding County Correctional Institution monitors the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and act promptly to remedy any such retaliation. There are periodic status checks performed. Items Spalding County Correctional Institution should monitor include any inmate disciplinary reports, housing, or program changes,

or negative performance reviews or reassignments of staff. Spalding County Correctional Institution continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

If any other individual who cooperates with an investigation expresses a fear of retaliation, Spalding County Correctional Institution takes appropriate measures to protect that individual against retaliation.

§115.68	<b>Post allegation protective custody</b>
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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 warden.

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

§115.71	<b>Criminal and administrative agency investigation</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 10.1. Based on interview with investigative staff.

When Spalding County Correctional Institution conducts its own investigations into allegations of sexual abuse and sexual harassment, it does so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

Where sexual abuse is alleged, Spalding County Correctional Institution uses investigators who have received special training in sexual abuse investigations.

Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator.

When the quality of evidence appears to support criminal prosecution, Spalding County Correctional Institution conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

GDOC Criminal Investigations Division conducts all investigations that have been determined to be criminal.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. No agency requires an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

Administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that contains 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.

Spalding County Correctional Institution retains all written reports for as long as the alleged abuser is incarcerated or employed by Spalding County Correctional Institution, plus five years.

The departure of the alleged abuser or victim from the employment or control of Spalding County Correctional Institution or agency does not provide a basis for terminating an investigation.

§115.72	<b>Evidentiary standard for administrative investigation</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 10.1.4. Based on interview with investigative staff.

Spalding County Correctional Institution imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

§115.73	<b>Reporting to inmates</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 10.15. and Notification Letter. Based on interview with warden and investigative staff.

Following an investigation into an inmate's allegation that they suffered sexual abuse in an agency facility, Spalding County Correctional Institution informs the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

If Spalding County Correctional Institution did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the inmate.

Following an inmate's allegation that a staff member has committed sexual abuse against the inmate, Spalding County Correctional Institution subsequently informs the inmate (unless Spalding County Correctional Institution has determined that the allegation is unfounded) whenever the staff member is no longer posted within the inmate's unit; the staff member is no longer employed at Spalding County Correctional Institution; Spalding County Correctional Institution learns that the staff member has been indicted on a charge related to sexual abuse within Spalding County Correctional Institution; or Spalding County Correctional Institution learns that the staff member has been convicted on a charge related to sexual abuse within Spalding County Correctional Institution.

Following an inmate's allegation that they had been sexually abused by another inmate, Spalding County Correctional Institution subsequently informs the alleged victim whenever Spalding County Correctional Institution learns that the alleged abuser has been indicted on a charge related to sexual abuse within Spalding County Correctional Institution; or Spalding County Correctional Institution learns that the alleged abuser has been convicted on a charge related to sexual abuse within Spalding County Correctional Institution.

All such notifications or attempted notifications are documented.

An agency's obligation to report under this standard is terminated if the inmate is released from Spalding County Correctional Institution's custody.

§115.76	<b>Disciplinary sanctions for staff</b>
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed PREA Policy section 11.1.

Staff are 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 have engaged in sexual abuse.

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

All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported

to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

**§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**

Reviewed PREA Policy section 11.3. Based on interview with warden.

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

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

**§115.78 Disciplinary sanctions for inmates**

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

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

Reviewed PREA Policy section 11.4 and Inmate Handbook. Based on interview with medical staff.

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

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

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

If inmates require therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, Spalding County Correctional Institution transfers the inmate to Georgia Diagnostic and Classification State Prison or Phillips State Prison.

Spalding County Correctional Institution disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

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

Spalding County Correctional Institution prohibits all sexual activity between inmates and may discipline inmates for such activity.

§115.81	<b>Medical and Mental health screening; history of sexual abuse</b>
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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.

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

If the screening indicates that an inmate has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. For the state inmates this is handled by Georgia Diagnostic & Classification Prison or Phillips State Prison.

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

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

§115.82	<b>Access to emergency medical and mental health services</b>
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- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on interview with medical staff.

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

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

Inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

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.

§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 interview with medical staff.

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

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.

Spalding County Correctional Institution provides such victims with medical services consistent with the community level of care.

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

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

§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**

Reviewed PREA Policy section 13.1. Based on interview with warden, PREA compliance manager; incident review team.

There have been no PREA incidents requiring an Incident Review but there are policies in place that address:

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

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

§115.87

**Data collection**

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

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

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

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

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

Upon request, Spalding County Correctional Institution provides all such data from the previous calendar year to the Department of Justice no later than June 30.

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on interview with PREA coordinator.

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

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

Spalding County Correctional Institution's report is approved by Spalding County Correctional Institution head and made readily available to the public through its website [www.spaldingcounty.com](http://www.spaldingcounty.com)

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**

Spalding County Correctional Institution makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website [www.spaldingcounty.com](http://www.spaldingcounty.com)

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 Spalding County Correctional Institution under review.

*Katherine Brown*

January 29, 2016

Auditor Signature

Date