

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: July 11, 2016

Date report submitted: July 12, 2016

Facility Information

Name of facility: Floyd County Prison and Work Release Center

Physical address: 329 Blacks Bluff Road, Rome GA 20161

Facility mailing address: N/A

Telephone number: 706-236-2490

Floyd County Corrections is:	<input type="checkbox"/> Military	<input checked="" type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		

Facility Type:	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison
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Name of facility's Chief Executive Officer: Michael Long	Title:	Warden
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Number of staff assigned to Floyd County Corrections in the last 12 months: 80

Designed facility capacity: 548

Current population of facility: 540

Facility security levels/offender custody levels: Minimum - Medium

Age range of the population: 18-65

Name of PREA Compliance Manager: Edwin Blansit	Title:	Sergeant
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Email address: blansite@floydcountyga.org	Telephone #	706-236-2490
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Agency Information

Name of agency: Floyd County Corrections

Governing authority or parent agency: Floyd County Board of Commissioners

Physical address: 329 Blacks Bluff Road Rome, GA 30161

Mailing address: N/A

Telephone number: 706-236-2490

Agency Chief Executive Officer

Name: Michael Long	Title:	Warden
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Email address: longm@floydcounty.org	Telephone number:	706-236-2490
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AUDIT FINDINGS

NARRATIVE:

The audit of Floyd County Prison and Work Release Center was conducted on July 11, 2016 by Katherine Brown, Certified PREA auditor. Prior to the on-site I received all the policies and documentation on June 6, 2016 to review and requested additional documentation to satisfy the standards. Received additional documentation on June 12, 2016 and completed the initial review.

An entrance meeting was held with facility staff. The following people were in attendance: Michael Long Warden; D. Jackson Deputy Warden and Sgt. Edwin Blansit, PREA Compliance Manager.

Following the entrance meeting I toured the Floyd County Prison and Work Release Center from 0915-0945. On the tour with me was, Michael Long Warden; D. Jackson Deputy Warden and Sgt. Edwin Blansit, PREA Compliance Manager.

The areas toured were a total of 10 housing units. There are 9 general population units and one administrative detention/segregation unit containing 18 double bunked cells, plus the kitchen, laundry, programs area, and work areas.

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

During the audit 196 offenders were in the building the remaining offenders were out at assigned jobs. I asked for an alpha listing of all offenders in house at Floyd County Corrections and randomly selected 14 offender as well as any offenders who were limited English speaking or had hearing/vision impairment to be interviewed. There were no hearing/vision impairment offenders there, I did interview one limited English speaking offender. I also asked for any offender who was transgender/intersex, there were none. I interviewed all security staff on duty the day of the audit (6) and conducted 10 specialized interviews.

There were seven (7) sexual assault/harassment allegation cases, all in 2015 (within the past year) 5 had been unfounded; 2 unsubstantiated. There have been no allegations received during 2016.

DESCRIPTION OF FACILITY CHARACTERISTICS:

Floyd County Corrections is comprised of a 448-bed medium security prison to house state offenders and a 100-bed Work Release Center to house local offenders. Both facilities are under the direct supervision of the Warden. The prison contains 8 dorms that are open bay with a common dayroom. The dorms are clearly visible from the control room. The control room is in the center of the hub and has a clear view into each dorm. There is also an 18 cell segregation unit that is double bunked. The Work Release Center has only one dorm currently open for work release offenders. Currently there are 25 offenders assigned to the work release program.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 5

Number of standards met: 35

Number of standards not met:

Number of standards not applicable: 3

§115.11	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. A. 1; FCC Organizational Chart; PREA Pamphlet; NIC PREA Coordinators Roles & Responsibility and interviews with PREA Coordinator and PREA compliance manager I find they meet this standard.

Floyd County Corrections has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Floyd County Correction's approach to preventing, detecting, and responding to such conduct. Policy FCC 208.06 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.

Floyd County 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 PREA Compliance Manager is a Sergeant that was appointed by the Warden and has the authority to comply with this standard.

§115.12	Contracting with other agencies for confinement of offenders
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I.A.2; GDC Contract and interview with the warden I find they meet this standard.

The contract with the Georgia Department of Corrections includes 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
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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 FCC 208.06 I.A. 3-5; FCC Staffing Plan; Shift Roster and interview with Warden and PREA Compliance Manager I find they meet this standard.

Floyd County 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 offenders against sexual abuse. Floyd County Corrections complies with the standard by staffing plan and shift rosters that were reviewed as part of this audit.

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

Floyd County Corrections completes an annual review, in consultation with the PREA coordinator required by § 115.11, to assess, determine, and document whether adjustments are needed. Based on review of the annual staffing report.

§115.14	Youthful offenders
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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

Floyd County Corrections' 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 FCC 208.06 I. A. 7 (a-g); Lesson Plan Cross Gender; Power Point and Trainee Roster I find they meet this standard.

Floyd County Corrections 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 Floyd County Corrections documents all cross-gender strip searches and cross-gender visual body cavity searches. During random staff and offender interviews it was confirmed staff do not perform cross gender strip searches.

Floyd County Corrections has policies and procedures that enable offenders to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering an offender housing unit. During the random offender interviews it was confirmed that offenders have privacy to perform bodily functions and cross gender staff announcements are made.

Floyd County Corrections has not had any transgender/intersex offenders however there are policies in place that address the following standards:

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

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

§115.16 Offenders with disabilities and limited English speaking

Exceeds Standard (substantially exceeds requirement of standard)

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 FCC 208.06 I. A. 8 (a-d); Staff Interpreters; Language Line; PREA Poster English/Spanish; PREA Video with Spanish subtitles; Pamphlet English/Spanish; Handbook English/Spanish and random offender and staff interviews.

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

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

§115.17 Hiring and promotion decisions

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

Based on review of FCC 208.06 I. A. 9 (a-e); FCC Personnel Selection; GDC IC. O 03-0012; New Hire Packet; Applicant Verification and interview with Administrative Assistant; review of personnel files I find they exceed this standard.

Floyd County Corrections does not hire or promote anyone who may have contact with offenders, and does not enlist the services of any contractor who may have contact with offenders, who has engaged in sexual abuse in any criminal justice facility, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied

threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. Based on interview with human resources all applicants have a back ground check done prior to job offer, if any sexual activity is discovered during the back ground screen they would not be offered a job.

Floyd County 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 offenders. Based on interview with human resources all applicants have a back ground check done prior to job offer, if any sexual activity is discovered during the back ground screen they would not be offered a job.

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

§115.18 Upgrades to facilities and technology

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on interview of Warden I find they meet this standard.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Floyd County Corrections considers how such technology may enhance Floyd County Correction's ability to protect offenders from sexual abuse. There have been no substantial or modifications to existing facilities. Floyd County Corrections currently utilizes cameras to prevent sexual abuse and investigate allegations of wrongdoing. When installing new equipment, the Warden, Deputy Warden of Security, and facility SART will ensure it is used to protect offenders form sexual abuse.

§115.21 Evidence protocol and forensic medical exams

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. B.; Procedure for SANE nurse; MOU with Sexual Assault Center for Northwest Georgia and interview with SANE/SAFE staff and PREA compliance manager I find they meet this standard.

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

Floyd County Corrections offers all victims of sexual abuse access to forensic medical examinations, at the facility, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Nurse Examiners (SANEs) from the Sexual Assault Center of Northwest Georgia. The SANE nurse from the sexual assault center actually responds to the facility to conduct the SANE exam.

Floyd County Corrections makes available to the victim a victim advocate from Sexual Assault Center for Northwest Georgia. Victim Advocates from SACNWGA used by the facility are pre-approved through the appropriate screening process and subject to the same requirements of contractors and volunteers who have contact with offenders.

As requested by the victim, a victim advocate from The Sexual Assault Center for Northwest Georgia accompanies and supports the victim through the forensic medical examination process and investigatory interviews and are provide emotional support, crisis intervention, information, and referrals.

To the extent Floyd County Corrections it is not responsible for investigating allegations of sexual abuse, Floyd County Corrections requests that the Floyd County Police Department follow the requirements listed above.

§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 FCC 208.06 I.B. 1 (a-h) & I. G Investigations (1-13) and interview with Warden and investigative staff I find they meet this standard.

Floyd County Corrections ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Floyd County Corrections follows the standards set forth by Floyd County Corrections. The Department's response to sexual assault follows "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents." When an incident is reported, a physical examination of the alleged victim

is conducted and SANE protocol is initiated. The Warden will immediately ensure an investigation is referred to the Floyd County Police Department Criminal Investigation Division.

Floyd County 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. Floyd County Corrections publishes such policy on its website. Floyd County Corrections documents all such referrals. Whenever an allegation is made, the Warden will notify the Floyd County Police Department. This notification will be made in writing and the notification will become part of the PREA investigation. This information is published on the Website.

§115.31	Employee training
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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

Based on review of FCC 208.06 I. C. 1-2; Sexual Assault/Sexual Misconduct Acknowledgement Statement; 1st Responder Card; Pocket Guide PREA Booklet; In Service Lesson Plan and interview with random staff I find they exceed this standard.

Floyd County Corrections trains all employees who have contact with offenders 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) Offenders' right to be free from sexual abuse and sexual harassment;
- (4) The right of offenders and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse;
- (8) How to avoid inappropriate relationships with offenders;
- (9) How to communicate effectively and professionally with offenders, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming offenders; and

(10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. All staff has received PREA training during in service training based on review of training records and random staff interviews.

The training is tailored to the gender of the offenders at Floyd County Corrections. The employees receive additional training if the employee is reassigned from a facility that houses only male offenders to a facility that houses only female offenders, or vice versa. Staff receives training based on the population of Floyd County Corrections they are assigned to. New employees receive training during Orientation.

Floyd County Corrections documents, through employee signature, those employees understand the training they have received.

Based on 1st Responder Card and Pocket Guide all staff have been issued and carry I find they exceed in this standard. There is no doubt as a first responder staff would know what to do.

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

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. C.3; Power Point; Video; Lesson plan and interview with volunteer and contractors I find they meet this standard.

Floyd County Corrections ensures all volunteers and contractors who have contact with offenders have been trained on their responsibilities under Floyd County Correction's sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Medical staff are contracted through Correct Health Care.

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

Floyd County Corrections has documentation confirming that volunteers and contractors understand the training they have received. All volunteers sign a Volunteer/Contractor Acknowledgment Statement. Volunteers and contractors interviewed confirmed they had received this training.

§115.33	Offender education
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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

Based on review of FCC 208.06 I.C.4; PREA Orientation for New Intake; Orientation Sign In; PREA Video "What you need to know"; PREA Intake Acknowledgment; PREA Video Sign In; Zero Tolerance Poster and interview with random offenders and intake staff I find they exceed this standard.

During the intake process, offenders receive information explaining Floyd County Correction's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. During the intake process all offenders receive the PREA pamphlet and watch the video.

Within 48 hours of intake, Floyd County Corrections provides a comprehensive education to offenders 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.

Floyd County Corrections provides offender education in formats accessible to all offenders, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to offenders who have limited reading skills. There is documentation of offender participation in these education sessions. The PREA Pamphlet is in both English/Spanish; Floyd County Corrections has a contract with the Language Line to provide translation for other languages

Based on information being played on the kiosk each time an offender goes to order something from canteen and also the phone system prompts them how to report an incident as soon as they pick up the phone as was confirmed during offender interviews, because they complained about PREA being told all the time I find they exceed this standard..

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

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I.C.5; GNSA Sexual Assault Investigations Training certificates; Investigators Post Training Records; NIC Certificate PREA Investigating Sexual Abuse in a Confinement Setting and interview with investigative staff I find they meet this standard.

In addition to the general training provided to all employees Floyd County 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. Floyd County Corrections maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Floyd County Corrections 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. At the conclusion of the class members are given a written exam to ensure their understanding of the class instruction and content delivered. The in-house investigator has prior investigation experience with the Sheriff Office.

All substantiated allegations of sexual misconduct are reported to the Floyd County Police Department Criminal Investigations Division.

§115.35	Specialized training: Medical and mental health care
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. C. 6 ; NIC Specialized Training PREA Medical Health Care for Sexual Assault Victims in a Confinement Setting; NIC Specialized Training PREA Behavioral Health Care for Sexual Assault Victims in a Confinement Setting and interviews with medical and mental health staff I find they meet this standard.

Floyd County Corrections ensures that all 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. Floyd County Corrections medical personnel are required to attend a specialized PREA training class using the NIC Specialized Training PREA Behavioral Health Care for Sexual Assault Victims in a Confinement Setting and 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.

Floyd County Corrections maintains documentation that medical practitioners have received the training.

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

If an offender required mental health treatment as a result of a PREA incident they would be either transported to Hays State Prison or they could be seen by the mental health staff from Correct Health that are at the Floyd County Sheriff Office Jail.

§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 FCC 208.06 I. D. 1-13; 30 day follow up; Offender PREA Classification Detail; PREA Sexual Victim/Sexual Aggressor Classification Screening and interview with random offenders and intake staff responsible for screening I find they exceed this standard.

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

Intake screenings take place immediately upon arrival at Floyd County Corrections.

Floyd County Corrections uses an objective screening instrument.

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

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

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

Within 30 days from the offender's arrival at Floyd County Corrections, Floyd County Corrections reassesses the offender's risk of victimization or abusiveness based upon any additional, relevant information received by Floyd County Corrections since the intake screening. Any offender who has been identified as needing further evaluation due to additional information received will be reassessed when warranted.

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

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

Floyd County Corrections implements appropriate controls on the dissemination within Floyd County Corrections of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the offender's detriment by staff or other offenders. Only limited staff has access to the risk screening form only the Counselors, Warden, Deputy Warden and PREA Compliance Manager.

Based on screening being done immediately upon arrival I find they exceed in this standard.

§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 FCC 208.06 I. D. (8-13) and interview with PREA compliance manager and staff responsible for risk screening I find they meet this standard.

Floyd County Corrections uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those offenders at high risk of being sexually victimized from those at high risk of being sexually abusive. All information from the risk screening is used to determine housing, bed assignments, work, education and programming.

Floyd County Corrections makes individualized determinations about how to ensure the safety of each offender.

Floyd County Corrections has not had any transgender/intersex offenders however there are policies in place that address the following:

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

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

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

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

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

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

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. D. 13 and interview with warden I find they meet this standard.

No offenders have been placed in involuntary segregation housing.

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

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

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

§115.51	Offender reporting
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. E. 1; Offender Handbook; PREA Pamphlet; FCC Brochure; PREA intake Acknowledgement; Staff Guide on the Prevention & Reporting of Sexual Misconduct with Offenders; PREA Investigation #191556 and interviews with random staff and offenders I find they meet this standard.

Floyd County Corrections provides multiple internal ways for offenders to privately report sexual abuse and sexual harassment, retaliation by other offenders or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. The offenders may make a report of sexual abuse, sexual harassment, or retaliation in writing, verbally, by utilizing the PREA hotline, and by phone or mail to the State Board of Pardons and Paroles Office of Victim Services. Offenders are encouraged to report allegations immediately and directly to staff at all levels. All reports are promptly documented and reported to the proper authority.

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

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

Floyd County Corrections provides a method for staff to privately report sexual abuse and sexual harassment of offenders.

§115.52 Exhaustion of administrative remedies

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

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

I find Floyd County Corrections is exempt from this standard In the event an offender used the grievance form to report a PREA related incident it would not follow the grievance process it would be handled as a PREA report and acted upon immediately.

§115.53 Offender access to outside confidential support services

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

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

Based on FCC 208.06 I. E. 3; PREA Intake Acknowledgement; Offender Handbook and interview with random offenders and I find they meet this standard.

Floyd County Corrections provides offenders with access to outside victim advocates for emotional support services related to sexual abuse by giving offenders mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations. Floyd County Corrections enables reasonable communication between offenders and these organizations and agencies, in as confidential a manner as possible. Floyd County Corrections offenders will be notified of the Sexual Assault Center of Northwest Georgia during Orientation. The staff provides the contact information for the rape crisis and victim advocacy service agency located in the community. This information is also available to them upon request. An offender may make a verbal or written request to staff to contact a victim service advocate or agency at any time. All reasonable measures will be taken to allow for as much privacy as possible.

Floyd County Corrections informs offenders, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. If offenders of Floyd County Corrections request to contact a the Sexual Assault Center of Northwest Georgia staff will make every effort to offer the resident reasonable privacy while maintaining visual security if located in

restricted or sensitive areas within Floyd County Corrections. Offenders will typically utilize the phone in their counselor's office. The counselor will ensure privacy while the resident is contacting the rape crisis counseling provider.

Floyd County Corrections maintains a memorandum of understanding with Sexual Assault Center of Northwest Georgia.

§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

Floyd County 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 an offender. Visitors can go to www.PREA.reports@gdc.ga.gov

§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)

Based on review of FCC 208.06 I. F. 1 (a-k) and interviews with random staff; warden and medical staff I find they meet this standard.

Floyd County 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 Floyd County Corrections; retaliation against offenders or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All personnel at Floyd County Corrections 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.

Floyd County Correction'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 a state offender considered a vulnerable adult under O.C.G.A. 30-5-4 then the GDC Director of Investigations, or designee will make notification to the appropriate outside law enforcement agency. If the alleged victim is a county offender considered a vulnerable adult under O.C.G.A. 30-5-4 then the warden or designee will make notification to the appropriate law enforcement agency.

Floyd County Corrections reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Floyd County Correction's designated investigators. All allegations of sexual abuse and sexual harassment, including third party and anonymous reports, will be reported to the facility investigator and/or Floyd County Police Department Special Investigations Unit. The Warden will be responsible for ensuring these notifications are made as soon as possible.

§115.62 Agency protection duties

Exceeds Standard (substantially exceeds requirement of standard)

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 FCC 208.06 I. F. 2 and interviews with random staff, and warden I find they met this standard.

Immediate action is taken to protect offenders when Floyd County Corrections learns that an offender is subject to a substantial risk of imminent sexual abuse. If an offender at Floyd County Corrections is determined to be in imminent danger of sexual abuse, the Warden will be notified immediately and the offender 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 FCC 208.06 I. F. 3 and report made to Washington State Prison and interview with Warden I find they meet this standard.

Upon receiving an allegation that an offender was sexually abused while confined at another facility, the head of Floyd County Corrections that received the allegation notifies the head of Floyd County Corrections or appropriate office of Floyd County 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 offender of Floyd County Corrections is sexually abused while confined at another facility the PREA Compliance will immediately upon notification notify the head of that facility.

§115.64 Staff first responder duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on FCC 208.06 I. F. 4; Sexual Abuse Response Checklist; 1st Responder Card and interview with security staff who are first responders and random staff I find they exceed this standard.

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

All staff have been issued a 1st Responder Card and wear them as part of their uniform. They also are given the Pocket Guide book. Based on all staff being issued the 1st responder card and I confirmed this during the interviews I find they exceed this standard.

§115.65 Coordinated response

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 FCC 208.06 I. F. 5; Sexual Abuse Response checklist; PREA Local Procedure directive and interview with warden I find they meet this standard.

Floyd County Corrections 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. Floyd County Corrections as a written Local Procedure Directive that identifies the roles of each individual involved in the PREA investigations.

§115.66	Preservation of ability to protect offenders 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)

X Not applicable standard.

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

Based on review of interview with Warden I find this facility is not applicable to Floyd County. Floyd County does not have Collective Bargaining.

§115.67	Agency protection against retaliation
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. F. 6; 90 Day Offender Sexual Abuse Review Checklist; 90 Day Staff Sexual Abuse Review Checklist interview with Warden, warden, designated staff member with monitoring retaliation; offenders in segregation for risk of sexual victimization.

Floyd County Corrections has a policy to protect all offenders and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other offenders or staff, and designate which staff members or departments are charged with monitoring retaliation. Anyone who retaliates against a staff member or an offender

who has reported in good faith an allegation of sexual abuse or sexual harassment in good faith shall be subject to disciplinary action.

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

For at least 90 days following a report of sexual abuse, Floyd County Corrections monitors the conduct and treatment of offenders or staff who reported the sexual abuse and of offenders who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by offenders or staff, and act promptly to remedy any such retaliation. There is periodic status checks performed. Items Floyd County Corrections should monitor include any offender disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Floyd County Corrections continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need. The appointing authority's designee for monitoring retaliation shall, for at least 90 days following a report of abuse, monitor the conduct and treatment of offenders or staff who reported the sexual abuse to see if there are any changes that may suggest possible retaliation, and will act promptly to remedy any such retaliation. This monitoring will include review of any offender disciplinary reports, housing or program changes, or negative performance reviews or reassignments of staff. Such monitoring shall 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, Floyd County Corrections takes appropriate measures to protect that individual against retaliation. If any other individuals/offenders, who are cooperating with the investigation, feel a need for retaliation monitoring, the appointed staff for the victim will also serve in this capacity for these identified individuals.

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

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. D. 13 and interview with warden I find they meet this standard.

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

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 FCC 208.06 i. G. (1-13); GNEA Sexual Assault Investigators training; Investigators Post Training records; NIC PREA Investigating Sexual Abuse in a Confinement Setting and interview with investigative staff I find they meet this standard.

When Floyd County 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 Floyd County Corrections Sexual Abuse Response Team (SART). The in house investigator is actually an investigator that use to work the Floyd County sheriff's department who has experience in conduct investigations. Substantiated SART investigations will immediately be referred to the Floyd County Police Department Criminal Investigations Division and unsubstantiated SART investigations shall be referred to Professional Standards an administrative review.

Where sexual abuse is alleged, Floyd County 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. Floyd County Corrections follows the procedures set forth in policy number 208.06. Floyd County Corrections will follow 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, Floyd County Corrections conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. Floyd County Corrections complies with this standard by following policies and procedures as outlined in FCC 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 offender or staff. No agency requires an offender who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a

condition for proceeding with the investigation of such an allegation. Floyd County Corrections complies with this standard by following policies and procedures as outlined in the FCC 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 five years.

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 to the Sheriff Office for prosecution.

Floyd County Corrections retains all written reports for as long as the alleged abuser is incarcerated or employed by Floyd County Corrections, plus five years. Floyd County Corrections complies with this standard by following policies and procedures as outlined in FCC 208.06 in regard to PREA Investigations concerning criminal prosecutions.

The departure of the alleged abuser or victim from the employment or control of Floyd County Corrections or agency does not provide a basis for terminating an investigation. Floyd County Corrections complies with this standard by following policies and procedures as outlined in FCC 208.06 in regard to PREA Investigations concerning criminal prosecutions.

§115.72	Evidentiary standard for administrative 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 FCC 208.06 I. G. 14 and interview with investigative staff I find they meet this standard.

Floyd County 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 offenders
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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 FCC 208.06 I. G.15; Sexual Abuse Allegation Notification Letter; PREA Log and Investigation file as well as interview with warden and investigative staff I find they meet this standard.

Following an investigation into an offender's allegation that they suffered sexual abuse in an agency facility, Floyd County Corrections informs the offender as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. Floyd County Corrections complies with this standard by following FCC 208.06, which states, "Floyd County Corrections shall inform the offender as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This will be completed by a member of the local SART unless the appointing authority delegates to another designee under certain circumstances. Such notifications or attempted notifications shall be documented. Following an offender's allegation that a staff member has committed sexual abuse against the offender, and upon completion of the Internal Investigation, an assessment of the appropriateness of notification will be made by the Appointing Authority in consultation with Departments Legal Office. If determined that notification is appropriate, it will be made in accordance with 28 CFR § 115.73."

If Floyd County Corrections did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the offender. Floyd County Corrections will obtain a copy of the investigation document and make proper notification to the offender as defined by policy.

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

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

on a charge related to sexual abuse within Floyd County Corrections. Floyd County Corrections adheres to the policy defined above as provided for in FCC 208.06.

All such notifications or attempted notifications are documented on the Sexual Abuse Allegation Notification Letter.

An agency's obligation to report under this standard is terminated if the offender is released from Floyd County Correction's custody. Floyd County Corrections adheres to this standard by following FCC 208.06, "Floyd County Corrections shall inform the offender as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. This will be completed by a member of the local SART unless the appointing authority delegates to another designee under certain circumstances. Such notifications or attempted notifications shall be documented. A facility's obligation to report under this standard shall terminate if the offender is released from Floyd County Correction's custody."

§115.76	Disciplinary sanctions for staff
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. H. 1 I find they meet this Standard.

No staff has been disciplined for a PREA related incident.

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

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

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. 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 Floyd County Police Department Special Investigation Division. Contractors and Volunteers who engage in sexual abuse will be prohibited from contact with offenders and reported to the appropriate law enforcement agencies.

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

§115.77	Corrective action for contractors and volunteers
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. H. 3 and interview with warden I find they meet this standard.

No Contractor/Volunteer has been disciplined for a PREA related incident.

Any contractor or volunteer who engages in sexual abuse is prohibited from contact with offenders and are reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Floyd County Correction's staff will immediately remove any contractor or volunteer from Floyd County Corrections 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.

Floyd County Corrections takes appropriate remedial measures, and considers whether to prohibit further contact with offenders, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. All Floyd County Correction's volunteers and contractors that do not adhere to the PREA standards set forth in FCC 208.06 are subject to the disciplinary standards as defined by that same policy. Remedial measures may include prohibiting contact with residents and reporting the incident to the appropriate law enforcement agency.

§115.78	Disciplinary sanctions for offenders
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. H. 3; Offender Handbook and interview with medical/mental health staff I find they meet this standard.

No Offenders have been disciplined for a PREA related incident.

Offenders are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the offender engaged in offender-on-offender sexual abuse or following a criminal finding of guilt for offender-on-offender sexual abuse. Floyd County Corrections will subject offenders to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the offender engaged in offender-on-offender sexual abuse or a criminal finding of guilt for offender-on-offender sexual abuse.

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

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

Offenders requiring Mental Health Services beyond what the Sexual Assault Center of Northwest Georgia the offender would be transferred to Hays State Prison which is the catchment facility.

Floyd County Corrections disciplines an offender for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

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

Floyd County Corrections prohibits all sexual activity between offenders and may discipline offenders for such activity.

§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 review of FCC 208.06 I. I; Procedure for SANE Nurse; Nursing Assessment form for Alleged Sexual Assault; MH/MR Assessment; NIC certificate PREA Behavioral Health Care for

Sexual Assault Victims in a Confinement Setting and interview with staff responsible for risk screening and medical/mental health staff I find they meet this standard.

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

If the screening indicates that an offender has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the offender is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. This will be accomplished by using the mental health staff from Correct Health Care at the Floyd County Sheriff Office Jail.

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

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

§115.82	Access to emergency medical and mental health 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 FCC 208.06 I. I; MOU with Sexual Assault Center of Northwest Georgia; SANE Nurse Evaluation and interview with medical and mental health staff I find they meet this standard.

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

If no qualified medical 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. Staff at the Floyd County Prison can contact medical staff at Floyd County Sheriff Office Jail to respond to the facility.

Offender victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in

accordance with professionally accepted standards of care, where medically appropriate. All doctors' orders received from the hospital are carried out at Floyd County Corrections.

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

§115.83	Ongoing medical and mental health care for sexual abuse victims
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 I. I and interview with medical/mental health staff I find they meet this standard.

Floyd County Corrections offers medical evaluation and, as appropriate, treatment to all offenders who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

In providing ongoing medical treatment services, Floyd County Corrections will utilize the medical staff at the facility. In providing ongoing mental health services either the Sexual Assault Center of Northwest Georgia will provide these services or the offender is transferred to Hays State Prison. These services will be provided at no cost to the offender in the case of sexual abuse victims or abusers.

The evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. In providing follow-up services, Floyd County Corrections medical, medical and mental health staff utilize treatment plans, referrals and, if necessary, placement in other facilities.

Floyd County Corrections provides such victims with medical and mental health services consistent with the community level of care.

Offender victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. All Floyd County Correction's offenders who are victims of sexual assault are treated by the Sexual Assault Nurse Examiner (SANE) from Sexual Assault Center of Northwest Georgia. Depending on the circumstances of the abuse, testing for sexually transmitted infections will be conducted at Floyd County Corrections.

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. Floyd County Corrections does not charge residents for PREA related treatments or services.

Floyd County Corrections shall attempt to conduct a mental health evaluation of all known offender-on-offender abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners. All Floyd County Correction's offender's that have been identified as having PREA concerns are interviewed by the local PREA Coordinator as part of the intake process. Any offenders who are known to be offender-on-offender abusers will be referred for mental health treatment immediately. Treatment will be provided, at no cost to the offender, as long as the mental health professionals deem it necessary. Floyd County Corrections Prison would not be sent this type of offender from the state however if they received one mental health services could be provided through the Correct Health Care staff at the Floyd County Sheriff Office Jail or be transferred to Hays State Prison.

§115.86 Sexual abuse incident reviews

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 FCC 208.06 I. J.; Sexual Abuse Incident Review checklist and interview with warden, PREA compliance manager and incident review team I find they meet this standard.

Floyd County Corrections 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 Floyd County Corrections; and they examine the area in Floyd County Corrections 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)

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 FCC 208.06 I. J. and FCC PREA Log I find they meet this standard.

Floyd County 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. No such request has been made.

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

Floyd County Corrections obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its offenders.

Upon request, Floyd County 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
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

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

Floyd County 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 Floyd County 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 Floyd County Correction's progress in addressing sexual abuse.

Floyd County Correction's report is approved by the Warden and made readily available to the public through its website www.romefloyd.com/departments;floyd-county-prison and www.romefloyd.com/departments;floyd-wrc-home.

§115.89 Data storage, publication and destruction

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of FCC 208.06 VI. I find they meet this standard.

Floyd County Corrections makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website www.romefloyd.com/departments;floyd-county-prison and www.romefloyd.com/departments;floyd-wrc-home.

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 Floyd County Corrections under review.

Katherine Brown

July 12, 2016

Auditor Signature

Date