

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: April 21, 2016

Date report submitted: April 23, 2016

Facility Information

Name of facility: Sumter County Correctional Institute

Physical address: 346 McMath Mill Rd. Americus, GA 31709

Facility mailing address: P.O. Box 484 Americus GA. 31709

Telephone number: 229-928-4582

Sumter County Correctional Institute 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: Jimmie Colson, Warden	Title:	Warden
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Number of staff assigned to Sumter County Correctional Institute in the last 12 months: 41 full time; 7 part time

Designed facility capacity: 350

Current population of facility: 349

Facility security levels/offender custody levels: Minimum, Medium

Age range of the population: 18-64

Name of PREA Compliance Manager: Tracey Hobbs	Title:	Deputy Warden Care & Treatment
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Email address: THobbs@sumtercountyga.us	Telephone #	229-928-4582
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Agency Information

Name of agency: Sumter County

Governing authority or parent agency: Board of County Commissioners

Physical address: 346 McMath Mill Road, Americus GA.

Mailing address: N/A

Telephone number: 229-928-4582

Agency Chief Executive Officer

Name: Randy Howard	Title:	Board of County Commissioners
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Email address: RHoward@sumtercountyga.us	Telephone number:	229-928-4582
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AUDIT FINDINGS

NARRATIVE:

The audit of Sumter County Correctional Institution was conducted on April 22, 2016 by Katherine Brown, Certified PREA auditor. The areas toured were a total of 4 dorms plus the kitchen, laundry, programs area, and work areas. There are 4 general population dorms and one administrative detention/segregation unit that can house 14 offenders.

In preparation of the audit I received the requested documentation on March 25 and began the review of the documentation. I asked for additional documentation and received it on April 15. At that point I was able to complete the documentation review portion of the audit process and was ready for the on-site.

An entrance meeting was held with facility staff. The following people were in attendance: Jimmie Colson, Warden; Leah Watson, Human Resource Director; James Murphy, Deputy Warden of Security/SART Member; Tracey Hobbs, Deputy Warden of Care and Treatment/PREA Compliance Manager; Willie Reliford, Captain of Security/SART Leader; Valerie S. Williams, Counselor; Alexias Major, Medical Director and Anthony Smith Compliance Coordinator.

Following the entrance meeting I toured the Sumter County Correctional Institution from 8:15-8:45. On the tour with me was, Jimmie Colson, Warden; James Murphy, Deputy Warden of Security/SART Member; Tracey Hobbs, Deputy Warden of Care and Treatment/PREA Compliance Manager; Willie Reliford, Captain of Security/SART Leader.

During the tour all facility notices were posted in all offender living areas except one where the offenders had removed them, this was replaced immediately; program areas and public areas announcing the audit. As I entered all offender living area cross gender announcements were made, this practice was also confirmed during random staff and inmate interviews.

I asked for an alpha listing of all offenders housed at Sumter County Correctional Institute and randomly selected 11 offenders to interview. I also asked for any offender who was limited English speaking or had hearing/vision impairment to be interviewed, there were none. I asked for any offender who was transgender/intersex, which there was none. I selected all security staff on duty which was 7 to interview and I conducted 10 specialized interviews.

There was one sexual harassment allegation case, within the past year that was unfounded. The reporting of this was done using the grievance system.

DESCRIPTION OF FACILITY CHARACTERISTICS:

Sumter County Correctional Institute is a medium security, 350 bed male facility prison. The physical layout of Sumter County Correctional Institute consists of seven dorms that house up to 44 offenders, one dorm that houses up to 22 offenders and one dorm that houses up to 20 offenders and 6 single occupancy Isolation/Segregation cells. The prison has a divided recreation yard behind the building. The administration area contains 10 offices, a conference room, a file room, and two restrooms. Any physical layout changes to Sumter County

Correctional Institute are approved by Warden Colson, and ensure the changes do not interfere with PREA standards.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: 3

Number of standards met: 37

Number of standards not met:

Number of standards not applicable: 3

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of Sumter County Correctional Institute LOP 208.06 I.A Zero Tolerance Policy; facility Organizational Chart and based on interviews with PREA compliance manager I find they meet this standard.

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

Sumter County Correctional Institute has designated a PREA compliance manager with sufficient time and authority to coordinate Sumter County Correctional Institute's efforts to comply with the PREA standard

§115.12 Contracting with other agencies for confinement of offenders

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Not applicable

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

Based on interview with agency's contract compliance manager SCCI does not contract with a private agency for the confinement of their offenders.

§115.13 Supervision and monitoring

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

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

Based on review of SCCI LOP 208.06 VII.A; GDC SOP 208.06 I; GDC SOP II07-0012; staffing plan and shift briefing report and based on interview with Warden and PREA Compliance Manager I find they meet this standard.

Sumter County Correctional Institute 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. Sumter County Correctional Institute has 41 full-time staff positions and 7 part-time positions, totaling 48. There are 40 security, 4 care and treatment, and 4 administrative positions. They currently have 5 vacant security positions and the vacancy rate is 2.4%. These vacancies are being advertised and are being interviewed for hire. These vacancies have not interfered with their ability to adequately cover all required post. Sumter County Correctional Institute complies with the standard by having staffing plans and shift rosters that were reviewed as part of this audit.

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

Sumter County Correctional Institute 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.

Sumter County Correctional Facility has policies and practices requiring intermediate level or higher level supervisors to conduct unannounced rounds, these rounds are documented in the Administrative Duty Officer Log Book. This was confirmed during interviews with supervisors; random staff and offender interviews.

§115.14 Youthful offenders

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

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

Sumter County correctional Institute 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

Based on review of SCCI LOP 208.06 VII. F; GDC SOP IIB01-0013; log books showing unannounced rounds and interviews with random staff and offenders I find they meet this standard.

Sumter County Correctional Institute 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 Sumter County Correctional Institute documents all cross-gender strip searches and cross-gender visual body cavity searches. Sumter County Correctional Institute follows Georgia Department of Corrections SOP in regard to Cross-Gender strip searches and visual body cavity searches. Only same-sex strip searches and visual body cavity searches are utilized. During random staff and offender interviews it was confirmed staff do not perform cross gender strip searches.

Sumter County Correctional Institute 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.

Sumter County Correctional Institute 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.

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

§115.16 Offenders with disabilities and limited English speaking

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of SCCI LOP 208.06 VII. G; PREA Pamphlet English/Spanish and interviews with random offender and staff I find they meet this standard.

Sumter County Correctional Institute 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 Sumter County Correctional Institute'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. Sumter County Correctional Institute is a work camp and accommodates offenders with disabilities when feasible however these types of offenders would not normally be housed at Sumter County Correctional Institute.

Sumter County Correctional Institute 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. Sumter County Correctional Institute 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
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of GDC SOP IV. 03-0012; SOP IV.A.9 (a-d) and interview with Human Resource Director and review of personnel files I find they exceed this standard due to an annual criminal history is performed on all staff/volunteers and contractors.

Sumter County Correctional Institute 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.

Sumter County Correctional Institute 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.

Sumter County Correctional Institute performs a criminal background records check before enlisting the services of any contractor who may have contact with offenders performs a records check annually of current employees and contractors who may have contact with offenders. Human Resource performs the original background screening as part of the hiring process, the annual background checks are performed by the Warden's secretary. Review of criminal histories confirmed the background checks are being done.

Sumter County Correctional Institute utilizes GDC SOP 208.06 to comply with this standard. As part of the interview process all potential employees or service providers are questioned in regard to prior histories that may involve PREA related concerns/issues prior to any hire/approval to provide services. All those persons' selected for employment or to provide services to the Sumter County Correctional Institute must consent in writing (Form SOP 208.06 ATT I), to a Criminal background check being conducted prior to official hire. If it is found that a potential employee or contractor has been found to be in violation of standards set forth in PREA the individual is not eligible for hire at the Sumter County Correctional Institute. If the PREA violations occur during time of employment at the Sumter County Correctional Institute the employee will be subject to termination and prosecution and all data will be made available for review by other potential employers.

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

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

Does Not Meet Standard (requires corrective action)

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

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

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Sumter County Correctional Institute considers how such technology may enhance Sumter County Correctional Institute's ability to protect offenders from sexual abuse. There have been no substantial or modifications to existing facilities. Currently at Sumter County Correctional Institute has a total 37 cameras that are around the inner and outer areas of the prison. These cameras are monitored by staff throughout the following areas: the main control room 24 hours a day, the Warden's office, Deputy Warden's, and Captain's office during normal work hours. The cameras are used 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)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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

Based on review of GDC SOP IK01-0006; SOP 208.06 IV.B.1(a-f); GDC SOP VH07-0001; NIC certificate PREA Behavioral Health Care for Sexual Assault in a Confinement Setting and based on interview with SANE/SAFE staff and PREA compliance manager I find they meet this standard.

To the extent Sumter County Correctional Institute is responsible for investigating allegations of sexual abuse; Sumter County Correctional Institute follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The Sumter County Correctional Institute follows a uniform evidence protocol in accordance with its policies as defined in GDC SOP IKOI -0006.

Sumter County Correctional Institute offers all victims of sexual abuse access to forensic medical examinations, at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations are be performed by a Sexual Assault Nurse Examiners (SANEs) from Lily Pad.

Sumter County Correctional Institute makes available to the victim a victim advocate from Lily Pad, Inc.

As requested by the victim they can choose a trained qualified agency staff member or a victim advocate from Lily Pad, to support the victim through the forensic medical examination process and investigatory interviews and are provide emotional support, crisis intervention, information, and referrals.

To the extent Sumter County Correctional Institute itself is not responsible for investigating allegations of sexual abuse, Sumter County Correctional Institute requests that the investigating agency follow the requirements listed above. Sumter County Correctional Institute utilizes investigators from the Georgia Department of Corrections Internal Investigations Unit or from Sumter Sheriff's Office who have been trained in this type of investigation.

§115.22 Policies to ensure referrals of allegations for investigations

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

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

Based on review of GDC SOP 208.06 IV. G. and interview with investigator I find they meet this standard.

Sumter County Correctional Institute ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. Sumter County Correctional Institute follows the standards set forth by the Georgia Department of Corrections in policy number 208.06. The Department's response to sexual assault follows "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents." When an incident is reported, a physical examination of the alleged victim is conducted. The Warden will immediately ensure an investigation is referred to the GDC Internal Investigations Unit. Referrals to outside law enforcement agencies will be made with the cooperation of the Internal Investigations Unit. Once an allegation is substantiated, Sumter County Correctional Institute will notify the Georgia Department of Corrections Internal Investigations. This notification will be made verbally and in writing and the notification will become part of the PREA investigation.

If a separate entity is responsible for conducting criminal investigations, such publication describes the responsibilities of both Sumter County Correctional Institute and the investigating entity. Once an allegation is substantiated, Sumter County Correctional Institute will notify the Sumter County Sheriff's Department, Georgia Department of Corrections Internal Investigations and the statewide PREA Coordinator. This notification will be made verbally and in writing and the notification will become part of the PREA investigation. Sumter County Correctional Institute complies with this standard by implementing GDC SOP 208.06 and IK01-0005 (103.10) which governs the conduct of PREA investigations.

§115.31 Employee training

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

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

Based on review of SCCI LOP 208.06 VII. J. 1; GDC SOP 208.06 IV. C; Employee Training Record Signature; SCCI Training Acknowledgement Letter; Training rosters; Power Point; PREA Pamphlet; Staff Guide on the Prevention & Reporting of Sexual Misconduct with Offenders; Sexual Assault/Sexual Misconduct Acknowledgement Statement and Staff PREA pamphlet: Your Role Responding to Sexual Abuse and interview with random staff I find they meet this standard.

Sumter County Correctional Institute 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. All staff document their training by signing, "Sexual Assault/Sexual Misconduct Acknowledgement Statement." This form is retained in the employee's personnel record. This procedure is also used for all employees, contractors, volunteers, and interns.

The training is tailored to the gender of the offenders at Sumter County Correctional Institute. 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. Sumter County Correctional Institute complies with this policy in providing yearly in-service training in PREA to all staff, security and non-security. Staff members who transfer to Sumter County Correctional Institute from a female facility will receive training from the management team to orient them to their new job at this male facility.

All staff/contractors/volunteers sign an annual acknowledgement (GDC SOP 208.06 Attachment 1, "Sexual Assault/Sexual Misconduct Acknowledgement Statement") indicating they have been trained and that they understand their PREA training. This statement is maintained locally in the Deputy Warden of Security's office.

§115.32 Volunteer and contractors training

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

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

Reviewed SCCI LOP 208.06 VII. J. 2; In Service Training Roster; PowerPoint; Sexual Assault/Sexual Misconduct Acknowledgement Statement Unsupervised Contractor/Volunteer; Assault/Sexual Misconduct Acknowledgement Statement supervised Contractor/Volunteer and interview with volunteer and contractors I find they meet this standard.

Sumter County Correctional Institute ensures all volunteers and contractors who have contact with offenders have been trained on their responsibilities under Sumter County Correctional Institute'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 offenders, but all volunteers and contractors who have contact with offenders are notified of Sumter County Correctional Institute's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Sumter County Correctional Institute has documentation confirming that volunteers and contractors understand the training they have received. All volunteers sign an Assault/Sexual Misconduct Acknowledgement Statement Unsupervised Contractor/Volunteer. Volunteers and contractors interviewed confirmed they had received this training.

§115.33 Offender education

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Reviewed SCCI LOP 208.06 VII J. 3; PREA pamphlet; PREA Video English/Spanish; Handbook; Sexual Abuse Review Checklist; Offender Awareness & Education Brochure; Sexual Victimization/Aggressor Classification Screening; Offender Lesson Plan and interview with random offenders and intake staff I find they exceed in this standard.

During the intake process, offenders receive information explaining Sumter County Correctional Institute's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. When offenders are transferred to the Sumter County Correctional Institute they undergo an orientation process. During orientation offenders are shown a video on the Prison Rape Elimination Act which includes instructions on how to avoid being a victim of sexual assault. The offender handbook contains a section with PREA information. Posters are mounted throughout Sumter County Correctional Institute with instructions on how to report allegations of sexual abuse/misconduct. During orientation, and during any other time, offenders are allowed to ask question about the Prison Rape Elimination Act and PREA issues.

Within 24 hours, Sumter County Correctional Institute provides a comprehensive education to offenders in person and 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.

Sumter County Correctional Institute 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; Sumter County Correctional Institute has a contract with the Language Line to provide translation for other languages as well as sign language for the deaf.

Based on the comprehensive training being conducted with 24 hours and the level of knowledge displayed by the offenders during the interviews I find they exceed in this standard.

§115.34 Specialized training: Investigators

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of SCCI LOP 208.06 VII. J. 4; Georgia Network to End Sexual Assault (GNESA) – Advanced Sexual Assault Investigations Training Program; In Service Training Roster; County PREA Compliance Manager Workshop; SART Training Roster; Power Point lesson Plan; Compliance Manager Training and interview with investigative staff I find they meet this standard.

In addition to the general training provided to all employees Sumter County Correctional Institute 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. Sumter County Correctional Institute maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. All personnel designated Sumter County Correctional Institute who is 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 Medical and MH Standards curriculum. At the conclusion of the class members are given a written exam to ensure their understanding of the class instruction and content delivered, Class attendance is documented locally by the Compliance Manger. All allegations of sexual misconduct are reported to the GDC Internal Investigations Unit, Staff of that unit has received specialized training regarding the techniques for investigating PREA-related issues.

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

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

Does Not Meet Standard (requires corrective action)

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

Based on review of SCCI LOP 208.06 VII. J. 5; GDC SOP VG17-0001 Staff Training; VH04-0001 Licensure & Credential; VH 05-0001 Orientation Training; VH05-0002 Continuing Education for Qualified Health Services Personnel; PREA pamphlet Behavioral Health Care for Sexual Assault Victims in a Confinement Setting; SART training sign in rosters and Medical PREA signed acknowledgement I find they meet this standard.

There is full time medical staff at Sumter County Correctional Institute that is shared with Sumter County Sheriff's Office. The jail and the County Correctional Institute are connected however inmates and offenders never intermingle. Medical staff is provided through contract with Transform Health Care. Mental health services are provided one day a week when the staff psychologist conducts their rounds. Any offender requiring further mental health need would be transferred to Rutledge State Prison.

Sumter County Correctional Institute ensures that all full and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to: detect and assess signs of sexual abuse and sexual harassment; 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. All Sumter County Correctional Institute Medical staff must attend specialized PREA training, using the NIC Specialized Training PREA Medical Standards curriculum. Sumter County Correctional Institute follows medical policies and standards set by the Georgia Department of Corrections.

Sumter County Correctional Institute maintains documentation that medical and mental health practitioners have received the training.

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

§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 SCCI LOP 208.06 VII. K; Case Notes; Victim/Aggressor Classification form; Victim/Aggressor Rating Guide; 90 day offender Sexual Abuse Review Checklist and interview with random offenders and intake staff responsible for screening I find they exceed in 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 Sumter County Correctional Institute.

Sumter County Correctional Institute uses the Victim/Aggressor Classification from which is 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 Sumter County Correctional Institute, in assessing offenders for risk of being sexually abusive. During the diagnostic/intake process, offenders are identified as high-risk sexual assault victims or aggressors. This identification process is documented in the Victim/Aggressor classification section of SCRIBE.

The facility is divided in half so there are Safe houses on one side which houses the potential victims and all aggressors are housed on the other side of the facility.

Within 30 days from the offender's arrival at Sumter County Correctional Institute, Sumter County Correctional Institute reassesses the offender's risk of victimization or abusiveness based upon any additional, relevant information received by Sumter County Correctional Institute 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.

Sumter County Correctional Institute implements appropriate controls on the dissemination within Sumter County Correctional Institute 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 Deputy Warden of Security; Deputy Warden of Care & Treatment; Captain and Counselor.

Based on the 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 review of GDC SOP 208.06 IV. D. 2(a-d); SCCI LOP 208.06; Victim/Aggressor Classification form; Victim/Aggressor Rating Guide; 90 day offender Sexual Abuse Review Checklist; Sexual Victim/Sexual Aggressor Screening form and interview with PREA compliance manager and staff responsible for risk screening I find they meet this standard.

Sumter County Correctional Institute 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. A screening for risk of victimization and abusiveness is conducted and processed through the Victim/Aggressor Classification Instrument. Offenders/Probationers are told during their orientation to the Georgia Department of Corrections, that staff that become aware of a sexual allegation must notify the warden/superintendent or his/her designee. Orientation includes this "Must Tell" policy.

Sumter County Correctional Institute makes individualized determinations about how to ensure the safety of each offender.

Sumter County Correctional Institute has not had any transgender/intersex offenders; however they have a policy in place that addresses 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, Sumter County Correctional Institute 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.

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

§115.43 Protective custody

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

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

Based on review of SCCI LOP 208.06 VII. K. 4; 90 day offender Sexual Abuse Review Checklist 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 Sumter County Correctional Institute restricts access to programs, privileges, education, or work opportunities, Sumter County Correctional Institute documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.

Sumter County Correctional Institute 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 Sumter County Correctional Institute clearly documents the basis for Sumter County Correctional Institute’s concern for the offender’s safety; and the reason why no alternative means of separation can be arranged. Every 30 days a review is performed to determine whether there is a continuing need for separation from the general population.

§115.51 Offender reporting

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

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

Based on review of SCCI LOP VII. L.; PREA pamphlet; Offender Handbook; Staff Guide on the Prevention & Reporting of Sexual Misconduct with Offenders and interviews with random staff and offenders I find they meet this standard.

Sumter County Correctional Institute 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. Sumter County Correctional Institute offenders may make a report of sexual abuse, sexual harassment, or retaliation in writing, verbally, by utilizing the PREA hotline 1-888-992-7849 or mail to the Department Ombudsman office. 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.

Sumter County Correctional Institute 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 Sumter County Correctional Institute, 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.

Staff accepts reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports. Sumter County Correctional Institute 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. This practice was confirmed during random staff interviews.

Sumter County Correctional Institute provides a method for staff to privately report sexual abuse and sexual harassment of offenders. This practice was confirmed during random staff interviews.

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

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

Based on review of GDC SOP II B.02-0001; SOP II. B 05-0001 and review of one report where the offender used the grievance process to report an alleged sexual harassment against an officer.

Sumter County Correctional Institute does not impose a time limit on when an offender may submit a grievance regarding an allegation of sexual abuse. Sumter County Correctional Institute does not impose time restrictions upon residents in regard to filing grievances alleging sexual abuse prior to or upon completion of a SART investigation.

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

Sumter County Correctional Institute ensures that an offender who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint. All grievances filed at Sumter County Correctional Institute can be submitted to any staff member. In a case where the staff member is the subject of the complaint, any other counselor can be utilized to submit the grievance. The grievances are placed in a locked box that only supervisors have access too.

Sumter County Correctional Institute 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 offenders, staff members, family members, attorneys, and outside advocates, are permitted to assist offenders in filing requests for administrative remedies relating to allegations of sexual abuse, and are also be permitted to file such requests

on behalf of offenders. Sumter County Correctional Institute will accept notification reports of sexual assault/harassment from third parties; however, standard policies and procedures will be used in the process from that point forward.

Sumter County Correctional Institute has established procedures for the filing of an emergency grievance when the offender is subject to a substantial risk of imminent sexual abuse.

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

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

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

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

Does Not Meet Standard (requires corrective action)

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

Based on interview with random offenders and review of MOU with Lily Pad Sane Center I find they meet this standard.

Sumter County Correctional Institute provides offenders with access to outside victim advocates for emotional support services related to sexual abuse by giving offenders mailing addresses and telephone numbers to Lily Pad SANE Center. Sumter County Correctional Institute enables reasonable communication between offenders and these organizations and agencies, in as confidential a manner as possible.

Sumter County Correctional Institute 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.

Sumter County Correctional Institute has memoranda of understanding with Lily Pad SANE Center.

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

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

Does Not Meet Standard (requires corrective action)

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

Based on review of SCCI LOP 208.06 VII. M.

Sumter County Correctional Institute 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. All staff members are trained in in-service training regarding PREA standards and are aware that they are required to accept any and all third party reports made to the Sumter County Correctional Institute on behalf of an offender involving sexual assault/harassment, these reports will be accepted and forwarded as policy and procedures dictate. During orientation, offenders are made aware that they can report any PREA allegation, even third-party allegations, to staff or by utilizing the PREA hotline, PREA hotline posters are on display throughout the facility.

§115.61

Staff and agency reporting duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on review of SCCI LOP 208.06 VII. N; Staff Guide on the Prevention & Reporting of Sexual Misconduct and interviews with random staff; warden and medical staff I find they meet this standard.

Sumter County Correctional Institute 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 Sumter County Correctional Institute; 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 Sumter County Correctional Institute 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. Sumter County Correctional Institute's staff is instructed through PREA training that any information obtained is limited to a need-to-know basis for staff, and only for the purpose of treatment, security, and management decisions, such as housing, work, education and programming assignments. Information is not to be indiscriminately discussed. Supervisors will always remind staff of this issue when staff report PREA-related issues to their supervisor.

If the alleged victim is considered a vulnerable adult under a State or local vulnerable person's statute, Sumter County Correctional Institute reports the allegation to the designated State or local services agency under applicable mandatory reporting laws. This will be done in accordance with GDC SOP 208.06 and in coordination with GDC Internal Investigations. Sumter County Correctional Institute does not currently house Offenders under the age of 18.

Sumter County Correctional Institute reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Sumter County Correctional Institute's designated investigators. In accordance with GDC SOP 208.06, all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, will be reported to the Sumter County Correctional Institute SART. The Warden will notify GDC Statewide PREA Coordinator, and the GDC Internal Investigations Unit. The Warden will be responsible for ensuring these notifications are made as soon as possible.

§115.62	Agency protection duties
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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 SCCI LOP 208.06 VII. O; GDC SOP 208.06 IV. F.2 and interviews with random staff and warden I find they meet this standard.

Immediate action is taken to protect offenders when Sumter County Correctional Institute learns that an offender is subject to a substantial risk of imminent sexual abuse. If an offender at Sumter County Correctional Institute 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
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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 SCCI LOP 208.06 VII. O. and interview with warden I find they meet this standard.

No such reports have been received.

Upon receiving an allegation that an offender was sexually abused while confined at another facility, the head of Sumter County Correctional Institute that received the allegation notifies the head of Sumter County Correctional Institute or appropriate office of Sumter County Correctional Institute 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 Sumter County Correctional Institute offender is sexually abused while confined at another facility the Warden or his designee will immediately

upon notification notify the head of that facility. A full investigation will be coordinated between both facilities by means of the GDC Internal Investigations Unit.

§115.64 Staff first responder duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of SCCI LOP 208.06 VII. H.; GDC SOP 208.06 IV. F. 4; SCCI PREA Reporting Process; Staff First Responder duties; SCCI Coordinated Response and interview with security staff who are first responders and random staff I find they meet this standard.

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

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. This was confirmed during interviews with medical and food service workers.

§115.65 Coordinated response

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of SCCI Coordinated Response and **interview with warden** I find they meet this standard.

Sumter County Correctional Institute 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. Sumter County Correctional Institute as a written Coordinated Response plan that identifies the roles of each individual involved in the PREA investigations.

§115.66

Preservation of ability to protect offenders from contact with abusers

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

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

Based on interview with agency head

Sumter County Correctional Institute does not participate in Collective bargaining.

§115.67

Agency protection against retaliation

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

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

Based on review of SCCI LOP 208.06 VII. P. and interview with Warden, Deputy Warden charged with monitoring retaliation I find they meet this standard.

Sumter County Correctional Institute 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.

Sumter County Correctional Institute 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, Sumter County Correctional Institute 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 Sumter County Correctional Institute should monitor include any offender disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Sumter County Correctional Institute 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, Sumter County Correctional Institute 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)
- 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 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. No offender has been placed in segregation.

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

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

Based on review of SCCI LOP 208.06 VII. O.; GNSEA – Advanced Sexual Assault Investigations; PREA Compliance Training; In Service Training Roster; Power Point; Lesson Plan and interview with investigative staff I find they meet this standard.

When Sumter County Correctional Institute 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 the facility Sexual Abuse Response Team (SART). Substantiated SART investigations will immediately be referred to the Sumter County Sheriff Department's Criminal Investigations Division.

Where sexual abuse is alleged, Sumter County Correctional Institute 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. Sumter County Correctional Institute follows the procedures set forth in policy number 208.06. Sumter County Correctional Institute 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, Sumter County Correctional Institute conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution. The Sumter County Correctional Institute complies with standard by following policies and procedures as outlined in the Georgia Department of Corrections policy number 208.06 in regard to PREA Investigations concerning criminal prosecutions.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as 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. The Sumter County Correctional Institute complies with standard by following policies and procedures as outlined in the Georgia Department of Corrections policy number 208.06 in regard to PREA investigations regardless of the credibility of those individuals involved.

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

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

The departure of the alleged abuser or victim from the employment or control of Sumter County Correctional Institute or agency does not provide a basis for terminating an investigation. Sumter County Correctional Institute complies with this standard by following policies and procedures as outlined in SCCI 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 GDC SOP 208.06 IV. G. and interview with investigative staff I find they meet this standard.

Sumter County Correctional Institute imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Sumter County Correctional Institute complies with standard by following policies and procedures as outlined in the GDC SOP 208.06 in regard to PREA Investigations concerning internal investigations and criminal prosecutions.

§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 SCCI LOP 208.06 VII. R; PREA Notification Letter and interview with warden and investigative staff I find they meet this standard.

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

County Correctional Institute complies with this standard by following Georgia Department of Corrections policy number 208.06, which states, "The facility 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 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, upon completion of the Internal Investigation, an assessment of the appropriateness of notification will be made by the Appointing Authority in consultation with Department Legal Office. If determined that notification is appropriate, it will be made in accordance with 28 CFR § 115.73."

If Sumter County Correctional Institute did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the offender. Sumter County Correctional Institute 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, Sumter County Correctional Institute subsequently informs the offender (unless Sumter County Correctional Institute 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 Sumter County Correctional Institute; Sumter County Correctional Institute learns that the staff member has been indicted on a charge related to sexual abuse within Sumter County Correctional Institute; or Sumter County Correctional Institute learns that the staff member has been convicted on a charge related to sexual abuse within Sumter County Correctional Institute. Sumter County Correctional Institute 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, Sumter County Correctional Institute subsequently informs the alleged victim whenever Sumter County Correctional Institute learns that the alleged abuser has been indicted on a charge related to sexual abuse within Sumter County Correctional Institute; or Sumter County Correctional Institute learns that the alleged abuser has been convicted on a charge related to sexual abuse within Sumter County Correctional Institute.

All such notifications or attempted notifications are documented. Sumter County Correctional Institute adheres to the policy defined above as provided for in Georgia Department of Corrections policy number 208.06. All PREA documentation is restricted to only necessary staff as clearly outlined in GDC policy.

An agency's obligation to report under this standard is terminated if the offender is released from Sumter County Correctional Institute's custody. Sumter County Correctional Institute adheres to this standard by following Georgia Department of Corrections policy number 208.06, "Sumter County Correctional Institute 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.

§115.76 Disciplinary sanctions for staff

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of SCCI LOP 208.06 VII. S and GDC SOP 208.06 IV. H I find they meet this standard.

Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who has engaged in sexual abuse. In accordance with GDC SOP 208.06, staff 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 GDC SOP 208.06, disciplinary sanctions for violations of GDC policy relating to sexual abuse or sexual harassment will be commensurate with the nature of the circumstances of the acts committed, the staff member's disciplinary history, and the sanctions.

All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. All Sumter County Correctional Institute staff, contractors and volunteers that do not adhere to the PREA standards set forth in Georgia Department of Corrections policy number 208.06 will be subject to the disciplinary standards as defined by that same policy. Staff members who are found to have engaged in sexual misconduct/abuse shall be banned from correctional institutions or subject to disciplinary sanctions up to and including termination. Staff may also be referred for criminal prosecution. Contractors and volunteers 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 and Training Council will be notified, when appropriate.

§115.77 Corrective action for contractors and volunteers

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

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

Based on review of SCCI LOP 208.06 VII. T.; Sexual Assault/Sexual Misconduct Acknowledgement Statement and interview with warden I find they meet this standard.

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. Sumter County Correctional Institute’s staff will immediately remove any contractor or volunteer from Sumter County Correctional Institute if they engage in sexual abuse. The contractor/volunteer will be prohibited from contact with offenders and will be reported to the appropriate law enforcement agency. The relevant licensing body will also be notified.

Sumter County Correctional Institute 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 Sumter County Correctional Institute volunteers and contractors that do not adhere to the PREA standards set forth in SCCI LOP 208.06 will be subject to the disciplinary standards as defined by that same policy. Remedial measures may include prohibiting contact with offenders 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)
- 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 SCCI LOP 208.06; GDC SOP 208.06 IV. H. 3; SOP II B02-0001; Offender Disciplinary Codes and interview with medical staff I find they meet this standard.

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. Sumter County Correctional Institute will subject offenders to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the offender engaged in offender-on-offender sexual abuse or a criminal finding of guilt for offender-on-offender sexual abuse. These sanctions will be imposed in accordance with SCCI LOP 208.06 and GDC SOP 208.06.

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

The disciplinary process considers whether an offender's mental disabilities or mental illness contributed to *his* behavior when determining what type of sanction, if any, should be imposed. GDC SOP 209.01 requires staff to consider an offender's mental disability or mental illness during the disciplinary hearing process and when determining appropriate sanctions. GDC SOP VG34-0001 (508.18) also addresses this issue.

Therapy services are limited at Sumter County Correctional Institute. They have one part time counselor that makes rounds once a week. Any offender requiring more extensive therapy would be transferred to Rutledge State Prison.

Sumter County Correctional Institute 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.

Sumter County Correctional Institute prohibits all sexual activity between offenders and may discipline offenders for such activity.

§115.81

Medical and Mental health screening; history of sexual abuse

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 SCCI LOP 208.06 VII. U; SOP VH07-0001; Medical PREA Log; Nursing Assessment Form for Alleged Sexual Assault and interview with staff responsible for risk screening and medical staff I find they meet this standard.

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

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 SCCI LOP 208.06 VII. U; medical PREA Log; Nursing Assessment Form for Alleged Sexual Assault and interview with medical staff I find they meet this standard.

Offender victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Sumter County Correctional Institute established policy requires that victims of sexual abuse be seen by onsite medical staff in a timely manner. If onsite medical staff determines a medical emergency exists, Offenders will be transported to Phoebe Sumter Medical Center by facility transport vehicle or by ambulance, to ensure their prompt treatment. If further treatment is required, the offender will be transported, by ambulance if necessary, to a higher level of care by order of medical and mental health providers.

Sumter County Correctional Institute has 24 hour medical personnel.

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 Sumter County Correctional Institute.

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. Sumter County Correctional Institute does not charge offenders for PREA related treatments or services.

§115.83	Ongoing medical and mental health care for sexual abuse victims
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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 GDC SOP VG20-0001; Program Services/Health Mental Health Services; MH/MR and interview with medical staff I find they meet this standard.

Sumter County Correctional Institute offers medical and mental health 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, Sumter County Correctional Institute will utilize the medical services of Georgia Department of Corrections medical staff. In providing ongoing mental health services 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, Sumter County Correctional Institute medical, medical and mental health staff utilize treatment plans, referrals and, if necessary, placement in other facilities, including facilities outside Sumter County Correctional Institute, upon the victim’s release from custody.

Sumter County Correctional Institute provides such victims with medical and mental health services consistent with the community level of care. Medical and mental health staff will provide services consistent with the community level of care. This is consistent with GDC SOP VH02-0008.

Offender victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate. All Sumter County Correctional Institute’s offenders who are victims of Sexual assault are treated by the Sexual Assault Nurse Examiner (SANE). Depending on the circumstances of the abuse, testing for sexually transmitted infections may be conducted at Sumter County Correctional Institute or at Phoebe Sumter Medical Center at no cost to the resident.

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Sumter County Correctional Institute does not charge residents for PREA related treatments or services.

Sumter County Correctional Institute 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 Sumter County Correctional Institute’s offender’s that have been identified as having PREA concerns are interviewed by the local PREA Coordinator as part of the intake process. Any offenders who are known to be offender-on-offender abusers will be referred for mental health treatment immediately. Treatment will be provided, at no cost to the offender, as long as the mental health professionals deem it necessary.

§115.86	Sexual abuse incident reviews
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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 SCCI LOP 208.06 VIII. V.; GDC SOP 208.06 IV. J.; Monthly PREA Log and **interview** with warden, PREA compliance manager and incident review team I find they meet this standard.

Sumter County Correctional Institute 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 Sumter County Correctional Institute; and they examine the area in Sumter County Correctional Institute 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 SCCI LOP 208.06 VII. W. and GDC SOP 208.06 IV. J. and review of monthly report and annual report I find they meet this standard.

Sumter County Correctional Institute 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. Sumter County Correctional Institute complies with this policy in adhering to Georgia Department of Corrections Policy Number 208.06, Sumter County Correctional Institute submits a report to the department's PREA Coordinator each month using GDC SOP 208.06 1 Attachment 2-PREA Monthly Report Form. This form is submitted by electronic method and is due by the fifth business day of the month following the reporting month. All allegations occurring within the month are included on this report along with the appropriate disposition; Cases that have not been closed by the last day of the month require a notification to the Department's PREA

Coordinator by e-mail advising status of case when it is closed. It is not necessary to submit a blank form when no allegations are reported within the month; the facility may submit an e-mail stating there were no PREA allegations for the reporting month and e-mail must include the reporting month/year, the facility name and name of person submitting report, In addition to the monthly reports, a GDC Major Incident Report is filed for every allegation of sexual abuse at Sumter County Correctional Institute.

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 request has been made to provide DOJ with this report.

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

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

Upon request, Sumter County Correctional Institute 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 interview with PREA Compliance Manager I find they meet this standard.

Sumter County Correctional Institute 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 Sumter County Correctional Institute 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 Sumter County Correctional Institute's progress in addressing sexual abuse.

Sumter County Correctional Institute's report is approved by Sumter County Correctional Institute head and made readily available to the public through its website www.sumtercountyga.us

§115.89	Data storage, publication and destruction
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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

Sumter County Correctional Institute 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.sumtercountyga.us

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 Sumter County Correctional Institute under review.

Katherine Brown

April 23, 2016

Auditor Signature

Date