

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS

NATIONAL
PREA
RESOURCE
CENTER



BJA
Bureau of Justice Assistance
U.S. Department of Justice

Interim Final Report

Auditor Information

Auditor name: Rodney P. Bivens
Address: P.O. Box 392 Sweetwater, TN 37874
Email: bivens.rodney@yahoo.com
Telephone number: 865-659-2424
Date of facility visit: June 21-23, 2015
Date report submitted: July 14, 2015

Facility Information

Name of facility: Cimarron Correctional Facility
Physical address: 3200 S Kings Highway Cushing, OK 74023
Facility mailing address: (if different from above) N/A
Telephone number: (918) 225-3336

The facility is:

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

Facility Type: Jail Prison

Name of facility's Chief Executive Officer: Raymond Byrd **Title:** Warden

Number of staff assigned to the facility in the last 12 months: 229

Designed facility capacity: 1752

Current population of facility: 1645

Facility security levels/inmate custody levels: Maximum Security/Medium to Maximum Custody

Age range of the population: 18-70

Name of PREA Compliance Manager: Jeorld Braggs **Title:** Assistant Warden
Email address: jeorld.braggsjr@cca.com **Telephone number:** (918)-225-3336 ext. 52246

Agency Information

Name of agency: Corrections Corporation of America
Governing authority or parent agency: (if applicable) N/A
Physical address: 10 Burton Hills Boulevard, Nashville, TN 37215
Mailing address: (if different from above) N/A
Telephone number: 615-263-3000

Agency Chief Executive Officer		
Name: Damon Hininger	Title:	President and Chief Executive Officer
Email address: Damon.hininger@cca.com	Telephone number:	615-263-3301
Agency-Wide PREA Coordinator		
Name: Lisa Hollingsworth	Title:	Senior Director PREA Programs and Compliance
Email address: Lisa.hollingsworth@cca.com	Telephone number:	615-263-6915

AUDIT FINDINGS

NARRATIVE:

The onsite PREA audit of the Corrections Corporation of America - Cimarron Correctional Facility in Cushing, Oklahoma was conducted June 21-23, 2015 by Department of Justice Certified PREA Auditor Rodney P. Bivens. Prior to this audit the facility provided to the auditor all policies, procedures, and facility documentation related to each standard for review. The auditor and the PREA Coordinator had ongoing communication for several weeks prior to the audit to prepare for the on-site visit. The facility supplied a list of inmate names sorted by housing units, disabilities, and special designations, as well as a list of facility staff names to the auditor. From these lists the auditor selected, at random, a sampling of inmates and staff to be interviewed during the on-site visit. Due to the size of this facility the sampling size for both inmates and staff was elevated to ensure consistency in training and implementation of the PREA standards. The sampling size for inmates included at least one inmate from each individualized housing unit pod. This decision was made to ensure all inmates throughout the facility were receiving the same information and education related to all aspects of the PREA program.

The on-site audit began with an entrance meeting being conducted on Sunday, June 21, 2015 at 8:20 a.m. in the administration conference room. The following staff attended the entrance meeting:

Warden Raymond Byrd
Assistant Warden of Operations Charles McBurney
Assistant Warden of Programs Jeorld Braggs (PREA Manager)
Larry Cox, Chief of Security
John Hilligoss, Chief of Unit Management
Cheryl Shoemaker, Quality Assurance Manager
Shannon Bandy, Human Resources Manager
Senior Director Lisa Hollingsworth, Agency PREA Coordinator

Following the entrance meeting the entire facility was toured from 8:30 a.m. to 5:45 p.m. During the tour the auditor reviewed camera placement, blind spots, staff placement and documentation to assist in determining standard compliance. The auditor also conducted

random inmate interviews in private offices provided at each housing unit while touring. The following staff accompanied the auditor on the facility tour:

Warden Raymond Byrd
Assistant Warden of Operations Charles McBurney
Assistant Warden of Programs Jeorl Braggs (PREA Manager)
Larry Cox, Chief of Security
John Hilligoss, Chief of Unit Management
Cheryl Shoemaker, Quality Assurance Manager
Senior Director Lisa Hollingsworth, Agency PREA Coordinator

All housing units, day rooms, inmate program areas, work areas and all other inmate accessible areas were toured. While touring several inmates and staff were questioned about their knowledge of PREA standards, procedures for reporting, services available and their responsibilities. All staff and inmates informally interviewed during the tour acknowledged receiving training and procedures for reporting sexual abuse, sexual harassment and/or retaliation for reporting. A total of 41 staff members were interviewed during the course of this audit. Staff interviews consisted of: 14 correctional officers selected at random covering all shifts, 1 volunteer, 3 contract employees, 4 intermediate or higher level supervisors, 14 specialized staff and 5 employees informally selected during the facility tour. All staff interviewed was well versed in their respective areas of responsibility regarding PREA and affirmed compliance with the applicable PREA standards. There is no SAFE or SANE staff at the facility; they are made available at the Unity Health Center in Shawnee, Oklahoma. Staff interviewed were well versed in their responsibilities in reporting sexual abuse, sexual harassment, staff negligence and retaliation for reporting. When questioned about evidence preservation, all staff responses reflected knowledge of agency policies and procedures.

A total of 36 inmates were interviewed during the on-site visit. These inmates consisted of: 32 inmates selected at random, 4 informally selected during the facility tour. There were 16 of the 32 inmates selected at random requiring specialized interviews broken down as follows: 4 hearing impaired, 3 vision impaired, 6 self-reported LBGTI, 1 self-reported prior victimization, 1 reported sexual abuse at facility, and 1 limited English proficient. All of the Inmates interviewed acknowledged receiving PREA training and written materials (posters, pamphlets, and inmates handbooks) outlining the agency's zero tolerance policies towards sexual abuse, sexual harassment, and retaliation for reporting, as well as the procedures for reporting. The disabled inmates interviewed confirmed receiving the PREA training and written materials in languages they could understand as well. All inmates interviewed felt if they had to file a PREA complaint the facility would respond appropriately to their complaint and staff take all PREA complaints very serious. The inmate that had reported an incident confirmed the facility had responded immediately and felt the incident was thoroughly investigated.

In the 12 months preceding the audit, Corrections Corporation of America - Cimarron Correctional Facility had received and investigated a total of twenty four PREA complaints broken down as follows:

<u>Number Received</u>	<u>Description of Complaint</u>	<u>Offender</u>	<u>Investigative Results</u>
3	Sexual Abuse (Intentional touching)	Inmate	2 Unsubstantiated 1 Still pending
6	Sexual Abuse (Contact and/or Penetration)	Inmate	5 Unsubstantiated 1 Unfounded

6	Sexual Harassment	Inmate	2 Unsubstantiated 4 Still pending
1	Sexual Abuse (Intentional touching)	Staff	Unsubstantiated
2	Sexual Abuse (Contact and/or Penetration)	Staff	1 Unfounded 1 Unsubstantiated
1	Sexual Abuse (Request to engage)	Staff	Still Pending
5	Sexual Harassment	Staff	Still Pending

All investigative files the auditor reviewed during the onsite visit appeared to thoroughly document the investigation process per agency policy. All sexual abuse cases were referred to the Oklahoma Inspector General's Office who investigated each case for potential criminal activity. During the past twelve months there was no cases substantiated resulting in criminal charges being filed.

At the conclusion of the on-site visit an exit meeting was held to discuss the audit findings. The following people were in attendance:

Warden Raymond Byrd
Assistant Warden of Operations Charles McBurney
Assistant Warden of Programs Jeorld Braggs (PREA Manager)
Larry Cox, Chief of Security
John Hilligoss, Chief of Unit Management
Cheryl Shoemaker, Quality Assurance Manager
Gwen Henry, Nurse
Dorothy Meeks, Mental Health Coordinator
Joe Sebenick, Investigator
Philip Baker, Contract Monitor
Senior Director Lisa Hollingsworth, Agency PREA Coordinator

During the exit meeting the auditor explained the process that would follow the on-site visit. The auditor also explained that all areas found to not meet the standards during the on-site visit must be corrected and he would be working closely with the PREA team to accomplish compliance. Finally the auditor acknowledged the willingness of all staff involved to accomplish PREA compliance and advised the PREA team of their requirements to post the final report on the facility website once compliance with all standards was achieved.

DESCRIPTION OF FACILITY CHARACTERISTICS:

Cimarron Correctional Facility, owned and operated by Corrections Corporation of America, is located at 3200 S Kings Highway Cushing, OK 74023. The facility has a current rated bed capacity of 1,752 utilized for housing medium to maximum custody adult male inmates. The State of Oklahoma has contracted with Corrections Corporation of America to house their inmates at this facility.

The Cimarron Correctional Facility was originally constructed in 1997 with a capacity of 1000 beds with an additional 752 beds added in 2008. The facility is located in Payne County,

Cushing, Oklahoma in North Central Oklahoma. The facility has a total of 277,640 square feet, which is covered by the buildings and structures.

Cimarron Correctional Facility compound I housing includes four standardized units that house eight pods each, with a separate gymnasium and a large outdoor recreation area. Cimarron Correctional Facility's original housing consists of six separate buildings. Each building is divided into two distinct housing units joined together by a passageway. Each housing unit consists of 60 two-person cells, thirty are at floor level and thirty are at mezzanine level, for a total population of 120 offenders per pod.

The facility was expanded in 2008 adding an outer compound (compound II), with a separate multi-purpose building. The compound II housing consist of two T-shaped housing units which were added and includes three wings of 120 beds each. In the second unit, one wing is designated for segregation beds and one wing for Intensive Supervision Programs. Each compound has an outdoor recreation area for volleyball, horseshoes, and a basketball court. The multi-purpose building of compound II contains a gymnasium, classrooms, a satellite kitchen and medical department.

The Corrections Corporation of America – Cimarron Correctional Facility’s stated mission is: "to provide a safe and secure environment to the offenders in our care, to our employees, and to the community in which we are located". Corrections Corporation of America values are "having PRIDE in all we do". It was evident the staff at the Corrections Corporation of America’s - Cimarron Correctional Facility were committed to excellence in corrections, by providing a dedicated team of professionals whose focus is on the enhancement of the quality of life through self-improvement opportunities for the inmates entrusted to their care.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded:	4
Number of standards met:	37
Number of standards not met:	0
Non-applicable:	2

§115.11 - Zero tolerance of sexual abuse and sexual harassment

- 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)

115.11 (a) The agency has a written policy and procedure mandating zero tolerance for all forms of sexual abuse and sexual harassment. This policy outlines the agency’s approach to preventing, detecting and responding to such conduct. The procedures for all staff were clearly outlined in the Corrections Corporation of

America - Cimarron Correctional Facility PREA policy 14-2 provided. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.11 (B) and (C) The agency employs an upper-level, agency-wide PREA Coordinator and a facility PREA Compliance Manager as required by this standard. Policy 14-2, page 2 outlines the responsibilities of the PREA Coordinator and PREA Manager. During interviews with the PREA Coordinator and the PREA Manager, both indicated they had sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.12 - Contracting with other entities for the confinement of inmates

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

Based on the documentation provided as well as staff interviews it was determined the Corrections Corporation of America - Cimarron Correctional Facility does not contract with other facilities to house inmates assigned to their custody. Therefore, this standard was found to be non-applicable to this facility during this audit.

§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)

Based on staff interviews, review of documentation provided and review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy, 14-2, pages 8, 9 and 10, sections D and E. The following delineates the audit findings regarding this standard:

115.13 (a) The facility has documented and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing as described and required by this standard. Video monitoring has also been deployed and upgraded to assist with the protection of offenders against sexual abuse. The staffing levels are monitored daily by review of shift rosters. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (b) The facility has procedures in place to ensure all deviations are covered by overtime or notification must be documented on "Notice to Administration" form 5-1B and submitted to the Warden outlining the reason(s) for the deviation. There have been no deviations reported where the staffing plan has not been complied with in the past twelve months, as confirmed by interview with the Warden. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (c) The staffing plan is reviewed annually by the PREA Manager and forwarded to the PREA Coordinator and Warden for review. It is then forwarded to the Vice President of Facility Operations for signature and approval of any recommendations made which would include changes to policy and procedures, physical plant, video monitoring, or staffing levels. The last Annual Staffing Plan assessment was completed on April 9, 2015. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.13 (d) Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy, section E on pages 9 and 10, staff interviews, and documentation provided. Intermediate-level or higher-level supervisors are required to conduct and are documenting UNANNOUNCED rounds on all shifts as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.14 – Youthful Inmates

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

Based on the documentation provided and staff interviews, Corrections Corporation of America – Cimarron Correctional Facility is an adult facility and does not house youthful offenders. Therefore, this standard was found to be non-applicable to this facility during this audit.

§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)

Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section K, pages 15 and 16, training curriculums, staff interviews, training file reviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.15 (a) Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section K on pages 15 and 16 outlines offender searches including searches of transgender and intersex offenders. The review of training curriculums and staff interviews revealed cross gender strip searches are prohibited except in exigent circumstances and must be documented on "Notice to Administration" form 5-1B when conducted. There have been no documented cross-gender visual body cavity or strip searches reported in the past 12 months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (b) Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section K, 1, b on page 16 prohibits male employees from frisk/pat searches of female inmates/residents except in exigent circumstances. However, Corrections Corporation of America - Cimarron Correctional Facility is an all-male facility. Therefore, this part of the standard is not applicable.

115.15 (c) Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section K on pages 15 and 16 prohibits frisk/pat searches of the female inmates by male staff and requires that all cross-gender searches in exigent circumstances be documented on the "Notice to Administration" form 5-1B. However, Corrections Corporation of America - Cimarron Correctional Facility is an all-male facility. Therefore, this part of the standard is not applicable.

115.15 (d) Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section K on pages 15 and 16 outlines that inmates shall be permitted to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks or genitalia. The inmates confirmed during interviews they have privacy when showering, using the toilets and while changing their clothes. Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section K on pages 15 and 16 also requires staff of the opposite gender to announce their presence prior to entering the housing units. Inmate and staff interviews revealed that opposite gender announcements were common practice at this facility and reminders of this requirement are posted on the entry doors of all housing units exceeding the requirements of this part of the standard during this audit.

115.15 (e) Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section K on pages 15 and 16, training curriculum provided and staff interviews the facility prohibits staff from physically examining transgender or intersex inmates for the sole purpose of determining genital status. If the inmate's genital status is unknown, it is determined during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.15 (f) Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section K on pages 15 and 16, training curriculum provided, staff training file reviews, and staff interviews the facility trains security staff to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.16 – Inmates with Disabilities and Inmates who are Limited English Proficient

- 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 Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, pages 13 and 14, section I, the lesson plan *Safety and Security Issues Part 2* and review of Language Line contract, as well as staff and inmate interviews. The following delineates the audit findings regarding this standard:

115.16 (a) The Corrections Corporation of America - Cimarron Correctional Facility takes appropriate steps to ensure inmates with disabilities (including, for example, inmates who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of its 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16 (b) The Corrections Corporation of America - Cimarron Correctional Facility takes reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient, including steps to provide interpreters who can interpret effectively accurately and impartially. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.16 (c) Corrections Corporation of America - Cimarron Correctional Facility does not rely on inmate interpreters, inmate readers, or other types of inmate assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.17 – Hiring and Promotion Decisions

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

Based upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section B, pages 5 and 6, Human Resource staff interviews, and personnel file reviews. The following delineates the audit findings regarding this standard:

115.17 (a) Corrections Corporation of America - Cimarron Correctional Facility does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor or volunteer who may have contact with inmates, who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution, has been convicted of engaging or attempting to engage in sexual activity in the community 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (b) Corrections Corporation of America - Cimarron Correctional Facility considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor or volunteer, who may have contact with inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (c)-1 Corrections Corporation of America - Cimarron Correctional Facility requires a criminal background records check be completed before hiring any new employee. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

(c)-2 Corrections Corporation of America - Cimarron Correctional Facility makes their best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegation of sexual abuse. This request is documented on Corrections Corporation of America's "Verification of Prior Employment" form 3-20-2A. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (d) Corrections Corporation of America - Cimarron Correctional Facility requires a criminal background records check be completed before enlisting the services of any contractor or volunteer who may have contact with the inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (e) Corrections Corporation of America - Cimarron Correctional Facility requires a criminal background records check be completed on all current employees, volunteers, and contractors at least every five years. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (f) Corrections Corporation of America - Cimarron Correctional Facility instills upon all employees a continuing affirmative duty to disclose any sexual misconduct as required by this standard. A Corrections Corporation of America's "Self Declaration of Sexual Abuse/Sexual Harassment" form 14-2H is completed by all applicants, upon being hired and if being considered for a promotion. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (g) Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 mandates that material omissions regarding sexual misconduct, and the provision of materially giving false information, are grounds for termination as required by this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.17 (h) Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 requires that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a current or former employee upon receiving a request from an institutional employer for whom such employee has applied to work. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.18 – Upgrades to Facilities and Technology

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 upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, page 30, section V, staff interviews and review of documentation provided. The following delineates the audit findings regarding this standard:

115.18 (a) Corrections Corporation of America - Cimarron Correctional Facility requires when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.18 (b) Corrections Corporation of America - Cimarron Correctional Facility requires when installing or updating a video monitoring system, electronic

surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse.

During this audit cycle there has been minimal enhancements to the video technology at this facility. All identified blind spots were addresses and staff as well as inmates confirmed during interviews they felt safer with the changes in place. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.21 – Evidence Protocol and Forensic Medical Examinations

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 upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, pages 23 and 24, section O and policy 13-79, page 2, section A-i and ii, investigative staff interviews, and review of documentation provided. The following delineates the audit findings regarding this standard:

115.21 (a) and (b) Corrections Corporation of America - Cimarron Correctional Facility complies with all elements of this standard. The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings. The Oklahoma Department of Corrections Inspector General investigates all PREA complaints for potential criminal activity and maintains a close working relationship with the County Prosecutor and the Cimarron Correctional Facility investigator on each case. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (c) Corrections Corporation of America - Cimarron Correctional Facility offers all victims of sexual abuse access to forensic medical examinations by Memorandum of Understanding with the Unity Health Center without financial cost, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) as outlined in the Memorandum of Understanding. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (d) The Corrections Corporation of America - Cimarron Correctional Facility has entered into a Memorandum of Understanding with Stillwater Domestic Violence Services, Inc. which agrees to provide outside victim advocacies services to the inmates. The services of these victim advocates has not been requested or used by

the inmates during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (e) Corrections Corporation of America - Cimarron Correctional Facility has entered into a Memorandum of Understanding with Stillwater Domestic Violence Services, Inc. which agrees to provide outside victim advocacies services to the inmates upon request. The facility also makes available to the victim a qualified agency staff member, upon request by the victim, who will accompany and support the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals as warranted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.21 (f) The Corrections Corporation of America - Cimarron Correctional Facility is responsible for administrative and criminal investigations. Therefore, this part of the standard is not applicable to this facility.

§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)

Based upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section O on pages 20 through 24, investigative staff interviews, and review of documentation provided. The following delineates the audit findings regarding this standard:

115.22 (a) The Corrections Corporation of America - Cimarron Correctional Facility is required to investigate ALL PREA complaints received at this facility. All potential criminal activity is referred to the Oklahoma Department of Corrections Inspector General for criminal investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.22 (b) All PREA allegations are investigated by the Corrections Corporation of America - Cimarron Correctional Facility for potential criminal activity. If it is determined that the allegation involves potential criminal activity, it is referred to the Oklahoma Department of Corrections Inspector General for criminal investigation and prosecution as warranted. This policy is published on the agency website as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.22 (c) The Corrections Corporation of America - Cimarron Correctional Facility refers all criminal allegations for investigation to the Oklahoma Department of Corrections Inspector General. The requirements of this part of the standard are

outlined in the policy that is posted on the website. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.31 – Employee Training

X Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section C on page 6, staff interviews, random staff training file review and review of documentation provided (power points, certificates, sign in sheets, signed acknowledgement forms, training curriculums and employee handouts). The following delineates the audit findings regarding this standard:

115.31 (a) Corrections Corporation of America - Cimarron Correctional Facility train all their employees who have contact with inmates on:

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

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31 (b) The training is tailored to the gender of the inmates at Corrections Corporation of America - Cimarron Correctional Facility. The employees receive additional training if the employee is reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.31 (c) The training staff provided a report containing all staff that had been PREA trained which confirmed the requirements needed to meet the standard and proved that all current staff was trained within one year of the effective date of the PREA standards. All staff receive annual refresher PREA training during in-service

which exceeds the requirements of this standard. Therefore, the facility exceeded this part of the standard during this audit.

115.31 (d) Corrections Corporation of America - Cimarron Correctional Facility documents, through employee signature on an acknowledgement form, that all employees understand the training they have received. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.32– Volunteer and Contractor 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)

Based upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section C-2 on page 8, volunteer and contractor interviews, random training file review and review of documentation provided (power points, certificates, sign in sheets, signed acknowledgement forms, training curriculums and handouts). The following delineates the audit findings regarding this standard:

115.32 (a) Corrections Corporation of America - Cimarron Correctional Facility ensures all volunteers and contractors who have contact with inmates have been trained on their responsibilities under Corrections Corporation of America - Cimarron Correctional Facility and/or Oklahoma Department of Corrections sexual abuse and sexual harassment prevention, detection, and response policies and procedures. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32 (b) The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of Corrections Corporation of America - Cimarron Correctional Facility zero-tolerance policy 14-2 regarding sexual abuse and sexual harassment and informed how to report such incidents. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.32 (c) Corrections Corporation of America - Cimarron Correctional Facility documents through employee signature on an acknowledgement form that volunteers and contractors understand the training they have received. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.33 – Inmate Education

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on review of the Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section I-1 and 2 on pages 13 and 14, the Inmate Handbook, PREA Pamphlets, Facility Orientation, PREA Posters, and the 30 day training video; as well as interviews with random inmates and staff. The following delineates the audit findings regarding this standard:

115.33 (a) During the intake process, inmates receive information explaining Corrections Corporation of America - Cimarron Correctional Facility's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (b) Within 30 days of intake, Corrections Corporation of America - Cimarron Correctional Facility provides comprehensive education to the inmates, administered by 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (c) Corrections Corporation of America - Cimarron Correctional Facility has provided such education within one year of the effective date of the PREA standards to all its inmates, and provides education to inmates upon transfer as required by this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (d) Corrections Corporation of America - Cimarron Correctional Facility provides inmate education in formats accessible to all inmates, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to inmates who have limited reading skills. The facility has an agreement with Language Line Interpreter Services as well as TDD phones to assist inmates with these disabilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (e) There was documentation provided of inmates participation in PREA educational sessions as required by this part of the standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.33 (f) Corrections Corporation of America - Cimarron Correctional Facility does provide the inmates with posters, pamphlets, and an inmate handbook in English and Spanish outlining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.34 – Specialized Training: Investigations

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

Based on review of the Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section b - i on page 7 as well as the PREA Specialized Investigator Training curriculums provided, Investigators training file review and investigative staff interviews. The following delineates the audit findings regarding this standard:

115.34 (a) In addition to the general training provided to all employees Corrections Corporation of America - Cimarron Correctional Facility ensures that the investigators have received training in conducting investigations in confinement settings. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34 (b) 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.34 (c) Corrections Corporation of America - Cimarron Correctional Facility maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.35 – Specialized training: Medical and mental health care

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

Based on review of the Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section b - ii on page 7 as well as the PREA Specialized Medical/Mental Health training video and curriculum provided, training file review and staff interviews. The following delineates the audit findings regarding this standard:

115.35 (a) Corrections Corporation of America - Cimarron Correctional Facility PREA policy as well as the PREA Specialized Medical/Mental Health training video, curriculum provided, training file review and staff interviews revealed the agency has provided specialized training to all its medical and mental health staff on how to detect and assess signs of sexual abuse and sexual harassment, how to preserve physical evidence, how to respond effectively and professionally to victims of sexual abuse and sexual harassment and how to report allegations of sexual abuse and sexual harassment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35 (b) The medical staff at this facility does not conduct forensic exams. Therefore, this part of the standard is not applicable to this facility.

115.35 (c) The agency maintains documentation that all medical and mental health practitioners have received specialized training. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.35 (d) Medical and mental health care practitioners also receive the annual training mandated for all employees, contractors, and volunteers. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.41 – Screening for Risk of Victimization and Abusiveness

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 Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section H on pages 12 and 13, inmate and staff interviews, inmate file reviews, and a review of the 14-2B objective "Initial and 30 day PREA Screening Assessment" form. The following delineates the audit findings regarding this standard:

115.41 (a) Corrections Corporation of America - Cimarron Correctional Facility ensures that all inmates are assessed during intake and upon transfer to another facility for risk of being sexually abused by other inmates or sexually abusive toward other inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (b) The Corrections Corporation of America - Cimarron Correctional Facility documentation provided mandates that screenings be conducted within 72 hours of arrival at the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (c) Based on the documentation provided and inmate file reviews the facility utilizes an objective screening instrument the covers all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (d) The intake screening instrument used considers, at a minimum, the following criteria to assess inmates for risk of sexual victimization:

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

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (e) 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 Corrections Corporation of America - Cimarron Correctional Facility, in assessing inmates for risk of being sexually abusive. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (f) Within 30 days from the inmate's arrival, the Corrections Corporation of America - Cimarron Correctional Facility will reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by Corrections Corporation of America - Cimarron Correctional Facility since the intake screening. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (g) Corrections Corporation of America - Cimarron Correctional Facility will reassess an inmate's risk level when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (h) Corrections Corporation of America - Cimarron Correctional Facility does not discipline inmates for refusing to answer screening questions or not disclosing complete information. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.41 (i) Corrections Corporation of America - Cimarron Correctional Facility implements appropriate controls on the dissemination of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not

exploited to the inmate's detriment by staff or other inmates. Based on policy review, interview with the Warden, and interviews with the staff responsible for completing the screening, all information gathered on the screening instrument is restricted to staff making housing, work and program assignments. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.42 – Use of Screening Information

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 Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section J on pages 14 and 15, inmate and staff interviews, file review, and a review of the 14-2B objective "Initial and 30 day PREA Screening Assessment" form. The following delineates the audit findings regarding this standard:

115.42 (a) Corrections Corporation of America - Cimarron Correctional Facility uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (b) Corrections Corporation of America - Cimarron Correctional Facility makes individualized determinations about how to ensure the safety of each inmate. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (c) Corrections Corporation of America - Cimarron Correctional Facility outlines the procedures to be followed in deciding whether to assign a transgender inmate to a facility for male or female inmates, and the process for making housing and programming assignments, on case by case basis as required by this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (d) Corrections Corporation of America - Cimarron Correctional Facility outlines the procedures for placement and programming assignments of each transgender or intersex inmate being reassessed at least twice per year to review any threats to safety experienced by the inmate as required by this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (e) Corrections Corporation of America - Cimarron Correctional Facility requires that a transgender and intersex inmate's own views regarding their own

safety be given serious consideration. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (f) Corrections Corporation of America - Cimarron Correctional Facility requires that transgender and intersex inmates be given the opportunity to shower separately from other inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.42 (g) Corrections Corporation of America - Cimarron Correctional Facility does not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§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)

Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section J on pages 14 and 15, staff interviews, inmate interviews, and documentation review. The following delineates the audit findings regarding this standard:

115.43 (a) Inmates at high risk for sexual victimization are not placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. The Corrections Corporation of America - Cimarron Correctional Facility policy outlines the procedures to ensure compliance with this standard. Staff and inmate interviews revealed no incidents of involuntary segregated housing being used for this purpose during the past 12 months at this facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (b) Inmates placed in segregated housing for this purpose have access to programs, privileges, education, and work opportunities to the extent possible. If Corrections Corporation of America - Cimarron Correctional Facility restricts access to programs, privileges, education, or work opportunities, Corrections Corporation of America - Cimarron Correctional Facility documents the opportunities that have been limited, the duration of the limitation; and the reasons for such limitations.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (c) Corrections Corporation of America - Cimarron Correctional Facility assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment does not ordinarily exceed a period of 30 days. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (d) If involuntary segregated housing assignment is made, Corrections Corporation of America - Cimarron Correctional Facility clearly documents the basis for the facilities' concern for the inmate's safety; and the reason why no alternative means of separation can be arranged. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.43 (e) Corrections Corporation of America - Cimarron Correctional Facility requires a 30 day review to determine whether there is a continuing need for separation from the general population. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.51 – Inmate 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)

Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section L on pages 16 and 17, the Inmate Handbook, PREA pamphlets, and posters provided to inmates were utilized to verify compliance with this standard. Staff and inmate interviews verified the inmates have multiple internal ways to report incidents of abuse or harassment. They can report verbally, in writing, dialing the hotline provided and/or through report of a third party. The following delineates the audit findings regarding this standard:

115.51 (a) Corrections Corporation of America - Cimarron Correctional Facility PREA policy outlines multiple internal ways for inmates to report incidents of abuse or harassment. They can report verbally, in writing, dialing the hotline provided and/or through report of a third party. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (b) Corrections Corporation of America - Cimarron Correctional Facility provides at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of Corrections Corporation of America - Cimarron Correctional Facility, and that is able to receive and immediately forward

inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. The Corrections Corporation of America - Cimarron Correctional Facility has by Memorandum of Understanding provided the address and phone number for Stillwater Domestic Violence Services, Inc. to the inmates satisfying the requirements of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (c) Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section L-2 page 17 requires all staff to accept reports made verbally, in writing, anonymously and from third parties. All allegations shall be promptly documented in an incident report and reported to the supervisor. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.51 (d) Corrections Corporation of America - Cimarron Correctional Facility staff may privately report sexual abuse and sexual harassment to the Warden, a supervisor, PREA manager, or the agencies ethics hotline at the corporate office. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.52 – Exhaustion of Administrative Remedies

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

The Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 does not require an inmate to submit a grievance or allow a PREA incident reported on a grievance to be processed through the facility's grievance process. However, the Oklahoma Department of Corrections Operational Procedure 090124, section VIII on pages 14 through 16, that are followed per contract, outlines all aspects of the requirements of this standard. Based on review of this procedure, documentation provided, inmate interviews, and staff acknowledgement. The following delineates the audit findings regarding this standard:

115.52 (a) Oklahoma Department of Corrections Operational Procedure 090124, section VIII outlines the administrative procedures to be followed to address inmate grievances regarding sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.52 (b) Oklahoma Department of Corrections Operational Procedure 090124, section VIII requires the following:

- (1) The agency shall not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse.
 - (2) The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.
 - (3) The agency shall not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.
 - (4) Nothing in this section shall restrict the agency's ability to defend against an inmate lawsuit on the ground that the applicable statute of limitations has expired.
- Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.52 (c) Oklahoma Department of Corrections Operational Procedure 090124, section VIII allows the inmate to submit the grievance directly to the Administrative Review Authority to ensure the following:

- (1) An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and
- (2) Such grievance is not referred to a staff member who is the subject of the complaint. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.52 (d) Oklahoma Department of Corrections Operational Procedure 090124, section VIII requires that the Administrative Review Authority issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 48 hours of the initial filing of the grievance. Computation of the 48 hour time period does not include time consumed by inmates in preparing any administrative appeal.

115.52 (e) Oklahoma Department of Corrections Operational Procedure 090124, section VIII directs the following:

- (1) Third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, shall be permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of inmates.
- (2) If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.
- (3) If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision on the original Inmate Grievance form. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.52 (f) Oklahoma Department of Corrections Operational Procedure 090124, section VIII directs the following:

After receiving an emergency grievance or an informal complaint alleging an inmate is subject to a substantial risk of imminent sexual abuse, the Administrative Reviewing Authority makes the determination as to whether the inmate is in substantial risk of imminent sexual abuse, and documents the action taken in

response to the emergency grievance. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.52 (g) Oklahoma Department of Corrections Operational Procedure 090124, section VIII outlines that the agency may discipline an inmate for filing a grievance related to alleged sexual abuse only when the Administrative Reviewing Authority determines that the inmate filed the grievance in bad faith. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.53 – Inmate Access to Outside Confidential Support Services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy section F on page 10, staff interviews, inmate interviews and documentation review. The following delineates the audit findings regarding this standard:

115.53 (a) The agency has entered into a Memorandum of Understanding with the Stillwater Domestic Violence Services, Inc. which agrees to provide confidential outside victim advocacies services to the inmates at Corrections Corporation of America - Cimarron Correctional Facility. The mailing address and telephone number for this agency are made available to all inmates at the facility. Corrections Corporation of America - Cimarron Correctional Facility enables reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible. The services of these victim advocates have not been requested or used by the inmates during this audit cycle, verified by phone call. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.53 (b) Corrections Corporation of America - Cimarron Correctional Facility informs inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.53 (c) Corrections Corporation of America - Cimarron Correctional Facility maintains a Memorandum of Understanding with the Stillwater Domestic Violence Services, Inc. in Stillwater, Oklahoma. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.54 – Third-Party 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)

Based on the review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section L, on pages 17 and 18 as well as a review of the agency website outlining third party reporting. The following delineates the audit findings regarding this standard:

115.54 (a) The agency provides multiple methods for receiving third-party reports of sexual abuse and sexual harassment on the agency website at: www.cca.com. The information available on the website explains how to report sexual abuse and sexual harassment on behalf of an inmate. The facility takes all reports seriously no matter how they are received and investigates each reported incident. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§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 Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section L on pages 17 and 18, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.61 (a) Corrections Corporation of America - Cimarron Correctional Facility 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 Corrections Corporation of America - Cimarron Correctional Facility; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (b) Corrections Corporation of America - Cimarron Correctional Facility requires apart from reporting to designated supervisors or officials, staff do not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (c) Corrections Corporation of America - Cimarron Correctional Facility requires medical and mental health practitioners to report sexual abuse immediately to the security staff supervisor. Medical and mental health practitioners are required to inform the inmates of their duty to report, and the limitations of confidentiality, at the initiation of services. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (d) If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, Corrections Corporation of America - Cimarron Correctional Facility reports the allegation to the designated state or local services agency. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.61 (e) Corrections Corporation of America - Cimarron Correctional Facility reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility investigator as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.62 – Agency Protection Duties

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

Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 on page 1, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.62 (a) Policy and staff training requires all staff to take immediate action and staff acknowledge during their interviews the requirement of all staff to protect inmates when it is learned that an inmate at the Corrections Corporation of America - Cimarron Correctional Facility is subject to a substantial risk of imminent sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.63 – Reporting to Other Confinement Facilities

- 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 Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section M-3 page 20, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.63 (a) Upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of Corrections Corporation of America - Cimarron Correctional Facility that received the allegation notifies the head of the facility or appropriate office where the alleged abuse occurred. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63 (b) and (c) Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.63 (d) Upon receiving a call from an outside facility that an inmate had been sexually abused while in the custody of the Corrections Corporation of America - Cimarron Correctional Facility. The allegation is referred immediately to the facility investigator to be investigated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§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)

Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section M on pages 18 - 20, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.64 (a) Corrections Corporation of America - Cimarron Correctional Facility policy outlines the responsibilities of all staff members receiving an allegation of sexual abuse to follow these guidelines:

- (1) Separate the alleged victim and abuser;
- (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;
- (3) 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
- (4) 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.64 (b) Corrections Corporation of America - Cimarron Correctional Facility PREA policy mandates when the first staff responder is not a security staff member, they shall advise the alleged victim not to take any actions that could destroy physical evidence, and then notify security staff immediately. The auditor confirmed compliance based on interviews with and training records of non-security staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§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)

Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section G pages 10-12, section M pages 18-21, staff interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.65 (a) Corrections Corporation of America - Cimarron Correctional Facility has a very comprehensive written 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. The plan clearly defines the roles and responsibilities of each person involved and the procedures to be followed in detail. Interviews with SART members confirmed their knowledge of the response plan.

Part of the response plan is the "Sexual Abuse Incident Check Sheet" form 14-2C which is initiated upon receiving a PREA allegation and ensures all steps in the plan are carried out in a timely manner exceeding the requirements of this standard.

§115.66 – Preservation of ability to protect inmates from contact with abusers

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on PREA Policy 14-2, section R pages 25 and 26, interviews with agency head and the PREA Coordinator, and documentation provided. The following delineates the audit findings regarding this standard:

115.66 (a) Employees are subject to disciplinary sanctions up to termination for violating Corrections Corporation of America - Cimarron Correctional Facility policies on sexual abuse and sexual harassment. When the Agency Head was interviewed he reported that 7% of Corrections Corporation of America facilities are unionized and 93% are not. The Corrections Corporation of America - Cimarron Correctional Facility has not entered into any collective bargaining agreements during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§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)

Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section G on page 11, staff interviews, inmate interviews, and documentation provided. The following delineates the audit findings regarding this standard:

115.67 (a) Corrections Corporation of America - Cimarron Correctional Facility has a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and designates which staff members or departments are charged with monitoring retaliation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (b) Corrections Corporation of America - Cimarron Correctional Facility has multiple protection measures, such as housing changes or transfers for inmates, victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (c) For at least 90 days following a report of sexual abuse, Corrections Corporation of America - Cimarron Correctional Facility monitors the conduct and treatment of inmates or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff, and act promptly to remedy any such retaliation. There is periodic status checks performed and documented. Corrections Corporation of America - Cimarron Correctional Facility's monitoring includes any inmate disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring indicates a continuing need. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.67 (d) If any other individual who cooperates with an investigation expresses a fear of retaliation, Corrections Corporation of America - Cimarron Correctional Facility takes appropriate measures to protect that individual against retaliation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.68 – Post-Allegation 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)

115.68 (a) Corrections Corporation of America - Cimarron Correctional Facility prohibits offenders who have alleged sexual abuse to be placed in involuntary segregated housing. If segregated housing is used, the same provisions as outlined in PREA policy 14-2, section J on pages 14 and 15 would apply. Interviews with the Warden and segregation staff revealed that involuntary segregation has not been used for this purpose in the past 12 months. The Warden stated that if separation was required to protect the offender, they would be placed in segregation for no longer than 72 hours. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.71 – Criminal and Administrative Agency 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)

Based upon review of the Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section N pages 21 and 22, policy 14-2 section O pages 22 and 23, investigative staff interviews, training certificates, investigative reports, as well as interviews with the PREA Coordinator, and the PREA Compliance Manager. The following delineates the audit findings regarding this standard:

115.71 (a) Corrections Corporation of America - Cimarron Correctional Facility investigator conducts an investigation immediately when notified of an allegation of sexual abuse and sexual harassment. The investigative files were reviewed and it appeared that the investigations were conducted promptly, documented thoroughly, and objectively for all allegations, including third-party, and anonymous reports. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (b) Based on training curriculums provided, Investigators training file review, and investigative staff interviews, it was evident the facility provided, in addition to the general training received by all employees, specialized training to all its investigators. This training included 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (c) Corrections Corporation of America - Cimarron Correctional Facility 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (d) When the quality of evidence appears to support criminal prosecution, Corrections Corporation of America - Cimarron Correctional Facility refers the case to the Oklahoma Department of Corrections Inspector General for the criminal investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (e) The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. The inmate who alleges sexual abuse is not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (f) Corrections Corporation of America - Cimarron Correctional Facility administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind

credibility assessments, and investigative facts and findings. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (g) Corrections Corporation of America - Cimarron Correctional Facility, criminal investigations are documented by the Oklahoma Department of Corrections Inspector General in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (h) Corrections Corporation of America - Cimarron Correctional Facility refers all allegations to the Oklahoma Department of Corrections Inspector General for investigation and prosecution when warranted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (i) Corrections Corporation of America - Cimarron Correctional Facility retains all written reports for as long as the alleged abuser is incarcerated or employed by Corrections Corporation of America - Cimarron Correctional Facility, plus five years. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (j) The departure of the alleged abuser or victim from employment or control of the Corrections Corporation of America - Cimarron Correctional Facility or agency does not provide a basis for terminating an investigation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (k) The Oklahoma Department of Corrections Inspector General conducts criminal sexual abuse investigations pursuant to the requirements of this standard. Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, outlines the requirements of the criminal investigation and complies with all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.71 (l) Corrections Corporation of America - Cimarron Correctional Facility refers all criminal cases to the Oklahoma Department of Corrections Inspector General and cooperates with their investigators during the entire investigation. The facility remains informed of the progress of the investigation through communication between the facility investigator and the Oklahoma Department of Corrections Inspector General agent handling the case. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.72 – Evidentiary Standard for Administrative 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)

Based upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section O, subsection 5 on page 24 and investigative staff interviews. The following delineates the audit findings regarding this standard:

Corrections Corporation of America - Cimarron Correctional Facility imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.73 – Reporting to Inmate

- 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 upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section Q on pages 24 and 25, documentation provided, and staff interviews. The following delineates the audit findings regarding this standard:

115.73 (a) Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy it was confirmed that following an investigation into an inmate's allegation he/she suffered sexual abuse in the facility, the inmate was to be informed whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded. The documentation provided confirmed the inmates were provided this notification on the "Inmate/Resident PREA Allegation Status Notification" form 14-2E. The inmates are required to sign the form documenting acknowledgement of this notification as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (b) The agency does request all relevant information from the criminal investigation conducted by the Oklahoma Department of Corrections Inspector General in order to inform the inmate as required by this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (c) Based on Corrections Corporation of America - Cimarron Correctional Facility PREA policy and documentation provided, it was confirmed that following an inmate's allegation that a staff member has committed sexual abuse against the inmate, the agency shall subsequently inform the inmate (unless the agency has determined that the allegation is unfounded) whenever:

- (1) The staff member is no longer posted within the inmate's unit;
- (2) The staff member is no longer employed at the facility;
- (3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the Corrections Corporation of America - Cimarron Correctional Facility; or

(4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the Corrections Corporation of America - Cimarron Correctional Facility

The documentation provided confirmed the inmates were provided this notification on the "Inmate/Resident PREA Allegation Status Notification" form 14-2E. The inmates are required to sign the form documenting acknowledgement of this notification as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (d) Following an inmate's allegation they had been sexually abused by another inmate, Corrections Corporation of America - Cimarron Correctional Facility subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or Corrections Corporation of America - Cimarron Correctional Facility learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The documentation provided confirmed the inmates were provided this notification on the "Inmate/Resident PREA Allegation Status Notification" form 14-2E. The inmates are required to sign the form documenting acknowledgement of this notification as required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (e) All such notifications or attempted notifications are documented. Based on the "Inmate/Resident PREA Allegation Status Notification" form 14-2E. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.73 (f) Policy outlines the agency's obligation to report under this standard terminates if the inmate is released from Corrections Corporation of America - Cimarron Correctional Facility's custody. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§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)

Based upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section R on pages 25 and 26, documentation provided, agency head, and PREA Coordinator interviews. The following delineates the audit findings regarding this standard:

115.76 (a) and (b) Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.

Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (c) 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.76 (d) 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, unless the activity was clearly not criminal, and to any relevant licensing bodies. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§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)

Based upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section R3 on pages 26 and 27, documentation provided, agency head, Warden, and PREA Coordinator interviews. The following delineates the audit findings regarding this standard:

115.77 (a) Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates and are reported to law enforcement, unless the activity was clearly not criminal, and to relevant licensing bodies. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.77 (b) Corrections Corporation of America - Cimarron Correctional Facility takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.78 – Disciplinary sanctions for inmates

- Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based upon review of Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section R on pages 25 and 26, documentation provided, agency head, and PREA Coordinator interviews. The following delineates the audit findings regarding this standard:

115.78 (a) Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (b) Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (c) The disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (d) The Mental Health staff offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, Corrections Corporation of America - Cimarron Correctional Facility does not require the offending inmate to participate in such interventions as a condition of access to programming or other benefits. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (e) Corrections Corporation of America - Cimarron Correctional Facility disciplines an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (f) Policy states 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.78 (f) Corrections Corporation of America - Cimarron Correctional Facility prohibits all sexual activity between inmates and may discipline inmates for such activity. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.81 – Medical and mental health screenings; history of sexual abuse

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

Based on medical and mental health staff interviews and documentation provided as well as Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section E on pages 9 and 10, section L on pages 17 and 18, and section M on pages 18 and 19. Also, policy 13-79 section A on pages 2 - 4. The following delineates the audit findings regarding this standard:

115.81 (a) and (c) If the screening indicates the inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, the screening staff at the Corrections Corporation of America - Cimarron Correctional Facility ensures the inmate is offered a follow-up meeting with the medical and/or mental health staff within 14 days of the intake screening as required by this part of the standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81 (b) If the screening indicates an inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, the screening staff at the Corrections Corporation of America - Cimarron Correctional Facility ensures the inmate is offered a follow-up meeting with mental health staff within 14 days of the intake screening as required by this part of the standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81 (d) Corrections Corporation of America - Cimarron Correctional Facility requires that any information related to sexual victimization or abusiveness that occurred in the facility 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.81 (e) Corrections Corporation of America - Cimarron Correctional Facility requires medical and mental health practitioners to obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in the facility, unless the inmate is under the age of 18. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.82 – Access to emergency medical and mental health services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on medical and mental health staff interviews and documentation provided as well as Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section E on pages 9 and 10, section L on pages 17 and 18, and section M on pages 18 and 19. Also, policy 13-79 section A on pages 2 - 4. The following delineates the audit findings regarding this standard:

115.82 (a) Corrections Corporation of America - Cimarron Correctional Facility has agreements with the Stroud Regional Medical Center, Cushing Regional Hospital, and Drumright Regional Hospital to treat inmate victims of sexual abuse. The facility also has medical and mental health staff at the facility ensuring inmates 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (b) Corrections Corporation of America - Cimarron Correctional Facility has procedures to follow when no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (c) Corrections Corporation of America - Cimarron Correctional Facility ensures inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.82 (d) Corrections Corporation of America - Cimarron Correctional Facility requires that all treatment services provided to the victim are without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.83 – Ongoing medical and mental health care for sexual abuse victims and abusers

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on medical and mental health staff interviews and documentation provided, Corrections Corporation of America - Cimarron Correctional Facility PREA policy 13-70, page 3 and 4, section 1 and 2, policy 13-79, page 3, section b, page 4, section 2 and page 5, section 2 and 3. The following delineates the audit findings regarding this standard:

115.83 (a) Corrections Corporation of America - Cimarron Correctional Facility offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (b) Corrections Corporation of America - Cimarron Correctional Facility mandates that 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (c) Corrections Corporation of America - Cimarron Correctional Facility requires that medical and mental health staff provide all victims with medical and mental health services consistent with the community level of care. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (d and e) Corrections Corporation of America - Cimarron Correctional Facility is an all-male facility. Therefore, this part of the standard is not applicable.

115.83 (f) Corrections Corporation of America - Cimarron Correctional Facility requires that medical and mental health staff provide inmate victims of sexual abuse while incarcerated tests for sexually transmitted infections as medically appropriate. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (g) Corrections Corporation of America - Cimarron Correctional Facility requires that medical and mental health staff provide treatment services 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.83 (h) Corrections Corporation of America - Cimarron Correctional Facility attempts to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning such abuse history and offer treatment when deemed appropriate by the mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.86 – Sexual abuse incident reviews

X Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on interviews with the Warden, PREA Coordinator, the PREA Manager, and documentation provided as well as Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section N on pages 21 and 22. The following delineates the audit findings regarding this standard:

115.86 (a) Corrections Corporation of America - Cimarron Correctional Facility 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (b) Corrections Corporation of America - Cimarron Correctional Facility ensures that these reviews occur within 30 days of the conclusion of the investigation and documents the review on the "Sexual Abuse Incident Review Report" form 14-2F. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (c) The review team consist of upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.86 (d) 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 the facility; and they examine the area in Corrections Corporation of America - Cimarron Correctional Facility 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. The agency has deployed an excellent PREA after action review form which addresses all elements of the standard. Corrections Corporation of America - Cimarron Correctional Facility conducts an incident review for all cases and reviews all findings telephonically with the agency wide PREA Coordinator for additional

clarification and guidance. Therefore, the facility exceeds the intent of this part of the standard.

115.86 (e) Corrections Corporation of America - Cimarron Correctional Facility shall implement the recommendations for improvement, or shall document its reasons for not doing so. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.87 – Data Collection

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

Based on interviews with the PREA Coordinator, the PREA Manager, and documentation provided as well as Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2 section T, on pages 27 and 28. The following delineates the audit findings regarding this standard:

115.87 (a), (b) and (c) Corrections Corporation of America - Cimarron Correctional Facility 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. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (d) Corrections Corporation of America - Cimarron Correctional Facility maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (e) Corrections Corporation of America - Cimarron Correctional Facility does not contract its inmates to other facilities. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.87 (f) Upon request, Corrections Corporation of America - Cimarron Correctional Facility provides all such data from the previous calendar year to the Department of Justice no later than June 30 when required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.88 – Data Review for Corrective Action

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

Based on interviews with the PREA Coordinator, the PREA Manager, and documentation provided as well as Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section T-3 page 28. The following delineates the audit findings regarding this standard:

115.88 (a) Corrections Corporation of America - Cimarron Correctional Facility 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 Corrections Corporation of America - Cimarron Correctional Facility as a whole. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88 (b) Such reports includes a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of Corrections Corporation of America - Cimarron Correctional Facility's progress in addressing sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88 (c) Corrections Corporation of America - Cimarron Correctional Facility's report is approved by the Corrections Corporation of America's agency head and made readily available to the public through its website www.cca.com. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.88 (d) Corrections Corporation of America - Cimarron Correctional Facility may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility, but must indicate the nature of the material redacted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

§115.89 – Data Storage, Publication, and Destruction

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

Based on interviews with the PREA Coordinator, the PREA Manager, and documentation provided as well as Corrections Corporation of America - Cimarron Correctional Facility PREA policy 14-2, section T-2-c on page 27. The following delineates the audit findings regarding this standard:

115.89 (a) through (d) Corrections Corporation of America agency PREA Coordinator makes all aggregated sexual abuse data, from facilities under Corrections Corporation of America direct control readily available to the public at least annually through the agency website: www.cca.com.

All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or Local law requires otherwise. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

AUDITOR CERTIFICATION:

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

Rodney P. Bivens

Auditor Signature

July 14, 2015

Date