

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



Name of Facility:		Federal Bureau of Prisons FCC Florence	
Physical address:		5880 State Highway 67 South, Florence, CO 81226	
Date report submitted:		February 20, 2015 (Final)	
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Date of facility visit:	May 6-9, 2014		
Facility Information			
Facility mailing address: <i>(if different from above)</i>	P.O. Box 7500; 5880 State Highway 67 South; Florence, CO 81226		
Telephone number:	719-784-5022		
The facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input checked="" type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	
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Agency Information			
Name of agency:	Federal Bureau of Prisons		
Governing authority or parent agency: <i>(if applicable)</i>	United States Department of Justice		
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AUDIT FINDINGS

NARRATIVE:

The audit of the FCC Florence was conducted with an IRP audit on May 6-9, 2014. The IRP Chair was Jean Moltz with members Cathy Slack and Michelle Van Dusen. The PREA audit was conducted by Cathy Slack and Jean Moltz assisted with ten 10 inmate random interviews.

It is the mission of the Federal Bureau of Prisons (FBOP) and Florence Correctional Complex (FCC) to protect society by confining offenders in the controlled environments of prisons and community based facilities that are safe, humane, cost-efficient, and appropriately secure, and that provide work and other self-improvement opportunities to assist offenders in becoming law-abiding citizens.

FCC Florence, Colorado is located just south, approximately 2 miles south of the town of Florence, which is itself about 40 miles south of Colorado Springs, and approximately 100 miles south of Denver.

The Federal Correctional Complex, Florence is comprised of four institutions with different missions and security levels. The facilities are located on 640-acres which were donated by to the Federal Government by the local community of Florence, Colorado in 1990. In 2000 the four institutions were consolidated to operate as a correctional complex. These institutions are located in close proximity to one another in order to consolidate administrative and operational services. The Complex has also enabled staff to gain experience at institutions of many security levels, enhance emergency preparedness by having additional resources within a short distance, and by allowing for the economies of scale. Each institution houses only male inmates. The FCC's Executive Staff is led by the Complex Warden, who is the final decision maker. Each member of the Executive Staff is responsible for a number of programs, operations and functions.

DESCRIPTION OF FACILITY CHARACTERISTICS:

Federal Prison Camp (FPC) is a satellite facility of the ADX. The minimum security satellite camp started accepting inmates in July 1992. The Camp currently houses 515 adult males serving an average sentence of seven years. The FPC is comprised of two housing units, Summit and Teller, which are double-bunked, multi-winged dormitories. Teller is designated for the Residential Drug Abuse Program, known as RDAP.

The facility is situated on 36 acres facing the FCI. The Camp is not fenced and is situated on your left to the north as you drive into the FCC Correctional Complex. The inmates at this location are in the Bureau of Prison's (BOP's) lowest security category. They provide all labor which includes landscaping, outside and vehicle fleet maintenance, and warehouse operations, for the outside work details that support the entire Complex. Community

activities (primarily furloughs to assist inmates nearing release in planning for their transition) are limited to those individuals who qualify for the lowest custody category.

RDAP is an intensive, long term in-patient program for offenders at the Camp with documented substance abuse problems. The Bureau uses the Modified Therapeutic Community (MTC) modality of choice. The strength of the MTC modality is the concept of "community as method." This experiential social learning, cognitive behavioral therapy modality has been found particularly useful with the offender population. Programming consists of a minimum of 500 contact hours; i.e., to face contact between treatment staff and inmate participants, over no less than nine months of half-day programming.

The Federal Correctional Institution (FCI) Florence is a medium security facility for adult male inmates. The FCI started accepting inmates in January 1993. The inmate housing consists of four separate buildings with double bunked cells. The Mesa unit provides 304 beds, the Norwood unit provides 304 beds, the Otero unit provides 304 beds and the Pueblo provides 304 beds. One of the four structures provides for the Residential Drug Abuse Program (RDAP). There is currently a separate housing unit at USP Florence for FCI Florence detention and segregation use.

The FCI provides structures that accommodate food service, warehouse, mechanical rooms, rear gate, inmate program spaces, public spaces, health services, laundry, commissary, garage, maintenance, and administrative offices.

██
██
██████████ Inmates confined at this facility have controlled movement within the secure compound for up to 15 hours a day.

Numerous Educational and Psychological programs to include the Residential Drug Abuse Program (RDAP) are offered at the FCI. Most programs are offered both in English and Spanish. The institution utilizes the services of numerous volunteers from the community to assist primarily in religious services

Programs provided include Basic Literacy (Pre-GED), General Educational Development (GED), pre-release preparation program, and English as a Second Language. Post-secondary education is available in the form of correspondence courses. Vocational training is also available and includes: drafting, cabinet making, and mechanical/computer assisted drafting, building maintenance, wellness program, restaurant management, and parenting courses.

Federal Prison Industries (UNICOR) operates an Upholstery Factory which employs approximately 200 inmates in either full or part-time positions. The inmates produce a variety of upholstery products including several different styles of stacking chairs; executive chairs and sofas along with ergo style seating. UNICOR sponsors a Resume writing class for inmates assigned to the factory to further their release preparation goals. UNICOR provides well known opportunities for the inmate population to obtain a viable means of earning a living upon release to the community.

The Residential Drug Abuse Program (RDAP) provides intensive drug abuse treatment to inmates who have been diagnosed with a drug disorder. The RDAP is a minimum of 500 hours over 9-12 months in duration, in a unit set apart from the general population (Norwood/B at the FCI and is accessible by handicap inmates.). The Bureau's treatment philosophy is evidence-based using Cognitive Behavioral Therapy (CBT) within a modified therapeutic community setting. The RDAP consists of three components: 1) a unit based

treatment (program at the FCI); 2) follow-up treatment (one-hour minimum per month at the FCI following completion of the unit based treatment; and, 3) community transition drug abuse treatment in the halfway house. At the FCI, there is a Drug Abuse Program Coordinator and three RDAP treatment specialists. Treatment capacity is based on a staff-to-inmate ratio of 1-to-24, one treatment specialist for 24 inmates.

The Non-Residential Drug Abuse Treatment program helps participants explore drug use, learn skills to improve thinking, and examine key transition issues. The program is offered to inmates in the general population, as well as to inmates housed in special security units, including SHU and the D-B unit.

There are recreational activities available and a 40-hour drug education and intervention program. A parenting program and release preparation is also provided. The institution provides religious services for all faiths and community volunteers. The Health Services Department is part of the Complex services. Visiting is conducted in the visiting room with Special Housing Unit visits conducted via video visiting.

The United States Penitentiary Florence (USP) was activated in February 1994. It is a high-security, all male institution housing inmates in four separate buildings in double-bunked cells; each building has two housing units. The facility has general population housing units and a special housing unit for detention and segregation use. [REDACTED]

[REDACTED] Inmates leaving the institution are under staff escort and in full restraints based on the security classification of inmates at this facility. Inmates confined here generally have controlled movement within the secure compound for up to 15 hours a day.

[REDACTED]

Inmate Management: USP Florence consists of the following three missions: Transitional Unit and Pre-Transfer phase of the ADX Step Down Program: is housed in DB Unit. The Transitional and Pre-transfer phase are the final two phases of the step-down component which commences at the Administrative Maximum Facility (ADX). Ordinarily, these are the final program requirements prior to an inmate transferring to the general population of another high security facility. Inmates will usually be required to remain in the Transitional Unit for 6 months before being considered for placement into the Pre-Transfer Unit. Inmates will usually be required to remain in the Pre-Transfer unit for 12 months before being considered for transfer to another institution. During this 12-month phase, staff can sufficiently monitor each inmate's adjustment in the least restrictive environment within the institution prior to transferring him to another facility.

The Special Management Unit (SMU) at the USP has been established to house inmates who require greater management of their interaction to ensure the safety, security, orderly operation of the Bureau of Prisons facilities, or protection of the public. The SMU is a multi-phase program whose mission is to teach self-discipline, pro-social values, and the ability to successfully coexist with members of other geographical, cultural, and religious backgrounds. Normally, this program has four-levels and is completed in 18-24 months. Only the Levels III and IV of the SMU program are available at the USP Florence, Colorado. These two levels are normally completed in 8-12 months.

Movement through each level of this program is dependent on strict adherence to the rules and regulations of the unit and on observed behavior and program participation. As inmates progress to the higher levels of the program, they will earn additional privileges. Lack of effort, rule and disciplinary infractions, or a poor attitude may result in delaying completion of the program to include repeating levels. Progress in the program is evaluated by a multi-disciplinary team. Upon successful completion, inmates are transferred to an open population facility. Inmates in SMU units do not interact with the rest of the population.

The Administrative Maximum Facility (ADX) is a high security, all-male institution which opened in 1994. The ADX houses maximum custody inmates in single occupancy cells. Maximum custody is the highest custody level that can be assigned to an inmate. This classification is reserved for those inmates that require the tightest controls and supervision. This is the only facility of its type in the Federal Bureau of Prisons, although there are many other USPs. This 490-bed facility includes inmates who are assaultive or disruptive, those with terrorist links, and those who are prone to escape. There have been no escapes or serious attempts since the facility opened. The missions of the ADX are to [1] assist the agency in maintaining the safety of both staff and inmates, while eliminating the need to increase the security of other penitentiaries; and [2] confine inmates under close controls while providing them opportunities to demonstrate progressively responsible behavior; participate in programs in a safe, secure environment; and establish readiness for transfer to a less secure institution. All inmates receive due process hearings prior to their placement at the ADX. The ADX houses less than one-third of one percent of the BOP's overall inmate population: 95 percent of the inmate population was transferred to the ADX from other facilities, while only 5 percent are direct court commitments

There are four general population housing units that share an identical three-year correctional component and have the capacity to house 64 inmates in each unit for a total of 256 inmates. Inmates housed in the general population receive up to 10 hours of out-of-cell exercise weekly and two 15-minute telephone calls monthly. Once an inmate successfully adheres to the necessary criteria, he is eligible for placement into the institution's Step-Down component of the General Population Program.

Inmates assigned to the Step-Down component are initially housed in the Intermediate Unit, a 32-bed housing unit. Inmates are given up to 1.5 hours out-of-cell exercise a day and receive three 15-minute telephone calls monthly. Inmates, who adhere to these provisions for six months, progress to the Transitional phase of the Step-Down component. The Transitional phase and Pre-Transfer phase are located at USP, high security. Inmates have increased out-of-cell time and receive four telephone calls monthly.

Inmates who adhere to the programming requirements for six months are moved to the Pre-Transfer Unit. The Pre-Transfer Unit is the final phase of the Step-Down component and takes place at USP Florence. Inmates who continue to demonstrate positive institutional adjustment for 12 months are referred for transfer to another facility.

Inmates in the Intermediate Unit (J) are housed in groups, with each group having a maximum of eight inmates. The escort requirements for inmates in this unit are the same as those in the General Population Units. Inmates are provided outdoor and indoor recreation with inmates of their assigned group. Each group of inmates is allowed on the range for one and one-half hours each day. Inmates consume their meals within their cells. Showers are located on the ranges and inmates may shower any time they are on the range.

The Control Unit (B Unit) is a 78-bed Administrative Unit that houses the most dangerous and disruptive inmates within the Federal Prison System. They are designated in the unit as a

result of serious misconduct during service of their sentences. Inmates receive a due process hearing prior to their placement into the unit. Additionally, each case referred for Control Unit placement is approved by the Regional Director and Assistant Director of the FBOP. They continue to review each inmate's adjustment during an in-person meeting with the inmate every 90 days and must authorize each inmate's release from the unit. While being moved, inmates are restrained and escorted by three staff. The period of time an inmate is assigned to the Control Unit is based on the severity of the misconduct that caused their placement in the unit. Inmates are afforded individual recreational opportunities for up to seven hours a week and receive one 15 minute telephone call each month.

The Special Security Unit (H-Unit) houses inmates who have Special Administrative Measures (SAM), pursuant to 29 C.F.R. SS501.2 or 501.3. Prior to arrival in this unit, the unit team will review the SAM and reason(s) for placement at the ADX to determine assigned quarters. There is a three-phase program for inmates housed in "H Unit". The types of privileges afforded to these inmates are determined by the phase.

Phase One is a baseline phase of the program in which the inmate may be permitted two non-legal telephone calls per month; restricted access to art and hobby craft items; access to a restricted commissary list; and escorted shower time on their respective range three times a week. In Phase Two, an inmate may be permitted three non-legal telephone calls per month; access to an expanded commissary list; access to an expanded art and hobby craft list; and unescorted shower time on their respective range five times weekly. The advancement to Phase Three may be contingent upon modification being made to the inmate's SAM. An inmate in this phase may be permitted four non-legal telephone calls per month; to consume a minimum of one meal on the range with up to three other inmates; continued access to the expanded art and hobby craft items; access to a further expanded commissary list; and out-of-cell recreation on the range with up to three other inmates. Every inmate housed in H-Unit has the opportunity to demonstrate he may be afforded additional privileges.

An inmate's advancement to the next phase of the Program is a classification decision as to whether the inmate can function with additional privileges without; posing a risk to institutional security and good order; posing a risk to the safety of staff, inmates or others, including the inmates himself; and/or posing a risk to public safety. In general, an inmate must have a minimum of 12 months clear conduct while housed in the unit, in the respective phase; must have active participation in and completion of all programs recommended by the unit team; must demonstrate positive behavior and respectful conduct towards staff and other inmates; and, must have a positive overall institution adjustment to include, but not limited to, personal hygiene, cell sanitation, etc.

SUMMARY OF AUDIT FINDINGS:

This audit was a combined American Correctional Association (ACA) Intensive Reaccreditation Program (IRP) audit as well as a PREA audit so there were three auditors at the Florence Correctional Complex. The PREA auditor and the IRP auditor are both certified under the Department of Justice to conduct PREA audits. The third auditor did not conduct interviews at the FCC Complex.

Inmate interviews were conducted on the second, third and fourth day of the audit. The PREA auditor conducted fourteen (14) random interviews at USP and FPC. There were two (2) inmates at the ADX who sent letters to the American Correctional Association that were interviewed regarding their letters and PREA. The IRP Chair auditor conducted ten (10) random inmate interviews which were at FCI. The total number of random inmate interviews conducted was twenty-six (26). The PREA auditor

attempted to interview eleven (11) random interviews at the ADX, however nine (9) refused.

There were an additional six (6) inmate interviews based on a special category of inmates. There were two (2) inmates who reported sexual abuse and one of those were currently under investigation by OIG. There were three (3) inmates who were interviewed as gay inmates. There was one (1) inmate who was disabled in a wheelchair who was interviewed. There were no transgender inmates at the FCC Complex.

Inmates interviewed were knowledgeable about how and where to report sexual abuse and sexual harassment. They all indicated they had received written and video information either in the Receiving and Discharge area on their arrival or on the housing units for those that have been at the facility for a considerable amount of time. There are highly noticeable PREA posters in yellow and black which are both in English and Spanish. The inmates have also a booklet on Sexually Abusive Behavior and Prevention in both Spanish and English which provides *An Overview for Offenders*. Most of the inmates interviewed did not feel that an announcement was made when female staff entered the housing units.

The PREA auditor interviewed ten (10) random staff and the ACA/IRP auditor who is also PREA certified, interviewed seven (7) random staff. There were twenty-nine (29) specialized staff who were interviewed by the PREA auditor. A Volunteer interview was conducted by phone as a volunteer was not available at the facility during the time of the interviews. Inmates and staff were well aware of the Zero Tolerance regarding Sexual Abuse and Sexual Harassment.

[REDACTED]

Staff trained at FCC Florence to be first responders was well versed on their responsibilities in reporting sexual assaults and suspected sexual abuse. When questioned about evidence preservation and medical considerations staff responses reflected agency policy and standard requirements. There were twenty-five allegations of sexual abuse and sexual harassment received at FCC Florence. All twenty-five of the allegations resulted in an administrative investigation. Two of the allegations were referred to criminal investigation. There were no allegations of sexual abuse while confined at another facility and reported to FCC Complex staff.

Number of standards exceeded: 4
Number of standards met: 38
Number of standards not met: 0
Non-applicable: 1

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor Comments, including corrective actions needed if does not meet standard.

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program revised 1/6/2014 addresses this standard. PS 5270.09 Inmate Discipline Program dated 8/1/2011 addressed this standard. PS3420.11 Standards of Employee Conduct dated 12/6/2013 addressed this standard. The Institution Supplement IS 5324.11 Sexually Abusive Behavior Prevention and Intervention Program revised 4/3/2014 addresses this standard. There are highly noticeable PREA posters in yellow and black which are both in English and Spanish posted throughout the living units and inmate work areas. The inmates have also a booklet on Sexually Abusive Behavior and Prevention in both Spanish and English which provides *An Overview for Offenders*.

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

XX FCC Florence Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Federal Bureau of Prisons (FBOP) renewed all existing contracts to include PREA requirements of policy and policy. There were 13 contracts renewed with private entities or other government agencies. Contract monitoring is in the contract to be done through on site visits and PREA documentation/audits.

§115.13 – Supervision and Monitoring

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program revised 1/6/2014 addresses this standard. PS3000.03 Human Resource Management Manual dated 12/19/2007 addressed this standard. In the FBOP all staff is considered law enforcement except contract and all staff receive the same training as corrections officers. Filling vacant positions is a high priority with FBOP and efforts are documented in quarterly Manpower Workforce/Utilization report. There are quarterly meetings with the Complex Warden, Business, Manager, Human Resource Manager and PREA Compliance Coordinators to review staffing issues. The PREA auditor reviewed the two quarterly reports. According to institutional policy FCC 5502.10E Duty Officer Guidelines and Reporting, dated 9/7/ 2012 which includes Institutional Duty Rounds. The Institutional Duty Officer will conduct unannounced rounds. Example logs of unannounced rounds were documented on Institutional Duty Officer (IDO) form and reviewed by this auditor. Staff and inmate interviews confirmed that unannounced rounds are being conducted.

§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)

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

N/A no youthful offenders at FCC Florence.

§115.15 – Limits to Cross-Gender Viewing and Searches

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

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

115.15 (d) standard states: "The facility shall implement policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an inmate housing unit."

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program revised 1/6/2014 addresses this standard. Policy Statement 5342.11, page 18, 20 and 21 meets this standard.

No cross gender searched strip searches or cavity searches have been conducted in the past 12 months or exigent circumstances have occurred to conduct cross gender strip searches.

All Staff at the time of the audit have been trained in cross-gender pat down searches and searches of transgender inmates. There were no transgender inmates housed at this facility during the time of the audit. All inmates and staff interviewed indicate the male population is able to dress, shower and toilet without female staff viewing them.

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. FCC 5324.11A Sexually Abusive Behavior Prevention and Intervention Program dated 4/3/2014 addressed this standard. FCI Florence Compliance Manager can also contact local disability agencies and available interpretation services for assistance as a resource to ensure the facility is providing effective communication accommodations when a need for such an accommodations is known. There is a contract with Sign Language Interpreters for PREA with Sign Language, USA, LLC. There is also a quick sheet from Language Line Solutions that provides assistance to inmates. Language Line Solutions phone number is 1-866-874-3972. There is also a list of 32 interpreters are contract to interpret for inmates as requested. One disabled inmates was interviewed.

§115.17 – Hiring and Promotion Decisions

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS3000.03 Human Resource Management Manual dated 12/19/2007 and PS 3420.11 Standards of Employee Conduct dated 12/6/2013 addressed this standard. The interview with Administrative Human Resource Manager and general interviews with staff support all aspects of this standard.

§115.18 – Upgrades to Facilities and Technology

XX **FCC Florence Exceeds Standard** (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Auditor Comments, including corrective actions needed if does not meet standard:

The Warden and Executive Staff at the FCC made rounds to each department and all housing units and discussed PREA and blind spots to increase staff awareness, and discussed ways to promote and improve inmate safety in those blind spots. **The following upgrades or enhancements occurred at the FCC Complex:**

- [REDACTED]
- Shower curtains were placed on the shower doors at the USP to prevent voyeurism while taking a shower
- Cameras were adjusted to where toilets are not visible in the FCI Medical Observation cell
- The toilets in the R&D holding cells at the FCI and USP were outfitted with waist high barriers to prevent voyeurism and promote privacy
- Barrier was installed around urinal in the FCI Recreation restroom (inside restroom)
- Outdoor restroom barriers were installed and windows tinted/painted in FCI Recreation (outside restroom)
- Partitions in R&D at the FCI and USP were installed to increase privacy during inmate visual searches as part of the intake process

- Privacy covering was installed to block the view of inmates utilizing the restroom in UNICOR at the FCI
- Radio transmitters were installed in the housing units at the USP to allow staff to broadcast through the radio system; Admission and Orientation, the Warden's message on Zero tolerance concerning PREA, education classes, and Psychology classes. Education maintains the system, to include the scheduling of the broadcasts
- Shower doors in the housing units at the FCI were raised to prevent voyeurism
- A privacy cover was installed in the USP's visual search room in the Visiting Room
- Bathroom doors for privacy were hung in Recreation at the USP and Camp
- A sign posted at the ADX on the door in the secure hallway near Control which states, "No Inmates Beyond this Point"
- Outside urinals were removed at the USP due to the institution's transition back to a general population yard
- Due to the extensive amount of sunlight during the spring and summer months, window tinting was installed in the FCI Recreation Department hallway to promote a better view and identification of inmates in that area should an incident occur
- A dark color was painted around the gymnasium walls in the FCI to provide contrast due to the sunlight and light colored clothing inmates wear. The color contrast promotes safety and enables better viewing and identifying of inmates
- Moved 4-man tables from the gymnasium into a common area in Recreation at the FCI for increased visibility

§115.21 – Evidence Protocol and Forensic Medical Examinations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addresses this standard in regards to Evidence Protocol. There is also a Guide for First Responders. The Memorandum of Understanding between the FBI and FBOP on Violations of Federal Criminal Statutes also addressed this standard. 115.21 (f) BOP has requested the FBI and/or OIG follow the requirements of paragraphs 115.21 (a through e.). Psychology Services has entered into an agreement with a rape crisis center to make available a victim advocate to inmates at the FCI, USP, and Camp Victim advocacy has been arranged with the Family Crisis Center in Canon City, Colorado. Victim advocacy services offered by the rape crisis center will not be available to inmates

at the ADX due to safety and security concerns. Psychology Services or Chaplaincy Services may provide victim services at the ADX. The memo dated April 3, 2014 from FCC Florence Complex Warden Berkebile, indicates that no victims have requested a victim advocate to provide emotional support or crisis intervention.

§115.22 – Policies to Ensure Referrals of Allegations for Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 and FCC 5324.11 Sexual Abusive Behavior Prevention and Intervention Program dated 4/3/2016 addresses this standard. PS5508.02 Hostage Situations or Criminal Actions Requiring FBI presence dated 12/12/96 addressed this standard. There were a total of twenty-five allegations of sexual abuse and sexual harassment received at the FCC Florence Complex which includes four facilities, FCI, ADX, USP and FCC. All twenty-five (25) of the allegations resulted in an administrative investigation. There were two allegations were referred to criminal investigation. There is a website regarding this standard which the PREA auditor checked on line entitled:

http://www.bop.gov/Inmate_programs/sa_prevention_reporting.jsp

§115.31 – Employee Training

XX Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

- PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 and FCC 5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 4/3/2014 addresses this standard. Based on review of training records and training verification signatures volunteers and contract staff have been trained. In interviews and discussion with staff, it was evident that staff are very knowledgeable regarding PREA and the facility procedures to respond to an alleged sexual assault. 115.31 (d) agency does document through staff signature or electronic signature that they understand the training received. Annual Refresher Training (ART) is occurring. A Desktop Icon was placed on all FCC computers for Complex Staff for PREA training videos. Staff roll calls were held for all Complex Staff, during all shifts, for PREA training and to promote staff awareness.

§115.32– Volunteer and Contractor Training

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addresses this standard. Based on interviews and review of training records, volunteers and contract staff have been trained. A phone interview with a contract staff was conducted during the PREA audit. Volunteers and contract staff do sign that they understood the training. There were 98 volunteers and contractors who have been trained in the last twelve months.

§115.33 – Inmate Education

XX Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program does address this standard. Interviews with staff revealed that all inmates receive the training. Interviews with inmates indicated they receive information about zero tolerance at the time of inmate orientation and how to report incidents of sexual abuse or harassment both in English and Spanish. There is information in the Inmate's Handbook and an overview for offenders in a Sexually Abusive Behavior Prevention and Intervention pamphlet dated April 2013 which is both in English and Spanish. There are zero tolerance posters in English and Spanish posted throughout the institution.

§115.34 – Specialized Training: Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS324.11 Sexually Abusive Behavior Prevention and Intervention Program does address this standard. There were 9 investigators at FCC Complex and all 9 have completed the required PREA investigative training. These investigators assist and cooperate with external investigators Federal Bureau of Investigation and Domestic Investigations and Operations Guide (FBI & DIOG). There is a website regarding this standard which the PREA auditor checked on line entitled:

http://www.bop.gov/Inmate_programs/sa_prevention_reporting.jsp

As far as external investigators, every prospective agent must complete the New Agent Training Program before becoming a Special Agent. The DIOG is a significant part of this specialized training, as is relevant legal training including on *Miranda* and requirements for building a case for prosecution, interviewing techniques and evidence collection. In addition, at their first field office post, new agents receive additional training in several of these areas as part of each field's office's New Agent Development Program. Agents assigned to investigate criminal matters receive regular refresher training on the DIOG and criminal investigative procedures, methods, and legal issues. There is a Field Evidence Management and Operations Policy Implementation guide for the FBI which demonstrates the FBI agents have training and guidelines in accordance with investigative requirements.

§115.35 – Specialized training: Medical and mental health care

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 address this standard. There are 31 permanent medical staff and 11 medical contractors which have all received specialized training. There is a Sexually Abusive Behavior Prevention and Intervention Annual Refresher Training class conducted. Staff at FCC Complex does not conduct forensic examinations. There is a SANE Nurse contract in place. The inventory of tools and equipment that are authorized to bring into an institution is approved and verified at front entrance. Badged Sexual Assault Nurse Examiner (SANE) Nurse authorized to complete onsite examinations, including the collection of sexual assault evidence (e.g., "rape kit") and conducting an examination for physical evidence, vs. sending the victim(s) and perpetrator(s) to an outside hospital All three institutions, USP, FCI, FPC have badges for two people that are authorized to enter the facilities. It is projected that it will take two (2) hours for an examination. The ADX does not allow anyone from outside the facility to conduct forensic exams due to safety and security concerns. The inmates are housed in single cells and there is little or no opportunity for the inmates at the ADX to have to mix with other inmates. The Sane Nurses are badged at all facilities which equal enhanced safety and security for the public as well as negating the need to escort teams outside of the secure facilities. In comparison to victim advocacy, due to the unique mission statement of the ADX, counseling services require direct consoler and inmate contact with very limited staff oversight. The ADX psychology staff chaplaincy staff are trained specifically for these types of situations. Once an inmate is

referred to the ADX, he is placed in a single cell status by the referring institution; the inmate receives a due process hearing from CO. Once assigned at the ADX the inmates receive individualized cells and programming.

§115.41 – Screening for Risk of Victimization and Abusiveness

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. Screening occurs immediately upon admission. The screening instrument has two questions asked 1) Have you ever been sexually assaulted? And 2) Have you recently been sexually assaulted. This was confirmed by documentation and interviews by staff and inmates.

§115.42 – Use of Screening Information

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

P5324.11 Sexually Abusive Behavior Prevention and Intervention Program does address this standard. The new screening form has changed and the language can be developed to be more clear to meet all the 10 requirements of this standard, specifically (d)(8) and (d)(9) regarding inmate's sexual victimization and inmate's perception of vulnerability.

115.41 (d)(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.

115.41 (h) Inmates may not be disciplined for refusing to answer, or for not disclosing complete information in response to paragraphs (d) (1), (d) (7), (d) (8), or (d) (9) of this section.

§115.43 – Protective Custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program and 3420.11 Standards of Employees Conduct dated 12/6/2013 does address this standard. FCC Florence has no inmates that have been of PREA related segregation which have existed beyond 30 days.

§115.51 – Inmate Reporting

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 and FCC 5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 4/3/2016 do address this standard. PS 3420.11 Standards of Employee Conduct dated 12/6/2013 addressed this standard. Inmate interviews confirmed multiple ways for inmates to report privately sexual abuse or sexual harassment. Information is outlined in the Admission and Orientation Handbook both in Spanish and English. PREA Posters are both in English and Spanish and are posted in the living units as well as the work areas of the facility. An inmate can tell any staff member, file an administrative remedy, utilize the electronic message (TRULINCS) to report confidentially any sexual abuse or harassment. An inmate can also report in writing to the Office of the Inspector General in Washington, DC. There is also contact information on the FBOP called the "Voice" where information can be obtained. Staff interviews all indicated they are required to document verbal reports immediately.

§115.52 – Exhaustion of Administrative Remedies

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS 5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. P3420.11 Standards of Employee Conduct dated 12/6/2013 addressed this standard. PS1330.18 Administrative Remedy Program dated 1/6/2014 does address this standard. There were 37 grievances in the past 12 months filed that an alleged sexual abuse occurred at FCC Florence. All 37 grievances reached final decision within 90 days.

§115.53 – Inmate Access to Outside Confidential Support Services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 and FCC 5324.11A dated 4/3/2014 addresses this standard. Sexually Abusive Behavior and Prevention pamphlet "An Overview for Inmates" is also available for inmates in Spanish and English. There are also zero tolerance posters in English and Spanish available for inmates. All inmates interviewed confirmed ability to contact an outside source. The Family Crisis Service, Inc. Domestic Violence and Rape Crisis Center has an MOU with FCC Florence. If an inmate needs to contact the Family Crisis Center they can make a confidential phone call with the assistance of the Chaplain's office, psychology department or case manager. A National Sexual Assault 24-Hour Hotline number (719) 275-2429 has been provided to the inmate population and interviews indicated all inmates were aware of the hotline number.

§115.54 – Third-Party Reporting

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program addressed this standard. The FBOP posts publicly, and maintains, the third party reporting avenue on its website. The website www.bop.gov Sexual Abuse Prevention and Reporting provides information for third party reporting. There is also a pamphlet "Sexually Abusive Behavior Prevention and Intervention" which distributes information on third party reporting. This was confirmed in inmate interviews.

§115.61 – Staff and Agency Reporting Duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. This was also verified during interviews with staff.

§115.62 – Agency Protection Duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. There is a facility "guide" for First Responders. This was also verified during interviews with staff. FCC Florence currently has no cases pertaining to this standard.

§115.63 – Reporting to Other Confinement Facilities

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/16/2014 addressed this standard. IS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 4/3/2014 addressed this standard. There have been no such notifications in the past 12 months.

§115.64 – Staff First Responder Duties

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. Staff interviews confirmed that staff are well trained in these requirements. Each staff member has a checklist to help guide them through the first responder duties. In the past 12 months, there were seventeen (17) allegations that an inmate was sexually abused. Of these seventeen (17) allegations, Eight (8) times the first security staff member to respond to the report separated the alleged victim and abuser. The number of times that staff were notified within a time period that still allowed for the collection of physical evidence was one (1) time. During this one time staff preserved and protected the crime scene until appropriate steps could be taken.

§115.65 – Coordinated Response

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/16/2014 addressed this standard. The First Responder checklist "One Source" includes medical, mental health, investigators and administrative staff.

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Central office reported there has been no collective bargaining agreement entered into or renewed since August 2013.

§115.67 – Agency protection against retaliation

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. The PREA Compliance Manager is responsible for tracking against any inmate retaliation and utilizes a tracking log.

§115.68 – Post-Allegation Protective Custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. There has been 1 instance in which the inmate requested Protective Custody following an allegation of sexual harassment.

§115.71 – Criminal and Administrative Agency Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. A letter dated April 2, 2014 from the Principal Deputy General Counsel of the U.S. Department of Justice and FBI refers to this information addressed in the FBI's Domestic Investigations and Operations Guide (DIOG) which governs the conduct of all criminal investigations in the U.S. There have not been any incidents warranting an FBI or OIG investigation in regards to sexual abuse or sexual harassment. There were 25 investigations at the facility that were completed in the past 12 months. Of the alleged sexual abuse investigations that were completed in the past 12 months, all inmates were notified, verbally or in writing of the results of the investigation.

§115.72 – Evidentiary Standard for Administrative Investigations

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. This information was also confirmed with facility investigator.

§115.73 – Reporting to Inmate

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. This information was also confirmed with facility investigator. There were 25 investigations of sexual abuse that were completed in the last 12 months. All 25 inmates were notified verbally of results of investigation. There were no investigations completed by an outside agency.

§115.76 – Disciplinary sanctions for staff

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS3420.11 Standards of Employee Conduct dated 12/6/2013 addressed this standard. In review of PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. There have been no staff members, in the past 12 months that have violated agency sexual abuse or sexual harassment policy.

§115.77 – Corrective action for contractors and volunteers

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS3420.11 Standards of Employee Conduct dated 12/6/2013 addressed this standard. PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. PS 3420.11 is applicable to contractors and volunteers. No contractors or volunteers have been reported to law enforcement for engaging in sexual abuse or sexual harassment.

§115.78 – Disciplinary sanctions for inmates

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addresses this standard and PS5270.09 Inmate Discipline Program dated 7/8/2012. There have been no administrative or criminal findings of incidents of inmate-on-inmate sexual abuse in the last 12 months.

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. Confirmed in inmate interviews.

§115.82 – Access to emergency medical and mental health services

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. Also covered in IS 5324.11 Sexually Abusive Behavior prevention and Intervention Program as written in standards and verified with Health Services Administrator and health services staff interviews.

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

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. Also covered in IS 5324.09 Sexually Abusive Behavior prevention and Intervention Program.

§115.86 – Sexual abuse incident reviews

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. There were 13 administrative investigations of alleged sexual abuse in the last 12 months. All thirteen of the incidents have been completed with a sexual abuse incident and reviewed within 30 days.

§115.87 – Data Collection

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. Documentation reviewed demonstrated compliance with this standard.

§115.88 – Data Review for Corrective Action

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program dated 1/6/2014 addressed this standard. The annual report is to be available on www.bop.gov. Confirmed in interview with facility PREA Compliance Manager there is a system in place to conduct a comparison. Annual Report is covered from August 20, 2012 to December 31, 2012.

§§115.89 – Data Storage, Publication, and Destruction

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

PS5324.11 Sexually Abusive Behavior Prevention and Intervention Program addressed this standard.

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.

Cathy Slack, PREA Auditor

February 20, 2015