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After the introductions and large group meeting, the ACA team and the PREA audit team began a joint institutional tour with each member having their own staff recorder and the Warden leading the tour route for both groups. Thus leaving the Chapel and returning to the Administration Building, the tour of the John B. Connally Jr. Unit proceeded as follows:

1 building - Administration with the numerous offices including Human Resources, Inmate Records, Use of Force, Mailroom, Grievance, Classification, Disciplinary, Risk Management, Case Manager, Investigators, Safe Prisons/PREA, and Security Threat Group (STG)

2 building - Commissary

3 building - Inmate housing general population cells and pods

4 building - Inmate housing general population cells and pods

19 building - Dorm housing

14 building - Maintenance

16 building - Back gate

5 building - Vocational

15 building - Central plan/Boiler room

6 building - Kitchen/Dining/Laundry/Medical

7 building - Inmate housing

8 building (toured Tuesday) - Inmate housing

10 building - Education/General Library/Law Library/Medical Infirmary and Dental

12 building - Administrative Segregation

11 building - Solitary

The PREA team then returned to 1 building with follow-up compound visits on Tuesday and Wednesday.

The escorted tour, the morning perimeter tour and follow up visits during the next two days gave access and overview to the Connally Unit. The auditors' mindset was to observe all areas, and especially those areas of the facility that must be observed carefully in order to verify compliance with the standards. Attention was paid to how well the inmates were supervised, monitoring technologies used, notice of blind spots, and other indicators that may be of concern for safety and security of the inmate population.

narrative, both PREA auditors were duly impressed with the cleanliness and sanitation of the Unit and the Warden's leadership. Also impressive was the staff's commitment, through (up-and-down) the chain of command from Regional Director and Warden of the facility, to all staff, volunteers, and others associated with the John B. Connally Jr. Unit.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The John B. Connally Jr. Unit of the Texas Department of Criminal Justice (TDCJ) is located in Kenedy, Texas. The facility itself is two miles south of Kenedy on Highway 181 in Karnes County, about 70 miles southeast of San Antonio. This facility is a large male, maximum-security unit housing a maximum of 2848 inmates, current population is less due to staffing problems (one dorm is closed), with a current population of 2470. The compound is a polygon (square-ish/trapezoidal) of about 90 acres within two, 12 foot high chain-link fences secured with razor ribbon. The perimeter/circumference is patrolled during the evening, night hours, and busy recreational times. The Connally Unit sits on about 820 acres of land in semi-arid South Texas and was named after Gov. John B. Connally Jr, who served three terms as governor, and died June 15, 1993.

The Connally Unit was officially dedicated in July 1995. Construction commenced in May 1994. It is a "2250" proto-typical unit. There are 20 buildings within the double fenced compound. The largest building is building 12 with over 500 single cells for administrative segregation/single cell housing. Building 6 is another very large building housing the kitchen, dining, laundry and medical. Buildings 5 and 10 contain vocational and educational/library facilities. Buildings 3, 4, 7 and 8 are four general population dorms with 432 bunks per dorm. Buildings 18 and 19 are dorm housing (building 18, inmate dorm housing is closed). There is an Administrative building (1), Chapel building (20), and Maintenance building (14). As one drives up, most notable is the chain-link fencing with razor ribbon and the three, 27 foot high security towers.

Custody levels of offenders range, G1, G2, G3, G4, G5, and Administrative Segregation. These custody levels run from the minimum G1 to the maximum security G5. Operations at the facility include agricultural contract grazing, security forces, security pack canines, unit garden, unit maintenance services, operational support, including food service, grounds service, field force, commissary, laundry, education, health services, recreation, and janitorial. Program operations include educational programs, literacy, adult basic education/GED, changes, pre-release, cognitive intervention, career and technology programs, vocational trades, community work projects, faith-based dormitories, education reentry planning, chaplaincy services, crime stoppers, goat kids initiative, and volunteer initiatives such as, education, employment/job skills, substance abuse education, support groups, mentoring, life skills and religious/faith-based studies and activities. Faith-based activities were especially impressive and offer the inmate population activities and programs helpful not only in long-term rehabilitation, but in the day to day activities at the Unit.

The medical capabilities at the Connally Unit are managed by the University of Texas Medical Branch, (UTMB). It includes ambulatory, medical, dental, and mental health services. Medical care is available 24 hours a day, seven days a week with a 17 inpatient bed infirmary, including 13 assisted-living beds and 2 health observation rooms. Telemedicine medicine and digital medical services are available. All services are on a single level, including chronic care clinics and CPAP accommodating housing. The emergency medical community hospital is Otto Kaiser Memorial Hospital, Kenedy, Texas. The forensic hospitals used, with the capability of accompanying SAFE/SANE staff, are: Citizens Hospital, Victoria,

TDCJ Administrative Directive, AD 02.46, Employees of Private Businesses and Governmental Agencies Contracting with the Texas Department of Criminal Justice, requires compliance with agency policy, and specifically with, the “zero tolerance” of sexual abuse and sexual harassment policy.

The Safe Prisons/PREA Plan details “shall be applicable to all individuals, including visitors and volunteers employed, or under contract with, or supervised by the TDCJ, including professional staff and any person who is involved directly or indirectly with the care and custody of offenders”.

Contracts and examples of contracts were reviewed. The interview with the Agency Contract Manager was reviewed. Contract employees were interviewed and it was clear from this review and interviews with staff that “zero tolerance” is practice and in compliance with PREA law. This standard is substantiated. Contracts themselves contain PREA statement documents of compliance requirements.

§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)

This standard requires that the facility operates with adequate staffing as outlined in the 11 steps of PREA Standard 115.13. During this audit process, particular attention was paid to the critical complement of security staff needed to operate the institution, the inmate population count, the morale of staff and inmates and the other various factors critical to supervision and monitoring. This facility has 181 positions vacant. That in itself gave the auditors concern and they required documentation of efforts being made to recruit and employ staff. The TDCJ is having problems with staffing in certain areas of Texas where the oil boom has enlisted/employed most all available help and workers, however with the slowdown presently noted, recruitment opportunities are more likely available for the Connally Unit. The TDCJ is also offering incentives such as a \$4000 signing bonus to help fill Correctional Officer positions. Special employment procedures have also been instituted without lowering the quality or standards expected of correctional staff. Overtime is being offered and paid to assist in meeting any day to day staffing shortage. All of this helps meet the requirement for supervision and monitoring. The institution has not fallen below its critical complement.

Intermediate level and higher-level staff conduct unannounced rounds, which helps ensure a monitoring and supervising presence on a daily basis. One bright point at the Connally Unit is the over 700 video cameras which assist in maintaining appropriate supervision and monitoring. They are using this technology to assure the supervision needed in every area of the institution where inmates are housed, assembled or have routine access.

Reasons for any deviation of the staffing plan were also reviewed by the auditor.

There have been zero (0) cross gender, visual body cavity searches of inmates that did not involve exigent circumstances in the past 12 months.

The facility has no female inmates. Thus, there have been no cross-gender patdown searches of female inmates.

The facility has implemented policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their buttocks or genitalia, except in exigent circumstances. Additionally, policies and procedures require staff of the opposite gender to announce their presence when entering an inmate housing unit. Policies were reviewed and the announcements were made while on tour and observed by the auditors.

The facility is required to document all cross-gender strip searches and cross gender visual body cavity searches (again, Administrative Directive, 03.22, pages 2 and 3).

The PREA Plan prohibits searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status.

Random interviews with staff and inmates confirmed compliance with this PREA standard.

§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)

The TDCJ, through its correctional mental health policies and through Administrative Directives, AD 04.25 and AD 06.25, address interpreter services, American Sign Language services and offenders with special needs. The agency has established procedures to provide inmates with limited English proficiency an equal opportunity to participate in, and benefit from all aspects of the agency's efforts to prevent and respond to sexual abuse and sexual harassment.

During the tour, and from interviews with staff and inmates, it was clear that there were numerous bilingual and multilingual staff and inmates at this facility. There seemed to be no difficulty in communicating with inmates who were limited in English proficiency. Interviews confirmed this. The staff was readily available for any interpretation needed.

Agency policy prohibits the use of the inmate interpreters or other types of inmate assistants except in limited circumstances.

In the past 12 months, there have been zero (0) number of inmate interpreters used, and there has been no delay.

change activities, but it was in fact incidental and more importantly, some privacy is/was maintained (i.e. showers/showering).

The 33 page Video Monitoring Plan with physical plant locations for video was reviewed and was found very impressive.

§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)

TDCJ is responsible for administrative and criminal sexual abuse investigations. The Safe Prison/PREA Operations Manual, SPP0M 05.01, assures investigators follow a uniform evidence protocol through the use of this operational memorandum and the Sexual Abuse Checklist.

Corrections Managed Healthcare Policy, CMHC G – 57.1 also stipulates the appropriate forensic medical examinations.

Emergency medical healthcare is provided by the Otto Kaiser Memorial Hospital in Kenedy, Texas.

Forensic medical exams are directed, by policy, to be at an outside hospital, maintaining SAFE or SANE staff. The institution calls ahead and checks at the following three facilities to make sure such staff is available: Citizens Hospital, Victoria Texas; Guadalupe Regional Medical Hospital, Seguin, Texas; or Methodist Hospital, San Antonio, Texas.

The facility has attempted to obtain community victim advocates from a local rape crisis center however, at this time it has been unsuccessful. The Connally Unit provides victim advocate services by qualified and trained staff. The Offender Victim Representative (OVR) is designated, by policy, as a mental health practitioner, sociologist or chaplain. At the Connally Unit, the Sociologist Unit Manager and a Chaplain are used as the OVR. The Chaplain was interviewed at length and appropriate services are extended.

§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)

Exceeds was based on training in turnout sessions, i.e. shift briefings; in the videos prepared at the highest levels in TDCJ; and the efforts made by the Warden, the training staff, and the officer command staff (Majors, Captains, and Lieutenants) at the institutional level.

In the past 12 months, 522 of the 523 staff have been trained or retrained in 10 listed PREA requirements. The agency has clearly documented all training and verified such training through the employee's acknowledgment verification.

Finally, this standard Exceeds not only based on the continuous and thorough training, but also through extended training such as the TDCJ extra effort to afford safety, through its Strategic Threat Group training, Extortion training, and commitment to preventing, detecting, and responding to sexual abuse and harassment.

Especially notable at the Connally Unit is the teamwork and leadership displayed by the staff. The Warden and his staff take an active role in all aspects of the operation. The attendance at turnouts and shift briefings, the enthusiasm and professionalism displayed by Sergeants and other key staff is commendable. The overall superior teamwork effort is reflected in attitudes of the staff and the cleanliness and order of the facility.

§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)

All volunteers and contractors who have contact with inmates have been trained in their responsibilities under TDCJ's policies which include procedures regarding sexual abuse, sexual harassment, prevention, detection and response.

The emphasis on volunteer training can be recognized in the efforts made by the TDCJ leadership in the Central Office who have established a Volunteer Service Plan and a Handbook for Volunteers which is available on the public website. A special training video has also been established to educate volunteers who assist the Texas Department of Criminal Justice

The agency maintains documentation confirming that the volunteer/contractors understand the training they have received.

§115.33 – Inmate Education

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

The two auditors observed admission and orientation in addition to viewing the Handbook. PREA information was reviewed by the auditors. During the intake process, inmates received information specific to “zero tolerance” and specific to their rights regarding sexual abuse i.e. to be free from sexual abuse and sexual harassment, how to report incidents of sexual abuse and sexual harassment and the right to be free from retaliation for reporting sexual abuse and sexual harassment.

The number of inmates admitted during the past 12 months who were given this information at the Connally Unit was 825. Each inmate that was interviewed formally and informally by the auditors revealed that they had been given PREA information.

It is noted that the number of those who were not educated during this period was zero (0).

Key information is available and readily visible to inmates through posters, handbooks, and other written formats at the Connally Unit.

It should be noted that in the area of PREA education for inmates, staff shortage did not reflect any deficiencies for inmate education. Emphasis on inmates’ safety and compliance with PREA law was/is a priority. Inmate interviews revealed, even though a shortage is noted, they were educated to PREA and that efforts for their safety were acknowledged.

§115.34 – Specialized Training: 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)

The agency’s training policy along with training curriculum and personnel policy, requires investigators to be trained in conducting sexual abuse investigations in confinement settings. This is outlined in a 59 page document; Correctional Training, Specialized Investigations.

The Office of the Inspector General also conducts specialized training as outlined in the OIG Operational Policy Manual (OPM) – 02.15. The number of investigators currently employed who have completed this training is 134. Three full-time OIG investigators are stationed at the Connally Unit.

The agency maintains documentation showing that investigators have completed the required training as outlined in the OIG, OPM – 02.15, and PD – 97.

Additionally, as appropriate, a TDCJ Offender Intake Processing Psychological Screening Interview form of four pages is documented. These forms include history and are done within 30 days. The risk assessment levels are reassessed as warranted.

Inmates, by policy, may not be disciplined for refusing to answer questions concerning these forms and risk assessments.

Dissemination of inmate PREA information within the facility, of responses to intake/transfer questions and assessments within the facility, is on a "need to know basis".

Interviews with random staff and inmates, intake staff, review of the process, and a review of files and documents confirm compliance with this standard.

§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)

During the intake process, it was noted that the institution made housing, bed, work, education, and program assignments for the inmates. Special attention was paid to the safety and security of those inmates that were at high risk of being sexually victimized and particular attention was paid to those inmates that were at risk of being sexually abusive or may be sexually abusive.

Each risk assessment screening, as addressed above, was on an individualized basis.

A transgender or intersex inmate is reviewed for placement at a male or female facility by a Reception/Intake Facility. There was one transgender case at the Connally Unit. Review/assessment is an ongoing process with the inmate's health and safety, and the security of the institution continually evaluated.

§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)

The TDCJ has a policy, Safe Prisons/PREA Plan in conjunction with its Safe Prisons/PREA Operations Manual (SPPOM) – 05.05 and with its' Administrative Segregation Plan, prohibiting the placing of inmates at high risk for sexual victimization 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.

There have been zero (0) number of inmates at risk of sexual victimization who were held in involuntary segregated housing in the past 12 months at the Connally Unit.

The auditors, from both inmate and staff interviews, felt that the staff at the Connally Unit were very professional, security and safety concerned, and individually directed when addressing inmate housing and program needs consistent with the safety and security of staff and inmates at the facility.

§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)

The Safe Prisons/PREA Plan has established procedures for allowing for multiple internal ways for inmates to report privately to agency officials.

The Safe Prisons/PREA Operational Manual and attachments outlines ways for inmates to report sexual harassment or sexual abuse.

Inmate Handbooks, distributed during intake, outline ways for inmates to report sexual harassment or sexual abuse.

The Texas Board of Criminal Justice PREA brochure, which outlines ways for reporting sexual abuse of inmates, is distributed to the public.

Simply, offenders may report allegations directly to the Major, the Office of the Inspector General (OIG), and the PREA Ombudsman. Reports to the PREA Ombudsman may be made confidentially. Third parties, including fellow offenders, staff members, family members, attorneys, and advocates, shall be permitted to assist offenders and request for administrative remedies relating to an allegation of sexual abuse.

Reporting information is attainable through inmate handbooks, on posters/bulletin boards, in information handouts, in the institutional libraries, and through the staff.

The agency provides for at least one way for inmates to report sexual harassment or abuse that is not part of the Correctional Institution Division (CID) TDCJ, and that is via the Texas Board of Criminal Justice (TBCJ) that has established a PREA Ombudsman's Office for reporting PREA incidents.

Interviews with inmates and staff revealed that inmates know how to report sexual abuse and sexual harassment and that staff know how to report sexual abuse and sexual harassment.

§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)

The Connally Unit, and the agency TDCJ, have an administrative procedure for dealing with inmate grievances regarding sexual abuse and sexual harassment. Policy and procedures are established for filing grievances as well as emergency grievances alleging that an inmate is subject to substantial risk of imminent sexual abuse.

Administrative Directives, AD 03.77 and AD 03.82 addressing, offender grievances and management of the offender grievances, is available to inmates and staff. Additionally, the Inmate Handbook and the Safe Prisons/PREA Plan and the Safe Prisons/PREA Operational Manual also cover these topics.

In the past 12 months, 11 grievances were filed that alleged sexual abuse. All 11 grievances alleging sexual abuse reached final decision within 90 days after being filed.

There were zero (0) number of inmate grievances alleging sexual abuse that resulted in disciplinary action by the agency for having been filed in bad faith.

§115.53 – Inmate Access to Outside Confidential Support Services

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

Inmate access to outside confidential support services is supported by the agency through its Safe Prisons/PREA Plan and is identified in the institutional inmate handbook, "How to Access Support Services".

Moreover, the Inmate Handbook indicates that an offender shall be provided access to victim advocates for emotional support services related to sexual abuse by staff if outside sources cannot be secured. Mailing addresses and telephone numbers, as well as toll-free hotline numbers have been provided to the inmate population. However, it seems that male institutions within Texas are having a tough time developing relationships and Memorandums Of Understanding (MOU) with rape crisis centers to procure these confidential support services.

There are listed outside confidential support services provided to the inmate population. However, again, there is no Memorandum Of Understanding or agreement with community

providers. The institution has solicited help but has been unsuccessful. The Religious Department Chaplain along with mental health staff and unit management staff have been trained in these kind of support services.

§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)

The Texas Board of Criminal Justice (TBCJ) Ombudsman website provides a method to receive third-party reports of inmate sexual abuse or harassment. Executive Directive, ED – 02.03 and Executive Directive, ED – 02.10, addresses information on the public website such as, how to report, to whom to report, and PREA complaints and inquiries.

Specifically, the policy states “the Texas Board of Criminal Justice (TBCJ) established the Prison Rape Elimination Act PREA Ombudsman’s Office to investigate, process PREA complaints and inquiries in accordance with the Prison Rape Elimination Act Ombudsman policy statement.” Moreover, it directs the public to the TDCJ website where the name, mailing address, and phone number to be used for the purpose of directing inquiries and complaints to the PREA Ombudsman are available.

The TDCJ “General Information Guide for Families of Offenders” outlines the mission of the TDCJ, and gives a brief description of principle program areas for the family. The table of contents list everything from intake to an institutional/unit directory and includes a section for the TBCJ PREA Ombudsman. This pamphlet is 39 pages with a wealth of information, including PREA third-party reporting.

Finally, the Executive Directive, ED – 02.10 attachment A is a PREA Ombudsman Inquiry Response Form outlining the specific allegations, prior institutional actions, and offender and staff interviews.

Inmate interviews confirmed knowledge of the PREA Ombudsman’s Office.

§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)

The TDCJ Safe Prisons/PREA Plan (p. 23) and the Safe Prisons/PREA Operational Manual (SPPOM) clearly outlines the staff and agency reporting steps. All staff is required to report immediately and in accordance to policy; any knowledge, suspicion, or information they

the sexual abuse was alleged to have occurred. Appropriate attention and follow-up was initiated.

In the past 12 months, there have been zero (0) number of allegations of sexual abuse that the Connally Unit received from other facilities.

The Safe Prisons/PREA Plan along with Administrative Directive, 16.20 address this standard.

§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)

The Texas Department of Criminal Justice Safe Prisons/PREA Operating Manual, it's Administrative Directive, AD 16.03, Evidence Handling and the Office of the Inspector General Operating Procedure Manual; all detailed the policy and action for the first responder to an allegation of sexual abuse.

The first security staff member to respond to the report that an inmate was sexually abused is required to separate the alleged victim and abuser, preserve and protect the crime scene, and request the alleged victim to take no action to destroy evidence. The policy also requires that efforts be made to ensure that the alleged abuser does not take any action that could destroy evidence, and then to notify the immediate supervisor or shift commander.

Random interviews with staff, interviews with the investigative staff, and higher and intermediate level supervisor interviews, all indicated that staff were aware of the steps and duties that first responders must take.

The auditors reviewed training curriculum, documents, and video presentations outlining first responders duties and responsibilities.

§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)

Under the leadership of the Senior Warden, there has been an emphasis on establishing a coordinated response. Monthly meetings are held with key staff, whether an incident has occurred or not. Conversations and interviews with the Warden revealed his personal commitment to PREA compliance. The agency/facility has a plan to coordinate actions taken

in response to an incident of sexual abuse, including first responders, medical and mental health practitioners, investigators, and facility leadership.

The TDCJ Safe Prisons/PREA Operation Manual dictates responding to an allegation of sexual abuse and requires a coordinated effort between Unit security staff, the Office of the Inspector General, medical and mental health services, and victim advocates or victim offender representatives. Procedures have been outlined to provide a systematic notification in the response process following a reported sexual abuse incident.

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

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

Central Office reported there has been no collective bargaining agreement entered into or renewed since August 2012. The TDCJ is not responsible for collective bargaining on the agency's behalf. Texas is a "right to work state" and does not have collective bargaining that would interfere with the preservation of the agency's ability to protect inmates from contact with abusers.

§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)

The Connally Unit protects inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations, from retaliation by staff or inmates. Not only is this protection against retaliation outlined in the Safe Prisons/PREA Plan of the TDCJ, but by the appointment of the Warden, as the monitor for staff retaliation, and by the appointment of a correctional major for monitoring inmate retaliation, these high appointments assist in, and communicate a commitment for, protection against retaliation. One sees a high priority for protection against retaliation of staff and inmates.

Additionally, there are personnel policies covering sexual harassment and discourteous conduct of a sexual nature. There are also general rules in personnel for conduct in the workplace, discrimination in the workplace, and sexual misconduct with offenders.

There is a 90 day monitoring time for the retaliation review period. Accompanying this review is a monitoring form for inmates/offenders and a monitoring form for staff. These forms assist in appropriately monitoring retaliation.

There have been zero (0) number of times an incident of retaliation has occurred in the past 12 months.

§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)

The agency has a policy prohibiting the placement of inmates who allege to have suffered sexual abuse 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. Simply, the state of Texas has a large prison system and separation options are readily available.

Administrative Directives, AD 03.50 and AD 04.63, as well as the agency's Administrative Segregation Plan, prohibits the placement of inmates who allege to have suffered sexual abuse in involuntary segregated housing. At the Connally Unit other alternatives, such as transfer, would be explored.

There have been zero (0) number of inmates who allege to have suffered sexual abuse, who were held in involuntary segregated housing in the past 12 months.

§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)

The Safe Prisons/PREA Plan of the TDCJ, addresses investigations under General Considerations. The three-step outline of considerations is as follows: 1) a uniform evidence protocol to investigate sexual abuse and sexual harassment, 2) sexual investigation shall be conducted promptly, early, and objectively including third-party and anonymous reports, and 3) the use of investigators who have been specially trained in sexual abuse investigations pursuant the TDCJ Safe Prisons/PREA Plan.

Further, the agency's Administrative Directive, AD 16.20 Reporting Incidents/Crimes to the Office of the Inspector General, establishes policy related to criminal and administrative

Interviews with investigators confirmed that an inmate who makes an allegation that he suffered sexual abuse at the Connally Unit is notified.

The auditors felt that the Connally Unit is in compliance with the provisions of this PREA Standard, Reporting to Inmates, consistent with the effective date of TDCJ policy.

§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)

Personnel policy of the TDCJ stipulates that employees or representatives of the Department are expected to adhere to the highest standards of conduct while on duty or off duty, including adherence to the rules of conduct in disciplinary violations.

An Executive Directive, Sexual Harassment and Discourteous Conduct of a Sexual Nature, ED – 13, further outlines expectations of employees.

Personnel Policy, PD – 29, Sexual Misconduct with Offenders, addresses sexual abuse, sexual harassment, sexual misconduct, and voyeurism.

Furthermore, the Texas Penal Code 39.04, addresses sexual abuse of inmates and the fact that it may rise to the level of a felony offense.

The Guidelines for Employees details the sanctions and actions required related to sexual abuse, sexual harassment, sexual misconduct, and voyeurism.

At the Connally Unit, in the past 12 months, there have been zero (0) number of facility staff that have been disciplined for violation of agency sexual abuse or sexual harassment policies. There has also been zero (0) number of staff that have been reported to law enforcement or licensing boards following termination or resignation prior to termination, for violating agency sexual abuse and sexual harassment policies.

§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)

The TDCJ has a very thorough and comprehensive Volunteer Service Plan (VSP) that, in conjunction with the Safe Prisons/PREA Plan, outlines the responsibilities and conduct for

volunteers who have contact with inmates. Special training and orientation is required to become a volunteer.

The training outlined in PREA standard 115.32 outlines and emphasizes the gravity of any volunteer or contractor who engages in sexual abuse to the extent that violators may be reported to law enforcement agencies or licensing boards unless the activity was clearly not criminal.

Volunteers and contractors signed acknowledgment forms indicating their orientation, training, and understanding of such.

At the Connally Unit, in the past 12 months, there have been zero (0) number of volunteers or contractors reported to law enforcement for engaging in sexual abuse of inmates.

§115.78 – Disciplinary sanctions for 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)

Inmate Discipline Policy, GR – 106, Disciplinary Rules and Procedures for Offenders, and the Safe Prisons/PREA Plan outline disciplinary sanctions for inmates for sexual abuse and sexual harassment. The inmate discipline policy clearly identifies individual disciplinary sanctions for inmates.

The Inmate Discipline Policy is substantial (47 pages) outlining major and minor offenses, all with different levels, but clearly indicating a very formal disciplinary process resulting in administrative findings. Inmates are subject to disciplinary sanctions following a criminal finding of guilt for inmate on inmate sexual abuse.

Correctional Managed Healthcare Policy, CHMC E – 35 is especially comprehensive and thorough in outlining therapy, counseling and interventions.

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

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

Risk screening and risk assessment is especially important during the intake process within the Texas Department of Criminal Justice. The Connally Unit, in screening inmates, uses the

