

PREA AUDIT REPORT Interim Final

ADULT PRISONS & JAILS

Date of report: October 12, 2017

Auditor Information			
Auditor name: Wynnie R. Testamark			
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Telephone number: 786-258-4951			
Date of facility visit: August 09 th – August 11 th , 2017			
Facility Information			
Facility name: Glen Ray Goodman Transfer Facility (Goodman Unit)			
Facility physical address: 349 PR 8430, Jasper, TX 75951			
Facility mailing address: <i>(if different from above)</i>			
Facility telephone number: 409-383-0012			
The facility is:	<input type="checkbox"/> Federal	<input checked="" type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input checked="" type="checkbox"/> Prison	<input type="checkbox"/> Jail	
Name of facility's Chief Executive Officer: Calvin Tucker			
Number of staff assigned to the facility in the last 12 months: 144			
Designed facility capacity: 612			
Current population of facility: 598			
Facility security levels/inmate custody levels: Medium/Minimum			
Age range of the population: 18 - 74			
Name of PREA Compliance Manager: Natasha Lambrick		Title: Sergeant, Unit Safe Prisons PREA Manager	
Email address: Natasha.Limbrick@tdcj.texas.gov		Telephone number: 409-383-0012	
Agency Information			
Name of agency: Texas Department of Criminal Justice			
Governing authority or parent agency: State of Texas			
Physical address: 861-B I-45 North, Huntsville, Texas, 77320			
Mailing address: P.O. Box 99, Huntsville, Texas, 77342			
Telephone number: 936-295-6371			
Agency Chief Executive Officer			
Name: Bryan Collier		Title: Executive Director	
Email address: Bryan.Collier@tdcj.texas.gov		Telephone number: 936-437-2101	

Agency-Wide PREA Coordinator	
Name: Lori Davis	Title: Director, Correctional Institutions Division
Email address: Lori.Davis@tdcj.texas.gov	Telephone number: 936-437-2170

AUDIT FINDINGS

NARRATIVE

The Prison Rape Elimination Act (PREA) Audit for the Ray Goodman Unit located at 349 PR 8430, Jasper, Texas, was coordinated through the Texas Department of Criminal Justice (TDCJ) and the American Correctional Association (ACA) Alexandria, Virginia Department of Justice (DOJ). Certified PREA Auditor Wynnie Testamark was notified by an ACA email of the assignment to conduct the PREA certification audit. The PREA certification audit was scheduled for August 9th through August 11, 2017, immediately following the conclusion of an ACA reaccreditation audit scheduled for August 7th – August 9th, 2017.

The audit process began prior to the on-site visit. Specifically the audit process began with contact between the ACA auditor, TDCJ Office of Administrative Review and Risk Management, Huntsville, and the Senior Warden of Ray Goodman Unit. Ms. Brenda German, TDCJ Administrative Assistant IV, mailed a USB thumb drive to the auditor, and received on July 11, 2017.

The thumb drive contained three essential parts. Part one contained master file documents for each of the 43 standards. Part two contained supporting documentation submitted by the agency, and part three contained the completed PREA Pre-audit Questionnaire. Additionally, completed interview documentation was also noted on the thumb drive for the Agency Contract Administrator, Agency Head/Designee, and PREA Coordinator.

The PREA Resource Audit Instrument used for Adult Prisons and Jails was furnished by the National PREA Resource Center. To summarize, there are seven sections, A through G, comprised of the following: A) Pre-Audit Questionnaire, sent by TDCJ; B) the Auditor Compliance Tool; C) Instructions for the PREA Audit Tour; D) the Interview Protocols; E) the Auditor's Summary Report; F) the Process Map; and G) the Checklist of Documentation. These instruments were used for guidance during the tour, interviews with random and specialized staff and random and specific classes of inmates and recommendations for review of documentations.

Following the protocols of making contacts, and checking on the posting of notices (posting was initiated through the American Correctional Association and the facility, Glen Ray Goodman Unit) I began review of the Pre-Audit Questionnaire and the material sent prior to the audit visit. Each item on the thumb drive was reviewed. The information from the standard files and the PAQ was used to complete the PREA Compliance Audit Instrument Checklist of Policies/Procedures; the PREA Resource Audit Instrument and other Documents in advance to identify additional information that might be required and could be collected prior and during the audit visit. The facility tour was scheduled for, and conducted on, August 9 – 11, 2017.

On Wednesday, August 9, 2017, at 11:00 a.m., following the ACA Audit closeout brief, the initial PREA audit of Glen Ray Goodman Unit began. An initial meeting took place in the Administration Training Room. Those in attendance were: Senior Warden Calvin Tucker, Major Aaron McFarland, Regional PREA/Safe Prison Elizabeth Hammons, Captain Kris Collins, Lieutenant Terry Bryant, PREA Compliance Manager/ Safe Prison Sergeant Natasha Limbrick, Medical Administrator Paula Whitton, ACA Coordinator Patrina Moran, and Risk Manager Region I Wendy Kolpack. The audit process was explained, schedule and informed staff the purpose of the PREA audit was to observe and assess all areas of the facility in order to verify compliance with the 43 PREA Standards. These staff later accompanied me during the tour of the facility.

An extensive facility tour was conducted, all areas of the facility were toured, and I was also able to interact with both staff and inmates at this time. Additional areas toured were, Restrictive Housing Unit (RHU), medical, intake, reception screening, central control, recreation, laundry, kitchen/inmate dining, library, program areas, various work areas, within the administrative building include the visiting room, human resources offices, training offices; staffs break areas, warden's office and porter work assignment areas. Several staff and inmates were interviewed during this time to ensure a sufficient sampling of interviews was conducted representing every aspect of inmate and staff demographic at the facility. I had the opportunity to observe the operations of the facility, and the interaction between staff and inmates.

All of the areas visited were well staffed and staff were making rounds/tours and monitoring key areas. Doors were locked and off limits areas were maintained. PREA information throughout the facility was clearly posted, both in English and Spanish. Posters listed the various steps that could be taken to report sexual abuse or sexual harassment incidents, provided contact information for the inmates to report these incidents and also cited the TCDJ's zero tolerance policy related to sexual abuse and sexual harassment. Information for additional services for victims of sexual abuse was also posted. There was no direct sight into the showers or bathroom areas within the prisoner cells, which allowed for ample privacy while showering, dressing or utilizing toilet facilities. Logbooks were reviewed and showed evidence of supervisory rounds on all shifts as well as announcements about opposite gender staff working within the housing unit. Staff and inmates both stated that they were not made aware in advance when supervisors were making rounds and everyone indicated that each female staff member announced their presence prior to entering the housing units.

Following the tour, I began to interview random inmates and staff; as well as specialized staff and any specialized inmates present at the facility during the time of the audit. Interviews were conducted in areas of relative privacy. Everyone interviewed participated willingly and appeared to have a good understanding of the PREA standards and the agency's response and requirements regarding the standards, zero tolerance and reporting. Inmates had a thorough understanding of their right to be free from abuse and harassment and everyone knew the appropriate channels in which to report allegations. All inmates felt they had enough privacy to change and shower without non-medical staff of the opposite gender viewing them in a state of undress. They all felt safe from sexual abuse and knew how to report abuse or harassment if needed.

All staff interviewed was knowledgeable about PREA and the agency's zero tolerance policy. They knew how to appropriately respond to a sexual assault and their mandatory requirement to report all allegations, notifications or suspicions of abuse or harassment. All staff indicated they had been trained on PREA, which included cross-gender/transgender pat searches. Staff was able to site-specific steps that needed to be taken in the event they were first responders to a sexual abuse incident. All staff responded they were prohibited from conducting a strip search of a prisoner to verify sexual identification. All staff interviewed had access to pocket cards the facility had provided to its entire staff. This was a great approach to allow staff a prompt source to guide them through the applicable steps required to address a sexual abuse or sexual harassment allegation/situation if they were the first responders or while receiving a report from an inmate.

Glen Ray Goodman Unit does not house youthful inmates.

Glen Ray Goodman Unit does not house female inmates.

A total of 63 inmate interviews were conducted.

A total of 49 staff interviews were conducted.

All specialized staff was interviewed except SANE/SAFE personnel. All SANE/SAFE exams are performed at the local hospital, St. Elizabeth Jasper Memorial and Lufkin Memorial.

There were two (2) allegations of sexual abuse and sexual harassment that were received within the past 12 months. Of the two (2) allegations received, they both resulted in administrative investigations.

There were 598 inmates housed at the facility on the day of the audit. All of the inmates are in the custody of Texas Department of Criminal Justice.

The on-site audit was concluded with an exit interview with the Warden, Administrative Staff, as well as representatives from all areas of the prison. Representatives from the Texas Department of Criminal Justice were also present throughout the audit tour, including entrance and exit interviews. The agency was commended on an excellent job of training staff and informing inmates concerning the agency's zero tolerance regarding sexual abuse and sexual harassment, as well as implementing the various standards applicable to the facility. The overall audit process was explained and an overview of the auditor's findings was presented. The preliminary findings were summarized and discussed.

DESCRIPTION OF FACILITY CHARACTERISTICS

The Glen Ray Goodman Transfer Facility (Goodman Unit) is a Texas Department of Criminal Justice (TDCJ) 612 bed minimum-security correctional facility that houses minimum custody inmates. It is situated on a 494-acre site located in southeast Texas, approximately three miles east of Jasper, Texas. The facility houses inmates who are pending assignment to a permanent facility after having completed the reception and diagnostic process. As a Transfer Facility, the Goodman Unit may not confine an inmate longer than two years per TDCJ policy. Inmates housed at the Goodman Unit fit a general population profile that does not require special security, medical or mental health services. Those inmates in need of special services are immediately moved to another TDCJ facility. Although the facility does not have a prison industry unit, a full range of educational and work opportunities are offered including two community work crews.

Construction of the facility was completed in 1995 and consists of four single story buildings with metal siding. The administration building contains offices, a control center, visitation area and reception area. There are two buildings adjacent on either side of the administration building forming a large “U” configuration. One building contains the housing units, which each has separate entrances. Units A, B and C are nearly identical in construction and all have a control center (picket) and three housing dormitory style pods housing 68 inmates each. Additionally, Unit A houses classification and has a weight room, Unit B houses the law library and Unit C has the chapel and chaplain's office.

On the opposite side of the compound is the support services building which contains the Education, Medical, Food Service, Commissary, Laundry, and Unit Supply departments. A Segregation Unit containing three single cells is also contained in this building. A fourth building contains the Maintenance Department and is located inside the outer perimeter but not inside the compound fence.

Housing units each consist of nine dormitories with a capacity of 204 inmates per housing unit. Every housing unit has a day room with at least one table, benches for sitting and a television. The inmates sleep in double bunks with a storage drawer under the bottom bunk for each man. The compound includes a large outdoor recreation area that is covered and has basketball courts as well as weight lifting equipment and a smaller uncovered recreation area, which also has recreation equipment.

There is a small visitor processing portable building at the front gate and a highway gate at the entrance into the facility parking lot. The facility also has a horse barn, hay barn and C-train; a cargo vessel used to store equipment used in fieldwork. The fields immediately adjoining the compound are used to produce vegetable crops. Other facility lands are leased out for hay production and cattle grazing.

The mission of the facility is stated as follows:

The mission of the Texas Department of Criminal Justice-Correctional Institutions Division, Glen Ray Goodman Unit is to maintain a level of security such that the public safety is maintained, as well as the safety of its employees and inmates; maintain a safe, clean environment for employees and inmates; produce an environment conducive to the rehabilitation of inmates; and manage the facility based on constitutional and statutory standards.

SUMMARY OF AUDIT FINDINGS

Number of standards exceeded: 3

Number of standards met: 38

Number of standards not met: 0

Number of standards not applicable: 2

Standard 115.11 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

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

Documentation provided TDCJ Central Office and reviewed: Safe Prisons/PREA Plan Unit Coordinated Response Plan

The Texas Department of Criminal Justice (TDCJ) utilizes the Safe Prisons PREA Plan, dated August 2014, as their primary comprehensive sexual abuse and sexual harassment policy for every facility within the Texas Department of Criminal Justice agency. This comprehensive document outlines the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment in each of its facilities.

A review of the TDCJ Organizational Chart confirmed TDCJ has designated an upper-level agency-wide Safe Prison PREA Coordinator, (Director, Correctional Institutions Division) with authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all facilities. On September 27, 2016, Barbara King, certified PREA auditor, interviewed Lorie Davis as the Agency Head designee; and the agency wide Safe Prisons PREA Coordinator. In her interview she explained how the Director has committed the Agency to providing a safe environment for staff and inmates by insuring the PREA standards remain a top priority. It was also affirmed she has sufficient time to fulfill her obligations in the development, implementation and maintaining oversight of the agency's compliance with PREA standards in all TDCJ facilities. She informed the auditor that any expansion or major facility modifications will continue to take into account the PREA Standards when considering design and installing video equipment.

As the Safe Prisons PREA Coordinator, she has six (6) regionally based Safe Prison/PREA Managers who report directly to her and to each of the Regional Directors where they are assigned. TDCJ has ninety-nine (99) Safe Prisons/PREA Managers designated as PREA Compliance Managers within each of their facilities. Her position is found on the Agency organizational chart, reporting directly to the Director.

Sgt. Elizabeth Hammon is the Regional Safe Prison Manager for the Glen Ray Goodman Unit.

Natasha Limbrick, Safe Prison PREA Manager, is the PREA Compliance Manager at the Glen Ray Goodman Unit. Sgt. Limbrick is confident and knowledgeable with the TDCJ policies, the PREA standards and the PREA process. She was very valuable during the site visit. During her interview she confirmed she has sufficient time to perform her PREA duties. She also indicated she has direct access to the Regional PREA Manager for any questions or suggestions. The inmates and staff at the Ray Goodman Unit were well aware of her position as well as the point of contact for any questions, concerns, reporting or information relating to PREA.

Standard 115.12 Contracting with other entities for the confinement of inmates

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

Documentation provided by TDCJ Central Office and reviewed: Contracts AD – 02.46

Cody Ginsel is the Director of Private Facility Contract Monitoring/Oversight Division for the Agency and the individual who supervises the employee contract monitor at each facility. Currently, TDCJ contracts with twelve (12) private prisons. To date, all facilities have received final reports documenting PREA compliance. The facility contract monitor oversees all the operational practices, the contract practices, and the day-to-day operations of that particular facility. Interview conducted by Barbara King, a certified auditor, in September 2016 confirms that the agency has a contract monitor on site for each facility.

Review of: Solicitation; Offer and Awards; and Modifications of Contract (MOC); for TDCJ contracts confirms that contracts for the confinement of its inmates with private agencies or other entities, including other government agencies, include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Staffing Plan, Staffing Plan Review, Staffing Plan Review Minutes, Safe Prisons/PREA Plan PO-07.002, PO-07.003, PO-07.004, PO-07.005, and PD-22.

Appraisal of the Ray Goodman Unit staffing plan; and Agency's policies and procedures confirms Goodman Unit has developed, documented, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring to protect inmates against abuse.

The Goodman Unit average daily number of inmates is 572 since 2012. The average daily number of inmates on which the staffing plan was predicated on is 612.

Warden Tucker, and The Safe Prisons PREA Compliance Manager, Sgt. Limbrick were very knowledgeable with the staffing plan for the Ray Goodman Unit. Agency policies in conjunction

with interviews with the Senior Warden and the Safe Prison PREA Compliance Manager confirms, the plan is reviewed annually prior to sending it to the Regional Office as mandated.

Ray Goodman Unit Annual Staffing Plan Reviews conducted in February of 2015, January 2016, and April 2017 for the Ray Goodman Unit was assessed. The facility annual review is then reassessed with the Agency Safe Prisons PREA Coordinator, Safe Prisons Regional Director, Safe Prisons PREA Compliance Manager, Warden, Assistant Warden, and Central Office Security Staffing staff to see whether adjustments are needed in the staffing plan, the deployment of monitoring technology, or the allocation of agency/facility resources to commit to the staffing plan to ensure compliance with the staffing plan. Final review is then forwarded to the Director with any recommendations if warranted.

There were some deviations from the Goodman Unit staffing plan during the last 12 months. The six most common reasons for deviating from the staffing plan in the past 12 months: Lack of available staff, Medical Transports, Hospital Security, Ad.Seg Beds not filled, Project deviation of staff, Restrictive activities (lockdowns). All deviations from the staffing plan were documented directly to the Warden and the Regional Director as policy dictates.

TDCJ policies reviewed confirm Goodman Unit has implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The Facility Warden, Department Heads and Security Supervisors, are required by policy to make unannounced rounds daily. The security supervisor rounds are documented on the daily shift reports and in the housing unit log books.

Interviews with staff and inmates confirmed that unannounced rounds are done randomly throughout the facility as required. Supervisors acknowledged that unannounced rounds are accomplished by staggering the round times and locations to keep staff from notifying other staff. TDCJ also has a policy that prohibits staff from notifying other staff about supervisor rounds. Staff violating this policy is subjected to disciplinary sanctions.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)
- N/A

Documentation provided by TDCJ and reviewed: Safe Prisons/PREA Plan, CPOM- 01.02, Ad. Seg. Plan, UCP 16.15, PO-07.140, I-219 Exercise Pamphlet

The Ray Goodman Unit does not house inmates under the age of 18. Therefore this standard does not apply.

Standard 115.15 Limits to cross-gender viewing and searches

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

Documentation provided by TDCJ Central Office and reviewed: AD-03.22 Inmate Searches, SPPOM 02.05, Post Orders, and Safe Prisons/PREA Plan, and CTSD Pre-service Training Contraband and Searches Curricula.

Reviewed documentation established the Goodman Unit has implemented policies and procedures that restricts cross gender strip searches or cavity searches except in exigent circumstances and requires that each be documented if ever performed. During the random staff interviews, each was well aware of the policy and documentation requirement if performed. The interview with the Warden, Safe Prisons PREA Compliance Manager, review of the file documentation and review of the Pre-Audit Questionnaire (PAQ), interviews with both random staff and residents, indicate that cross-gender strip searches and visual body cavity searches of inmates have not occurred at the Goodman Unit in the past 12 months.

Reviewed documentation established the Goodman Unit does not search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status. If exigent circumstances existed all staff interviewed understood that gender should be determined through conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner. The interviews with the Warden, Safe Prisons PREA Compliance Manager, interviews with both random staff and residents, review of the file documentation and review of the Pre-Audit Questionnaire (PAQ), indicate that physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status have not occurred at the Goodman Unit in the past 12 months.

During the interviews with staff, they related that they understood the policies on announcing their presence as well as pat searches. They also understood the policies as they pertain to transgender or intersex residents and determining their sex. All of the staff interviewed indicated that they had received training on cross gender pat down searches, and searching of a transgender resident, this was confirmed by viewing their training logs. Female staff was observed verbally announcing their presence upon entering the male inmate living areas.

Reviewed documentation established the Goodman Unit 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 breast, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. These guidelines and processes require staff of the opposite gender to announce their presence when entering an inmate-housing unit. Interviews with random selection of staff, and random selection of inmates from each housing unit confirms inmates are able to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender viewing them as required by the standard. Modesty panels and/or partial walls have been installed in all housing units; providing the inmates with privacy.

Reviewed documentation also confirmed; the Goodman Unit has guidelines and processes in place to ensure training security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Interview with staff confirm they have been trained how to conduct cross-gender pat-down searches and searches of transgender and intersex inmates in a professional and respectful manner.

Training documentation provided verified all of security staff assigned to the Goodman Unit, has received and understands the cross-gender pat-down searches and searches of transgender and intersex inmates. During interviews with a random sample of staff, each confirmed they received training in the Training Academy during primary PREA training, during Turn-out Briefing, and also during annual In-service training. All staff PREA training is documented in their individual electronic training file.

The Goodman Unit has not housed a transgender or intersex resident within the last 12 months.

This Goodman Unit does not house female inmates; therefore, sections (b and c) of this standard do not apply.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

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)

Documentation provided by TDCJ Central Office and reviewed: AD-04.25, AD-06.25, Intake Procedures 1.10 & 6.05, CMHC E-37.5, G-51.1, Certified American Sign Language (ASL) Interpreter Services; G-51.5 Sign Language, SM-05.50, PO-07.105, AD-04.25, Safe Prisons-PREA Plan, SPPOM 03.01, List of staff that speak 20 Foreign Languages, SPPOM 02.03 SAFE Prison PREA Program Posting.

Reviewed documentation determined the agency has policies and practices in place to provide appropriate services to inmates with disabilities and inmates who are limited English proficient. Listed services available are for those who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities have an equal

opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps include, when necessary to ensure effective communication with inmates who are deaf or hard of hearing while providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using the necessary specialized vocabulary. In addition, the agency ensures that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities, including inmates who have intellectual disabilities, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans With Disabilities Act, 28 CFR 35.164.

An interview with TDCJ Agency Head Designee, confirmed information is delivered in different formats, written, video, English, Spanish, etc.; policies are in place to provide assistance to any inmate identified as having a Special Needs in accordance with Correctional Managed Health Care policy, i.e. American Sign Language Interpreter Services; language assistance is provided to monolingual Spanish inmates; and alert systems are on facilities that house blind and deaf inmates use a system of lights and bells to alert gender supervision changes in the housing area.

The Ray Goodman Unit utilizes staff to provide interpretive services including sign language if needed. In addition, The Goodman Unit maintains a roster of those staff certified as level 4 and level 5 translators to provide translation assistance as needed. For those inmates with a hearing impairment, the PREA video presentation is provided in writing. There were zero instances within the past 12 months where inmate interpreters, readers, or other types of inmate assistants were used for the report or investigations of sexual abuse and/or sexual harassment.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.17 Hiring and promotion decisions

- 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)

Documentation provided by TDCJ Central Office and reviewed: PD-71, PD-73, PD-75, Safe Prisons/PREA Plan, PERS 598 TDCJ Job Application Supplement for Agency Applicants, PERS 282 TDCJ Employment Application Supplement, PD-27, PD-75 Examples: DPS Access System, Criminal Background Checks, TDCJ Application Clearance Request Fax Cover Sheet.

Review of TDCJ policies, determined that guidelines and practices are in place to ensure the agency does not hire or promote anyone who may have contact with inmates, and shall not enlist the services of any contractor who may have contact with inmates, who: 1) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); 2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the

victim did not consent or was unable to consent or refuse; or 3) Has been civilly or administratively adjudicated to have engaged in the activity described in the first paragraph (2) of this section.

The Ray Goodman Unit does not hire or promote anyone who may have contact with inmates, and does not enlist the services of any contractor who may have contact with inmates, who has engaged in sexual abuse in any criminal justice facility, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion. The Goodman Unit considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates. The Goodman Unit performs a criminal background records check before enlisting the services of any potential employee and contractor who may have contact with inmates.

A State Identification Number (SID) is created for each employee/contractor fingerprint working at the Goodman Unit. The system checks daily to ensure all SIDs are entered in the system and provides warrant checks every six months on each employees, generated the month of their birth date and six months after each year. The system also provides an automatic electronic notification to the agency when any criminal charges are brought against an employee, contractor or volunteer. The Safe Prisons PREA Plan and Standards of Employee Conduct mandates employees disclose, to the facility, any sexual misconduct allegation made against them.

During the interview with Human Resources personnel, PREA Compliance Manager Coordinator, and documentation reviewed; it was confirmed that background checks are being completed during the initial hiring process; confirmed the agency considers incidents of sexual harassment in determining whether to hire or promote; and confirmed unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work. The policy established by the agency also applies to applicants for contract positions.

TDCJ's hiring policies and interviews with staff confirm the agency considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates.

Documentation on the PAQ confirms, The Ray Goodman Unit hired 2 people who have contact with inmates and one contractor had criminal background record checks, in the past 12 months. Also, an interview with Human Resource personnel confirmed background checks are completed on all new employees prior to hiring.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.18 Upgrades to facilities and technologies

- 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)

Document received from TDCJ Central Office and reviewed: SOPM 07.02 New Installation/Relocation of Video Surveillance and, SM-01.14 Operating & Monitoring Video Surveillance.

Review of agency policies and interviews with the Agency Head Designee, and Senior Warden, it was confirmed Goodman Unit has policies and procedures in place to ensure when installing or updating video monitoring system, electronic systems, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect inmates from sexual abuse.

In addition, agency policy established that prior to the new installation of video surveillance equipment the Surveillance Systems Coordinator will coordinate with the agency safe prison/ PREA compliance manager to collect any relevant information containing the prevalence of substantiated and unsubstantiated incidents of sexual abuse from the previous year for that unit. The surveillance System Coordinator in conjunction with the Unit Warden and the Warden of Security Operations will deploy the surveillance equipment in an effort to enhance the agency's ability to protect inmates from sexual abuse.

The Goodman Unit has not made a substantial expansion to existing facilities since August 20, 2012. However, to ensure video surveillance systems are used to protect inmates against assault, extortion, and sexual abuse in accordance with the TDCJ Safe Prisons/PREA Plan; the Senior Warden confirmed in an interview, 8 security cameras were installed and security mirrors was strategically installed throughout the facility. Also, the Goodman Unit is scheduled to receive new security enhancements, inclusive of an updated video monitoring system, electronic surveillance system, or other monitoring technology; when additional funding is received. The Safe Prisons PREA Manager would be involved in the equipment location selection and overall process.

Although the Goodman Unit has not had any incidences of Sexual Assaults/Abuse; after tour and analysis of the facility, it was highly recommended to place cameras inside, and increase security checks in the housing areas. Doing so should enhance the agency's mission to provide a more sexually safe environment for inmates and staff.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: AD-16.03 SPPOM-05.01 Sexual Abuse Checklist Attachment G, OIG -04.05, Safe Prisons/PREA Plan, CMHC G-57.1, and review OVR Training Lesson Plan.

TDCJ (Ray Goodman Unit) has policies and procedures in place that allows Goodman Unit the responsibility for investigating allegations of sexual abuse and the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. During interviews the PREA Compliance Manager, medical staff and investigators, it was confirmed, Ray Goodman Unit does not conduct on-site forensic medical examinations.

When evidentiary or medical appropriate, a victim of sexual abuse is transported to the local hospital in Jasper, Texas (CHRISTUS Jasper Memorial or Memorial Lufkin). Inmates will be provided treatment and services as required by the laws, regulations, standards and policies established by and administered includes but is not limited to, minimum standards and the uniform evidence protocol adopted by the medical facility. The uniform evidence protocol used includes sufficient procedural detail to aid responders in obtaining useable physical evidence.

In agreement with TDCJ guidelines and processes, agency's (Ray Goodman Unit) policies are in place to ensure the protocol is developmentally appropriate for youth where applicable, and, as appropriate, is adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violent Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011. Conversely, Ray Goodman Unit is an all-male adult facility that house inmates of 18 years old and older. Therefore, this part of the standard is non-applicable.

TDCJ (Ray Goodman Unit) guidelines are in place to ensure as requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member will accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals. In conversations with medical staff, and PREA Compliance Manager, each confirmed policies are in place to ensure victim advocate services are available. Additionally, The Ray Goodman Unit makes available to the victim a victim advocate from the employees who have received required training as inmate/victim representatives.

Victims of sexual assault who require a forensic exam will be taken to the nearest hospital emergency department for completion of the exam. State law (SB-1191) requires that ER staff have specialized training to complete a forensic exam, but does not require that be SANE or SAFE training. When possible SANE or SAFE will be utilized.

Information attained from the PAQ, and interviews conducted with medical, & mental health personnel, and Safe Prisons PREA Compliance Manager, confirmed, there were no forensic medical examinations conducted on inmates from Ray Goodman Unit during the past 12 months. In addition, forensic medical examinations are performed at the local hospital in Jasper, Texas (CHRISTUS Jasper Memorial or Memorial Lufkin). Services are available to victims at no cost with victim advocate services available to inmate victims of sexual abuse. TDCJ staff and OIG investigators are responsible for administrative and criminal investigations, and a list of state and local Rape Advocacy Centers is available to inmates in the Ray Goodman Unit Law Library.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Procedures Governing Investigations of Allegations of Sexual Abuse and Sexual Harassment: BP-1.07, AD-02.15, AD-16.20, PD-29, Safe Prisons/PREA Plan, and SPPOM-05.01, SPPOM-05.05, OIG -04.05

The Ray Goodman Unit has policies and procedures in place to ensure an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. All administrative investigations of sexual abuse and sexual harassment are conducted by agency staff (Captains and above), which has received the appropriate training to conduct such investigation. All criminal investigations of sexual abuse and sexual harassment are forwarded by TDCJ to the Office of Inspector General (OIG) for investigation. The OIG investigators also assist in conducting staff-on inmate sexual abuse administrative investigations as well.

Information attained from the PAQ and interviews conducted with OIG/investigative staff, confirmed during the past 12 months, there were 2 allegations of sexual abuse or sexual harassment at Ray Goodman Unit. An investigation was completed for each of the 2 allegations reported. There were 2 allegations resulting in an administrative investigation. There were no cases for sexual abuse or sexual harassment accepted or referred for criminal investigation during the past 12 months.

It was also established that policies are in place to ensure allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The Ray Goodman Unit (TDCJ) publishes such policy on its website and, makes the policy available to all. The agency documents all such referrals.

During interviews with Agency Head Designee, Senior Warden, and investigative staff each confirmed all allegations of sexual abuse/sexual harassment are referred immediately for investigation. It was also confirmed staff trained in PREA investigations, specifically the Captains and above ranking staff conducts the administrative investigations.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.31 Employee training

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

relevant review period)

- Does Not Meet Standard (requires corrective action)

Documentation provided by TDCJ Central Office and reviewed: Correctional Training Staff Development Curriculums (CTSD) CTSD – Pre-Service Training Block 1 & 2, CTSD – Safe Prisons PREA Program In-service, CTSD – Non-Supervisor In-Service Training Safe Prisons PREA Program, CTSD – Supervisor In-Service Training Safe Prisons PREA Program Safe Prisons PREA in Texas – Video Script SPPOM 06.01.

The Ray Goodman Unit has policies in place to ensure training is provided to all employees who may have contact with inmates on: 1) Its zero-tolerance policy for sexual abuse and sexual harassment; 2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; 3) Inmates' rights to be free from sexual abuse and sexual harassment; 4) The right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment; 5) The dynamics of sexual abuse and sexual harassment in confinement ; 6) The common reactions of sexual abuse and sexual harassment victims; 7) How to detect and respond to signs of threatened and actual sexual abuse; 8) How to avoid inappropriate relationships with inmates; 9) How to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates; and 10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities. A review of staff's training rosters with acknowledgment of staff's signatures served as confirmation of staff receiving such training. Specifically, each employee received PREA training during initial orientation and each year during annual in-service training. Additionally at a minimum, security staff receives additional PREA training during daily Turn-out at shift change.

Relative to TDCJ Gender Specific Training; there are policies are in place to ensure the Ray Goodman Unit provides training tailored to the gender of the male inmates at the facility to include transgender and intersex. An appraisal of the Familiarization Training policy, confirmed all new employees who transferred from another facility to Ray Goodman Unit, received familiarization on compliance with PREA and TDCJ (Ray Goodman Unit) Sexual Abuse Prevention and Response Procedures.

The standard requires refresher PREA training every two years, however; agency policies require employees to receive refresher PREA training annually. The agency's PREA Compliance Manager and Security Supervisors were responsible for conducting the vast majority of PREA training including continuous training to staff that includes during daily Turn-out at shift exchange. While at Ray Goodman Unit, I attended a shift Turn-out and observed the presentation of PREA training and pertinent shift information provided by the Security Supervisors.

Based upon random interviews of staff, training documentation, lesson plans, and attendance sign in sheets provided by TDCJ Central office; it's apparent the primary focus is to provide a sexually safe environment for both staff and inmates. All employees training are kept in TDCJ electronic training database.

The PREA Compliance Manager and Security Supervisors were complimented by both security and non-security staff as doing a astounding job in conducting an enormous amount of PREA training on a continuous basis. They took a personal interest in learning the DOJ PREA Standards and applying it in their successful efforts to train staff. Training rosters documented 100% of Ray Goodman Unit staff completing the required PREA training. Information retrieved from Goodman Unit's PAQ, confirmed 143 security (10 admin) were trained or retrained on the PREA requirements during the

past 12 months.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Volunteer Services Training Curriculum, AD-02.46, PD-29, Safe Prisons/PREA Plan, Volunteer Services Plan, AD-07.35, Handbook for Volunteers, Letter of Orientation for Special Volunteers, Appendix F Acknowledgement of Volunteer Training Orientation.

The Ray Goodman Unit has policies in place to ensure the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates are notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Additionally, documentation reviewed confirmed, Ray Goodman Unit provides annual PREA training to all volunteers and contractors rather than the two-year standard requirement. The volunteers and contract workers were provided PREA training in classroom and individual settings at Ray Goodman Unit. They were also provided with a copy of Staff's PREA Handbook, PREA pamphlets, educational material obtained from the National PREA Resource Center, PREA brochures detailing first responder duties for easy reference, access to PREA information throughout the entire facility utilizing flyers, posters, and the viewing of a PREA video. Training documentation and interviews confirmed; Volunteers/Contractors shall report immediately to the appropriate authority any information revealed by an inmate to a volunteer that is criminal in nature or could impact public or facility safety.

Example PREA Volunteer and Contractors Training Forms signed by the volunteers and contractors reviewed confirmed they had received and understood their responsibilities from the PREA training. There were 12 facility contractors, and 24 volunteers who have contact with inmates who were trained in agency policies and procedures regarding sexual abuse/harassment prevention, detection, and response during the past 12 months at Ray Goodman Unit. All volunteer training is kept in TDCJ electronic Volunteer database.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: SPPOM 06.02, IPM 01.10, SPPOM 02.03, SPPOM Attachment B1-6, UCPM-05.00, Inmate Orientation Handbook, Inmate Video Instruction Letter, Inmate SAA Video Script, AD-04.25, AD- 06.25, SM-05.50, CMHC E-37.5, G-51.01, G- 51.05, and Staff Who Speak Other Foreign Languages List.

The Ray Goodman Unit has policies and procedures in place to ensure during the intake process inmates receive information explaining the agency's zero- tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Intake/Classification staff receiving the inmates confirms inmates are provided with information about the agency's zero- tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment immediately when they arrive at the facility during intake. Interviews with random sample of inmates confirm they receive the valuable PREA information verbally and in writing. The auditor observed arrival of new inmates to the facility and saw the PREA packets given to the inmates. There were 1,166 inmates at Ray Goodman Unit admitted during the past 12 months who were given PREA information at intake.

Agency has safeguards in place to ensure within 30 days of arriving at Ray Goodman Unit, comprehensive education is given to inmates either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. During the past 12 months, 921 inmates have received the above-mentioned comprehensive education. TDCJ's policies and Safe Prison PREA Plan ensure all inmates receive education upon transfer to a different facility to the extent the policies and procedures of the inmate's new facility differ from those of the previous facility.

Conversing with the Safe Prison PREA Compliance manager, she confirmed Inmates are provided with Sexual Abuse Awareness Brochures, and receive the Safe Prison/PREA video training within the first 7 days of arrival at the facility in formats accessible to all inmates. During the tour, Sexual Awareness Posters and Zero-Tolerance Policy posters posted throughout the facility and housing units were observed. Additionally, Orientation material were provided and posted in English and Spanish addressing their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. Additionally, staff provides each inmate with a copy of an Inmate Orientation Handbook and The Prevention of Sexual Abuse in Prison. Random interview with inmates confirm they were provided education in the language in which they understood and, those who have limited reading skills.

At the time of the on site visit; Ray Goodman Unit had no deaf or blind inmates. Limited English

speaking paperwork reviewed, LEP random inmates interviewed; no interpreter needed. TDCJ provides a list of staff approved to translate when the needed. Documentation of inmate participation in these education sessions was provided and reviewed.

Random inmates interviewed was well aware of the Safe Prison PREA Compliance Manager at the Ray Goodman Unit, and on the training provided and continuous training offered by the facility through PREA video, PREA posters, and the placement of resources to report allegations of sexual abuse and/or sexual harassment to include the postings of hotline telephone numbers posted in the inmates' housing units and phone areas.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: PD-97, BP-01.07, OIG-OPM 02.15, CMHC C- 25.1, OIG-OPM 04.05, AD-16.03, ED-12.10, CTSD Specialized Investigations, OIG LP2029, OIG LP-3201, and OIG Roster.

Ray Goodman Unit has policies are in place to ensure in addition to the general training provided to all employees pursuant to 115.31, TDCJ ensures that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings. The Specialized Training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

Training records reviewed confirmed TDCJ (Ray Goodman Unit) Investigators, have completed the course "Investigating Sexual Abuse in a Confinement Setting" and a course on interview, interrogation, and evidence collection. This Specialized training was in addition to the mandatory training requirements for sexual assault investigations. Furthermore, OIG Investigators receive in-service training that specifically relates to sexual assaults within confinement setting and conduct all criminal allegations of sexual abuse and/or sexual harassment reported for the agency.

There are 138 OIG investigators agency wide and 13 specifically assigned certified to conducted inmate on inmate sexual abuse/ sexual harassment investigations and to conduct staff on inmate sexual abuse/sexual harassment investigations to Ray Goodman Unit in the past 12 months. The training records and course curriculum were reviewed for both the OIG Investigators and the Ray Goodman Unit Investigators. TDCJ Central Office maintains an electronic database for each investigator; and Training Rosters of Unit Investigators located at Ray Goodman Unit Human Resources.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.35 Specialized training: Medical and mental health care

- 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)

Documentation provided by TDCJ Central Office and reviewed: CMHC C-25.1, CMHC G-57.1, CMHC C-19.1, Letter of Orientation TDCJ Health Services Students/ Trainees, Medical and Mental Health Orientation Checklist, Medical and Mental Health PREA Training Post Test, AD-16.03.

The University of Texas Medical Branch (UTMB), a contract provider, provides all Medical and Mental Health services to inmates at the Goodman Unit. TDCJ Safe Prison PREA Plan and UTMB policies confirm and ensures that all full-and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: 1) How to detect and assess signs of sexual abuse and sexual harassment; 2) How to preserve physical evidence of sexual abuse; 3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and 4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

Interviews with the Senior Warden, Safe Prisons PREA Compliance Manager, and Medical/Mental staff, each confirmed the facility does not perform forensic medical exams. The inmates are transferred to St. Elizabeth (CHRISTUS Jasper Memorial) in Jasper, Texas or Lufkin Memorial Hospital in Lufkin, Texas where a SAFE/ SANE practitioner 24/7 can provide a forensic examination.

Interviews with medical and mental Health staff, and review of training logs issued on June 2016 and May 2017, confirm that full-and-part medical and mental health care practitioners have received PREA training mandated for employees under 115.31.

100% percent of all Medical and Mental Health care practitioners who work regularly at this facility and have received the training required by agency policy. The Ray Goodman Unit & TDCJ Central Office maintains documentation that medical and mental health practitioners have received said training.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.41 Screening for risk of victimization and abusiveness

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

Documentation provided by TDCJ Central Office and reviewed: Agency Screening Policy SPPOM-03.01, CMHC E-35.1, H-61.01, A-09.01, IPM-5.06, and Safe Prisons/PREA Plan.

TDCJ has policies in place to ensure all inmates are assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates. Conversely, Ray Goodman Unit is not a TDCJ intake facility. The full intake screening process is conducted at another TDCJ facility prior the inmates' arrival. Staff at the Ray Goodman Unit does however; conduct interviews upon the inmates' arrival where Safe Prison PREA Compliance Manager and Classification staff conducts an additional screening of risk of victimization and abusiveness.

TDCJ policies and forms are in place to ensure the initial screening considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing inmates for risk of being sexually abusive.

During the past 12 months, 1145 inmates entered the facility (whose length of stay in the facility was for 72 hours or more) were screened for risk of sexual victimization or risk of sexually abusing other inmates within 72 hours of their entry into the Ray Goodman Unit .

Additionally, within the past 12 months, 5 inmates were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the Ray Goodman Unit based upon additional, relevant information received since intake. It was demonstrated and signed documentation was provided; that all inmates upon admission to the Goodman Unit or transfer to another facility are screened for risks of sexual victimization or risk of sexually abusing other inmates.

Interviews with the Senior Warden, Safe Prison PREA Compliance Manager, Classification staff, and review of intake screening forms confirmed all inmates are screened prior to their arrival at Ray Goodman Unit interview by the Safe Prisons PREA Compliance Manager for any new or omitted information during their original intake screening. During the interview of a random sample of inmates, each confirmed they received the screening as required.

TDCJ (Ray Goodman Unit) has policies in place to ensure the facility implements appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates. During interviews with the Agency PREA Coordinator, Safe Prison PREA Compliance Manager and Classification staff responsible for screening inmates, it was confirmed that the agency outlines who should have access to an inmate's risk assessment within the facility in order to protect sensitive information and prevent abuse of the inmate while providing access of the information to only those on a need to know basis. Subsequently, the assessment is scanned and can be viewed electronically for historical data by classification.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

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)

Documentation provided by TDCJ Central Office and reviewed: CMHC G-51.11, SPPOM-03.01 with Attachment E, UCPM-04.00

The Ray Goodman Unit (TDCJ) policy requires that inmates be screened upon arrival at an institution, facility, or program reception center for an appropriate housing assignment. Inmates who are identified/screened as high risk for sexual victimization via the screening process are not to be placed in segregated housing, unless an assessment of all available alternatives has been completed, and there is no available alternative means of separation from likely abusers.

TDCJ has policies in place on how information from the risk screening required by 115.41 is limited to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. Also, policies are in place to ensure the agency makes individualized determinations about how to ensure the safety of each inmate.

TDCJ's procedure is in place upon staff deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, and in making other housing and programming assignments, the agency considers on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether the placement would present management or security problems.

TDCJ (Ray Goodman Unit) has policies in place to ensure agency shall not place lesbian, gay, bisexual, transgender, or intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such inmates. However, during the interview with the Safe Prison PREA Compliance Manager, she stated no intersex inmates have been designated at the Ray Goodman Unit within the past 12 months.

During interviews with the Senior Warden, and Safe Prisons PREA Compliance Manager they confirmed the Ray Goodman Unit does not have any dedicated units, or wings solely for lesbian, gay, bisexual, transgender, or intersex inmates. During interviews with 3 self-identified gay inmates, each confirmed they have not been placed in a dedicated unit or wing solely on the basis of being identified as gay.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons/PREA Plan, SPPOM-05.05, Ad Seg Plan, Protective Safe Keeping Plan, I-169 Initial Placement, I-203 Placement on Restriction Guidelines for ASC Members Protective Safe Keeping documentation.

Ray Goodman Unit has policies and procedures in place that ensure inmates at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. If a facility cannot conduct such an assessment immediately, the facility holds the inmate in involuntary segregated housing for less than 24 hours while completing the assessment. During the last 12 months there have been zero inmates held in involuntary segregated housing due to a risk of sexual victimization.

Ray Goodman Unit has policies that ensure the facility assigns such inmates to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. During interviews with the Senior Warden, Major and staff who are assigned to supervise inmates in segregated housing, inmates who are identified at high risk for sexual victimization or who have alleged sexual abuse are placed in involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged and is used as a last resort and for a time of less than 30 days. Due to zero inmates having been assigned to segregated housing for high risk for sexual victimization up to 30 days, there were no inmates to be interviewed.

Lastly, TDCJ has policies that ensure every 30 days; the facility affords such inmate a review to determine whether there is a continuing need for separation from the general population. Interviews with Senior Warden, Safe Prison PREA Compliance Manager, and staff supervising inmates in segregated housing, confirmed procedures are in place to ensure a review of the inmate every 30 days to determine whether there is a continuing need for separation from the general population. There were zero inmates held in in involuntary segregated housing for at risk of sexual victimization within the past 12 months, therefore no inmate files to be reviewed.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons/PREA Plan, BP-03.91, AD-14.09, Inmate Orientation Handbook, Inmate Reporting Policy ED-02.10, SPPOM Attachment A & AS TBCJ PREA Brochure, and General Information Guide for Families of Inmates.

TDCJ (Ray Goodman Unit) policies provide multiple internal ways for inmates to privately report sexual abuse and sexual harassment to agency officials while allowing the inmate to remain anonymous upon request. The State PREA Ombudsman Office or the Texas Board of Criminal Justice (TBCJ). Inmates are allowed to forward these letters sealed and uninspected to the Texas Board of Criminal Justice; TDCJ Executive Director; Deputy Executive Director; any Division Director; Deputy Director; PREA Ombudsman; or Senior Warden. The PREA Ombudsman contact information and a Hotline number was posted in the housing units telephones for inmate reference.

TDCJ (Ray Goodman Unit) has policies in place to ensure the inmates are provided at least one way for inmates to report abuse or harassment to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials, allowing the inmate to remain anonymous upon request. Review of the Statement of Fact confirms TDCJ does not detain inmates solely for civil immigration purposes.

During interviews with a random sample of staff, employees stated they may privately report any suspicion of sexual abuse or sexual harassment of an inmate by contacting the OIG, the Senior Warden, PREA Ombudsman, and/or Hotline. Also, while on tour, observation made of posters posted is in both English and Spanish, advising inmates of their right to be free from sexual violence/harassment, the agency's zero tolerance policy, and a hotline number they can call. TDCJ (Ray Goodman Unit) provides information on their website also, for the public to privately report sexual abuse and sexual harassment of inmates.

Interviews of staff and inmates, confirmed an inmate could report an incident of sexual abuse, sexual threats or any act of retaliation verbally or in writing, anonymously and from third parties. Staff confirmed verbal reports of sexual abuse and/or sexual harassment are promptly documented and submitted to their supervisor. During interviews with random sample inmates, each inmate confirmed awareness of ways to report sexual abuse and methods to do so privately. Inmates shared their awareness and understanding of the reporting opportunities made available to them when reporting sexual abuse and/or sexual harassment.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: AD-03.82, OGOM sections 1.01, 1.04, 4.00, 7.00 & AD-03.82, Safe Prisons/ PREA Plan, SPPOM 05.01, SPPOM 05.11, BP-03.77

The Ray Goodman Unit (TDCJ) has a formalized appeals process that allows inmates to file an appeal without having to submit to the staff member who is the subject of the appeal and, that the appeal will not be forwarded to the staff member.

Ray Goodman Unit has policies and procedures in place that ensures the facility has an administrative procedure for dealing with inmate grievances regarding sexual abuse.

Ray Goodman Unit has policies and procedures in place to ensure: 1) The agency does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse; 2) the agency applies otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse; 3) the agency does not require an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse; 4) nothing in this section shall restrict the agency's ability to defend against an inmate lawsuit on the ground that the applicable statute of limitations has expired.

Review of agency's policies confirm that: 1) an inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and 2) such grievance is not referred to a staff member who is the subject of the complaint. Interview with staff overseeing inmate grievances, random staff, inmates, and Safe Prisons PREA Compliance Manager report inmates can submit a grievance without submitting it to a staff member who is the subject of the complaint and the grievance is not referred to such staff member.

Review of agency's policies confirmed the agency issues a final agency decision the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance; 2) computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal; 3) the agency may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the inmate in writing of any such extension and provide a date by which a decision will be made; 4) at any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, the inmate may consider the absence of a response to be a denial at that level.

Interviews of staff overseeing inmate grievances, random staff, inmates, and Safe Prisons PREA Compliance Manager confirmed; decision are based on merits of grievance and portion of a grievance are made within 90 days of the filing.

Third parties, including inmates, staff members, attorneys, and outside advocates, may assist inmates in filing request, and such request may require a condition of processing that victim agree to pursue subsequent steps; and if inmate declines the request, decision is documented.

Staff overseeing inmate grievances, random staff, random inmates, and Safe Prisons PREA Compliance Manager, all confirmed during interviews; there were no grievances alleging sexual abuse filed by inmates in the past 12 months, requiring third-party assistance.

Interview with staff overseeing inmate grievances, random staff, random inmates, and Safe Prisons PREA Compliance Manager stated and confirmed policies are in place for emergency grievance for inmates subject to a substantial risk of imminent sexual abuse, grievance is immediately forwarded to a level of review at which immediate corrective action is taken within 48 hours; and issues a final agency decision within 5 calendar days.

Interview with staff overseeing inmate grievances, random staff, random inmates, and Safe Prisons PREA Compliance Manager confirmed that Ray Goodman Unit has guidelines stating an inmate may be disciplined for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the inmate filed the grievance in bad faith.

There were no inmates disciplined for filing a grievance in bad faith during the last 12 months.

During the past 12 months, there was zero grievance filed that alleged sexual abuse at Ray Goodman Unit.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Inmate Orientation Handbook, List of Rape Advocacy Centers, SPPOM 02.03 Attachment C, RCC MOU

TDCJ (Ray Goodman Unit) has policies and procedures in place that ensures the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services agencies. The facility enables reasonable communication between inmates and these organizations and agencies in as confidential a manner as possible.

TDCJ (Ray Goodman Unit) policies are in place and to ensure the facility informs inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws. Random sample of inmates, confirm they are aware of and have received material that identifies access to victim advocates for emotional support services available outside the facility for dealing with sexual abuse, if needed. The inmates confirmed the facility provided mailing addresses and telephone numbers for the outside services.

Interview with the Safe Prison PREA Compliance Manager, Mental & Mental Health professionals, and documentation of the agency MOU's confirm TDCJ (Ray Goodman Unit) has a MOU with Texas Association Against Sexual Assault (TAASS), and Families In Crisis last modified on July 3, 2017 for victim advocacy; access to outside confidential support in the event there's an incident or allegation. The agency maintains copies of agreements.

The Ray Goodman Unit also provided solicitation letters demonstrating they had tried to solicit services from the local outside victim advocates (Better Tomorrow) to provide emotional support services related to sexual abuse for their inmates.

A comprehensive list of Rape Crisis Centers, is available to the inmate population, and is located in the law library.

There were no inmates interviewed who stated they had utilized or attempted to utilize an outside victim advocate for emotional support services related to sexual abuse during the past 12 months.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: SPPOM-04.02, ED-02.03, ED-02.10 General Information for Families of Inmates Brochure (available on line) Safe Prison PREA Plan.

TDCJ (Ray Goodman Unit) has established a system to receive third-party reports of sexual abuse and sexual harassment and distribute publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate. “The Texas Department of Criminal Justice (TDCJ) shall establish guidelines for reporting complaints or inquires from elected officials, the public, and inmates pertaining to allegations of sexual abuse and sexual harassment, and related initiatives to the PREA ombudsman”, and the General Information Guide for Families of Inmates Brochure. The Senior Warden, and Safe Prison PREA Compliance Manager confirmed, the agency has established a Webpage that gives a link to process a third-party report of sexual abuse and sexual harassment. The agency’s website was also viewed and confirmed.

During the last 12 months the Ray Goodman Unit has not had a third party PREA report.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons PREA Plan, PD-29, CMHC E-35.02, G-57.01, COURAGE YOP 02.05, AD-16.20, SPPOM 05.01.

TDCJ (Ray Goodman Unit) polices provide clear guidelines to all staff regarding their obligation to report immediately and according to agency policy any knowledge, suspicion, or information

regarding an incident of sexual abuse or sexual harassment that occurred in a facility whether or not it is part of the agency; retaliation against inmates or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

TDCJ (Ray Goodman Unit) has policies and procedures in place that require apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.

TDCJ (Ray Goodman Unit) policies ensure unless otherwise precluded by Federal, State, or local law, medical mental health practitioners are required to report sexual abuse pursuant to the first paragraph of this section and to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services. Mental Health and Medical staff, both confirmed, at the initiation of services to an inmate, they disclose the limitations of confidentiality and their professional duty to report.

If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable person's statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws. The Ray Goodman Unit does not house any inmates under the age of 18.

TDCJ (Ray Goodman Unit) has guiding policies on third party and anonymous reports to the facility's designated investigators. Interviews conducted with the Senior Warden and Safe Prison PREA Compliance Manager confirmed all allegations of sexual abuse and sexual harassment including those from third party and anonymous sources are reported directly to the designated facility investigators.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.62 Agency protection duties

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

Documentation provided by TDCJ Central Office and reviewed: SPPOM-05.01, SPPOM-05.03, AD-02.15, and Safe Prisons/PREA Plan.

TDCJ (Ray Goodman Unit) policy is in place to ensure when the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the inmate. Policies also is in place and enforced to ensure showing such notification provided as soon as possible, but no later than 72 hours after receiving the allegation. In addition, inmate at risk or potential predator may be moved to another housing unit or transferred. If no other options are available temporarily protective custody until other steps can be taken can be considered.

Interviews conducted with the Senior Warden, Safe Prison PREA Compliance Manager, and random

staff, (security and non-security) confirmed upon becoming aware that an inmate is subject to a substantial risk of imminent sexual abuse; inmates would be immediately separated from the threat in the least restrictive method possible. TDCJ process was also confirmed by speaking to many staff members during the tour, both custody and non-custody, and through the random staff interviews that were conducted. All staff members were aware of the requirement to immediately remove the prisoner from the area of the imminent threat.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.63 Reporting to other confinement facilities

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

Documentation provided by TDCJ Central Office and reviewed: BP-01.07 Inspector General Policy Statement, AD-16.20, Safe Prisons/PREA Plan SPPOM-04.01, SPPOM-04.02, SPPOM-05.05 SPPOM-05.01 Sexual Abuse Response and Investigations, and written interview from Director, Correctional Institutions Division & Compliance Coordinator.

TDCJ (Ray Goodman Unit) has policies and procedures in place to ensure where upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred. This notification shall be occur as soon as possible, but no later than 72 hours upon becoming aware. The facility in which the allegation of sexual abuse and/or sexual harassment occurred is responsible for ensuring the allegation is investigated in accordance with these standards.

Interviews with the Senior Warden, Safe Prisons PREA Compliance Manager, supervisors and random staff confirmed upon becoming aware of an allegation, notification has to be made immediately.

During the past 12 months, the Ray Goodman Unit has not received any allegations that an inmate was abused while confined at another facility.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

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)

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons/PREA Plan, SPPOM-05.01, and AD-16.03 OIG OPM-04.05

TDCJ (Ray Goodman Unit) established policies and procedures to ensure upon learning of an allegation that an inmate was sexually abused, the first security staff member to respond to the report shall be required to: 1) separate the alleged victim and abuser; 2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; 3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any action that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and 4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating defecating, smoking, drinking or eating.

During the past 12 months, there were two (2) allegations that an inmate was sexually abused. In both instances, the first security staff member to respond to the report separated the alleged victim and abuser at the Goodman Unit.

The TDCJ staff receives and have in their possession; a PREA quick reference guide for immediate response to allegations of sexual violence against inmates. A copy of the pocket reference provided as part of the audit documentation and is recognized as an excellent practice by the Ray Goodman Unit. The reference covers all steps to take during incidents of sexual abuse and if followed assures compliance with this standard. First responder duties are also discussed during daily Turnout at shift change with Shift Supervisors.

All staff (security, non-security, volunteers, and contract workers) interviewed during the tour, during random staff interviews and during First Responder interviews, expressed how to respond to and appropriately handle allegations of sexual assault as a first responder.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons/PREA Plan, SPPOM-05.01.

TDCJ (Ray Goodman Unit) has policies and procedures to ensure the facility developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners' investigators, and facility leadership.

According to agency's policies and institutional plan, responding to an allegation of sexual abuse requires a coordinated effort between unit security staff, the Office of the Inspector General (OIG), medical and mental health services, and victim advocates (where available) or an Inmate Victim Representative (OVR). TDCJ (Ray Goodman Unit) procedures provide a systematic notification and response process following a reported sexual abuse incident.

Interviews with medical staff, mental health staff, investigators and multiple supervisors confirmed they were knowledgeable of TDCJ's PREA Investigation Checklist, and that it had to be filled out on every allegation of sexual abuse, ensuring each of the facility relevant areas is notified and has provided their appropriate response to allegations of sexual abuse.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.66 Preservation of ability to protect inmates from contact with abusers

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

Documentation provided by TDCJ Central Office and reviewed: PD-22 General Rules of Conduct, PD-29 Sexual Misconduct with Inmates, PD-35 Independent Dismissal Mediation

TDCJ to include Ray Goodman Unit is not responsible for collective bargaining on the agency's behalf. Texas is a "right to work state" and does not have collective bargaining agreements that would interfere with the preservation of the agency's ability to protect inmates from contact with abusers.

This standard is not applicable.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: (PD-13, PD-22, PD-29, SPPP 05.08) (90-Day Monitoring for Retaliation: Inmate & Staff), Safe Prisons/PREA Plan, SPPP 02.04, and written interview Director, Correctional Institutions Division & Compliance Coordinator.

TDCJ, (Ray Goodman Unit) has policies and procedures in place to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff, and shall designate which staff members or departments are charged with monitoring retaliation. TDCJ (Ray Goodman Unit) Safe Prisons PREA Compliance Manager has been designated the Retaliation Monitoring Manager, and reports directly to the Warden in PREA retaliation concerns.

TDCJ, Ray Goodman Unit has multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. An interview with the Senior Warden, and Safe Prisons PREA Compliance Manager, confirmed inmates and staff are protected from retaliation from sexual abuse or sexual harassment allegations.

TDCJ, Ray Goodman Unit has guidelines to the facility monitors the conduct or treatment of inmates or staff who report sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by inmates or staff for at least 90 days following a report of sexual abuse if the initial monitoring indicates a continuing need.

TDCJ, Ray Goodman Unit policies states, in the case of inmates, such monitoring also include periodic status checks.

An interview with Safe Prisons PREA Compliance Manager and random staff confirms, in the case of inmates, such monitoring includes periodic status checks. Inmates are monitored and assessed every 30 days for 90 days, but if actions are required in between those periods, staff will respond accordingly. Status checks are also encouraged according to agency policies; for any staff that reported an incident of sexual abuse or sexual harassment.

According to Director of Correctional Institutions Division, Senior Warden, and Safe Prisons PREA Compliance Manager, all offenders and staff who report sexual abuse or sexual harassment, or who cooperate with sexual abuse or sexual harassment investigations are protected from retaliation by other offenders or staff. Retaliation monitoring includes review of any inmate disciplinary reports, housing or program changes, or any negative performance reviews or reassignments of staff.

Agency's policies specifically states retaliatory measures against employees and inmates who report incidents of sexual violence, staff sexual misconduct or sexual harassment as well as retaliatory measures against those who cooperate with investigations shall not be tolerated and shall result in disciplinary action and/or criminal prosecution.

Senior Warden and Safe Prisons PREA Compliance Manager confirmed, the agency's obligation to monitor shall terminate if the agency determines that the allegation is unfounded.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: AD-03.50, 04.63, Administrative Segregation Plan, Committee Review Decision form, Guidelines for Administrative Segregation Plan & Committee Members, and Safe Prisons/PREA Plan.

TDCJ, Ray Goodman Unit has policies and procedures in place to ensure any use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse is subject to the requirements of 115.43. Agency guidelines indicate inmates will not be placed in involuntary segregation unless an assessment of all available alternatives has been made and a determination is made that no alternative is available. The facility will assess any inmate in these circumstances within 24 hours.

Interviews with the Senior Warden, Safe Prisons PREA Coordinator, Major, and the Supervisor assigned to supervise inmates in segregated housing confirmed the policies are in place to allow use of segregated housing to protect an inmate when necessary.

It was reported on the PAQ, that there has been no inmates who alleged to have suffered sexual abuse held in involuntary segregated housing in the past 12 month.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons/ PREA Plan, AD-16.20, AD-16.03, BP-01.07, AD-02.15, Records Retention Schedule, OIG OPM-03.72, SPPOM-05.05, and CTSD Spec. Investigation Training.

TDCJ policies states, when the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, it does so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. In addition, The Regional Captain reviews all Emergency Action Communication (ECA) notifications of sexual related incidents for their respective region. Where sexual abuse is alleged, investigators who have received special training in sexual abuse investigations will conduct the investigation pursuant to Standard 115.34.

OIG Investigator, confirmed criminal investigations are documented, and the reports contain a description of the allegation; description of victim; witness and perpetrator interviews; description of DNA; physical, documentary and other evidence; and the cases closing summary. Furthermore, all substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as inmate or staff. TDCJ (Ray Goodman Unit) does not require an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. Moreover, administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

An interview with Safe Prisons PREA Compliance Manager confirm the agency retains all written reports referenced, for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. Also, the departure of the alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation.

TDCJ is responsible for all administrative investigations and criminal investigations are the responsibility of the OIG. There is no Department of Justice involvement.

An interview with Correctional Institutions Division Director, Director Senior Warden, Safe Prison PREA Compliance Manager, and investigators confirmed when outside agencies investigate sexual abuse, the facility cooperates with outside investigators and endeavors to remain informed about the progress of the investigation. TDCJ and OIG investigators investigate all allegations of sexual abuse.

The investigators training records were reviewed.

There have been no substantiated allegations of conduct that appear to be criminal that were referred for prosecution.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.72 Evidentiary standard for administrative investigations

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

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons/PREA Plan SPPOM-05.05, CTSD Spec. Investigation Training

TDCJ, Ray Goodman Unit has policies and procedures in place to ensure the facility imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

An interview with facility investigative staff, confirmed Ray Goodman unit imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Interview with the OIG Agent, confirmed criminal cases are referred for possible prosecution when evidence provided is determined to be that beyond a

reasonable doubt.

TDCJ, Ray Goodman Unit has policies and procedures in place to ensure any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the standard requirements. TDCJ facility staff conducts all administrative investigations. The OIG conducts all criminal investigations. All investigations follow TDCJ policies and the PREA standard requirements.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.73 Reporting to 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)

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons/PREA Plan, SPPOM-05.05 (Attachment J & M), SPPOM – 05.10, SPPOM-05.11 (Attachment F), and Administrative Review/Investigations.

TDCJ Ray Goodman Unit has policies and procedures to ensure that following an investigation into an inmate's allegation he suffered sexual abuse in an agency facility, agency informs the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

There were two (2) criminal and/or administrative investigations of alleged inmate sexual abuse that were completed by the agency (Ray Goodman Unit) in the past 12 months. Of those inmates, two (2) were notified, verbally or in writing, of the results of the investigation. A review of investigative files, acknowledged receipt of inmate notifications.

Ray Goodman Unit has policies and procedures in place to ensure all such notifications or attempted notifications are documented. Interviews with the Senior Warden, Safe Prisons PREA Compliance Manager, and investigative staff, each confirmed all required notifications or attempted notification are documented showing the date and time of the notification in case chronology. If the inmate refused to discuss the outcome, it is noted the date and time of the attempted notification and the fact that the inmate refused. A review of investigative files, acknowledged receipt of inmate notifications.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: (PD-13 Sexual Harassment & Discourteous Conduct of a Sexual Nature, PD-22 General Rules of Conduct & Disciplinary Action Guidelines for Employees, PD-29 Sexual Misconduct with Inmates) and AD-16.20 Reporting Incidents/Crimes to the OIG, WBP-07.15, and WBP-07.44

TDCJ Ray Goodman Unit has policies and procedures to ensure staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Also, ensures termination is the presumptive disciplinary sanction for staff that has engaged in sexual abuse. During the last 12 months, Ray Goodman Unit has not had an employee terminated due to an incident of sexual harassment or sexual misconduct incident.

There are policies in place to ascertain disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories at TDCJ Ray Goodman Unit.

Interviews with the Senior Warden, Safe Prisons PREA Compliance Manager, and Human Resource Staff confirms disciplinary sanctions for violations of agency policies related to sexual abuse or sexual harassment are commensurate with the nature and circumstances of the act committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. In the past 12 months, zero staff have been disciplined, or terminated for violation of agency sexual abuse or sexual harassment policies.

The agency also, have policies and procedures in place to ensure all terminations for violations of agency sexual abuse or sexual harassment policies, and resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. Ray Goodman Unit has had zero staff reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies within the past 12 months.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Volunteer Service Plan, Acknowledgement of Volunteer Training Orientation, Volunteer Services Training Facilitators Guide, PD-29 Safe Prisons/PREA Plan, Chaplin Policy Manual -13.03.

Ray Goodman Unit has policies and procedures to ensure any contractor or volunteer, who engages

in sexual abuse is prohibited from contact with inmates and is reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Ray Goodman Unit has had zero contractors or volunteers reported to law enforcement for engaging in sexual abuse of inmates.

Ray Goodman Unit has processes in place to ensure the facility takes appropriate remedial measures, and considers whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. Interviews with Senior Warden, Safe Prisons PREA Compliance Manager, and Major confirm that policies are in place and enforced to ensure the disciplinary sanctions inmates are subject to following an administrative or criminal finding that the inmate engaged in inmate-on-inmate sexual abuse are progressive disciplinary system based on guidelines.

Interviews with volunteers, and contractors, confirm they have been trained in their responsibilities regarding sexual abuse and sexual harassment prevention, detection, and response, per agency policy and procedure.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons/PREA Plan, Disciplinary Rules and Procedures for Inmates, CMHC E-35.1, and SOTP 01.01

TDCJ (Ray Goodman Unit) has policies and procedures in place to ensure inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.

Senior Warden and Safe Prisons PREA Compliance Manager confirm sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.

A Review of TDCJ (Ray Goodman Unit) policies and procedures confirms the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

Reviewed TDCJ (Ray Goodman Unit) policies and procedures confirms if the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility considers whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

Reviewed TDCJ (Ray Goodman Unit) has policies in place to ensure that, for the purpose of

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

TDCJ policies prohibit all sexual activity between inmates and may discipline inmates for such activity. Conversely, an agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.

The Goodman Unit did not have any inmate on inmate disciplined for the violation of sexual abuse or harassment policy during the past 12 months.

In the past 12 months, there have been zero criminal findings of guilt for inmate-on-inmate sexual abuse that have occurred at the Ray Goodman Unit.

In the past 12 months, there have been zero administrative findings of inmate-on-inmate sexual abuse that have occurred at the Ray Goodman Unit.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 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)

Documentation provided by TDCJ Central Office and reviewed: Safe Prisons/PREA Plan SPPOM-03.01 Attachment E, 05.05 CMHC A-09.1, E-35.1, E-35.2, G-57.1, H-61.1, I-70.1, CPOM 02.05

TDCJ, (Ray Goodman Unit) has policies and procedures in place to ensure if the screening pursuant to 115.41 indicates that a prison/jail inmate has experienced prior sexual victimization, whether it occurred in an instructional setting or in the community, staff ensures that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening. Classification staff and Safe Prisons PREA Compliance Manager confirms, if a screening indicates that an inmate previously perpetrated sexual abuse, the facility offer a follow-up meeting with a mental health practitioner within 14 days of the intake screening.

TDCJ (Ray Goodman Unit) has policies in place to ensure any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, program assignments, or as otherwise required by Federal, State, or local law.

TDCJ has policies and procedures in place to ensure medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

Interviews with the Safe Prisons PREA Compliance Manager, Medical and Mental Health staff, all

confirmed that Mental Health practitioners are required to obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.82 Access to emergency medical and mental health 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)

Documentation provided by TDCJ Central Office and reviewed: Documentation provided by agency reviewed: CMHC G-57.1 Sexual Assault/Sexual Abuse, Safe Prisons PREA Plan, SPPOM 05.01 Completing the Inmate Protection Investigation, and CMHC A 01.01 Access to Care, I-214 Referral to Mental Health Services.

TDCJ (Ray Goodman Unit) policies requires inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and on-site mental health practitioners according to their professional judgment. If no qualified medical practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim and are to immediately notify the appropriate medical and on-site mental health practitioners.

Inmate victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.83 Ongoing medical and mental health care for sexual abuse victims and 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)

Documentation provided by TDCJ Central Office and reviewed: CMHC G-57.1 Sexual

Assault/Sexual Abuse, Safe Prisons PREA Plan, SPPOM 05.01 Completing the Inmate Protection Investigation, CMHC E-32.1 Receiving, Transfer and Continuity of Care Screening, CMHC E-44.1 Continuity of Care, and Rights of Crime Victims.

A review of TDCJ (Ray Goodman Unit) policies and procedures, confirms the facility offers medical and mental health evaluation and appropriate treatment to inmates who have been victimized by sexual abuse in a correctional confinement facility. The evaluation and treatment of victims includes as needed, follow-up service, treatment plans and referral for continued care following their transfer to or placement in other facilities or the victim's release from custody.

Medical and mental health services are offered by TDCJ consistently with the care level offered in the local community. Victims will be provided with medical and mental health services consistent with the community level care. The inmate victims of sexual abuse will be offered tests for sexually transmitted infections as medically appropriate. All treatment of services in regards to the sexual abuse occurring at Ray Goodman Unit will be provided without cost to the victim. This includes whether or not the victim identifies his abuser or refuse to cooperate with any investigation that may arise from the incident.

Interviews conducted with the Safe Prisons PREA Compliance Manager, Medical & Mental Health professionals, random staff and inmates confirmed inmates' access to outside confidential support services. Also, agency policy requires inmates receive timely unimpeded access to emergency medical treatment, and crisis intervention services without delay.

Ray Goodman Unit does not house female inmates.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.86 Sexual abuse incident reviews

- 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)

Documentation provided by TDCJ Central Office and reviewed: AD 02.15 Operations of the Emergency Action Center & Reporting Procedures for Serious or Unusual Incidents, Safe Prisons PREA Plan, (Instructions for Reporting Alleged Sexual Abuse and Sexual Harassment) and Monthly Safe Prisons PREA Report.

TDCJ (Ray Goodman Unit) policies and procedures ensure the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded.

In addition, the PREA Ombudsman maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. The agency also obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates.

The Ray Goodman Unit conducts a sexual abuse incident review at the conclusion of sexual abuse investigation, unless the allegation has been determined to be unfounded. The Incident Review Team conducts the review within 30 days of the investigation conclusion. The Incident Review Team consists of upper-level management, with input from line supervisors, investigators, and medical or on-site mental health practitioners. Any recommendations made from the review, are implemented. If not, reasons why are documented.

In the past 12 months, there were two (2) administrative investigations of alleged sexual abuse completed at the facility, excluding only “unfounded” incidents.

In the past 12 months, there were two (2) administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only “unfounded” incidents.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.87 Data collection

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

Documentation provided by TDCJ Central Office and reviewed; AD 02.15 Operations of the Emergency Action Center & Reporting Procedures for Serious or Unusual Incidents, BP-02.09 PREA Ombudsman Policy Statement, OIG OPM 04.05 Inmate Sexual Assault Investigations, Safe Prisons PREA Plan, SPPOM 08.01 Safe Prisons/PREA Management Office, and DOJ, BJS 2014/2015 Survey of Sexual Violence (SSV).

TDCJ Ray Goodman Unit policies confirmed procedures are in place and applied to ensure the agency; collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions; maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews, and includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

Agency policies ensure the incident-based sexual abuse data is aggregated on an annual basis. The incident-based data collected is required to include at minimum information necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. The PREA Ombudsman maintain reviews, and collects data as needed from

all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Bureau. As a result of comprehensive data collection and review, the TDCJ maintains separate incident based data from all available incident-based documents as noted in agency policies. The Director, Correctional Institutions Director (CID), PREA Coordinator and, Safe Prisons PREA Compliance Manager confirm the agency aggregates the incident-based sexual abuse data at least annually. All confidential information is securely retained by TDCJ.

A review of the completed Ray Goodman Unit Survey of Sexual Violence, 2014/2015 confirmed incidents base sexual abuse data is aggregated on an annual basis.

The Director, Correctional Institutions Director (CID), Senior Warden and Safe Prisons PREA Compliance Manager confirmed, uniform data has been collected for every incident of sexual abuse alleged to have occurred at the Ray Goodman Unit while using a standardized instrument and set of definitions.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.88 Data review for corrective action

- 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)

Documentation provided by TDCJ Central Office and reviewed: BP-02.09 PREA Ombudsman Policy Statement, PREA Ombudsman Safe Prisons Program Annual Report, 2015 Safe Prisons Program Annual Report, Safe Prisons PREA Plan, Texas Government Code 501.171-176, OIG (Confidential information not contained in report), and written interview from Director, Correctional Institutions Division & Compliance Coordinator.

TDCJ (Ray Goldman Unit) policies confirm, the agency shall review data collected and aggregated pursuant to standard 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including: 1) Identifying problem areas; 2) Taking correction action on an ongoing basis; and 3) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.

An Annual Report is compiled by the joining efforts of the Office of the Inspector General, PREA Ombudsman, and Safe Prison/PREA Office. The data collected through the Emergency action center reporting process and independent reports submitted directly to the OIG is sent monthly, and annually as well. All the data is integrated and reviewed for usefulness. Agency leadership and Safe Prisons/PREA Managers Office review it.

The report included areas identified by the facilities in need of corrective actions and a summary of any corrective action taken that was previously identified. The report also included a comparison of the current year's data and corrective action with those from prior years while providing an

assessment of the agency's progress in addressing sexual abuse.

Agency website viewed: www.tdcj.state.tx.us/tbcj/tbcj_prea.html

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

Standard 115.89 Data storage, publication, and destruction

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

Documentation provided by TDCJ Central Office and reviewed: Documentation provided and reviewed: PREA Records Retention Schedule, ED-02.09 PREA Record Management, Safe Prison Annual Report and Safe Prison Plan.

TDCJ (Ray Goodman Unit) has policies and procedures in place to ensure guidelines are followed to ensure data collected pursuant to standard 115.87 are securely retained. The PREA Coordinator confirmed during an interview that the Safe Prisons/PREA Office maintains a stand-alone access database system that only allows office staff access to enter and query data. The manager is the only authorized agent to delete information.

She went on to say, mainframe data reported through the Emergency Action Center is stored on a server. Employees must have a user account to access the EAC system. There is a 2nd level of security where specific access is granted only to certain individuals based on their security profile. Access to this system is approved only through the EAC administrator.

Also, the agency make all aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts, readily available to the public annually through its agency's website and was reviewed.

Agency's policies further confirmed that personal identifiers and sensitive information shall be redacted from the reports in instances when publication would present a clear and specific threat to the safety and security of a unit while maintaining the nature of the material.

TDCJ (Ray Goodman Unit), follows the record retention scheduled for all Safe Prisons/PREA documents. All sexual abuse data collected shall be maintained for at least 10 years after the date of the initial collection unless federal, state, or local law requires otherwise. The agency's retention schedule for these documents is Death / Discharge plus ten (10) years. Inmate Classification files retention time period is thirty (30) years. Policy and procedures are in accordance with Federal, State and local law requirements.

Based on documentation provided, reviewed, and interviews conducted, the Ray Goodman Unit is compliant.

AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.

Wynn R. Testamark

October 12, 2017

Auditor Signature

Date