

Keeton Corrections Inc.

2017 PREA Annual Report



Keeton Corrections Inc. mandates zero tolerance toward all forms of sexual abuse and sexual harassment.

The Prison Rape Elimination Act (PREA) of September 4, 2003, was enacted by the United States Congress to address the problem of sexual assault in all United States penal facilities.

PREA supports the elimination, reduction and prevention of sexual assault/rape within our prisons, community corrections centers and local jails. PREA applies to Offender-on Offender and Staff-on-Offender sexual misconduct.

**Kimberly K. Spence
CEO/President**

Karen Hall
Vice President

Sharon Littledog
Human Resource Manager/PREA Coordinator

KCI 2017 PREA Annual Report – January 18, 2018

(In accordance with Standard 115.88)

Keeton Corrections Inc. (KCI) has been operating Residential Reentry Center's (RRC) facilities since 1982. KCI is committed to meeting the requirements of the Prison Rape Elimination Act of 2003 and enhancing the safety and security for all KCI offender. It is the policy for KCI to provide a safe and secure environment for all offenders, staff, volunteers, and contractors, free from the threat of sexual abuse or assault. This report is a summary of the agency's efforts in PREA compliance. By examining the collection and aggregation of agency data. KCI is dedicated to improving the effectiveness of sexual abuse detection, prevention, and response. KCI has always taken active steps to train staff to refrain from prohibited contact and inappropriate relationships with offenders while also working towards prevention and elimination of sexual abuse within KCI facilities.

At the close of calendar year 2017, KCI had 7 designated Residential Reentry Centers (RRC). Of the 7 RRC's 6 facilities housed male and female offenders and 1 facilities housed male offenders (state offenders and parolees). KCI also maintains a facility that house Mothers with Infants Nurturing Program (MINT) at KCI-Tallahassee.

This report has been prepared in accordance with standard 112.287 and standard 115.288 of the PREA Standards in order to address and improve effectiveness of KCI in sexual abuse prevention, detection, and response policies, practices and training.

General Information

During January 1, 2017 thru December 31, 2017 there were 813 new admissions into KCI facilities. The average daily was 308.56 % (32.59% females and 275.97% males).

Purpose

This document serves as an annual review to assess and improve the effectiveness of sexual abuse prevention, detection, and response policies, practices, and training KCI provides pursuant to Standard 115.288 and Standard 115.289 of the national PREA standards.

PREA Report Activity

The table below indicates the number of "Resident against Resident", "Staff against Resident", and "Resident against Staff" reports that occurred during year 2017.

Definitions of Findings

Substantiated: Allegation investigated, and the investigation indicated that the alleged event did occur.

Unsubstantiated: Allegation investigated and insufficient evidence to decide as to whether event occurred.

Unfounded: Allegation investigated, and investigation indicated alleged event did not occur.

Non-PREA: Allegation investigated, and investigation indicated PREA alleged event did not occur.

Ongoing: Investigation is ongoing.

The table below indicates the findings of the investigations into "Offender-on-Offender" PREA allegations listed in the PREA Report Activity table on the preceding page.

KCI -Tallahassee

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Jacksonville

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Ocala

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Pensacola

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	1	0	0

KCI-Birmingham

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Mobile

January – December	Unsubstantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	1	0	0	0

The table below indicates the finding of the investigations into “Staff-on-Offender” PREA allegations listed in the PREA Report Activity table on the preceding page.

KCI-Tallahassee

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Jacksonville

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	1	0	0

KCI-Ocala

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Pensacola

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Birmingham

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Mobile

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

The table below indicates the findings of the investigations into "Offender-on-Staff" PREA allegations listed in the PREA Report Activity table on the preceding page.

KCI-Tallahassee

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Jacksonville

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Ocala

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Pensacola

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Birmingham

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

KCI-Mobile

January – December	Substantiated	Unsubstantiated	Unfounded	Non-PREA	Ongoing
2017	0	0	0	0	0

The PREA report that was made for KCI-Mobile, KCI-Jacksonville, and KCI-Pensacola, were due to incidents reported regarding pat searches of the offenders. The PREA report was passed on directly to the Federal Bureau of Prisons by the PREA Coordinator. There were no in-house PREA reports made regarding any incidents of sexual assault or sexual abuse that occurred at any of KCI facilities.

PREA Incident Reviews

KCI has implemented a Sexual Abuse Incident Review group per PREA standard 115.286. The facility conducts a sexual abuse incident review at the conclusion of every criminal and administrative sexual abuse investigation, unless the allegation has been determined to be

unfounded. The review team consist of upper management staff and allows for input from line supervisors, investigators, and medical or mental health practitioners. Such review will ordinarily occur within thirty (30) days of the conclusion of the investigation. KCI will implement the recommendations for improvement, or document its reasons for not doing so.

Review Criteria

1. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
2. Consider whether the alleged incident was motivated by race; ethnicity; gender identify; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation, or was motivated or otherwise caused by other group dynamics at the facility;
3. Examine the area in the facility where the allegation occurred to assess whether physical barriers in the area may enable abuse;
4. Assess the adequacy of staffing levels in that area during different shifts;
5. Assess whether monitoring technology should be changed to supplement supervision by staff; and
6. Prepare a report of its findings. Including but not necessarily limited to determinations made pursuant to paragraph (d)(1) through (d)(5) of this section, and any recommendations for improvement and submit such report to the facility director and PREA Coordinator.

Problems Identified and Corrective Action Taken:

- MOU's were needed for rape crisis centers and the local law enforcement agencies in KCI-Tallahassee – KCI has made several attempts to secure MOU with rape crisis center. MOU for local law enforcement agencies is secured and satisfy the standard.
- Applications did not have adequate language at KCI-Tallahassee to inquire as to whether a new hire had previous allegations or charges for sexual abuse or harassment – The agency updated the employment application to satisfy the standard.
- Although one staff member at KCI-Tallahassee is bilingual, there was a need to have an agency in place to utilize translation if there ever was a need – KCI is working diligently to obtain an agency to provide the service.
- Inmates are initially being screened within a 24-hour timeframe, but the form utilized did not meet requirement and inmates were not rescreened within 30 days - The PREA assessment tool was revised. All new inmate arrivals after initial assessment will be rescreened within 30 days.
- A formalized staffing plan was deemed necessary to establish documentation of standard 115.213 for all KCI-Facilities – KCI now has a formalized staffing plan that will

be reviewed on an annual basis by the PREA Coordinator, Facility Director, and Quality Assurance Manager.

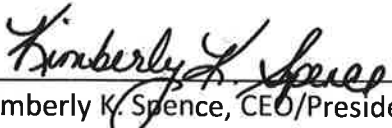
- All KCI facilities Resident Monitor need to be more familiar and comfortable with their duties related to first responder duties – All KCI staff have been trained specifically on first responder duties, as well as supplied a checklist to ensure all first responder steps are followed.

Analysis/Corrective Action: None needed this reporting period.

Unfortunately, data was not kept in 2016 to compare to 2017. In the next annual review comparison will be with 2017 and 2018 data.

Agency Goals for 2018

It is the goal of KCI that every inmate in our care understand and exercise their right to be free from sexual abuse and sexual harassment from other inmates, staff, volunteers, and staff. KCI continues to implement best practices and requirements of the PREA standards to address allegations of sexual abuse and sexual harassments of offenders. KCI is dedicated to ensuring the sexual safety of all residents and every facility, which is a direct result of creating a culture that fully integrates and embraces the intent of the PREA standards and the highest level of sexual safety. KCI will continuously identify problem areas in policies and practice at the agency level.



Kimberly K. Spence, CEO/President
Keeton Corrections Inc.