

PREA Audit: Subpart B Short-Term Holding Facilities Audit Report



U.S. Customs and
Border Protection

AUDITOR

Name of Auditor:	(b)(6)(b)(7)(C)	Organization:	Creative Corrections LLC
Email Address:	(b)(6)(b)(7)(C)	Telephone Number:	(b)(6)(b)(7)(C)

AGENCY

Name of Agency:	U.S. Customs and Border Protection
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PROGRAM OFFICE

Name of Program Office:	Office of Field Operations
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SECTOR OR FIELD OFFICE

Name of Sector or Field Office:	San Diego, California
Name of Chief or Director:	(b)(6)(b)(7)(C)
PREA Field Coordinator:	(b)(6)(b)(7)(C)
Sector or Field Office Physical Address:	610 West Ash Street, San Diego, California 92101
Mailing Address: <i>(if different from above)</i>	

SHORT-TERM HOLDING FACILITY BEING AUDITED

Information About the Facility			
Name of Facility:	Calexico East Port of Entry		
Physical Address:	1699 East Carr Road, Calexico, California 92231		
Mailing Address: <i>(if different from above)</i>			
Telephone Number:	(b)(6)(b)(7)(C)		
Facility Leadership			
Name of Officer in Charge:	(b)(6)(b)(7)(C)	Title:	Assistant Port Director
Email Address:	(b)(6)(b)(7)(C)	Telephone Number:	(b)(6)(b)(7)(C)

AUDIT FINDINGS

NARRATIVE OF AUDIT PROCESS AND DESCRIPTION OF FACILITY CHARACTERISTICS:

Directions: Discuss the audit process to include the date(s) of the audit, names of all individuals in attendance, audit methodology, description of the sampling of staff and detainees interviewed, description of the areas of the facility toured, and a summary of facility characteristics.

The Prison Rape Elimination Act (PREA) on-site audit of Customs and Border Protection (CBP) Office of Field Operations (OFO) Calexico-East (Calexico-E) Port of Entry (POE) was conducted on Thursday, September 26, 2019, from 07:00 hours until 18:50 hours. The audit was conducted by (b)(6)(b)(7)(C), Certified PREA Auditor, contracted through Creative Corrections, LLC, of Beaumont, Texas. This was the first PREA audit for Calexico-E POE. The Calexico-E POE is a short-term processing and holding area detaining male and female adults, unaccompanied alien children (UAC) and family units for a time period specified to be under 24 hours, pending transfer for removal or detention. The purpose of the audit was to determine compliance with the Department of Homeland Security (DHS) PREA Standards. The on-site audit followed the Auditor's electronic review of CBP's PREA policies and procedures and email with CBP Headquarters (HQ) Subject Matter Experts (SMEs).

The Point of Contact for Calexico-E POE was Watch Commander/PREA Field Coordinator (WC-PFC) (b)(6)(b)(7)(C).

An entry-briefing led by the Auditor was conducted at 08:00 on the day of the on-site review. Those in attendance at the entry-brief were:

(b)(6)(b)(7)(C), Watch Commander/PREA Field Coordinator (WC-PFC), Calexico-East Port of Entry
(b)(6)(b)(7)(C), Watch Commander, Calexico-East Port of Entry

Immediately following the entry-briefing, the Auditor and the Watch Commander were given a tour of Calexico-E POE by the WC-PFC, which followed the path a detainee would follow from primary screening, into secondary screening, and into processing/holding. Calexico-E POE is comprised of two buildings separated by a significant distance in a large complex and housing three traveler-crossing functions (Pedestrian, Vehicular, and Truck Cargo) and (b)(7)(E). (b)(7)(E). These cells are used on a very temporary basis as all detainees, individuals, including U.S. citizens, who are wanted by other law enforcement authorities, are turned over to other authorities, and are transferred to Calexico West POE (Calexico-W POE) to complete processing and for holding. UACs are immediately transferred to Calexico-W POE where there are dedicated holding arrangements for them. When utilized, this area is inaccessible to adult detainees and male and female minors are required to sit separately from adults at all times. A Customs and Border Protection Officer (CBPO) is stationed with the UACs at all times and may not leave the area without relief. At the time of the on-site audit, there were no detainees or UACs at Calexico-E POE.

The pedestrian building was erected in the early 1990's and allows passengers to pass through a large lobby where they present their documentation to officers. Those requiring additional inspection are escorted to a reception area off the lobby where secondary processing takes place. Travelers who are detained can be placed in (b)(6)(b)(7)(C), each with a half-wall partitioned toileting area. Privacy screens are present on the door of each room and can be pulled across to provide privacy during toileting. Vehicle lanes are adjacent to the pedestrian building and have their own secondary processing area and holding rooms. Buses arriving through the vehicle lanes are diverted to a parking area in vehicle secondary. All passengers must exit the bus and have their credentials checked at the secondary counter. Currently, (b)(7)(E) with toilet facilities are in use. (b)(7)(E), but can easily be converted back to their originally intended use.

The adjacent building, a significant distance from the pedestrian and vehicle screening areas, provides a large truck reception and parking area, loading docks and an inspection area, and a secondary processing area with (b)(7)(E) (b)(7)(E) with toileting facilities. (b)(7)(E). Administrative offices are also located in this building. Individuals, including U.S. citizens, wanted by other law enforcement agencies, who are detected in the cargo area, are held in the holding rooms until released to local law enforcement or to Homeland Security Investigations (HSI) agents.

All staff with direct contact to detainees are law enforcement officers. Detainees who require holding are transferred to Calexico-W POE, where they are seen by the medical assistants on duty there. Janitorial services are also provided by a private contractor, but they have no detainee contact. Detainees are removed from any area where janitorial or maintenance contractors must work and the workers are escorted in and out by law enforcement staff. The number of

officers working in the holding area remains fluid and varies in accordance with the flow of detainees. (b) (7)(E) are monitored in a secure port control area around the clock and in the supervisors' offices. The Auditor reviewed all (b) (7)(E) of holding areas and determined that there was no breach of detainee privacy.

SUMMARY OF OVERALL FINDINGS:

Directions: Discuss audit findings to include a summary statement of overall findings and the number of provisions which the facility has achieved compliance at each level: Exceeds Standard, Meets Standard, and Does Not Meet Standard.

On Thursday, September 26, 2019, an exit briefing for Calexico-E POE Holding Facility was held. The exit briefing was opened and conducted by Creative Corrections Certified PREA Auditor (b) (6), (b) (7)(C). Those in attendance for the briefing were:

- (b)(6)(b)(7)(C), National OFO PREA Coordinator, OFO, HQ (By teleconference)
- (b)(6)(b)(7)(C), Watch Commander (WC), Calexico-East Port of Entry

Scope of the Audit: Prior to the on-site audit, the Auditor was able to review the HQ and Local Pre-Audit Questionnaires (PAQs), the HQ Responsive Documents and Data Requests, local documents, including Calexico-E POE specific documents, HQ Participation documents, and medical provider websites. The Auditor was also in contact with or reviewed communications from four HQ Subject Matter Experts (SMEs).

The Auditor was given a complete tour of Calexico-E POE. The Auditor had complete access to the facility and observed Primary Screening and initial Secondary Screening. The Auditor was provided with a private interview room for staff interviews. The Auditor was able to use a private telephone line to privately access OIG. Required Prevention of Sexual Abuse (PSA) and Notice of Audit postings were seen throughout the public, staff and detainee processing areas as required.

During the on-site audit, the Auditor interviewed law enforcement personnel from all three shifts. In total, the Auditor interviewed six local SMEs, and 13 random officers. There were no detainees to be interviewed at Calexico-E POE. The Auditor completed a total of 19 interviews. The Auditor was able to review the staff training curriculum and training completion records on-site. There were no strip or body cavity searches performed at Calexico-E POE during the audit period. This was confirmed by both SME interviews with the WC/PFC and random staff interviews.

During the Audit Process, the Auditor reviewed the compliance of 25 DHS Subpart B Standards at Calexico-E POE. The Auditor found Calexico-E POE exceeded one standard (115.131); met 22 standards (115.111; 115.114; 115.116; 115.117; 115.118; 115.121; 115.122; 115.131; 115.132; 115.141; 115.151; 115.154; 115.161; 115.162; 115.163; 115.164; 115.165; 115.166; 115.167; 115.176; 115.177; 115.182, 115.186; and did not meet two standards (115.113, 115.115).

SUMMARY OF AUDIT FINDINGS	
Number of standards exceeded: 1	
Number of standards met: 22	
Number of standards not met: 2	
OVERALL DETERMINATION	
<input type="checkbox"/> Exceeds Standards (Substantially Exceeds Requirements of Standards) <input type="checkbox"/> Meets Standards (Substantial Compliance; Complies in All Material Ways with the Standards for the Relevant Review Period) <input checked="" type="checkbox"/> Does Not Meet Standards (Requires Corrective Action)	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Not Low Risk

PROVISIONS

Directions: In the notes, the auditor shall include the evidence relied upon in making the compliance or non-compliance determination for each provision of the standard, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet the standard. These recommendations must be included in the Corrective Action Plan Final Determination, accompanied by information on specific corrective actions taken by the facility. Failure to comply with any part of a standard provision shall result in a finding of "Does not meet Standard" for that entire provision, unless that part is specifically designated as Not Applicable. For any provision identified as Not Applicable, provide an explanation for the reasoning. If additional space for notes is needed, please utilize space provided on the last page.

§115.111(a) – Zero tolerance of sexual abuse; Prevention of Sexual Assault Coordinator.

- Exceeded 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)

Notes:

The facility meets the standard. The agency has taken definitive steps to inform the public, all employees, and detainees of its adherence to the PREA Standards. The Commissioner's Memorandum on Zero Tolerance for Sexual Abuse and Assault dated March 11, 2015; the CBP Directive 2130-030 Prevention, Detection and Response to Sexual Abuse and/or Assault in CBP Holding Facilities dated January 19, 2018; and the Commissioner's Memorandum on Unaccompanied Alien Children (undated) issued to all CBP employees clearly outline the duty of all CBP staff members to prevent, detect and respond to all allegations or observations of sexual abuse. Zero tolerance posters are posted throughout the facility and were familiar to all interviewed random staff. Interviews with the HQ and Local SMEs emphasize staff training on zero tolerance and local random staff interviews verify staff have been trained. The Auditor was able to interview both the HQ PSA Coordinator and the PREA Field Coordinator. These interviews verify both the agency and the facility have provided dedicated personnel to insure PREA provisions are in compliance with the standard.

§115.113(a) through (c) – Detainee supervision and monitoring.

- Exceeded 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)

Notes:

(a) The facility meets the standard provision through appropriate levels of supervision, operational procedures and (b) (7)(E). CBP Directive 2130-030 requires OFO to develop facility-based guidelines to meet the supervision needs of each facility. Interviews with the WC and WC/PFC verify that shift supervisors have both the responsibility and latitude to move shift staff or request additional staff from adjoining POEs as supervision needs require. Interviews with shift supervisors verified this latitude. During the on-site audit, the Auditor never witnessed a level of supervision that created concern.

(b) The facility does not meet the standard provision. CBP Directive 2130-030 requires each Field Office implement an annual review process for all POEs holding detainees. The Calexico-E POE WC/PFC detailed supervisor meetings during his interview in which supervisory personnel discuss security concerns, traveler flow and special incidents which impact supervision needs at the port. The WC/PFC was asked about an annual review/report detailing supervision reports and the Auditor explained the requirements to them. The report was not available at the time of the audit. During the opening meeting for the Calexico-E POE on-site audit, the WC/PFC attempted to provide the Auditor with an annual staffing review based on the Calexico-E POE compliance audit closeout meeting. The Auditor explained to the WC/PFC that this report was not consistent with the standard requirement. Corrective Action is required. **Corrective Action:** Provide documentation of an annual review for Calexico-E POE which details responses to the concerns outlined in standard provision (c).

(c) The facility meets the standard provision. Areas of consideration detailed in the standard provision are regularly discussed by Supervisors and the Shift Commanders. This practice was confirmed by interviews with the WC/PFC and facility Supervisors. Supervisors have continuous access to WCs and often call during off duty hours; particularly when the composition of travelers is high or the flow of detainees out of holding at Calexico-W POE has been interrupted. Normally, supervision concerns result in staff from the previous shift being held over or staff from an adjoining POE being reassigned. The WC/PFC reported that staff from Calexico-E POE can be reassigned to Calexico-W POE when necessary to assist with the detainees in holding.

§115.114(a) and (b) – Juvenile and family detainees.

- Exceeded 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 (provide explanation in notes):

Notes:

(a) The facility meets the standard provision. CBP National Standards on Transport, Escort, Detention and Search (TEDS) dated October, 2015, require juveniles be treated at all times in their best interest and all guidelines for Special Populations be taken into consideration. Calexico-E POE immediately separates all UACs from accompanying adults unless the familial relationship can be immediately vetted. All UACs received at Calexico-E POE are immediately transferred to Calexico-W POE.

(b) The facility meets the standard provision. UACs are immediately separated from accompanying adults, unless the relationship has been properly vetted and verified prior to holding. Local SME and random staff interviews confirm a combination of agency and State Department data base searches with separate interviews of both the minor and the accompanying adult are used to vet the relationship. Staff were well-versed in dynamic interviewing skills including eye contact, interrupted speech patterns and the observation of the relationship between the parties involved. UAC removal and transfer from Calexico-E POE holding is always given the highest priority and is immediate.

§115.115(b) through (f) – Limits to cross-gender viewing and searches.

- Exceeded 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)

Notes:

(b) The facility meets the standard provision. CBP TEDS sets specific guidelines for cross-gender viewing and searches in the absence of truly exigent circumstances. Interviews with Local SMEs and staff support the standards and strip and body cavity searches are not performed except in exigent circumstances, with body cavity searches of juveniles being referred to a medical practitioner. Children and UACs are not searched. This was verified by the WC/PFC.

(c) The facility meets the standard provision. CBP TEDS requires all strip and body cavity searches be documented. The Auditor requested and was shown the search training provided to all law enforcement personnel when they have firearms re-certification. Staff interviews verified this bi-annual training. The Auditor was informed by the WC/PFC that there were no strip or body cavity searches performed at Calexico-E POE during the audit period. This report was verified during supervisory and random staff interviews.

(d) The facility meets the standard provision. Calexico-E POE has developed internal procedures and practices which allows for privacy during detainee clothes changing and toileting as required in the standard provision and CBP TEDS. No detainees shower at Calexico-E POE. The facility has also established the firm practice of making deliberate announcements when opposite gender staff enter a holding room, area, search room or lavatory. A review of training records confirms staff have been trained to perform this function and it is also reinforced on the PREA Quick-Reference Cards. Both random staff and Local SMEs reveal announcements are consistently practiced.

(e) The facility meets the standard provision. All supervisory and random staff report they would ask the detainee to self-identify if they had a need to know the detainee's gender. They all report strip searches are not authorized to determine a detainee's gender. A review of the search logs reveals no strip searches were conducted to determine a detainee's gender.

(f) The facility does not meet the standard provision. While interviews with Supervisors and Officers confirmed training for cross-gender pat-down searches in exigent circumstances, the agency produced no specific training materials for pat-down searches of transgender detainees. This lapse in training creates a situation where staff interviews reveal officers perform differently when searching transgender detainees. Many Officers respond to the detainee's self-identification and they are pat searched by an Officer of the same gender as how they identify. Some Officers continue to ask the detainee the status of their genitalia and they are searched by an Officer of the same biological gender regardless of their gender identification. Corrective Action is required. **Corrective Action:** Provide documentation all law enforcement staff at Calexico-E POE have received and understand specific training regarding the searching of transgender detainees.

§115.116(a) through (c) – Accommodating detainees with disabilities and detainees who are limited English proficient.

- Exceeded 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)

Notes:

(a) The facility meets the standard provision. CBP Directive 2130-030 requires staff in holding facilities to provide reasonable accommodations to detainees who are hearing impaired, blind or have low vision, or who have intellectual or mental health disabilities. Staff interviews verified the steps Officers and Supervisors would take to provide accommodations to detainees with these disabilities. These include staff reporting they have read PREA notices to visually impaired and functionally illiterate detainees. Staff report detainees with pervasive disabilities at Calexico-E POE have been minimal and most disabled detainees travel with family members. There were no detainees available to be interviewed at Calexico-E POE.

(b) The facility meets the standard provision. CBP Directive 2130-030 requires all holding facilities to provide effective, accurate and impartial in-person or telephonic interpretation services to detainees who are Limited English Proficient (LEP). All PREA posters are posted in both English and Spanish, but also provide direction in commonly spoken languages. All interviewed staff except three are fluent in Spanish and English. All staff report they have been able to communicate with LEP detainees via the available U.S. Citizenship and Immigration Service (USCIS) language line. Half of all interviewed staff members indicate they have used the interpretive services. There were no detainees available to be interviewed at Calexico-E POE.

(c) The facility meets the standard provision. CBP Directive 2130-030 directs other detainees are not to be utilized as interpreters when a detainee has alleged sexual abuse or has been found to be sexually abused. The Auditor was able to verify local practice at Calexico-E POE is consistent with the Directive through interviews with the WC/LPC and Supervisors. All interviewed Officers reinforced other detainees may not be used in these circumstances and state they would use a staff member if appropriate or the language line as per their directions in muster.

§115.117(a) through (f) – Hiring and promotion decisions.

- Exceeded 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)

Notes:

(a) The facility meets the standard provision. CBP Directive 2130-030 requires the Office of Human Resources Management (HRM) ensure compliance with hiring, promotion and discipline requirements as outlined in the standard provision. The Directive requires the Office of Human Resources Management to place policies and procedures in place to ensure CBP does not hire any contractors who have a history of sexual abuse. Interview with the HQ HRM SME and documents downloaded from HRM verify compliance with the standard provision for employees.

(b) The facility meets the standard provision. Interview with the HQ HRM SME verifies new employees and employees seeking promotion must complete an application which asks about previous sexual misconduct and imposes a continuing duty to disclose any such future misconduct.

(c) The facility meets the standard provision. The Auditor selected the names of 17 random staff members of all ranks from Calexico-E POE. The WC/PFC submitted these names to HQ Personnel Security Division (PSD) SME via the HQ PSA Coordinator. Review of a computer check of these employees found the agency to be in compliance with pre-hire and five-year follow-up checks; but there was one employee of concern who has an open investigation since 2014. Communication with the PSD Administrator-SME provided transparency and assurance that concerns with the background investigation were not PREA-related or exclusionary. This information was also verified with information received from the Office of Professional Responsibility/Investigations Operations Division/ Sexual Abuse and Assault Investigations (OPR/IOD/SAAI) Coordinator, who had provided information there were no sexual abuse allegations received from Calexico-E POE involving staff members during the audit period.

(d) The facility meets the standard provision. Calexico-E POE has no medical contractor staff on-site. Janitorial and maintenance contractors have no contact with detainees. Local procedures require staff to remove any detainees from an area where maintenance or janitorial contractors must work. There are currently no volunteers on-site at Calexico-E POE.

(e) The facility meets the standard provision. Interview with the HQ HRM SME confirms it is agency policy to rescind an offer of employment to a prospective employee or to terminate the employment of any employee who makes a material omission or provides false information regarding sexual abuse misconduct. Staff are informed of the policies regarding material omissions and providing false information in the CBP Standards of Conduct which is referenced in their yearly required ethics training taken online.

(f) The facility meets the standard provision. CBP Directive 2130-030 allows for the provision of any substantiated allegations of sexual abuse regarding former employees upon receiving a request to do so from an institutional partner for whom such an employee has applied to work, unless prohibited by law. Interview with the HQ HRM SME verifies this practice by the agency.

§115.118(a) and (b) – Upgrades to facilities and technologies.

- Exceeded 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 (provide explanation in notes):

Notes:

(a) The standard provision is not applicable as Calexico-E POE has acquired no new facility or undergone a major expansion since May 6, 2014.

(b) The facility meets the standard provision. When (b) (7)(E) was recently updated at Calexico-E POE, an interview with the WC/PFC verifies PREA supervision and privacy concerns were taken into consideration.

§115.121(c) through (e) – Evidence protocols and forensic medical examinations.

- Exceeded 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)

Notes:

(c) The facility meets the standard provision. CBP Directive 2130-030 specifies the treatment services to be provided to a detainee victim of sexual assault. Calexico-E POE utilizes the services of Pioneers Memorial Hospital for forensic examinations of sexual abuse victims determined to be evidentiary or medically appropriate at no cost to the detainee and only with the detainee's consent. The examination is to be performed by a Sexual Assault Forensic Examiner (SAFE) or a Sexual Assault Nurse Examiner (SANE). This practice was confirmed via Local SME interviews with Shift Supervisors. The Auditor confirmed the provision of SANE nursing services with an identified supervisor at Pioneers Memorial Hospital during an interview on October 14, 2019.

(d) The facility meets the standard provision. The Auditor determined that Pioneers Memorial Hospital has sexual abuse advocacy services in-house. Local SME interview with the WC/PFC verified sexual abuse victims from Calexico-E POE would have access to victim services at the hospital. The Auditor confirmed the availability of sexual abuse advocacy services at Pioneers Memorial Hospital with an identified Supervisor during an interview on October 14, 2019.

(e) The facility meets the standard provision. Interview with the Watch Commander/PFC verifies both the Calexico Police Department and the Imperial County Sheriff's Department have been advised of and are agreeable to following PREA requirements.

§115.122(c) and (d) – Policies to ensure investigation of allegations and appropriate agency oversight.

- Exceeded 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)

Notes:

(c) The facility meets the standard Provision. CBP Directive 2130-030 requires prompt reporting of all sexual assaults/allegations to the facility administrator or agency office. All interviewed Local SMEs and random staff report they will immediately report such incidents up the chain of command and to the Joint Intake Center (JIC). After discussion with the WC/PFC, the Supervisor is to inform local law enforcement, as appropriate. This report was confirmed by Supervisor interviews. Reporting requirements are also specified on staff's PREA Quick Reference Card.

(d) The facility meets the standard provision. Interview with the HQ PSA Coordinator verifies the appropriate offices are advised of all incidents/allegations of sexual abuse by the JIC and/or Commissioner's Situation Room.

§115.131(a) through (c) – Employee, contractor and volunteer training.

- Exceeded 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)

Notes:

(a) The facility exceeds the standard provision. The standard requires that the agency train all employees, contractors and volunteers who may have contact with detainees to be able to fulfill their responsibilities under these standards, including the agency's zero-tolerance policies; detainee's right to be free of sexual abuse and retaliation for reporting such abuse; definitions and examples of prohibited and illegal sexual behaviors; recognition of situations where sexual abuse may occur; recognition of physical, behavioral, and emotional signs of physical abuse, and methods of preventing such occurrences; procedures for reporting knowledge or suspicion of sexual abuse; how to communicate effectively and professionally with detainees including lesbian, gay, bisexual, transgender, intersex, or gender non-

conforming detainees; and the requirement to limit reporting of sexual abuse to individuals with a need-to-know in order to make decisions concerning the victim's welfare for law enforcement or investigative purposes. All employees of Calexico-E POE have received the training required by the standard. The Auditor reviewed the training curriculum and training records while on-site. Staff interviews verified the above training via the Performance and Learning Management System (PALMS). Note: Contractor (maintenance and janitorial) staff are not trained as Calexico-E POE insures the contractors and detainees have no contact. The facility has addressed the issue of contract employees by initiating internal procedures which require detainees to be removed from any area where contractors need to clean or conduct maintenance. The contract employees are then escorted to the empty area. This practice was witnessed by the Auditor on several occasions during the on-site audit. Calexico-E POE currently utilizes no volunteers. Calexico-E POE has a practice of regular face-to-face musters, shift meetings, and Town Hall meetings with staff where they can discuss procedures, train on new procedures and ask questions. These meetings and clearly posted local supervision guidelines for detainee supervision exceed the standard provision.

(b) The facility meets the standard provision. Reviewed training records verify all active staff at Calexico-E POE were trained within two years of the effective date of the standards or upon their hire, if hired after the initial training. Training records confirm all law enforcement staff received refresher training as required. Staff interviews confirm yearly PREA training on PALMS and bi-annual training.

(c) The facility meets the standard provision. Training records are maintained electronically and are maintained for a minimum of five years as required by the standard and Local SME interview with the Training Supervisor verified compliance.

§115.132 – Notification to detainees of the agency's zero-tolerance policy.

- Exceeded 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)

Notes:

The facility meets the standard. Calexico-E POE maintains colorful, large print posters of DHS's zero-tolerance policy in all detainee holding areas, in all processing areas, in all staff lounges and office areas, in all public lobbies and in all primary holding areas. The posters are printed and posted in English and Spanish, but also contain a box providing zero tolerance and reporting information in all common languages. In addition, DHS's Zero-Tolerance brochures were viewed in its public lobbies and CBP addresses Zero-Tolerance prominently on its website.

§115.134 – Specialized training: Investigations.

- Exceeded 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 (provide explanation in notes):

Notes:

N/A – Refer to the CBP Sexual Abuse Investigations Audit Report.

§115.141(a) through (e) – Assessment for risk of victimization and abusiveness.

- Exceeded 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)

Notes:

(a) The facility meets the standard provision. CBP TEDS requires all detainees be assessed for being at-risk of sexual assault before being placed in a hold room or holding facility. Based on this assessment, the processing Officer is to decide whether the detainee needs to be placed alone or placed away from other detainees. Local SME and random staff interviews demonstrate proficiency on the part of staff to establish a dialogue with the detainee to look for and respond to non-verbal cues and to ask additional questions until the Officer determines if the detainee is vulnerable to sexual assault. Vulnerable detainees are removed from contact with other detainees whenever possible. If not possible, continuous sight and sound supervision is required by local procedure and was verified by staff interviews.

(b) The facility meets the standard provision. All detainees at Calexico-E POE are asked if they have concerns about their personal safety in holding at Calexico-E POE. This practice was verified by random staff interviews. Staff report they are asking questions to determine the detainee's safety in holding. They will assess potential victims or perpetrators according to their physical build, available criminal records and subsequent questioning.

(c) The facility meets the standard provision. CBP TEDS requires the processing Officer consider evaluation factors

outlined in the standard provision. Randomly interviewed Officers were able to recite all factors except in two interviews.

(d) The facility meets the standard provision. Interviewed Local SMEs report, upon a detainee being identified as "high risk" and no single cell being available, Officers will consult with the on-duty Supervisor and an Officer will be detailed to provide continuous sight and sound supervision. This practice was confirmed through officer interviews.

(e) The facility meets the standard provision. CBP TEDS requires staff to ensure assessments are provided in privacy where sensitive information cannot be learned by other parties. The dissemination of sensitive information is to be controlled on a "need to know" basis. Random staff interviews verify this practice.

§115.151(a) through (c) – Detainee reporting.

- Exceeded 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)

Notes:

(a) The facility meets the standard provision. Both CBP TEDS and CBP Directive 2130-030 provide multiple ways for detainees to report sexual abuse/assault, retaliation and/or staff neglect or violations leading to sexual assault. HQ and Local SME interviews, staff interviews and detainee interviews verify detainees may report abuse orally or in writing to staff; third party reports are accepted, and detainees may request to make private anonymous telephone calls to OIG. When questioned about detainee calls to OIG, the Officers stated that a detainee wishing to make a private call to OIG would be escorted to the office with windows; the officer will dial the OIG hotline telephone number, hand the telephone to the detainee and supervise the detainee from outside the office until they complete their call. Officers report they will not ask the detainee why they wish to call OIG, but all Officers reported they would clear the call with their Supervisor.

(b) The facility meets the standard provision. Local SME and staff interviews reveal all staff have been trained to allow detainees to report sexual abuse to OIG, or to have a family member or other third-party contact OIG.

(c) The facility meets the standard provision. Random staff interviews confirm they must accept oral, written anonymous, or third- party reports of sexual abuse. In turn, those reports must immediately be reported to their supervisor and documented electronically in the detainee's file.

§115.154 – Third-party reporting.

- Exceeded 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)

Notes:

The facility meets the standard provision. CBP Directive 2130-030 directs third parties may report sexual abuse on behalf of detainees. The public can also go to the CBP PREA website at <https://www.cbp.gov/about/care-and-custody/how-make-report>. DHS posters direct third parties on how to make written or telephonic reports to OIG. Calexico-E POE staff are required to allow private and anonymous calls from detainees to OIG. Interviewed staff report third parties can call OIG directly on the hotline number. They also report should a third-party report abuse to them, they would immediately remove the detainee from holding, notify their supervisor and follow the same protocol for a detainee report. During the on-site audit, the Auditor was able to place a call to OIG from the office designated for detainee private calls.

§115.161(a) through (d) – Staff reporting duties.

- Exceeded 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)

Notes:

(a) The facility meets the standard provision. CBP Directive 2130-030 requires all staff to report immediately any knowledge, suspicion or information regarding an incident of sexual abuse/assault; retaliation against detainees or staff who made such a report or participated in an investigation of sexual abuse, or any staff neglect or violation of responsibilities contributing to an incident of sexual abuse/assault. All interviewed Local SMEs and random staff affirmed these responsibilities, and most responded with the phrase "duty to report". When staff were asked how they could report outside of the chain of command, they all reported they could call the OIG hotline, but some reported they would tell their supervisor, another supervisor or the WC/PFC unless the supervisor was involved in the allegation.

(b) The facility meets the standard provision. Calexico-E POE staff have gone over the PREA Quick Reference Cards at

muster and reported during random staff interviews they must immediately report any incident to their supervisors and their supervisors, in turn, must ensure the incident is reported to local law enforcement, the JIC, and the Commissioner's Situation Room. A few officers did not receive the Quick Reference cards at muster and were issued the cards during the audit.

(c) The facility meets the standard provision. Random staff interviews verify dissemination of information regarding a sexual assault is limited to their immediate supervisor, staff necessary to protect the detainee and the crime scene and anyone else with a need to know.

(d) The facility meets the standard provision. Interview with the HQ SAAI SME reveals sexual assaults of victims under age 18 and vulnerable adults will be reported to the designated State or local services agency by the Port Director or their designee and at the direction of the OPR/IAD/SAAI Coordinator. This practice was verified by the WC/PFC.

§115.162 – Agency protection duties.

- Exceeded 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)

Notes:

The facility/agency meets the standard. CBP TEDS requires any agency employee who believes circumstances exist which place a detainee at imminent risk of sexual assault to take immediate action to protect the detainee. Local interviews with the WC/PFC and Local SMEs affirm the detainee must immediately be protected by isolation or direct constant supervision (sight and sound) or both. Staff report any detainee who is determined to be of imminent risk of sexual abuse/assault would be removed from contact with other detainees and would be supervised as detailed by the Supervisor or Watch Commander. This report was verified by the WC/PFC.

§115.163(a) through (d) – Report to other confinement facilities.

- Exceeded 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)

Notes:

(a) The facility meets the standard provision. CBP Directive 2130-030 requires should a detainee have been sexually abused/assaulted at another facility prior to arriving at Calexico-E POE, the prior agency or administrator must be notified. Interview with the WC/PFC verifies the OIC or their designee would make this notification. This was confirmed by the Field Office Branch Chief as port practice.

(b) The facility meets the standard provision. The standard provision requires the notification be made within 72 hours of receiving the allegation. The WC/PFC reports the Calexico-E OIC or their designee will make the notification immediately. The Field Office Branch Chief confirmed the report would be immediate.

(c) The facility meets the standard provision. The WC/PFC indicates the notification would be documented by a copy of the notification being placed in the detainee's file.

(d) The facility meets the standard provision. The WC/PFC reports the advised agency, if outside CBP, would be notified of the PREA requirements by the Officer in Charge (OIC) or their designee. If within CBP, the agency receiving the notice is required by Directive 2130-030 to notify JIC.

§115.164(a) and (b) – Responder duties.

- Exceeded 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)

Notes:

(a) The agency/facility meets the standard provision. CBP Directive 2130-030 requires upon learning of a detainee sexual assault, the first responding Officer or their Supervisor is to perform all first responder duties delineated in the standard provision. In addition to training all law enforcement personnel on first responder duties, the agency/facility has provided all law enforcement officers with pocket reference cards of their first responder duties and Calexico-E POE reviews these cards at staff musters. All interviewed Supervisors and Officers were able to recite their duties as first responders to a sexual abuse/assault incident.

(b) This standard provision is non-applicable at Calexico-E POE. All first responders at Calexico-E POE are law enforcement officers.

§115.165(a) through (c) – Coordinated response.

- Exceeded 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)

Notes:

(a) The agency/facility meets the standard provision. CBP Directive 2130-030 is the agency's coordinated response plan for prevention, detection and response to sexual abuse. The Directive provides a clear progressive plan for all components of addressing sexual abuse in holding facilities. Interviews with all Supervisors verified an awareness of their requirement to provide medical care. They were also aware detainees must have access to the advocates provided by Pioneer Memorial Hospital.

(b)(c) The facility meets the standard provision. CBP Directive 2130-030 requires Calexico-E POE to notify another DHS facility if the victim of sexual abuse/assault is transferred there. This notification must include the detainee's need for medical or social services, if the need exists. Calexico-E POE must also make the same notifications to non-DHS facilities, if the law allows for this notification. These requirements were verified by the WC/PFC and would be made by the Port Watch Commander or their designated supervisor.

§115.166 – Protection of detainees from contact with alleged abusers.

- Exceeded 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)

Notes:

The facility meets the standard. With regard to staff, interviews with both the HQ LER SME and the HQ OPR SAAI SME verified Agency policy is to remove staff from contact with detainees pending the outcome of an investigation into alleged sexual abuse/assault or violation of agency policies at the consideration and discretion of agency management including the Port Director and OIC. The Field Office/Branch Manager reports the Port Director would reassign any staff member from detainee contact, where allegations of sexual abuse/assault or violations of policy had been made against and such allegations were considered to be credible. This re-assignment would remain in force until the completion of the investigation. Calexico-E POE does not allow contact between contractor staff and detainees and currently utilizes no volunteers. Interview with the HQ LER SME reports Officers do not supervise contractors, but control detainee exposure. If contractor/detainee contact somehow did occur and there is an allegation of sexual abuse/assault; the contractor would be removed from any possible detainee contact and the Port Director would seek the removal of the contractor from the facility. This practice was verified by the Field Office Branch Manager as port practice.

§115.167 – Agency protection against retaliation.

- Exceeded 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)

Notes:

The facility meets the standard. CBP TEDS prohibits all CBP staff from retaliating against any person, including a detainee, who alleges or complains about mistreatment, participates in an investigation into an allegation of staff misconduct, including sexual abuse, or for participating in sexual activity as a result of force coercion, threats, or fear of force. The training on and implementation of this policy was verified by interviews with the HQ SAAI SME and the local WC/PFC. Interviewed staff and supervisors report retaliation is prohibited and they have been trained to look for signs that it was occurring. All interviewed SMEs and random staff understood their duty to report retaliation as well.

§115.171 – Criminal and administrative investigations.

- Exceeded 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)

Notes:

N/A – Refer to the CBP Sexual Abuse Investigations Audit Report.

§115.172 – Evidentiary standard for administrative investigations.

- Exceeded 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 (provide explanation in notes):

Notes:

N/A – Refer to the CBP Sexual Abuse Investigations Audit Report.

§115.176(a) and (c) through (d) – Disciplinary sanctions for staff.

- Exceeded 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 (provide explanation in notes):

Notes:

(a) The agency/facility meets the standard provision. CBP Directive 2130-030 states CBP personnel may be subjected to disciplinary action up to and including removal from their position and Federal Service for substantiated allegations of sexual abuse/assault and/or for violating CBP's sexual abuse policies. There were no substantiated allegations of sexual abuse at Calexico-E POE during the last 12 months. Interviews with HQ HRM/LER SME verifies disciplinary action is pursued in all cases of substantiated sexual assault or violating sexual abuse policies and removal from their position and Federal Service is the presumptive action.

(c) The agency meets the standard provision. Interview with the HQ HRM/LER SME reveals there were no reports of substantiated sexual abuse/violation of sexual abuse policies for staff at Calexico-E POE. Interview with the HQ SAAI SME confirms all substantiated cases of sexual abuse are referred to appropriate law enforcement agencies by the Port Director and notification is coordinated by HQ SAAI SME.

(d) The agency meets the standard provision. Interview with the HQ SAAI SME verifies removals for substantiated sexual abuse/violations of sexual abuse policies would be reported to relevant licensing bodies, to the extent known by SAAI staff.

§115.177(a) and (b) – Corrective action for contractors and volunteers.

- Exceeded 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)

Notes:

(a) The facility meets the standard provision. Interviews with the Local SMEs reveal all suspected perpetrators of sexual abuse will immediately be removed from contact with detainees. Calexico-E POE currently does not utilize volunteers and Calexico-E POE has excluded all contractors from contact with detainees by local procedure and practice. Interview with the HQ SAAI SME verifies any substantiated allegations of sexual abuse would result in notification of the allegation to appropriate law enforcement agencies and licensing authorities by the Port Director or their designee.

(b) The facility meets the standard provision. Local SME interview with the WC/PFC verifies any contractor suspected of perpetrating sexual abuse would be removed from all duties where detainee contact could occur pending the outcome of an investigation.

§115.182(a) and (b) – Access to emergency medical services.

- Exceeded 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)

Notes:

(a)(b) The facility meets the standard provision. Detainee victims of sexual abuse at Calexico-E POE are to be immediately transported to Pioneers Memorial Hospital. This facility offers the comprehensive medical services as outlined in the standard provision. The services would be provided to the victim at no charge regardless of the victim's cooperation with the sexual assault investigation. Interview with the WC/PFC verified these services would be provided at no charge, regardless of the detainee's cooperation.

§115.186(a) – Sexual abuse incident reviews.

- Exceeded 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)

Notes:

The agency meets the standard. The HQ PAQ indicates there have been no investigations of sexual abuse allegations at this facility in the past 12 months. Interview with the HQ PSA Coordinator reveals their office regularly receives sexual abuse incident reviews within 30 days after the conclusion of a sexual abuse investigation at a facility. The Incident Review Committee (IRC) is comprised of three CBP HQ Program Managers. The Watch Commander/PFC indicated the Calexico-E Port Director would implement any recommendations made by the IRC. In the event that a recommendation could not be followed, the Port Director would document the reason why the recommendation was not followed in correspondence to the HQ IRC.

§115.187 – Data collection.

- Exceeded Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Not Applicable (provide explanation in notes):

Notes:

N/A – Refer to the CBP Sexual Abuse Investigations Audit Report.

ADDITIONAL NOTES

Directions: Please utilize the space below for additional notes, as needed. Ensure the provision referenced is clearly specified.

None.

AUDITOR CERTIFICATION:

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

(b)(6)(b)(7)(C)

Auditor's Signature

January 9, 2020
Date



PREA Audit: Subpart B Short-Term Holding Facilities Corrective Action Plan Final Determination

AUDITOR

Name of Auditor:	(b)(6)(b)(7)(C)	Organization:	Creative Corrections, LLC
Email Address:	(b)(6)(b)(7)(C)	Telephone Number:	(b)(6)(b)(7)(C)

AGENCY

Name of Agency:	U.S. Customs and Border Protection
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PROGRAM OFFICE

Name of Program Office:	Office of Field Operations
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SECTOR OR FIELD OFFICE

Name of Sector or Field Office:	San Diego, California
Name of Chief or Director:	(b)(6)(b)(7)(C)
PREA Field Coordinator:	(b)(6)(b)(7)(C)
Sector or Field Office Physical Address:	610 West Ash Street, San Diego, California 92101
Mailing Address: (if different from above)	Same as Above

SHORT-TERM FACILITY BEING AUDITED

Information About the Facility

Name of Facility:	Calexico-East Port of Entry
Physical Address:	1699 East Carr Road, Calexico, California 92231
Mailing Address: (if different from above)	Same as Above
Telephone Number:	(b)(6)(b)(7)(C)

Facility Leadership

Name of Officer in Charge:	(b)(6)(b)(7)(C)	Title:	Assistant Port Director
Email Address:	(b)(6)(b)(7)(C)	Telephone Number:	(b)(6)(b)(7)(C)

FINAL DETERMINATION

SUMMARY OF AUDIT FINDINGS:

Directions: Please provide summary of audit findings to include the number of provisions with which the facility has achieved compliance at each level after implementation of corrective actions: Exceeds Standard, Meets Standard, and Does Not Meet Standard.

An on-site audit of the Customs and Border Protection (CBP), Office of Field Operations (OFO), Calexico-East Port of Entry (POE) was conducted on September 26, 2019, and the preliminary findings report was submitted on October 23, 2019. Following comments from CBP Headquarters and from the Auditor, the report dated December 19, 2019, was submitted as a Final Draft on January 9, 2020.

At that time, the Auditor reviewed the compliance of 25 Subpart B standards and the Calexico-East POE was found to be have exceeded one standard: (115.131) and in compliance with 22 standards: (115.111; 115.114; 115.116; 115.117; 115.118; 115.121; 115.122; 115.132; 115.141; 115.151; 115.154; 115.161; 115.162; 115.163; 115.164; 115.165; 115.166; 115.167; 115.176; 115.177; 115.182 and 115.186). The Calexico-East POE was found to not be in compliance with two standards: (115.113 and 115.115).

On April 21, 2020, the Calexico-East POE submitted a preliminary Corrective Action Plan (CAP) dated March 20, 2020. Several documents were sought and received by the Auditor. In conjunction with the CAP, an Annual Review of Detainee Supervision Guidelines document was submitted to comply with standard provision 115.113 (b). The document was found to be insufficient by the Auditor. On August 25, 2020, a revised Annual Review of Detainee Supervision document was submitted to the Auditor. This information was reviewed by the Certified PREA Auditor and Program Manager for Creative Corrections and accepted. The Calexico-East POE submitted staff re-training, muster and staff sign-offs to comply with standard provision 115.115 (f) on August 20, 2020. The Calexico-East POE is now compliant with all PREA standards.

Although there was regular communication between Creative Corrections and CBP Headquarters, the CAP was not completed within the required 180-day time period.

PROVISIONS

Directions: After the corrective action period, or sooner if compliance is achieved before the corrective action period expires, the auditor shall complete the Corrective Action Plan Final Determination. The auditor shall insert the provision(s) below that required corrective action and state if the facility's implementation of the provision now "Exceeds Standard," "Meets Standard," or "Does not meet Standard." The auditor shall include the evidence replied upon in making the compliance or non-compliance determination for each provision that was found non-compliant during the audit.

§115.113

- 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

Notes:

On April 21, 2020, the Calexico-East POE submitted a record of an Annual Review of Detainee Supervision Guidelines dated September 24, 2019, which initially did not satisfy all elements of the standard. Elements missing were the correct listing of participants, facility descriptions, and a description of responses employed to respond to the different types of populations entering the Port of Entry determined to be inadmissible. An amended Annual Review of Detainee Supervision Guidelines was submitted to the Auditor on August 25, 2020, via Headquarters and was found to be satisfactory. The Calexico-East POE is now compliant with standard provision 115:113 (b).

§115.115

- 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

Notes:

On August 20, 2020, the Calexico-East POE submitted local musters dated February 11, 2020, and national documents outlining officer performance requirements regarding cross-gender staff announcements upon entering holding rooms, proper personal search techniques, cross-gender searches, determination of detainee gender identification and proper techniques in processing transgender applicant procedures for the pat search of transgender detainees. A muster dated August 19, 2020, to all personnel reminding them of the pat-search techniques for processing transgender applicants for admission was also submitted. Additionally, the Calexico-East POE submitted staff re-training sign-offs and acknowledgements confirming the training provided to personnel at the Calexico-East POE. The Calexico-East POE is now compliant with Standard 115.115 (f).

OVERALL DETERMINATION - AFTER IMPLEMENTATION OF THE CORRECTIVE ACTION PLAN	
<input type="checkbox"/> Exceeds Standards (Substantially Exceeds Requirements of Standards) <input checked="" type="checkbox"/> Meets Standards (Substantial Compliance; Complies in All Material Ways with the Standards for the Relevant Review Period) <input type="checkbox"/> Does Not Meet Standards (Requires Corrective Action)	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Not Low Risk

AUDITOR CERTIFICATION:

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

(b)(6)(b)(7)(C) _____
Auditor's Signature

August 28, 2020
Date