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Steven Conry
Vice President of Operations - Corrections Corporation of America (CCA)

Written Statement to the U.S. Commission on Civil Rights' Briefing on the State of Civil Rights at Immigration Detention Facilities

Nothing is more important to our company than the safety and welfare of those entrusted to our care. For more than 30 years, the Corrections Corporation of America (CCA) has worked with our government partners to assure each individual's safety. We believe in our mission and our work. Federal, state and local governments continue to partner with our company after decades of working together because they know the value we can provide to their agencies.

CCA has established a zero-tolerance policy against all forms of sexual abuse and sexual harassment, and we have adopted an aggressive plan to prevent, detect and respond to all allegations of conduct that falls into either category. At the same time, CCA has an established human rights policy and comprehensive policies protecting residents' legal rights, which recognize and include protections for freedom of expression and identity, freedom from discrimination or harassment, access to counsel, the courts and foreign consulates, access to grievance processes, the right to visitation and communication, and freedom of religion.

These policies represent steadfast commitments to our government partners and the individuals entrusted to our care. We train our staff on these policies and continually review our training, communication and reporting practices to consider improvements, and we engage regularly with stakeholders on human rights issues.

With respect to compliance with federal standards, we have devoted significant staff and resources to assuring Prison Rape Elimination Act (PREA) compliance. CCA has a corporate level PREA Coordinator and a designated PREA Compliance Manager at each facility. Facility policy, forms, operational practices, physical layout and other applicable factors have all been assessed to ensure compliance. Facility staff monitor compliance regularly and independent internal operational audits are conducted annually to assess compliance. We also conduct PREA mock audits with certified PREA auditors in advance of the formal, externally performed PREA Audits.

CCA has had a successful start to the formal PREA Audit process. All facilities audited during the Year 1 Cycle were able to have final reports issued within the initial 30-day window. So far, the Year 2 Cycle has met with comparable success.

Similarly, CCA is committed to assuring compliance with the Performance-Based National Detention Standards (PBNDS). PBNDS standards are incorporated into the policies and operational practices at every CCA facility where these standards apply. CCA trains staff on



policies and procedures relevant to their work and continually reinforces that training over the course of a staff member's tenure.

We treat all those under our care under the guidelines and regulations outlined by our government partners. CCA has adopted PREA standards in their entirety as part of our policies, operational practices and internal audit processes. CCA has also incorporated PBNDS standards into policies used to manage facilities where they apply. Facilities operating under PBNDS standards are typically audited by Immigration and Customs Enforcement (ICE) once a year. ICE is an essential partner in assuring each individual's safety and well-being. ICE provides staff who serve in several different compliance roles at our facilities. ICE Detention Service Managers (DSMs) at each facility report independently to ICE headquarters. ICE Assistant Field Office Directors (AFODs) report independently to ICE regional offices. Additionally, ICE Compliance Units provide daily monitoring of PBNDS compliance and additional field support as needed. As part of our partnership with ICE we have developed and implemented a Quality Control Plan for each ICE contract in an effort to further meet the government's needs.

In order to ensure that these standards are applied consistently across our facilities nationwide, the policies and operating practices at all facilities are coordinated by subject matter experts operating out of CCA's Facility Support Center (FSC), which is our headquarters. CCA operates facilities based on a standard set of policies but adapts as appropriate to meet government partner contractual requirements. Comprehensive operational audits are conducted by independent FSC-based auditors on an annual basis, and facilities are charged with conducting self-monitoring based on the same standards contained in the independent auditors' audit tool. These assessments are conducted throughout the year, with all elements of the operational audit tool reviewed at least once per year.

Our commitment to preventing sexual abuse and protecting legal and human rights has been steadfast over our 30-year history. We look forward to working closely with our government partners to continue that commitment in the future.

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