



## **PRISON RAPE ELIMINATION ACT (PREA) Annual Report 2018**

### ***Introduction***

The Prison Rape Elimination Act (PREA) was signed into Federal law in 2003 by President George W. Bush and was created to address the problem of sexual misconduct in all confinement facilities. In 2012, the U.S. Department of Justice released national PREA standards to prevent, detect and respond to sexual abuse and sexual harassment in confinement facilities. The Act requires all federal, state, and local corrections agencies to have a zero-tolerance policy regarding sexual assault/ sexual abuse in prisons, jails, police lock-ups, and community confinement facilities.

Community Resources for Justice, Inc. (CRJ) has a zero-tolerance policy relative to sexual misconduct. All of its community-based residential reentry programs comply with federal and respective state laws as they pertain to PREA, sexual violence and sexual misconduct.

The Corporate PREA Coordinator, Susan Jenness Phillips, retired on November 16, 2018, after 33 years of service with CRJ. Heriberto Crespo, Assistant Director of SQA, was named as the new Corporate PREA Coordinator. He will work in tandem with Senior Management staff to develop, implement, and oversee company efforts to comply with PREA standards in all of CRJ's community-based residential reentry programs. The Program Directors have been designated to serve as their facility's PREA Liaison to coordinate each individual facility's efforts in its compliance with the PREA standards.

In compliance with PREA requirements, Community Resources for Justice, Inc. (CRJ) submits this 2018 Annual Report.

### ***PREA Activities***

During 2018, CRJ's Standards and Quality Assurance Department (SQA) monitored PREA activities at all five community-based residential reentry programs throughout the year.

During 2018, SQA, under the guidance of the PREA Coordinator, was responsible for:

1. Conducting audits of case files for completion of:
  - a. PREA Intake Orientation Checklists upon admissions
  - b. PREA Screening and Scoring forms within 72 hours of admission

- c. PREA safe discussions between residents and case managers at first case manager meeting and every meeting thereafter
- 2. Observing PREA posting in all programs during Walk-Throughs of the five programs
- 3. Establishing a paperless documentation process for future PREA audits
- 4. Tracking PREA training throughout the year
- 5. Maintaining the PREA Incident Tracking Chart
- 6. Maintaining all documentation involved in allegations of sexual abuse or sexual harassment and the resulting investigation reports.

During 2018, three programs (Horizon House in Albany, New York; Houston House in Pawtucket, Rhode Island; and Brooke House in Boston, Massachusetts.) completed their PREA audits (in February, July and September, respectively). They were audited by an independent, Department of Justice certified, PREA auditor, Jack Fitzgerald (the same auditor used to audit CRJ’s programs in 2015 and 2016). The results for all three programs reflected compliance in all areas of the regulations. The PREA Audit reports for Horizon, Houston and Brooke are posted on the CRJ webpage, along with previous audits reports for 2015 and 2016.

Coolidge House and Hampshire House continued their focus in 2018 on PREA compliance in anticipation of their PREA audits occurring in 2019. Please note: McGrath House merged with Coolidge House on April 3, 2018. Data from McGrath has been incorporated into the Coolidge House data.

**Annual PREA Data**

Regarding incidents of sexual abuse and sexual harassment in 2018, the results are as follows:

<b>2018</b>	Allegations of <b>RESIDENT</b> on <b>RESIDENT</b> Sexual Abuse	Allegations of <b>RESIDENT</b> on <b>RESIDENT</b> Sexual Harassment	Allegations of <b>STAFF</b> on <b>RESIDENT</b> Sexual Abuse	Allegations of <b>STAFF</b> on <b>RESIDENT</b> Sexual Harassment
<b>Brooke</b>	0	0	0	0
<b>Coolidge*</b>	0	0	0	0
<b>Hampshire*</b>	0	0	0	0
<b>Horizon*</b>	0	0	0	2
<b>Houston*</b>	0	0	1	1

\* = BOP contract programs

<b>2018</b>	<b>ALLEGATIONS</b>	<b>SUBSTANTIATED</b>	<b>UNSUBSTANTIATED</b>	<b>UNFOUNDED</b>	<b>ONGOING INVESTIGATION</b>
<b>Resident on Resident Nonconsensual Sexual Acts</b>	0	0	0	0	0
<b>Resident on Resident Sexual Harassment</b>	0	0	0	0	0
<b>Staff on Resident Sexual Abuse</b>	0	0	0	1	0
<b>Staff on Resident Sexual Harassment</b>	0	1	2	0	0
<b>TOTALS</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>0</b>

During the 2018 reporting period, there were three allegations of sexual harassment (two at Horizon House and one at Houston House). Two of three incidents resulted in an “unsubstantiated” finding. One incident (Horizon House) resulted in a “substantiated” finding. The substantiated incident involved a staff person sexually harassing a resident. The Program Director conducted an investigation and it was determined to be “substantiated.” The staff person was terminated. An investigation report with the findings was submitted to all relevant PREA-related stakeholders.

During the 2018 reporting period, there was one allegation of sexual abuse by staff on a resident (Houston House). The investigation determined that the allegation was “unfounded.”

Regarding external audits, the Federal Bureau of Prisons (FBOP) conducted quarterly monitorings (external audits) at the four CRJ/BOP programs. Brooke House receives no external audits from its funders. There were no accreditation (external) audits conducted by the American Correctional Association (ACA) of any CRJ program in 2018.

### Aggregate PREA Data

The combined PREA data for the years 2015-2018 is as follows:

2015-2018	Allegations of <b>RESIDENT</b> on <b>RESIDENT</b> Sexual Abuse	Allegations of <b>RESIDENT</b> on <b>RESIDENT</b> Sexual Harassment	Allegations of <b>STAFF</b> on <b>RESIDENT</b> Sexual Abuse	Allegations of <b>STAFF</b> on <b>RESIDENT</b> Sexual Harassment
<b>Brooke</b>	0	0	0	0
<b>Coolidge*</b>	0	0	0	5
<b>Hampshire*</b>	0	0	0	1
<b>Horizon*</b>	0	0	0	4
<b>Houston*</b>	0	0	1	1
<b>Totals</b>	0	0	1	11

\* = BOP contract programs

2015-2018	TOTAL ALLEGATIONS	SUBSTANTIATED	UNSUBSTANTIATED	UNFOUNDED	ONGOING INVESTIGATION
Resident on Resident Nonconsensual Sexual Acts	0	0	0	0	0
Resident on Resident Sexual Harassment	0	0	0	0	0
Staff on Resident Sexual Abuse	2	0	0	2	0
Staff on Resident Sexual Harassment	10	1	2	7	0
<b>TOTALS</b>	<b>12</b>	<b>1</b>	<b>2</b>	<b>9</b>	<b>0</b>

CRJ continues its PREA training for all staff and residents in the community-based residential reentry programs to prevent sexual misconduct and to fully investigate and prosecute those involved in such conduct. The CRJ PREA Trainer conducted several PREA training sessions for staff throughout the three-year period. She recently updated her training to include role-playing in PREA situations. Staff noted in their evaluations of the training that the role-playing was very valuable and useful to them in their positions.

The system to collect data on incidents of a sexual nature at each of CRJ's community-based residential reentry programs continues to provide PREA data. Each program collects accurate, uniform data for every allegation of sexual abuse or sexual harassment under its direct control using a standardized instrument and the Corporate PREA Coordinator aggregates that incident-

based data as needed. The data collection is now all electronic and located on a confidential, shared drive. The Program Director or designee enters the data monthly and the PREA Coordinator checks the database periodically to ensure the data is entered.

Since 2015, the aggregation of sexual abuse and sexual harassment data is required by CRJ Corporate policy.

Each community-based residential reentry program that CRJ operates continues to make great efforts to improve the prevention, detection, and response to incidents of sexual abuse and sexual harassment.