

PRISON RAPE ELIMINATION ACT

Annual Report 2021

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.

Heriberto Crespo, Assistant Director of Quality and Compliance (Q&C), as the Corporate PREA Coordinator works 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 are 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 2021 Annual Report.

PREA Compliance Activities

During 2021, CRJ's Quality and Compliance Department monitored PREA activities at all ten community-based residential reentry programs throughout the year.

Q&C, under the guidance of the PREA Coordinator, is responsible for:

1. Conducting audits of case files for completion of:
 - a. PREA Intake Orientation Checklists upon admission;
 - b. PREA Screening and Scoring forms within 72 hours of admission; and
 - c. PREA safe discussions between residents and case managers at the first case management meeting and every meeting thereafter.
2. Observing PREA postings in all programs during facility walk-throughs
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 of allegations of sexual abuse or sexual harassment and the resulting investigation reports

In 2021, four programs underwent their PREA Certification: Horizon House in Albany, New York; LightHouse RRC in Buffalo, New York; Houston House in Pawtucket, Rhode Island and Brooke House in Boston, Massachusetts. The four programs were audited by an independent, Department of Justice certified, PREA auditor, Jack Fitzgerald (the same auditor used to audit CRJ's programs in 2015, 2016 and 2018). The final PREA Audit reports for Horizon House, LightHouse RRC, Houston House and Brooke House were posted on the CRJ webpage, along with previous audit reports for 2015, 2016, 2018, and 2019. The PREA Audit report results for all four programs reflect compliance in all areas of the regulations.

CRJ launched the Western Massachusetts Foundation House in 2019, a new partnership with the Hampden County Sheriff's Department to provide reentry support in the Springfield area. On March 1, 2021, Foundation House relocated to a transitional site, independent of the Hampden County Sheriff's office. The program name changed to the CRJ's Western Massachusetts Residential Reentry Center, (WMRC). The Hampden County Sheriff's Department continued to be a referral partner along with Massachusetts Probation Service, Board of Parole, Department of Corrections, and other County Sheriff's Departments. The Western Massachusetts Reentry Center serves thirty (30) residents and is in West Springfield, MA. CRJ program staff are responsible for collecting, monitoring, and evaluating all PREA data for the Western Massachusetts Reentry Center similar to our other locations.

In June 2020, CRJ began collaborating with There is A Solution, (TIAS) in New Bedford, MA – a community-based residential reentry center. From June 2020 – December 2020, CRJ provided technical assistance and oversight for TIAS' reentry program.

In March 2021, CRJ took over full operation of the TIAS reentry program and renamed it the New Bedford Reentry Center (NBRC). The program opened in March 2021 and serves twenty (20) residents in New Bedford, MA.

WMRC and NBRC are scheduled for their initial PREA Certification in the August 2022. Coolidge House and Hampshire are scheduled for their PREA Re-certification in June 2022.

In August 2020, Family Re-entry (FRE), a non-profit organization based in Bridgeport, Connecticut was acquired by CRJ through merger. FRE is now part of the Social Justice Services Division of CRJ. Among services provided by FRE and now under the auspices of CRJ, is a residential program known as Dana's House. Located in New Haven, Connecticut, Dana's House serves fifteen men paroled from the Connecticut Department of Correction. While the CT DOC conducts the PREA Certification, CRJ program staff are responsible for collecting, monitoring and evaluating all PREA data for Dana's House. Dana's House is scheduled to undergo its PREA re-certification in June 2022.

Table 1 below shows the number of PREA allegations by location and allegation type in 2020.

Table 1: Allegations of sexual abuse and sexual harassment, 2021 (N=13)

2021	Allegations of RESIDENT on RESIDENT Sexual Abuse	Allegations of RESIDENT on RESIDENT Sexual Harassment	Allegations of RESIDENT on STAFF Sexual Abuse	Allegations of STAFF on RESIDENT Sexual Abuse	Allegations of STAFF on RESIDENT Sexual Harassment
Brooke	0	0	0	1	1
McGrath	0	0	0	1	0
NBRC	0	0	0	0	0
WMRC	0	0	0	1	1
Coolidge*	0	0	0	1	0
Hampshire*	1	1	0	1	1
Horizon*	0	0	0	0	0
Houston*	0	1	0	0	0
LightHouse *	0	0	0	0	2
FRE – Dana House	0	0	0	0	0
Totals	1	2	0	5	5

* = BOP contracted programs

Table 2 shows a summary of findings by allegation type in the CRJ programs overall.

Table 2: Summary of Findings 2021 (N=13)

2021 Findings	ALLEGATIONS	SUBSTANTIATED	UNSUBSTANTIATED	UNFOUNDED	ONGOING INVESTIGATION
Resident on Resident Sexual Abuse	1	0	0	1	0
Resident on Resident Sexual Harassment	2	1	1	0	0
RESIDENT on STAFF Sexual Abuse	0	0	0	0	0
Staff on Resident Sexual Abuse	5	1	1	2	1
Staff on Resident Sexual Harassment	5	1	2	2	0
TOTALS	13	3	4	5	1

PREA Allegations reported and investigated

During the 2021 reporting period, there were a total of 13 PREA allegations and investigations. Please refer to Table 1 for details on the number and type of allegations by location. Table 2 shows the allegation type and finding.

There was one allegation of sexual harassment by a resident on a resident. Hampshire House reported the allegation. The Program Director conducted the investigation. It was determined to be unsubstantiated.

There were two allegations of sexual abuse by resident on resident. Hampshire House and Houston House reported the allegations. The Program Directors of the respective programs conducted the investigations. The investigation conducted by Hampshire House staff determined the allegation to be unfounded. The investigation conducted by Houston House staff determined the allegation to be substantiated. The resident was returned to higher custody. The investigation reports with the findings were submitted to all relevant PREA-related stakeholders.

There were five allegations of sexual abuse by staff on residents. The following five programs (Brooke, Coolidge, Hampshire, McGrath and WMRC), each reported one allegation of sexual abuse by staff towards a resident. The Program Director and Senior Director of Re-entry Operations conducted the investigations.

- Two allegations were deemed unfounded (Coolidge and WMRC).
- The allegation reported by Hampshire was deemed unsubstantiated.

- The allegation reported by McGrath was deemed to be substantiated. The staff person who had been placed on leave was terminated. The investigation reports with the findings were submitted to all relevant PREA-related stakeholders.
- There is one allegation that is still in the process of investigation at Brooke House. When the investigation is concluded, all relevant PREA related stakeholders will be notified.

There were five allegations of sexual harassment by staff on residents (one from Brooke, one from WMRC, one from Hampshire and two from LightHouse RRC). The Program Directors of the respective programs conducted the investigations.

- Two allegations were deemed unfounded – one from Brooke and one from LightHouse.
- Two allegations were deemed unsubstantiated – one from Hampshire and one from LightHouse.
- One allegation reported by WMRC was deemed to be substantiated. The staff person who had been placed on leave was terminated. The investigation reports with the findings were submitted to all relevant PREA-related stakeholder

In addition to the Q&C audits and reviews, the Federal Bureau of Prisons (FBOP) conducted quarterly monitoring visits (external audits) at the five CRJ/BOP programs. Brooke House, McGrath, WMRC and NBRC received no external audits from its funders. There were no accreditation (external) audits conducted by the American Correctional Association (ACA) of any CRJ program in 2021.

Tables 3 and 4 below illustrate the same data for the period of 2015 – 2021. Over that period there were 57 allegations made. Table 3 shows the type of allegation by location and Table 4 shows the findings by allegation type.

Table 3: Combined PREA data for the years 2015-2021

2015- 2021 N=57	Allegations of RESIDENT on RESIDENT Sexual Abuse	Allegations of RESIDENT on RESIDENT Sexual Harassment	Allegations of RESIDENT on STAFF Sexual Abuse	Allegations of STAFF on RESIDENT Sexual Abuse	Allegations of STAFF on RESIDENT Sexual Harassment
Brooke	0	0	0	2	1
McGrath	0	3	0	2	0
WMRC - opened 3.1.20	0	0	0	1	1
NBRC - opened 3.1.20	0	0	0	0	0

Table 3: Combined PREA data for the years 2015-2021

2015- 2021	Allegations of RESIDENT on RESIDENT Sexual Abuse	Allegations of RESIDENT on RESIDENT Sexual Harassment	Allegations of RESIDENT on STAFF Sexual Abuse	Allegations of STAFF on RESIDENT Sexual Abuse	Allegations of STAFF on RESIDENT Sexual Harassment
Coolidge*	0	1	0	4	5
Hampshire*	1	2	2	8	5
Horizon*	0	0	0	1	6
Houston*	0	3	0	1	4
LightHouse*	0	1	0	1	2
FRE – Dana House	0	0	0	0	0
Totals	1	10	2	20	24

* = BOP contracted programs

Table 4: Summary of Findings 2015-2021

2015-2021 N=57	TOTAL ALLEGATIONS	SUBSTANTIATED	UNSUBSTANTIATED	UNFOUNDED	ONGOING INVESTIGATION
Resident on Resident Nonconsensual Sexual Acts	0	0	0	0	0
Resident on Resident Sexual Harassment	10	5	4	1	0
Resident on Staff Sexual Abuse	2	0	1	1	0
Staff on Resident Sexual Abuse	21	1	3	16	1
Staff on Resident Sexual Harassment	24	3	6	15	0
TOTALS	57	9	14	33	1

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 system of collecting 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 incident-based data as needed. The data collection is 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 or sexual harassment.