

PRISON RAPE ELIMINATION ACT

Annual Report 2022

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 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 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 2022 Annual Report.

PREA Compliance Activities

During 2022, 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 2022, four programs underwent their PREA Certification: Coolidge House in Boston, Massachusetts; Hampshire House in Manchester, New Hampshire; Western MA Reentry Center, in Springfield, Massachusetts and Dana's House in New Haven, Connecticut.

The New Bedford Reentry Center in New Bedford, Massachusetts was originally scheduled to undergo their PREA Certification in December 2022; however, it was rescheduled to January 2023. McGrath House will undergo their PREA Certification in October 2023.

Three programs (Coolidge House, Hampshire House, and Western MA Reentry Center) 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 Dana's House program was audited by an independent, Department of Justice certified, PREA Auditor, Adam Barnett. Mr. Adam Barnett works with Diversified Correctional Services, of Atlanta Georgia. His organization is under contract with the CT DOC.

The final PREA Audit reports for Coolidge House, Hampshire House were posted on the CRJ webpage, along with previous audit reports for 2015, 2016, 2018, 2019 and 2021. The final PREA report for Dana's House was also posted on the CRJ web page. The final report for Western MA Reentry Center is pending. It will be posted upon receipt. The PREA Audit report results for all four programs reflect compliance in all areas of the regulations.

Table 1 below shows the number of PREA allegations by location and allegation type in 2022.

Table 1: Allegations of sexual abuse and sexual harassment, 2022 (n=9)
Total number of residents admitted in 2022, N = 905.

2022	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	0	0
McGrath	0	0	0	0	0
New Bedford RC	0	0	1	0	0
Western MA RC	0	0	0	0	0
Coolidge*	1	0	0	0	2
Hampshire*	0	0	0	0	0
Horizon*	0	0	0	0	0
Houston*	0	1	0	0	0
LightHouse*	0	1	0	0	3
FRE – Dana House	0	0	0	0	0
Totals	1	2	1	0	5

* = Federal Bureau of Prison (FBOP) contracted programs

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

Table 2: Summary of Findings 2022 (N=9)

2022 Findings	ALLEGATIONS	SUBSTANTIATED	UNSUBSTANTIATED	UNFOUNDED	ONGOING INVESTIGATION
Resident on Resident Sexual Abuse	1	0	1	0	0
Resident on Resident Sexual Harassment	2	1	0	1	0
RESIDENT on STAFF Sexual Abuse	1	1	0	0	0
Staff on Resident Sexual Abuse	0	0	0	0	0
Staff on Resident Sexual Harassment	5	0	1	4	0
TOTALS	9	2	2	5	0

PREA Allegations reported and investigated

During the 2022 reporting period, there were a total of 9 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 were two sexual abuse allegations reported in 2022:

- There was one allegation of sexual abuse by a resident on a staff member. New Bedford Reentry Center reported the allegation. The Program Director conducted the investigation. It was determined to be substantiated. The resident was returned to higher custody.
- There was one allegation of sexual abuse by a resident on resident reported from Coolidge House. The Program Director conducted the investigation and determined it was unsubstantiated.

There were seven sexual harassments allegations reported in 2022:

- Two allegations were Resident on Resident:
 - One allegation of sexual harassment by a resident on a resident was reported by Houston House. The Program Director conducted the investigation. It was determined to be substantiated. The resident was returned to higher custody.
 - One Resident on Resident Sexual Harassment allegation reported by LightHouse. The Program Director conducted the investigation, and it was determined to be unfounded.
- Five allegations were Staff on Resident
 - Coolidge House reported two allegations of sexual harassment by a staff on residents. The Program Director conducted the investigations. One was determined to be unsubstantiated, and one was deemed unfounded.
 - Lighthouse reported three allegations of sexual harassment by a staff on residents. The Program Director conducted the investigations. All three were determined to be unfounded.

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, Western Massachusetts Reentry Center and New Bedford Reentry Center 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 2022. Dana's House is funded by the Connecticut Department of Corrections. They did not conduct any external audit in 2022.

Tables 3 and 4 below illustrate the same data for the period of 2015 – 2022. Over that period there were 66 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 2015-2022.

Allegations of sexual abuse and sexual harassment, 2015-2022, (n=66)
Total number of residents admitted in 2015 through 2022, N = 7,259.

2015- 2022 n=66	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
Western MA RC	0	0	0	1	1
New Bedford RC	0	0	1	0	0

Table 3: Combined PREA data for the years 2015-2022

2015- 2022	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*	1	1	0	4	7
Hampshire*	1	2	2	8	5
Horizon*	0	0	0	1	6
Houston*	0	4	0	1	4
LightHouse*	0	2	0	1	5
FRE – Dana House	0	0	0	0	0
Totals	2	12	3	20	29

* = BOP contracted programs

Table 4: Summary of Findings 2015-2022

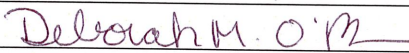
2015-2022 N=66	TOTAL ALLEGATIONS	SUBSTANTIATED	UNSUBSTANTIATED	UNFOUNDED	ONGOING INVESTIGATION
Resident on Resident Nonconsensual Sexual Acts	1	0	1	0	0
Resident on Resident Sexual Harassment	12	6	4	2	0
Resident on Staff Sexual Abuse	2	0	1	1	0
Staff on Resident Sexual Abuse	22	2	3	17	0
Staff on Resident Sexual Harassment	29	3	7	19	0
TOTALS	66	11	16	39	0

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.

Reported prepared by Quality & Compliance Department	
Report Reviewed and approved by:	
Signature:	
Deborah M. O'Brien, President & CEO Community Resources for Justice	
Date: 4/20/2023	