



Gaudenzia, Inc.
Annual Prison Rape Elimination Act (PREA) Report
July 2018 – June 2019
Completed By: John DiLeonardo & Bhavani Raghavan
(Corporate PREA Managers)

This is Gaudenzia, Inc.’s third annual PREA report. The data has been collected, reported and reviewed in a manner consistent with PREA standards outlined in 115.286, 115,287 and 115.288 of the agency approved Prison Rape Elimination Act policy. The data in the tables below was collected and compiled from Gaudenzia’s twenty (20) PREA accredited programs across three states Pennsylvania, Delaware and Maryland and the time frame for this report is from July 1, 2018 to June 30, 2019. Each State has either one or two regional PREA coordinators who have assisted with the data collection and development of this report, by maintaining an active, ongoing regional spreadsheet of incidents, type of incidents, outcome etc. and where the information has been redacted to preserve confidentiality of Gaudenzia residents and staff. The obtained data have been classified by the following categories:

- Resident – with Resident sexual abuse
- Resident – with Resident sexual harassment
- Staff – with Resident sexual abuse
- Staff – with Resident sexual harassment

PENNSYLVANIA:

Name of Program	Type of Program
1. Gaudenzia Vantage	Residential Drug & Alcohol (D&A) licensed long term program for Women with children (WWC)
2. Gaudenzia Fountain Springs	Residential D&A licensed long term program for (WWC)
3. Gaudenzia New View	Residential Mental Health licensed program
4. Gaudenzia Gibson	Residential Mental Health licensed program
5. Gaudenzia New Destiny	Residential Half way house licensed program for women
6. Gaudenzia Common Ground	Residential Mental Health & D&A licensed and Detox licensed program for adults
7. Gaudenzia Siena CCC	Community Corrections Center (PA Department of Corrections (DOC)
8. Gaudenzia Siena D&A	Residential D&A licensed facility, contracted with PA-DOC
9. Gaudenzia Concept 90	Residential D&A licensed facility for men
10. Gaudenzia Outlooks	Residential Mental Health licensed program for adults
11. Gaudenzia West Chester	Residential D&A licensed long term program for men
12. Gaudenzia FIRST	Residential half way house for co-occurring men (PA – DOC)
13. Gaudenzia Washington House	Residential licensed half-way house for women

14. Gaudenzia Philly House	Community Corrections Center (PA Department of Corrections (DOC))
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DELAWARE:

Name of Program	Type of Program
15. Gaudenzia Fresh Start	Residential D&A licensed program for young adults
16. Gaudenzia New Journey	Residential Mental Health licensed program for adults

MARYLAND:

Name of Program	Type of Program
17. Gaudenzia Park Heights Women's Long Term	Residential D&A licensed long term program for women
18. Park Heights New Vision	Residential Mental Health licensed program for co-occurring individuals
19. Gaudenzia Woodland	Residential D&A licensed long term program for men
20. Gaudenzia Crownsville	Residential half way house for men

Each program in each state has a designated reporting mechanism which can be accessed by residents at any time to report sexual abuse or harassment. Staff and clients can anonymously report a PREA issue via email to the corporate PREA coordinators by using the following email address prea@gaudenzia.org or they can write a letter to the PREA coordinator at Gaudenzia Incorporated, 106 W. Main Street, Norristown, PA 19401. Staff also accepts reports made verbally, in writing, anonymously, and from third parties and promptly documents any verbal reports.

The next three tables demonstrate PREA classified data along with outcomes of each reported case as either: Substantiated, Unsubstantiated, Unfounded or Investigation Pending. At the end of the report is conclusion, our overall analysis and future recommendations.

TABLE 1: Pennsylvania PREA data from July 2018 – June 2019.

	Number of cases reported	Substantiated	Unsubstantiated	Unfounded	Investigation Pending
Resident with Resident sexual abuse	1		1		
Resident with Resident sexual harassment	10	3	3	4	
Staff with on Resident sexual abuse	0				
Staff with Resident sexual harassment	8		4	4	

TABLE 2: Delaware PREA data from July 2018 – June 2019.

	Number of cases reported	Substantiated	Unsubstantiated	Unfounded	Investigation Pending
Resident – on – Resident sexual abuse	2	2			
Resident – on – Resident sexual harassment	1	1			
Staff – on Resident sexual abuse					
Staff – on Resident sexual harassment	2		1	1	

TABLE 3: Maryland PREA data from July 2018 – June 2019.

	Number of cases reported	Substantiated	Unsubstantiated	Unfounded	Investigation Pending
Resident – on – Resident sexual abuse	6	6			
Resident – on – Resident sexual harassment	3	2	1		
Staff – on Resident sexual abuse	5	3	2		
Staff – on Resident sexual harassment	1		1		

Analysis & Conclusion:

Gaudenzia takes all allegations of sexual abuse and harassment very seriously and we conduct a thorough internal investigation on every case reported. Cases in the past year have usually been reported either verbally or in writing by:

- Complaints sent to Governing body/MCO's
- Client
- Staff
- Emails sent to prea@gaudenzia.org
- Letters sent to the directors or corporate compliance officers

When we receive a complaint, we follow the procedures described in our PREA policy standards. We involve our Human Resources department if the incident involves a Gaudenzia staff member. The regional PREA manager investigates the complaint and a PREA certified manager completes the investigation. At a minimum the internal review involves, interview with parties involved, interview of witnesses, review of surveillance if available, review of records both clinical and personnel. Additionally, the General Counsel and the Director of Clinical Services/PREA Manager review all PREA incidents at the time of or shortly after the incident is initially reported for the purpose of providing investigative suggestions, follow-up tasks guidance, and assist in the analysis of the final report.

There were totally 39 reported cases in the July 2018 – June 2019 review period. This is a 11% increase in reported incidents from the previous year. In analyzing the statistics for 2018-2019 review year, it is important to initially note the number of incidents in each category – with particular review emphasis on the number of staff with client (sexual abuse and sexual harassment) cases.

- A. In the 2018-2019 report year, there were only three (3) substantiated staff with resident sexual abuse cases (last year was 4) and zero (0) alleged staff with client sexual harassment cases – a total of three (3) allegations involving staff misconduct with clients. This is a 72% decrease in overall number of cases involving staff.
- B. It appears that the total number of substantiated sexual harassment and substantiated sexual abuse cases involving resident with resident increased from 14 to 10, which is a 40% increase.
- C. With regard to the 39 cases in all four categories; seventeen (17) substantiated cases (14 last year). There were eleven (11) substantiated sexual abuse cases and six (6) was substantiated sexual harassment cases:
 - ***Eight (8) (Last year -7) were resident – with – resident sexual abuse***
 - ***Six (6) (last year 3) were resident – with – resident sexual harassment.***
 - Three (3) (last year 2) were staff – with – resident sexual abuse
 - Zero (0) (last year 2) were staff – with – resident sexual harassment.
- D. The underlying reason for the increase in the number of resident with resident cases cannot be conclusively established. There are, however, certain factors which may contribute to the increase in reported/identified resident w/ resident claims. These factors include:
 - increased education of the client population in sexual harassment;
 - increased use of therapeutic community tools to identify and be accountable for inappropriate behavior;

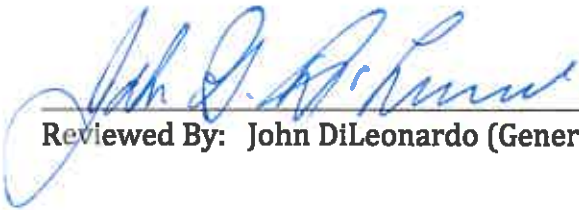
- increased turnover and decreased average length of stay for the client population, as a whole;
- staff turnover
- increased identification of and reporting of incidents reportable under PREA as compared to the previous year

Based on the analysis of incidents 2018-2019 report/review year and to continuously improve the quality of services we provide and ensure the safety & security of our staff and clients, we made the following changes.

- Amended our PREA policy to include training of personnel on an ANNUAL basis.
- Reviewed our video surveillance coverage at each facility in order to make changes/additions where appropriate.
- Continued to monitor and adjust our staffing plans/rosters to avoid cross gender contact, specifically for afterhours and overnight hours in our residential facility



Submitted By: Bhavani Raghavan (Director of Clinical Services & PREA Corporate Manager)



Reviewed By: John DiLeonardo (General Counsel & Director of Compliance)