



Gaudenzia, Inc.
Annual Prison Rape Elimination Act (PREA) Report
July 2019 – June 2020

PREA Background:

The Prison Rape Elimination Act (PREA) was signed into Federal Law in 2003. It was created to address the problem of sexual misconduct in all confinement facilities. In 2012, the US Department of Justice released national PREA standards to prevent, detect and respond to sexual abuse and sexual harassment in confinement facilities. PREA requires all federal, state, and local correctional agencies to have a zero-tolerance policy regarding prisons, jails, police lock-ups, and community confinement facilities.

Gaudenzia, Inc. has a zero-tolerance policy for sexual misconduct. All facilities/programs comply with federal and respective state laws as they pertain to PREA, sexual violence and sexual misconduct.

Definitions:

- Substantiated- A substantiated allegation means an allegation that was investigated and determined to have occurred.

- Unsubstantiated- An unsubstantiated allegation means an allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred.

- Unfounded- An unfounded allegation means that an allegation that was investigated was determined to not have occurred.

Annual Report:

Since 2015, Gaudenzia was worked diligently to revise corporate and program policies to guide our employees, volunteers, vendors, and clients with regard to incidents of sexual harassment and sexual abuse.

Each program in each state has a designated reporting mechanism that residents can access at any time to report sexual abuse or harassment. Staff, clients, and external parties can anonymously report:

- i. PREA issue via email to the corporate PREA coordinators by using the following email address prea@gaudenzia.org or
- ii. They can write a letter to the PREA coordinator at Gaudenzia Incorporated, 106 W. Main Street, Norristown, PA 19401.
- iii. Staff also accepts reports made verbally, in writing, anonymously, and from third parties and promptly documents any verbal statements.
- iv. Staff and clients can also call the company's G-line, the agency's compliance hotline at 844-293-5090

Data is collected, reported, and reviewed in a manner consistent with PREA standards outlined in 115.286, 115,287, and 115.288 of the agency’s approved Prison Rape Elimination Act policy on an annual basis.

The data were collected and compiled from Gaudenzia’s fourteen (14) PREA audited programs across three states Pennsylvania, Delaware, and Maryland. The time frame for this report is from July 1, 2019, to June 30, 2020. The data collection process is completed by maintaining an active, ongoing regional spreadsheet of incidents, types of incidents, outcomes, etc. The information has been redacted to preserve the 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 Gibson	Residential Mental Health licensed program
2. Gaudenzia Common Ground	Residential Mental Health & D&A licensed, and Detox licensed program for adults
3. Gaudenzia Siena CCF	Community Corrections Center (PA Department of Corrections (DOC))
4. Gaudenzia Siena D&A	Residential D&A licensed facility contracted with PA-DOC
5. Gaudenzia Concept 90	Residential D&A licensed facility for men
6. Gaudenzia Outlooks	Residential Mental Health licensed program for adults
7. Gaudenzia West Chester	Residential D&A licensed long-term program for men
8. Gaudenzia Philly House	Community Corrections Center (PA Department of Corrections (DOC))
9. Gaudenzia Washington House	

DELAWARE:

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

MARYLAND:

Name of Program	Type of Program
12. Gaudenzia Park Heights Women’s Long Term	Residential D&A licensed long-term program for women
13. Park Heights New Vision	Residential Mental Health licensed program for co-occurring individuals
14. Gaudenzia Woodland	Residential D&A licensed long-term program for men
15. Gaudenzia Crownsville	Residential halfway house for men

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

TABLE 1: Pennsylvania PREA data from July 2019 – June 2020.

	Number of cases reported	Substantiated	Unsubstantiated	Unfounded
Resident with Resident sexual abuse	1	1		
Resident with Resident sexual harassment	8	2	2	4
Staff with Resident sexual abuse	1			1
Staff with Resident sexual harassment	4	1		3

TABLE 2: Delaware PREA data from July 2019– June 2020.

	Number of cases reported	Substantiated	Unsubstantiated	Unfounded
Resident with Resident sexual abuse	0			
Resident with Resident sexual harassment	0			
Staff with Resident sexual abuse	0			
Staff with Resident sexual harassment	0			

TABLE 3: Maryland PREA data from July 2019 – June 2020.

	Number of cases reported	Substantiated	Unsubstantiated	Unfounded
Resident with Resident sexual abuse	6	5		1
Resident with Resident sexual harassment	10	4	4	2
Staff with Resident sexual abuse	0			
Staff with Resident sexual harassment	5	4	1	

Analysis & Conclusion:

When Gaudenzia, Inc. receives 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. If the incident involves only clients, the regional PREA coordinator investigated with assistance from regional management staff. The corporate compliance department does assist with investigations that involved sexual abuse allegations. At a minimum, the internal review involves interviews with parties involved, interviews of witnesses, review of surveillance if available, and records of both clinical and personnel. Other operational documents like communication logs, records of rounds completed, etc. are also reviewed.

There were a total of 35 reported cases in the July 2019 – June 2020 review period; this is lower than the total number of incidents reported in the previous year (39). This is an approximate 10% decrease in reported incidents. Contributing to this decrease is that there were no/zero incidents reported in our Delaware programs and the number of incidents in our Pennsylvania programs decreased by about 38%. It is important to acknowledge that three Pennsylvania programs (New View, Sienna House CCF and Sienna House D&A) closed in March 2020. However, in our Chesapeake region programs, the incidents increased from 15 reported in 2018-2019 to 21 reported in 2019-2020; this was approximately 40 % increases.

- Although there was an increase in overall incidents, in analyzing these trends, it is essential to note that from 2018-2019, the number of staff on resident sexual abuse cases decreased from 5 in 2018-2019 to 0 in 2019-2020, this is a 100% decrease in this type of incidents.
- Interestingly in the Maryland programs, the number of sexual harassment cases increased in both the following categories: resident on resident and staff on resident. Additionally, the number of substantiated cases within these categories also increased from 2019-2020 in comparison to 2018-2019.
- The factors contributing to this increase in sexual harassment substantiated cases are explored below:
 - Hiring practices have been less than optimal, and training has not been consistent this past year due to the pandemic.
 - All of the reported sexual harassment cases involving staff were against entry-level support staff. This position has a high turnover rate, making employee engagement, onboarding, and training more difficult.
 - Increased reporting opportunities for both staff and client

Based on the analysis of incidents 2019-2020 report/review year and continuously improving the quality of services we provide and ensuring our staff and clients' safety & security, we made the following changes.

- Improved screening, interviewing, and onboarding processes of potential candidates by the HR department for entry-level positions.
- Increased HR oversight regionally – HR regional managers.
- PREA training is more accessible as it is now on Relias Electronic learning platform
- Compliance line for staff and clients to call to report complaints – G-line.
- An established and dedicated compliance department provides agency-wide oversight of investigations around PREA, grievances, and allegations.