



Gaudenzia DRC, Inc.

# Annual Prison Rape Elimination Act (PREA) Report

Reporting Period: July 1, 2020, through June 30, 2021

**Submitted by:**

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**Gaudenzia, DRC**  
**Annual Prison Rape Elimination Act (PREA) Report**  
**July 1, 2020, through June 30, 2021**

**Background:**

The Prison Rape Elimination Act (PREA) was enacted on September 4, 2003, to provide for the analysis of the incidence and effects of prison rape in federal, state, and local institutions and to provide information, resources, recommendations, and funding to protect individuals from prison rape. PREA establishes a zero-tolerance standard for the incidence of prison rape and makes prison rape a top priority in each prison system.

Gaudenzia DRC, Inc. is an affiliate entity of the collection of companies known as Gaudenzia. Recently, the Gaudenzia, Inc. Compliance Department has assumed oversight of, inter alia, specific Gaudenzia DRC, Inc. operations, functions, and activities, including, but not limited to, Gaudenzia DRC, Inc.'s adherence with PREA. Accordingly, Gaudenzia, Inc.'s Compliance Department has developed this report.

**Policy Summary:**

Gaudenzia holds and adopts a zero-tolerance sexual abuse and sexual harassment policy. Gaudenzia expressly prohibits all forms of sexual abuse and sexual harassment, including among our judicially-involved residents.

PREA applies to all Gaudenzia DRC employees, contractors, and volunteers serving in community confinement programs as well as residents in community confinement programs. Contractors are any people regularly providing services on a recurring basis pursuant to a contractual agreement with the agency. Employees (also called "staff") are any people who work directly for the agency or facility. Volunteers are any individuals who donate time and effort on a recurring basis to enhance the activities and programs of the agency. Residents are any people confined or detained in a juvenile facility or in a community confinement facility.

**Definitions:**

The following terms shall have the meaning in this report listed hereunder:

- **Substantiated** – An allegation that was investigated and determined to have occurred.
- **Unsubstantiated** – 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 allegation that was investigated and determined not to have occurred.

#### Reporting Mechanisms:

Since 2015, Gaudenzia has worked diligently to monitor and, when necessary, revise corporate and program policies to guide our employees, volunteers, officers, vendors, and clients with regard to incidents of sexual harassment and sexual abuse. Any employee, volunteer, officer, vendor, client, or external party can anonymously report instances of sexual abuse or sexual harassment by either:

1. Emailing the Corporate PREA-specific email address at: [PREA@Gaudenzia.org](mailto:PREA@Gaudenzia.org).
2. Emailing the Corporate Complaint hotline at: [GLine@Gaudenzia.org](mailto:GLine@Gaudenzia.org).
3. Calling the Corporate Complaint hotline at: 844-293-5090.
4. Writing a letter to Gaudenzia's Compliance Department located at 106 West Main Street, Norristown, Pennsylvania 19401.
5. Submitting a written report to any employee of Gaudenzia.
6. Making verbal reports to any employee of Gaudenzia.

#### Summary:

##### Methodology:

Data from Gaudenzia DRC programs was collected, compiled, and reviewed in a manner consistent with 28 CFR § 115.286, 28 CFR § 115.287, and 28 CFR § 115.288 from July 1, 2020, through June 30, 2021. Data is collected through all reporting mechanisms and is added to an exhaustive list of all incidents. The data contained in this report has been classified into one of four total categories:

1. Resident-to-Resident sexual abuse
2. Resident-to-Resident sexual harassment
3. Staff-to-Resident sexual abuse
4. Staff-to-Resident sexual harassment

##### Results:

The next table records the number of received PREA reports by category and outcomes of each PREA received report from July 1, 2020, through June 30, 2021.

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*Table 3. Received PREA Reports from July 1, 2020, through June 30, 2021.*

Category	Number of cases reported	Outcome		
		Substantiated	Unsubstantiated	Unfounded
Resident-to-Resident sexual abuse	1*	0	0	0
Resident-to-Resident sexual harassment	4**	0	0	1
Staff-to-Resident sexual abuse	1	1	0	0
Staff-to-Resident sexual harassment	4	0	3	1

\*One matter pending investigation.

\*\*Three matters pending investigation.

**Analysis:**

There were ten (10) total reported PREA cases from July 1, 2020, through June 30, 2021. Gaudenzia DRC reasonably suspects that a contributing factor to this increase in staff-to-resident sexual abuse is that programmatic staff require more specialized and focused training on matters of sexual abuse and sexual harassment. In the wake of the COVID-19 pandemic, Gaudenzia DRC has experienced new levels of staff overturn across all programmatic positions. Some vacant positions were filled with new staff who did not receive more specialized and focused training on matters of sexual abuse and sexual harassment. Separately, due to staffing shortages as a result of COVID-19, there was historically less employee-to-employee oversight, than in previous years.

Based upon the analysis of incidents, Gaudenzia DRC shall provide focused and specialized training on sexual abuse and sexual harassment for staff who come into direct contact with judicially-involved clients. Additionally, Gaudenzia DRC has developed, deployed, and integrated automated mechanisms to facilitate the prompt reporting and communication of PREA-related incidents to the Corporate Office. The automated mechanisms enable Gaudenzia DRC to adequately respond to PREA-related incidents and submitted PREA reports in accordance with DOC Policy and Procedures. Furthermore, Gaudenzia, Inc.’s Compliance Department shall be responsible for the prompt investigation of all PREA-related incidents and submitted PREA reports. Separately, Gaudenzia has increased efforts to hire and retain new staff in programs with a high number of vacant positions.