



ANNUAL PRISON RAPE ELIMINATION ACT (PREA) REPORT 7/01/2021 TO 6/30/2022

The Federal Prison Rape Elimination Act (PREA) of 2003 was established to address the sexual abuse and sexual harassment of offenders in confinement settings. On August 20, 2012, the PREA Standards Final Rule was released to help prevent, detect, and respond to sexual violence, staff sexual misconduct, and sexual harassment in community confinement facilities.

Gaudenzia, Inc. is committed to adhering to all PREA standards as well as state regulations. Our goals are to provide a safe environment to all clients and staff members and secure treatment for any clients wanting or needing our services.

Gaudenzia PREA policy establishes zero tolerance for sexual abuse, staff sexual misconduct, and sexual harassment and provides guidelines for the prevention, detection, response, investigation, and tracking of allegations against sexual offenders.

To ensure that all facilities are in alignment with the act, Gaudenzia has implemented the following:

1. Annual review of the PREA zero-tolerance policy of sexual harassment and abuse to reword and strengthen the language to reflect practices and documentation required by the Act. [**§ 115.211 Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**]
2. Individualized PREA Screening Tool (PRAT) tailored to the needs of Gaudenzia's unique population and setting. [**§ 115.241 Screening for risk of victimization and abusiveness.**] Staff specialized training (how to use PRAT scores in housing decisions and daily operations, etc.) [**§ 115.231 Employee training; § 115.232 Volunteer and contractor; § 115.234 Specialized training**]
3. In-person and online group and individual training of staff members on the proper use of PRAT, appropriate PREA screening techniques and PREA standards of the Act.
4. Client and staff education of the protections offered by PREA and their right to be protected against retaliation for reporting and the requirement to report in good faith suspicious behavior. PREA pamphlets and posters are widely known and easily accessible to clients and staff members in all facilities at Gaudenzia. [**§ 115.233 Resident education; § 115.251 Resident reporting.**]
5. Proper supervision and monitoring by staff including a close look at the physical plant of the facilities (being aware of the blind spots, heightening supervision where needed, etc.) [**§ 115.213 Supervision and monitoring**]
6. Periodic PREA facility audits done by external auditors and also internal quarterly CQI audits to include a comprehensive physical plan audit.
7. New and revised PREA training on RELIAS – the scope of this training being to screen for sexual victimization and sexual aggression scores. This information is carefully reviewed and used in decisions related to housing, daily operations, supervision and monitoring.



Education is available in-person, in groups, or online via Relias. [§ 115.231 Employee training; § 115.232 Volunteer and contractor]

Gaudenzia, Inc. remains diligent in investigating all allegations of sexual abuse, staff sexual misconduct, and sexual harassment against offenders. Staff and offenders are educated on the agency's zero-tolerance policy and provided information on the multiple ways to report an allegation, including third-party reporting.

DEFINITIONS PER §115.5 [General definitions] & §115.6 [Definitions related to sexual abuse]:

Substantiated allegation: an allegation that was investigated and determined to have occurred.

Unsubstantiated allegation: an allegation that was investigated and insufficient evidence was obtained to determine if the allegation did or did not occur.

Unfounded allegation: an allegation that was investigated and proven not to have occurred.

Ongoing investigation: the investigation was initiated and is continuous.

Sexual abuse by a resident: as defined by § 115.6 Definitions related to sexual abuse.

Sexual abuse by a staff member: as defined by § 115.6 Definitions related to sexual abuse.

Sexual harassment: as defined by § 115.6 Definitions related to sexual abuse.

REPORTING MECHANISMS:

Since 2015, Gaudenzia, Inc., has worked consistently to educate and guide its subsidiaries, affiliates, our employees, volunteers, officers, vendors, and clients with regard to the duty to immediately report any suspicions and/or incidents of sexual harassment and sexual abuse. Education of non-retaliatory practices and policy of Gaudenzia regarding reports in good faith is also emphasized. 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**.
2. Emailing the Corporate Complaint hotline at: **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.

STATISTICS:

Data is collected, compiled and reviewed according to PREA standards: **§ 115.286 Sexual abuse incident reviews. § 115.287 Data collection. § 115.288 Data review for corrective action** for the time period 7/01/2021 to 6/30/2022.

The following are categories of reported allegations within Gaudenzia, Inc.:

1. **Client with Client (C/C) sexual abuse**
2. **Client with Client sexual harassment**
3. **Staff with Client (S/C) sexual abuse**
4. **Staff with Client sexual harassment**



TOTAL NUMBER OF ALL PREA ALLEGATIONS BY OUTCOME

Gaudenzia Facility		Total Allegations	Substantiated	Unsubstantiated	Unfounded	Ongoing Investigation
DE	Fresh Start	0	0	0	0	0
MD	Crownsville	0	0	0	0	0
	Park Heights NVOH	3	1	0	2	0
	Park Heights Women's LT	0	0	0	0	0
	Woodland	2	2	0	0	0
PA	Concept 90	0	0	0	0	0
	New Outlooks	0	0	0	0	0
	Philly House	2	1	0	1	0
	West Chester House	1	0	1	0	0

TOTAL NUMBER OF ALL PREA ALLEGATIONS BY CATEGORY

Gaudenzia Facility		Total Allegations	C/C Abuse	C/C Harassment	S/C Abuse	S/C Harassment
DE	Fresh Start	0	0	0	0	0
MD	Crownsville	0	0	0	0	0
	Park Heights NVOH	3	0	1	0	2
	Park Heights Women's LT	0	0	0	0	0
	Woodland	2	0	2	0	0
PA	Concept 90	0	0	0	0	0
	New Outlooks	0	0	0	0	0
	Philly House	2	0	0	2	0
	West Chester House	1	0	0	1	0

ANALYSIS & CONCLUSION:

Gaudenzia takes PREA allegations very seriously. Gaudenzia's Corporate Compliance, Human Resources Departments and Program Leadership strictly follow PREA regulatory standards to respond to PREA allegations in a timely and efficient manner.

To demonstrate compliance with PREA,

1. Our PREA facilities are audited on a rotation basis at least annually for compliance with PREA standards. All audits conducted at our facilities have confirmed that Gaudenzia is in full compliance with PREA standards.
2. Gaudenzia collects data on every allegation of sexual abuse and harassment at its facilities. Each allegation is reported to all applicable regulatory bodies in a timely manner as required.
3. A comprehensive investigation is conducted either by the compliance team, or the program management.
4. Following the outcome of the investigation, the Compliance Department and facility leadership meet to debrief on the outcome of the investigation, determine if any change is needed in the policy or practice to better prevent, detect and/or respond to sexual abuse and sexual harassment.
5. Each year, Gaudenzia aggregates all the data collected for further review, discussion, recommendations and opportunities for improvement. This is done at quality improvement and leadership meetings at least on a quarterly basis.
6. Gaudenzia has developed its own PREA Risk Assessment Tool (PRAT) to screen for sexual victimization and sexual aggression scores. This information is carefully reviewed and used in decisions related to housing, daily operations, supervision and monitoring. Education is available in-person, in group or online via Relias.
7. Our facilities have camera systems installed which are regularly assessed for placement, operation, and effectiveness and reviewed in the process of investigations.
8. Our staff members regularly (annually and on a needed basis) receive mandatory specialized training for the proper use of Gaudenzia's PRAT tool and the proper applicability of the PRAT scores.

There is a total number of 8 PREA allegations reported for the time frame of 7/01/2021 to 6/30/2022. This is an abrupt decrease of 65% of PREA allegations from last fiscal year. It is important to note that only 4 cases of PREA allegations were deemed as substantiated. This is a sharp 42% decrease in substantiated PREA cases (7 cases) from last year. This represents a safer community to grow and develop as a client at Gaudenzia, Inc.

Contributing factors to overall decrease in PREA allegations and PREA substantiated cases could be:

- the high level of awareness of residents' rights and responsibility to report any suspicious behavior,
- the fortified efforts of Gaudenzia staff members to prevent, detect and timely respond to reported allegations,



- Gaudenzia's zero-tolerance policy to sexual abuse and harassment is widely known across the agency and the promise of non-retaliation,
- mandatory PREA education, posters and pamphlets, and
- staff genuine commitment to excellence.

Gaudenzia has also established and implemented a new treatment model in our programs to deliver a strength-focused, person-centered, integrated treatment model utilizing evidence-based approaches that are gender, culture, and trauma-informed.

Gaudenzia respects individuals' gender and sexuality preferences and promotes the safety of our clients and staff through training, comprehensive screening, and assessment of clients' mental and psychological well-being.

Gaudenzia continually strives to ensure the sexual safety of our residents. In order to provide safer facilities, Gaudenzia reports and thoroughly investigates any allegation of sexual victimization.

A special thank you to frontline staff members for their tireless commitment and endless efforts to keep our clients safe at all times but also to our executive team for assuring the best efforts Gaudenzia, Inc. could possibly make to improve the quality of our services to clients!

*Completed by
the Director of Corporate Compliance
Rodica Grate*

*Signature: Rodica Grate
Date: 9.07.2022*