



**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 DRC is committed to adhere to all PREA standards as well as state regulations. Our goals are to provide safe environment to all clients and staff members and secure treatment for any clients wanting or needing our services.

Gaudenzia DRC 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 DRC 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 training of staff members on the 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 postings are conspicuously posted throughout the facility and for informational pamphlets are readily accessible to staff and clients. [**§ 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 are completed by the PA DOC as well as Gaudenzia. continuous, Quality improvement to include a physical plant inspection.



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7. New and revised PREA training on RELIAS – include that with some detailed information regarding the scope of the training. [§ 115.231 Employee training; § 115.232 Volunteer and contractor]

Gaudenzia DRC 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, to include reporting to PA Department of Corrections.

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:

Gaudenzia DRC, 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 DRC 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. Emailing the Gaudenzia DRC PREA compliance manager Ava Foster at: afoster@drpc.org or by telephone 484-806-1816.
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. Letters can also be sent to PA PREA Coordinator, Office of State Inspector General, 55 Walnut Street Harrisburg, Pa 17101
5. Submitting a **written report** to any employee of Gaudenzia DRC
6. Making **verbal reports** to any employee of Gaudenzia DRC



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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 DRC:

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
PA	DRC	21	0	19	0	2

TOTAL NUMBER OF ALL PREA ALLEGATIONS BY CATEGORY

Gaudenzia Facility		Total Allegations	C/C Abuse	C/C Harassment	S/C Abuse	S/C Harassment
PA	DRC	21	02	12	1	6

ANALYSIS & CONCLUSION:

Gaudenzia DRC 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. Gaudenzia DRC is audited at a minimum of annually through onsite visits by inspection teams as well as online by the PA DOC through their Power DMS reporting tool. The facility is in full compliance with all established PREA Standards.
2. Gaudenzia DRC collects data on every allegation of sexual abuse and harassment at its facility. 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 and PA Department of Corrections
4. Following the outcome of the investigation, the Compliance Department and facility leadership and the PA DOC meet to debrief through a Sexual Abuse Incident review (SAIR) to determine if Proper Policy and Procedures were



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followed or if any changes are recommended to established Policy and Procedures

5. Gaudenzia DRC uses the PA Department of Corrections 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.
6. Gaudenzia DRC has a camera system that is routinely monitored and reviewed in the process of investigations.
7. Gaudenzia DRC staff members receive mandatory training annually and on a as needed basis.

There was a total of 21 PREA allegations reported for the time frame of 7/01/2021 to 6/30/2022. 100% of the reported PREA allegations were found to be unsubstantiated following investigations.

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 incidents of sexual abuse or sexual harassment.
- the fortified efforts of Gaudenzia DRC staff members to prevent, detect and timely respond to reported allegations,
- Gaudenzia DRC 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 DRC continually strives to ensure the sexual safety of our residents.

Gaudenzia DRC reports to and cooperates with the PA DOC to thoroughly investigate all allegations of sexual abuse