

2021 PREA ALLEGATION SUMMARY REPORT & ASSESSMENT

Submitted by: Ramona Wheeler, VP, PREA Coordinator

This report is submitted in accordance with PREA §115.288 (a)(3), and may be viewed on the agency’s website, in accordance with PREA §115.288(c). Information contained in this report covers client sexual-related allegations received from January 1, 2021, through December 31, 2021. Earlier information may be found in the agency’s 2019, 2020 PREA Report(s). **Questions, or comments may be addressed by contacting us at: prea@alvis180.org.**

CENSUS SUMMARY

Number of persons under supervision of the facility on December 31, 2021:	Number of persons admitted during 2021 (from January 1 to December 31, 2021):
Facility Name, year-end headcount	Calendar year admissions total
Alum Creek North-49 Alum Creek South-33	Alum Creek North-171 Alum Creek South -245
OhioLink – Lima-89 ACRP – Long St.-45	OhioLink-Lima-261 ACRP Long St. -186
Price Hall-24 Dunning Hall-32 Breslin Hall - 0	Price Hall -88 Dunning Hall -147 Breslin Hall - 58
Work Release-69	Work Release (Jackson Pike) - 472
OL-Toledo:57	OL-Toledo: 269 Males: Females:
COPE-0 TCRC-85	TCRC: 655 Males: Females:

ALLEGATIONS SUMMARY

<p>NUMBER OF REPORTED allegations of client-on-client SEXUAL HARASSMENT:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 1</p> <p>1</p> <p>0</p> <p>0</p> <p>0</p>
<p>NUMBER OF REPORTED allegations of client-on-client SEXUAL ABUSE:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded 	<p>TOTAL: 0</p> <p>0</p> <p>0</p> <p>0</p>
<p>NOTICE OF REPORTED allegations of client-on-client RETALIATION:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p>
<p>NUMBER OF REPORTED allegations of staff-on-client SEXUAL HARASSMENT:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 4</p> <p>3</p> <p>0</p> <p>1</p> <p>0</p>
<p>NUMBER OF REPORTED allegations of staff-on-client SEXUAL ABUSE:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 5</p> <p>3</p> <p>0</p> <p>2</p> <p>0</p>
<p>NUMBER OF REPORTED allegations of staff-on-client RETALIATION:</p> <ul style="list-style-type: none"> • Substantiated 	<p>TOTAL: 0</p> <p>0</p>

<ul style="list-style-type: none"> • Unsubstantiated • Unfounded • Investigation ongoing 	<p>0</p> <p>0</p> <p>0</p>
<p>NUMBER OF ALLEGATIONS IN 2021:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 10</p> <p>7</p> <p>0</p> <p>3</p> <p>0</p>

ANALYSIS

During the 3-year PREA cycle of 2019 – 2021:

- Overall allegations have decreased to 10 in 2021, from 15 in 2020, and 18 in 2019, or 30 percent;
 - *In 2021, 2,352 residents received education on the agency’s zero tolerance policy against sexual harassment, sexual abuse, and retaliation; resident education included consequences for reporting false, and/or frivolous allegations.*
- Overall allegations decreased to 15 in 2020, compared to 18 in 2019, or 17 percent;
 - *In 2018, Alvis fully implemented an Enhanced pat-down search procedure; most reported allegations in 2018 involving resident sexual abuse by a staff member were regarding a pat-down search, and were determined to be unfounded, or unsubstantiated.*
 - *Ongoing resident education, and increased resident accountability is estimated as a key impact with allegations made in bad faith, and a positive impact on the reduction of allegations in 2021.*
- The most common reason for unfounded allegations of sexual abuse in 2019, 2020, and 2021 continues to be related to reports of inappropriate resident pat-down searches;
- Allegations of staff retaliation against a resident related to a reported allegation of sexual abuse remain at 0 in 2021;
- Allegations in 2021 of resident-on-resident retaliation related to a reported allegation of sexual abuse remain at 0 in 2021;
- Allegations decreased to 1 in 2021, from 6 in 2020, while at 0 in 2019, of resident-on-resident sexual harassment;
- Reports of prior sexual abuse during incarceration decreased to 0 in 2021, from 2 in 2020, and 5 in 2019. The head of the facility/institution is notified of the reports when cases are received by residents.

IMPROVEMENTS

Based on information received and reviewed of resident reports of sexual abuse, sexual harassment, and retaliation, Alvis will continue the following action steps, implemented in 2021:

- Unfounded allegations of sexual abuse by another resident, or staff will undergo a Post-incident review by the agency's Sexual Abuse Response Team (SART);
- Internal facility site reviews will be conducted by an in-house team comprised of multiple areas of oversight, to provide ongoing assessment of key operational areas (e.g., PREA Intake screenings/re-screenings, housing and bed assignments of residents deemed as high risk for sexual abuse, or sexual abusiveness);
- Alvis will make a continued effort to establish documented Memorandums of Understanding (MOU's) with local law enforcement in Ohio cities where Alvis operates residential programs: Chillicothe, Lima, and Toledo (a documented MOU with Columbus law enforcement is currently in place), and which conduct criminal investigations of reported allegations of resident sexual abuse.

GENERAL SUMMARY

Alvis continues to emphasize a zero-tolerance policy with respect to resident sexual abuse, harassment, and retaliation. Internal site reviews are conducted as a proactive approach to resident supervision, and monitoring of facilities to prevent, detect, and report client sexual harassment, sexual abuse, and retaliation. During the 2020-2021 pandemic, employees received monthly PREA refreshers on various PREA standards via the Relias eLearning system. Alvis suspended facility in-person site reviews during the 2020-2021 pandemic, and will resume in 2022, depending on CDC guidelines for congregate settings.

Alvis has imposed disciplinary action, up to, and including termination, for staff substantiated allegations of sexual harassment, and sexual abuse of residents. Unfounded allegations have resulted in additional resident education, resident violations, and staff training. The predominate area for staff training, or re-training is on proper pat-down search procedures, first responder procedures, and boundaries with residents. Specialized training for medical, and mental health staff in 2021 was provided via webinars, and continues to be a staple in staff training requirements for new hires in the agency's Behavioral Health service line. New facility directors who participate in administrative investigations received specialized PREA training in 2019, 2020, and 2021. Due to the pandemic, investigations training in 2021 program directors received required training via online courses through the National Institute of Corrections (NIC).

Alvis is actively taking steps toward ongoing, full PREA compliance. Employee training and resident education is conducted throughout the year on Alvis policies and procedures on the prevention, detection, and reporting of resident sexual abuse, sexual harassment, and retaliation; working with vulnerable populations, and residents' right to be free from sexual abuse, sexual harassment, and retaliation.