

2024 PREA ALLEGATION SUMMARY REPORT & ASSESSMENT

Submitted by: Ramona Wheeler, CHRO, 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). The information contained in this report covers client sexual-related allegations received from January 1, 2024, through December 31, 2024. Earlier information may be found in the agency’s 2023, 2022 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, 2024:	Number of persons admitted during 2024 (from January 1 to December 31, 2024):
Facility Name, year-end headcount	Calendar year admissions total
Alum Creek Men -145 Alum Creek Women - 55	Alum Creek Men-648 Alum Creek Women -267
OhioLink – Lima-70	OhioLink-Lima-259
Work Release/POWER-73	Work Release/POWER (Jackson Pike) - 390
OL-Toledo: 57	OL-Toledo: 259
COPE-0 TCRC-128	TCRC: 533

ALLEGATIONS SUMMARY

<p>NUMBER OF REPORTED allegations of client-on-client SEXUAL HARASSMENT:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Ongoing investigation 	<p>TOTAL: 3</p> <p>2</p> <p>1</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 • Ongoing investigation 	<p>TOTAL: 3</p> <p>1</p> <p>0</p> <p>2</p> <p>0</p>
<p>NOTICE OF REPORTED allegations of client-on-client RETALIATION:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Ongoing investigation 	<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 • Ongoing investigation 	<p>TOTAL: 1</p> <p>0</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 • Ongoing investigation 	<p>TOTAL: 8</p> <p>3</p> <p>1</p> <p>4</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 • Ongoing investigation 	<p>0</p> <p>0</p> <p>0</p>
<p>NUMBER OF ALLEGATIONS IN 2024:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Ongoing investigation 	<p>TOTAL: 15</p> <p>7</p> <p>2</p> <p>6</p> <p>0</p>

ANALYSIS

During 2024:

- Overall allegations have increased to 15 from 14 in 2023, and 8 in 2022.
 - *In 2023, 2,473 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.*
 - *In 2024, Alvis continued to fully train staff on PREA standards and consequences for substantiated and unsubstantiated violations. Three of eight allegations were substantiated and involved inappropriate relationships with residents, all resulting in staff terminations. Four of 8 allegations were unfounded*
 - *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 a virtually flat number of total allegations in 2024.*

- The most common reason for unfounded [sexual harassment] allegations of sexual harassment in 2022, 2023, and 2024 continues to be related to reports of inappropriate resident comments, and gestures;
- Allegations of staff retaliation against a resident related to a reported allegation of sexual abuse remain at 0 in 2024;
- Allegations in 2024 of resident-on-resident retaliation related to a reported allegation of sexual abuse remain at 0 from 2022, and 2023;
- Allegations increased to 3 in 2024, from 1 in 2023, and 0 in 2022, of resident-on-resident sexual harassment; this was due to homophobia related to LGBTI residents housed with straight residents.
- Reports of prior sexual abuse during incarceration decreased to 0 in 2024, with 1-2 reported in years 2022 and 2023. 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 2024:

- 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);
- In 2025, Alvis will implement a PREA team to assure ongoing staff training, and resident education on PREA policies and procedures, client rights; a state of “audit-readiness” in residential facilities; and, timely response to allegations of resident sexual abuse, sexual harassment, and /or retaliation;
- 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 will be conducted quarterly as a proactive approach to resident supervision, and monitoring of facilities to prevent, detect, and report client sexual harassment, sexual abuse, and retaliation. During 2023-2024, employees continued to receive monthly PREA refreshers on various PREA standards via the Relias eLearning system, and in-person sessions (e.g., Teams, Zoom). Alvis will resume in-person site reviews on a regular schedule in 2025.

Alvis has imposed disciplinary action, up to, and including termination, for staff (including contractors) substantiated allegations of sexual harassment, and sexual abuse of residents. Unfounded allegations have resulted in additional resident education, resident violations (when allegations are made in bad faith), and staff training. The predominate area for staff training, or re-training is on first responder procedures, and boundaries with residents. Specialized training for medical, and mental health staff in 2024 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 via National Institute of Corrections (NIC) online training, in 2022, 2023, and 2024.

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 (i.e., LGBTI), and residents' right to be free from sexual abuse, sexual harassment, and retaliation.