



HOWARD
CENTER
Help is here.

**Eliminating Sexual Abuse and Sexual Harassment
in Howard Center's Park Street and
Transition House Programs**

January - December 2015

About Howard Center

Our mission is to improve the well-being of children, adults, families, and communities.

We offer life-saving professional crisis and counseling services to children and adults; supportive services to individuals with autism and developmental disabilities who need help with education, employment, and life maintenance skills; counseling and medical services for those struggling with substance abuse, and intensive interventions for adults with serious and persistent mental health challenges. Howard Center was founded in 1873 and serves more than 15,000 individuals and families every year.

PREA's Applicability

Howard Center's Park Street and Transition House programs provide residential placement and treatment services under contract with Vermont's Department of Children and Families' Family Services Division – Youth Justice. As a result of this relationship, these programs must comply with the standards in accordance with the federal Prison Rape Elimination Act (PREA). To that end, Howard Center has updated and developed policies and procedures to address resident safety in these programs.

Howard Center has a zero tolerance policy regarding sexual abuse and sexual harassment of individuals. This prohibition is supported by the agency's Code of Ethics, the Policy Prohibiting Physical, Emotional, and Sexual Abuse of Clients and the Policies and Procedures Addressing the Prison Rape Elimination Act in our operations manual as well as the Violence Prevention and Weapons-Free Workplace Policy in the Personnel Manual. All staff members, contractors, interns, or volunteers working at Park Street or Transition House facilities or having direct contact with residents of those facilities are required to sign a form stating they understand the zero tolerance policy and their role as a mandatory reporter.

About Park Street and Transition House Programs

Park Street provides intensive residential treatment to adolescent males ages 12-17 with sexual harming behaviors. Residents attend the onsite Fay Honey Knopp School, a licensed school that provides a supportive, therapeutic and safe educational environment.

Transition House is a residential program for adolescents and young men aged 16-22 which provides supportive housing and preparation for independent living. This program provides youth with high-risk, harmful and/or delinquent behaviors, an opportunity to live in a supervised setting in order to build the skills necessary to be successful as adults.

PREA Pre-Audit Activities

- Prior to the audit, work was done on agency, personnel, and facility policies and procedures to bring them into compliance with the PREA standards.
- Howard Center formed a PREA Committee to work on the PREA standards. The group consisted of each program's director/coordinator (and facility PREA Compliance Manager), their supervisors, a newly designed PREA Coordinator, the Director of Compliance, and representatives from Human Resources. Following the completion of the PREA audit, the group met regularly the rest of the year.

- In preparation for the audit, policies, procedures, and evidence were forward to the PREA auditor.

Areas for Improvement Identified from the PREA Audit

The PREA audit reported the following performance regarding compliance with the standards:

Category	Park Street	Transition House
Number of Standards Exceeded	0	0
Number of Standards Met	23	22
Number of Standards Not Met	16	18
Number of Standards N/A	2	1

Some of the standards that were not met required limited additions or clarification to agency and program policies and procedures to bring us into compliance. While not an all-inclusive list, the agency focused on the corrective actions listed below.

Forensic Examinations: In order to ensure a victim receives appropriate care, the agency needs to establish a memorandum of understanding with hospitals regarding forensic examinations and with advocacy centers for crisis support and counseling services.

PREA Training: The online PREA training the agency developed for employees, contractors, interns, and volunteers was found to be lacking by the PREA auditor. A number of areas need to be enhanced in order to comply with all of the requirements. Once completed, the updated training would need to be retaken by all.

Vulnerability Assessment: The programs needs to adopt and implement an acceptable vulnerability assessment to screen residents for both potential victimization and perpetration and use it for treatment planning, bed placement, education assignments, and safety and security decisions.

Coordinated Response Plan: The agency needs to develop a coordinated response plan for staff to follow when an alleged sexual assault has occurred. The plan will ensure that Howard Center personnel work cooperatively with each other, investigators, medical and mental health providers, and advocates.

Sexual Abuse Data – Storage, Publication, and Destruction: The agency’s policies were not sufficient to comply with these standards. New policies and enhancement to existing ones are required. The agency must also develop a website to post the sexual abuse information.

Overall PREA Policy: The agency developed an over PREA policy that addressed an number of requirements under PREA such as the agency’s zero tolerance policy, response and follow up regarding alleged sexual assaults, response and following up regarding alleged sexual harassment, the PREA specific grievance policy, administrative investigations, and data collection. A number of changes are necessary to ensure compliance with the rule.

Sexual Abuse Data for 2015

Program	Youth on Youth Sexual Abuse	Staff on Youth Sexual Abuse	Youth on Youth Sexual Harassment	Staff on Youth Sexual Harassment
<i>Park Street Program</i>	0	0	2	0
<i>Transition House</i>	0	0	0	0

This is the first year of documenting PREA data.

There were only two sexual harassment incidents at Park Street during 2015. Both were investigated and both were substantiated. The first incident occurred in the school and involved several individuals engaged in sexual harassing behavior that included sexual jokes, gestures, and innuendo. A teacher asked them to stop but the behavior continued and was reported by the alleged victim. The alleged victim was separated from the perpetrator and provided support to develop a safety plan. The second incident occurred in the bathroom of a restaurant. The perpetrator reached under the stall wall and made masturbatory gestures to the victim. Victim was separated from the perpetrator and a safety plan was developed to ensure the victim's safety.

There were no incidents of sexual abuse at Park Street.

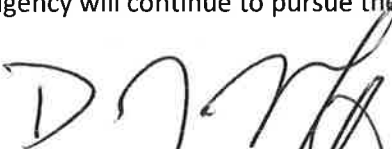
There were no incidents of sexual abuse or sexual harassment at Transition House.

Conclusion

Prior to the end of 2015, the vulnerability assessment was adopted and has been used at both Park Street and Transition House.

Efforts are underway to make the necessary changes to the PREA Training and overall PREA policy and create the Coordinated Response Plan and the sexual abuse data policies. It is expected that these will be done before the end of the corrective action period.

The agency is in discussions with the child advocacy centers in each county regarding both the crisis and support services and the forensic examinations. The MOUs many take some time to obtained but the agency will continue to pursue them.



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