



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

January 2020 – December 2020

About Howard Center

We help people and communities thrive by providing supports and services to address mental health, substance use, and developmental needs.

We serve children, adults, families and communities as the designated provider for mental health and developmental disability services and the preferred provider for substance use services in Chittenden County.

Howard Center was founded in 1865 as an agency to serve the widows and orphans of the civil war at the Home for Destitute Children. Since then, Howard Center has been a trusted provider in our community for more than 150 years, offering progressive, compassionate, high-quality care and treatment for those members of our community in need.

Today, our staff of 1,600 nurses, support workers, clinicians, teachers, case managers, psychiatrists, and others provide help and support in over 60 locations across six Vermont counties to more than 16,000 people each year. We serve children, adults, families, and communities in a range of settings with a broad array of services for mental health, developmental, and substance use needs.

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 Compliance Activities

Throughout the year, the agency continued its efforts to meet the requirements of PREA.

- All staff, contractors and volunteers complete the PREA training annually.
- PREA information is provided to all new residents and their guardians and information is readily available to them at each site. Information is also available on Howard Center's Safe Environment Standards webpage.
- All allegations of sexual abuse and sexual harassment are thoroughly investigated and resulting findings and plans are shared with all staff at the site, guardians and the Vermont Department for Children and Families Residential Licensing & Special Investigations Unit to ensure the safety of the residents.
- Due to the COVID-19 pandemic, the audits of both Park Street and Transition House programs for compliance with the PREA standards scheduled for this year was postponed until 2021. Both programs remain committed to following the standards.

Sexual Abuse and Sexual Harassment Allegations Data for 2020

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>	1	0	4	0
<i>Transition House</i>	0	0	0	0
<u>Previous Years Data</u>				
2019 Data				
<i>Park Street Program</i>	0	0	1	0
<i>Transition House</i>	0	0	0	0
2018 Data				
<i>Park Street Program</i>	0	1	5	0
<i>Transition House</i>	0	0	0	0
2017 Data				
<i>Park Street Program</i>	2	0	2	0
<i>Transition House</i>	0	0	1	0
2016 Data				
<i>Park Street Program</i>	1	0	6	0
<i>Transition House</i>	0	0	0	0
2015 Data				

<i>Park Street Program</i>	0	0	2	0
<i>Transition House</i>	0	0	0	0

Park Street

There were four substantiated incidents of sexual harassment that took place in the common areas of the residence and in the agency van. There were two incidents with two particular youth who had directed sexual jokes at peers as a means of trying to connect with them socially, which created uncomfortable feelings for their peers. In addition, these same two peers who are in treatment due to sexually reactive behaviors also stated and gestured sexually inappropriate things in the presence of their peers causing them to feel uncomfortable. These youth were held responsible for their actions via additional treatment to address their inappropriate sexualized behavior and placed on individualized plans where they were kept separate from their peer group until they were able to complete reparation with their peers where they earned trust to safely reenter both the school and residential milieu environment with others. Both these youth have also received 1:1 staffing at various points during 2020 in order to help maintain boundaries and safety for all. Due to ongoing unsafe behaviors one of these youth was discharged from the program to a more staff secure setting.

There was one incident of youth on youth nonconsensual or abusive sexual acts that took place at school. The incident involved a youth moving into a tight space to get past another youth and brushed his private parts up against the other youth's private parts when squeezing by him causing the youth to feel uncomfortable. The victim questioned if the behavior was intentional given his peer had alternative ways to get by the youth without having contact. The youth who violated the personal space of the other youth acknowledged the behavior, however claimed the behavior was accidental and not intentional. These youth were kept separate from each other until there was an opportunity for reparation between the youth.

There were no incidents of staff on youth sexual misconduct or sexual harassment. It is believed that the specific profile of sexualized youth served at Park Street in 2020 was indicative of the increase in the number of PREA incidents compared to the previous year. Three of the initiated incidents involved new clients enrolled in treatment at Park Street in 2020.

Transition House

For the third consecutive year, there were no allegations of any type of sexual abuse or sexual harassment at Transition House.

Conclusion

Staff at both programs will continue to be vigilant in their efforts to protect youth in our facilities and ensure compliance with PREA.

A certified Department of Justice PREA auditor has been scheduled to conduct an audit of both Park Street and Transition House programs for compliance with the PREA standards in April 2021.

DocuSigned by:

Dave Kronoff

B834F0A74E61493...

Dave Kronoff

Privacy Officer, PREA Coordinator and Health Informatics Regulatory Specialist

DocuSigned by:

Bob Bick

84B9B169DD0C401...

Bob Bick

Chief Executive Officer