



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

January 2021 – December 2021

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 19,000 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.
- The overall Policies and Procedures Addressing the Prison Rape Elimination Act were revised to include clarification of how allegations will be handled at Transition House when the victim is an adult and Park Street situations where residents exhibit patterns of daily sexualized behaviors/statements that do not meet the PREA definition of sexual harassment but may cause other residents to feel unsafe or uncomfortable, will be investigated as a PREA incident. Additional, clarity was added regarding cooperation with external investigations, monitoring of victims following a report sexual abuse or sexual harassment, and which staff member is responsible for reporting to the appropriate licensing body.
- Park Street’s video surveillance system was enhanced this year.
- Transition House updated supervision policies.

The PREA audit that was delayed last year due to COVID took place this year. Since COVID was still a factor, interviews of agency leadership were conducted virtually. Both onsite audits were conducted, but one was delayed due to a possible COVID infection. In August 2021, the certified Department of Justice PREA auditor, Sharon Pette, informed both Park Street and Transition House that their programs achieved 100% compliance with the PREA standards.

Sexual Abuse and Sexual Harassment Allegations Data for 2021

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>	2	0	2	0
<u>Previous Years Data</u>				
2020 Data				
<i>Park Street Program</i>	1	0	4	0
<i>Transition House</i>	0	0	0	0
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

In 2021 Park Street provided services to 15 youth, ages ranged from 14-17. There were 7 admissions and 4 discharges during this time.

There were two substantiated incidents of sexual harassment that took place in the common areas of the residence and in the agency van. There was one incident with a youth who found himself attracted to the female staff and would often make sexualized comments or gestures in the presence of his peers about the staff. This youth reported he was displaying such behavior as a means of trying to connect and fit in socially with his peers. He later crossed a boundary by telling his peer something sexual about himself causing his peer to feel uncomfortable and file a PREA report. This youth has been referred to treatment due to similar sexually reactive behaviors in a community setting. Both youth met as part of a restorative circle to address the concerning behavior and to develop clear boundaries and ways to maintain healthy social interactions with peers. Follow up work was done with both youth in sessions with their clinician.

The other incident involved a youth who was mocking another youth's identity via a sexualized joke in thinking his peers would find it funny. This youth was held responsible for his actions via separation from his peer group to focus on how his actions negatively impacted his peer. He was placed on individualized plan where was kept separate from his peer group until he was able to complete reparation with his peers and he was able to earn trust to safely reenter both the school and residential milieu environment with others and not continue to engage in similar harassing and retaliatory behavior.

There were no incidents of staff on youth sexual misconduct or sexual harassment.

It is believed that the ongoing work in restorative circles has helped youth problem solve and have a safe space to resolve issues that cause them discomfort, thus the reduction in the number of incidents in 2021. The perpetrator of one incident involved a youth who has been very sexualized during his stay

at Park Street and has required lots of individualized programming and intensive treatment to help him shift his sexually problematic behavior. The perpetrator of the other incident is new to treatment and has a history of being a bully and verbally abusive in his interactions with others. There was also an enhanced video surveillance system installed during this time period which was helpful to view footage of grievances filed.

Transition House

In 2021, the program had a total of 9 different clients (6 admissions and 6 discharges) ranging from ages 16-19 years old.


The Transition house had one PREA related incident that occurred during the 2021 calendar year. This resulted in 4 allegations between 2 clients – each client alleging sexually abusive contact against the other and each resident alleging sexual harassment against the other. Each client reported there was a consensual relationship between them which they kept secret from T House staff. Each client stated this relationship became nonconsensual, but contact continued, thus leading to PREA investigation. One sexual abusive contact allegation was substantiated. The other sexual abusive contact and both sexual harassment allegations were unsubstantiated. The perpetrator in the substantiated sexually abusive contact allegation was removed from Transition House program.

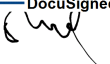
As a result of this investigation, the Transition House updated policies in supervision guidelines. Previously, clients would be allowed to be in the back seat of staff car while on transportation to different locations (i.e., going to the basketball gym). It was discovered that staff are unable to provide necessary supervision to ensure abusive contact or other sexual harassment behaviors are not occurring. Staff may have no more than 2 clients in their vehicles, with one client being in the front passenger seat to ensure supervision. Additionally, in house supervision policies were enhanced. When there is more than one client on the 2nd floor of the residence, even if clients are in their bedrooms, a staff member must be on this floor – most frequently in the staff office. This is to ensure clients are not having unsupervised time on the 2nd floor.

Conclusion

The activities noted above, enhance the safety of the programs' residents.

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

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