



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

January 2022 – December 2022

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.

Sexual Abuse and Sexual Harassment Allegations Data for 2022

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	1	0
<i>Transition House</i>	0	0	0	0
<u>Previous Years Data</u>				
2021 Data				
<i>Park Street Program</i>	0	0	2	0
<i>Transition House</i>	2	0	2	0
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

There was 1 youth admitted to Park Street in 2022 and this 1 youth was not adjudicated.

There were no reported youth on youth nonconsensual sexual acts or abusive sexual contacts.

There was one alleged incident of youth-on-youth sexual harassment that reportedly took place during a treatment group. The reported incident involved a youth alleging that another youth made a sexual comment that was directed at him before the group and then he later invaded his space in group causing him to feel unsafe. The incident was not substantiated after viewing video footage. This incident was addressed in therapy with both youths to help resolve the actions of both creating discomfort amongst each other.

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

It is believed that the ongoing work with restorative circles has helped youth problem solve and have a safe space to resolve issues that cause them discomfort, thus the ongoing reduction in the number of incidents in 2022. Plus, the stability of youth in the program with an average of 18 months of treatment in 2022 with only 1 new admission would also contribute to the shifts in outward sexualized behavior. The video surveillance system also helps to address patterns of overall problematic behavior more quickly, thus helping to intervene with therapeutic interventions and helping to support improved treatment outcomes.

Transition House

In 2022, the Transition House had a total of 7 different clients. One of our clients was discharged in 2022 and also returned later on in the year 2022. From January 1, 2022-December 31, 2022, the number of intakes was 5 and the number of discharges was 4.

For the timeframe of January 1, 2022, through December 31, 2022, the Transition House had no instances or allegations of sexual abuse or sexual harassment. The Transition House continues to train staff and comply with the PREA standards.

Conclusion

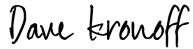
The number of sexual abuse and sexual harassment allegations match the lowest total number of incidents since 2019.

At Transition House, during a review of supervision and a new client admission, staff were made aware of two small blind spots that are unable to be surveilled on the camera. The blind spots were discovered at the end of December 2022. A supervision plan was made for staff to be vigilant if clients are in those spots in the house and a plan was made to address the blind spots by February 2023, barring any disruptions by the current supply chains issues.

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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