



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

January 2023 – December 2023

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 19,290 people each year. We serve children, adults, families, and communities in a range of settings with a broad array of exemplary 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 is a community-based residential program providing treatment to families and adolescent males, ages 12-17 with sexual harming behaviors. Through the use of a cognitive behavioral based model with the Good Lives Model concepts and trauma-informed approach, Park Street works collaboratively with youth, their families and referring agencies to modify inappropriate sexual behavior through a strengths-based skill building focus. The goal is to inspire personal change that will promote youth to care about themselves and others and to be responsible for their own 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 home for cisgender males and transgender females ages 16-22 who have been in long-term residential programming and are continuing treatment in a less restrictive, transitional setting. The program helps youth with complex behavioral, mental health, and substance

use needs by offering individual and family therapy, vocational/educational support, and service coordination for each resident.

PREA Compliance Activities

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

- All Park Street and Transition House staff, including agency staff with supervision and oversight responsibilities, as well as contractors and volunteers complete the PREA training annually.
- PREA information is provided to all new program 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 the 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 clarifications regarding 1) the training of contractors and volunteers, 2) if State or local authorities did not accept an allegation for investigation, 3) expanded the grievance appeal process, and 4) the storage of electronic data.
- In the PREA General Overview online training for staff, we included a link to the PREA Juvenile Comprehensive video produced by the PREA Resource Center.
- Created a hard copy PREA General Overview for Contractors & Volunteers training.
- In June 2023, the certified Department of Justice PREA auditor, Sharon Pette, submitted the final PREA Facility Audit Report for the Transition House program. They achieved 100% compliance with the PREA standards (exceeding three of the standards and meeting 40 of them).
- Given the evolving nature of the PREA auditor evidentiary standards, Transition House’s audit findings and report were shared with the Park Street program to assist them in their efforts to maintain compliance with PREA.
- Additional cameras were added to the camera surveillance system at Transition House to cover the blind spots identified last year.

Sexual Abuse and Sexual Harassment Allegations Data for 2023

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>				
2022 Data				
<i>Park Street Program</i>	0	0	1	0
<i>Transition House</i>	0	0	0	0

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 were 2 youth admitted to Park Street in 2023 and both youths were 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 game of basketball. The reported incident involved 2 youth alleging that another youth made sexual comments and gestures that were directed at them and invaded their space during the game causing them to feel uncomfortable. The incident was substantiated after interviewing all involved. This incident was addressed in therapy with both the victims of the targeted incident and the identified perpetrator.

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

Staff and youth are provided with education regarding zero tolerance for sexually harmful behavior and opportunities to intervene and shift such behavior remains consistent in the daily work at Park Street for treating youth with sexually problematic behavior.

Transition House

In 2023, the Transition House had a total of 6 different clients. From January 1, 2023-December 31, 2023, the number of intakes was 2 and the number of discharges was 2.

For the timeframe of January 1, 2023, through December 31, 2023, 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. The Transition House underwent a PREA audit during 2023 where all standards were met.

Conclusion

The number of sexual abuse and sexual harassment allegations match the lowest total number of incidents in both 2022 and 2019. This is a testament to the programs' staff and their continuing efforts to ensure the safety of residents.

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.



Dave Kronoff
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Bob Bick
Chief Executive Officer

