



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

January 2024 – December 2024

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 1,500 support workers, clinicians, nurses, teachers, case managers, psychiatrists, and others provide help and support to more than 19,000 people each year in over 60 locations throughout Vermont. 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 and Sexual Harassment 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 youth 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.
- On an annual basis, each program has a meeting to address any areas of concern, to review protective factors that are in place to prevent incidents and to make any recommendations to further enhance the safety of the program.

Sexual Abuse and Sexual Harassment Allegations Data for 2024

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	1	1	0
<i>Transition House</i>	0	0	0	0
<u>Previous Years Data</u>				
2023 Data				
<i>Park Street Program</i>	0	0	1	0
<i>Transition House</i>	0	0	0	0
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 2024 and neither youth are adjudicated. Both cases came into the custody of DCF as a CHINS.

In 2024 Park Street provided services to 9 youth and there was one reported case of youth on youth sexual victimization.

The one alleged incident of youth-on-youth sexual harassment reportedly took place in the kitchen area of the residence. The reported incident involved a youth alleging that another youth had exposed his private parts to him. The incident was unfounded after viewing video footage. The alleged victim had made a false allegation regarding their peer. It was recommended that this youth be discharged from the program due to creating several unsafe situations in the program and causing disruption to the

treatment of other youth. Given the lack of availability for an alternative placement for this youth, they were staffed 1:1 always and kept separate from the milieu until such time that a new placement was found.

There was also one incident discovered in the same youth's journal claiming a staff on youth sexual victimization had occurred. The reported incident reflected in the entry of the youth's journal, alleged that a staff member had engaged in sexually abusive contact with them at the Fay Honey Knopp Memorial School while responsible for their 1:1 care. Upon discovery of the journal, the youth had been discharged from the program due to a mental health crisis. A report of the abuse was called into DCF Centralized Intake and was accepted for a Chap 49 investigation. The staff member alleged to have engaged in the sexual abuse was placed on administrative leave until the investigation was closed. The finding of the investigation determined this allegation to be unfounded, given the youth reported, their journal entry was not true and instead a sexual fantasy given the youth's sexual attraction to the staff member.

Given this youth's history of making similar false allegations prior to their admission to Park Street with the goal to address their sexually problematic behavior, it was determined quickly that the youth was too unstable to engage in services offered, and too disruptive to the therapeutic needs of others, thus a recommendation for discharge was determined.

The significance of lived trauma and the acuity of care for youth reenacting their exposure to abusive life experiences has been heightened in the youth being referred into the care at Park Street, thus the need for greater awareness and intervention to maintain the safety for all who live or work in this environment. Decisions to offer services to less kids, ensuring adequate staffing for the intensity of need and having a dedicated position to help train staff and build individualized programming for youth are some the strategies implemented to help address the areas of need and reduce the risk of sexually harmful behavior on campus. The ongoing use of the video surveillance system also helps to support a safer environment for all.

Transition House

From January 1, 2024, to December 31, 2024, Transition House served a total of 5 clients. Of these, one client was admitted to the house, while three clients were discharged from care. Only one youth admitted in 2024 was adjudicated and could be considered delinquent, though this same client was discharged from the program in the same year.

There were no allegations or instances of sexual abuse or harassment at Transition House for the year 2024. The Transition House continues to train staff and comply with all PREA regulations. Residents are given ongoing education regarding the program's Zero Tolerance policy for sexual abuse and harassment.

Conclusion

The number of sexual abuse and sexual harassment allegations continue to remain low. 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.

A handwritten signature in black ink, appearing to read "D. J. Kronoff", written over a horizontal line.

Dave Kronoff

Privacy Officer, PREA Coordinator and Health Informatics Regulatory Specialist

A handwritten signature in blue ink, appearing to read "Sandy McGuire", written over a horizontal line.

Sandy McGuire

Chief Executive Officer