

2023 PREA ALLEGATION SUMMARY REPORT & ASSESSMENT

Submitted by: Ramona Wheeler, CHRO, PREA Coordinator

This report is submitted in accordance with PREA §115.288 (a)(3), and may be viewed on the agency’s website, in accordance with PREA §115.288(c). Information contained in this report covers client sexual-related allegations received from January 1, 2023, through December 31, 2023. Earlier information may be found in the agency’s 2022, 2021 PREA Report(s). **Questions, or comments may be addressed by contacting us at: prea@alvis180.org.**

CENSUS SUMMARY

Number of persons under supervision of the facility on December 31, 2023:	Number of persons admitted during 2023 (from January 1 to December 31, 2023):
Facility Name, year-end headcount	Calendar year admissions total
Alum Creek Men -138 Alum Creek Women - 52	Alum Creek Men-1,528 Alum Creek Women -104
OhioLink – Lima-68	OhioLink-Lima-777
Price Hall-0 Dunning Hall-0 Breslin Hall - 0	Price Hall -0 Dunning Hall -0 Breslin Hall - 0
Work Release/POWER-79	Work Release/POWER (Jackson Pike) - 477
OL-Toledo: 51	OL-Toledo: 620
COPE-0 TCRC-131	TCRC: 1,583

ALLEGATIONS SUMMARY

<p>NUMBER OF REPORTED allegations of client-on-client SEXUAL HARASSMENT:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 1</p> <p>0</p> <p>0</p> <p>1</p> <p>0</p>
<p>NUMBER OF REPORTED allegations of client-on-client SEXUAL ABUSE:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded 	<p>TOTAL: 1</p> <p>0</p> <p>0</p> <p>1</p>
<p>NOTICE OF REPORTED allegations of client-on-client RETALIATION:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p>
<p>NUMBER OF REPORTED allegations of staff-on-client SEXUAL HARASSMENT:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 1</p> <p>1</p> <p>0</p> <p>0</p> <p>0</p>
<p>NUMBER OF REPORTED allegations of staff-on-client SEXUAL ABUSE:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 9</p> <p>4</p> <p>1</p> <p>4</p> <p>0</p>
<p>NUMBER OF REPORTED allegations of staff-on-client RETALIATION:</p> <ul style="list-style-type: none"> • Substantiated • Unsubstantiated • Unfounded • Investigation ongoing 	<p>TOTAL: 0</p> <p>0</p> <p>0</p> <p>0</p> <p>0</p>

NUMBER OF ALLEGATIONS IN 2023:	TOTAL: 14
• Substantiated	5
• Unsubstantiated	3
• Unfounded	6
• Investigation ongoing	0

ANALYSIS

During the 2023:

- Overall allegations have increased to 14 from 8 in 2022, and 10 in 2021;
 - *In 2023, 2,473 residents received education on the agency's zero tolerance policy against sexual harassment, sexual abuse, and retaliation; resident education included consequences for reporting false, and/or frivolous allegations.*
- Overall allegations increased to 14 in 2023, from 8 in 2022, and 10 in 2021, but decreased by 1 compared to 15 in 2020;
 - *In 2020 through 2021, resident living spaces were adjusted due to Covid-19, increasing physical separation in sleeping areas, common areas, and the use of shower/restroom facilities. It is estimated that this had a significant impact on the reduction of sexual misconduct, as any physical contact presented to residents an increased risk of Covid-19 exposure.*
 - *In 2022, Alvis hired a program liaison to assist with PREA compliance, staff/contractor/volunteer training, resident education.*
 - *Of 14 allegations in 2023, 6, or 42.8 %, were Unfounded, and 3, were Unsubstantiated. However, 37% were Substantiated.*
- The most common reason for unfounded [sexual harassment] allegations continues to be related to reports of inappropriate resident comments, and gestures;
- Allegations of staff retaliation against a resident related to a reported allegation of sexual abuse remain at 0 in 2023;
- Allegations of resident-on-resident retaliation related to a reported allegation of sexual abuse remain at 0 in 2023;
- Allegations rose to 1 in 2023, decreased to 0 in 2022, from 1 in 2021, and 6 in 2020, of resident-on-resident sexual harassment;
- Reports of prior sexual abuse during incarceration remained at 1 in 2023, compared to 1 in 2022, compared and 0 in 2021. The head of the facility/institution is notified of the reports when cases are received by residents.

IMPROVEMENTS

Based on information received and reviewed of resident reports of sexual abuse, sexual harassment, and retaliation, Alvis continued the following action steps, implemented in 2023:

- Internal facility site reviews being conducted by an in-house team comprised of multiple areas of oversight, to provide ongoing assessment of key operational areas (e.g., PREA Intake screenings/re-screenings, housing and bed assignments of residents deemed as high risk for sexual abuse, or sexual abusiveness);
- In 2023, Alvis implemented a PREA team to assure ongoing staff training, and resident education on PREA policies and procedures, client rights; a state of “audit-readiness” in residential facilities; and, timely response to allegations of resident sexual abuse, sexual harassment, and /or retaliation;
- Alvis successfully renewed a documented Memorandum of Understanding (MOU) with local sexual abuse organizations (e.g., SARNCO) in Ohio cities where Alvis operates residential programs: Chillicothe, Lima, and Toledo (a documented MOU with Columbus law enforcement is currently in place), and which conduct criminal investigations of reported allegations of resident sexual abuse.

GENERAL SUMMARY

Alvis continues to emphasize a zero-tolerance policy with respect to resident sexual abuse, harassment, and retaliation. Internal site reviews are conducted quarterly as a proactive approach to resident supervision, and monitoring of facilities to prevent, detect, and report client sexual harassment, sexual abuse, and retaliation. During 2023, Alvis continued the practice from 2021-2022, whereby employees continued to receive monthly PREA refreshers on various PREA standards via the Relias eLearning system, and virtual in-person sessions (e.g., Teams, Zoom). Alvis continued with in-person site reviews during 2023, as the pandemic status in communities expired.

Alvis has imposed disciplinary action, up to, and including termination, for staff (including contractors) substantiated allegations of sexual harassment, and sexual abuse of residents. Unfounded allegations have resulted in additional resident education, resident violations, and staff training. The predominate area for staff training, or re-training is on first responder procedures, and boundaries with residents in order to manage agency staff turnover. Specialized training for medical, and mental health staff is targeted for 2024, and will be provided via webinars, and n-person facilitated training for new hires in the agency’s Behavioral Health service line. There were no new facility directors hired in 2023 to receive training in administrative investigations related to sexual misconduct, and client sexual victimization.

Alvis is actively taking steps toward ongoing, full PREA compliance. Employee training and resident education is conducted throughout the year on Alvis policies and procedures on the prevention, detection, and reporting of resident sexual abuse, sexual harassment, and

retaliation; working with vulnerable populations, and residents' right to be free from sexual abuse, sexual harassment, and retaliation.