

2022 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, 2022, through December 31, 2022. Earlier information may be found in the agency’s 2020, 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, 2022:	Number of persons admitted during 2022 (from January 1 to December 31, 2022):
Facility Name, year-end headcount	Calendar year admissions total
Alum Creek (North & South combined -99	Alum Creek North-180 Alum Creek South -289
OhioLink – Lima-72 ACRP – Harmon Ave. - 45	OhioLink-Lima-259 ACRP Harmon Ave. -168
Price Hall-24 Dunning Hall-22 Breslin Hall - 0	Price Hall -87 Dunning Hall -136 Breslin Hall - 58
Work Release/POWER-78	Work Release/POWER (Jackson Pike) - 477
OL-Toledo: 50	OL-Toledo: 263
COPE-0 TCRC-134	TCRC: 568

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: 0</p> <p>0</p> <p>0</p> <p>0</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: 2</p> <p>2</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: 5</p> <p>2</p> <p>0</p> <p>3</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 2022:	TOTAL: 8
• Substantiated	4
• Unsubstantiated	0
• Unfounded	4
• Investigation ongoing	0

ANALYSIS

During the 3-year PREA cycle of 2020 – 2022:

- Overall allegations have decreased to eight (8) in 2022, compared with 10 in 2021, and 15 in 2020, or 47 percent;
 - *In 2022, 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 decreased to 10 in 2021, compared to 15 in 2020, or 34 percent;
 - *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 2018, Alvis fully implemented an Enhanced pat-down search procedure; most reported allegations in 2018 involving resident sexual abuse by a staff member were regarding a pat-down search, and were determined to be unfounded, or unsubstantiated.*
 - *Ongoing resident education, and increased resident accountability is estimated as a key impact with allegations made in bad faith, and a positive impact on the reduction of allegations in 2022.*
- The most common reason for unfounded [sexual harassment] allegations of sexual abuse in 2020, 2021, and 2022 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 2022;
- Allegations in 2021 of resident-on-resident retaliation related to a reported allegation of sexual abuse remain at 0 in 2022;
- Allegations 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 increased to 1 in 2022, compared with 0 in 2021, and 2 in 2020. 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 will continue the following action steps, implemented in 2023:

- Internal facility site reviews will be 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 will implement 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 will make a continued effort to establish documented Memorandums of Understanding (MOU’s) with local law enforcement 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 2021-2022, 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 resumed in-person site reviews during 2022, depending on CDC guidelines for congregate settings.

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. Specialized training for medical, and mental health staff in 2022 was provided via webinars, and continues to be a staple in staff training requirements for new hires in the agency’s Behavioral Health service line. New facility directors who participate in administrative investigations received specialized PREA training via National Institute of Corrections (NIC) online training, in 2020, 2021, and 2022.

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.