

Volunteers of America Mid-States

2019 PREA Annual Report

July 1, 2018-June 30, 2019

In accordance with 28 CFR 115.288-115.289

Volunteers of America Mid-States (VOA Mid) has historically embraced principles associated with the Prison Rape Elimination Act of 2003 (PREA). Prior to implementation of PREA in our programming, VOA Mid has always made it a priority to train and prepare staff to maintain standards that would prohibit inappropriate contact or relationships between staff and Clients. We have always maintained a high standard in requiring staff to attend trainings on boundaries that would assist in maintaining professionalism; including prevention of and elimination of possible sexual abuse or other inappropriate sexual behaviors within our facilities. As part of the Community Confinement Standard, our Halfway Back Mens Program held the primary responsibility of ensuring that all standards were followed under PREA zero tolerance of sexual abuse in confinement facilities since 2013. Over the years and expansion of our services, we have grown from serving a maximum of 50 men through the Department of Corrections to now serving over a possible 129 men and women in our fully functioning Addiction Recovery Services Residential and Outpatient Program. With this expansion and the increase in the population we serve, came the need to make significant modifications and improvements. In accordance with Standard 115.287, all data, collected, reviewed and aggregated in this report is from the fiscal year 2018-2019. In the following annual report, the findings will document improvements made to increase our efforts in effectively preventing sexual abuse, detection, response policy, practices and trainings.

At the close of fiscal year 2018, VOA Mid had three (3) designated residential treatment programs that met the criteria for "Community Confinement facilities." In the beginning of the fiscal year 2018, we began to identify a steady increase in our number of Clients through the Department of Corrections. More than half of the Clients entering our women's treatment program, and other men's residential program, were involved in the justice system through home incarceration, probation or parole, or corrections through counties outside of Jefferson County. To maintain compliance with PREA, we created our PREA Policy to cover our entire Addiction Recovery Services (ARS), which would involve all residential programming of three (3) sites.

Identifying Problem Areas/Corrective Action

During an initial audit halfway through 2018 fiscal year, VOA MID identified 14 out of 25 standards that were out of compliance with PREA. This process allowed VOA MID to bring the identified non-compliant areas into compliance. The below corrective actions are the results of this initial audit.

VOA MID requires a staffing plan to ensure safety and security of residents. Although our facility was observed to have enough staff on site and available, no plan was on file. VOA MID developed and documented a staffing plan for all three locations. A section in the staffing plan also documented video monitoring locations and access. An assessment of this plan was completed and deemed to meet PREA compliance.

A review of the hiring and promotion policy within VOA MID identified areas of improvement. To become compliant, VOA MID developed a procedure that documents how we prevent hiring and promoting anyone who has engaged in misconduct according to PREA policy. New hire and internal promotion applications have been modified to ask the questions according to the standard. The human resource department created a tracking system for background checks to comply with the standard that background checks are completed every 5 years.



Serving Kentucky, Tennessee, West Virginia, and Clark and Floyd Counties in Indiana.



VOA MID established contact with LMPD in order to ensure that a MOU is in place to comply with the standard addressing evidence protocols and forensic medical examinations. Once this was in place, VOA MID published our PREA Investigative policy on the VOA website. This publication required that it detailed the responsibilities of both VOA MID and LMPD in regards to conducting any criminal investigations.

During the auditor visit, it was noted that many of the staff interviewed were within less than a year of their employment and unclear of the PREA policy. To ensure that VOA MID comply with employee training requirements, ARS implemented a quarterly, mandatory training schedule utilizing the approved training curriculum. All staff and Interns are required to attend the PREA trainings. Additional training requirements and tracking of attendance was implemented for medical/mental health professionals along with specialized training for completing searches with the Transgender community.

Within 72 hours of admission into our programs and by 30 days, VOA MID PREA policy states that we are to complete a risk assessment of sexual victimization and sexual abusiveness. We identified that this practice was being completed regularly in the men's program. However, this was not the case in the women's program. To ensure compliance of this standard, the implementation of a tracking system was developed. This system tracks the date of the initial intake and triggers the date the re-assessment is to occur. A monthly PREA meeting is scheduled with the PREA Coordinator and Director to ensure completion of the assessments and assess for any problems with the KOMS.

VOA MID modified the agency protection against retaliation and reporting to residents to become compliant with PREA. The PREA Coordinator is the designated staff responsible for monitoring for retaliation, developed the coordinated response checklist and ensuring that all notifications are completed per the standard. The PREA Coordinator is also responsible for monitoring the compliance of reporting incidents, scheduling the review of investigations, and collecting required data under the supervision and direction of the Director of Addiction Recovery Services.

In fiscal year 2018-2019, VOA MID had two (2) incidents however, three (3) reports were completed due to one of the incidents involving two individuals. The incidents were reported and investigated per the policy and procedures with only one being substantiated. The below corrective actions are the result of the unsubstantiated and substantiated reports of sexual abuse in our facilities.

For the men's program, the review team had recommendations on one (1) substantiated case of staff on Client sexual abuse from October 2018. The Staff reported not being aware of PREA policy and procedure and no documentation was on file for the staff attending any trainings. The team recommended that all staff attend mandatory trainings and sign acknowledgment forms. There wasn't clarity around how many staff were on duty at the time of the incident and video monitoring was not accessible to all management. The team recommended that monitoring capabilities be approved for all management and fiscal year budget reviewed to ensure adequate staff are present on each unit.

For the men's program, the review team had a recommendation on one (1) unsubstantiated case involving searches from May 2018. The review team noted that inadequate staffing levels during the search and untrained staff as being a key factor. The recommendation was to conduct quarterly trainings for proper search procedure and increase staff during searches.

Assessment of Agency Progress in Addressing Sexual Abuse

One major example of progress that VOA MID has made in data collection and reporting is implementing procedures on data collection and monitoring. While working on strategic planning during the fiscal year annual reporting, PREA

monitoring has been added to the agency wide quarterly monitoring practice managed by the Manager of Quality Assurance. This practice will assist in maintaining accurate data for reporting on annual reports, for aggregation and corrective action planning. As noted in the chart below, data for fiscal year 2018-2019 was collected utilizing the above implemented practice and is the most accurate. The increase in the number of reported incidents, may be directly related to the lack of maintaining accurate data on site.

Community Confinement Facilities Total Allegations of Sexual Abuse	2015- 2016	2016- 2017	2017- 2018	2018- 2019
Substantiated	0	0	0	1
Unsubstantiated	1	0	1	2
Unfounded	1	0	0	0
TOTAL	1	0	0	3

Community Confinement Facilities Total Allegations of Sexual Harassment	2015- 2016	2016- 2017	2017- 2018	2018- 2019
Substantiated	1	0	0	0
Unsubstantiated	0	0	0	0
Unfounded	0	0	0	0
TOTAL	0	0	0	0

As VOA Mid- States continue to train staff and educate the Clients in regards to PREA, this allows for all to feel more comfortable and confident in reporting incidents. Having identified the PREA Coordinator as being the primary individual required to maintain the data accurately, allows for accountability.

In 2015, PREA Audits were conducted at one location for the one program at the time in which PREA standards were required. The facility was Shelby Men’s Halfway Back program. We were found to be 100% compliant with all standards. The women’s campuses and programs were not a part the audit until 2018. VOA MID-States will continue to make ongoing corrective action as needed to ensure compliance on all campuses of PREA Standards.

Approved by:



Jennifer Hancock, President and CEO