



Memorandum

To: Mr. Joseph Newman, CEO Cornerstone Programs Corporation
From: Michael Breedlove, Facility Director/PREA Coordinator
Date: 8/04/2017
Re: 2016 PREA in Review

Mr. Newman,

The content of this memorandum is a review of the sexual abuse and sexual harassment allegations made in 2016 and a plan of action.

It was reported that there were 4 reports of sexual victimization allegations for 2016. This represents a 100% increase in sexual victimization allegations when compared to the 2 sexual victimization allegations that were reported in 2015.

These numbers were reported for 2016 to the Bureau of Justice Statistics (BJS) in accordance with PREA definitions and categories as follows:

- There was 0 Youth-on-Youth Non-Consensual Sexual Act allegations reported.
- There was 0 Youth-on-Youth Abusive Sexual Contact allegations reported.
- There was 0 Youth-on-Youth Sexual Harassment reported.
- There were 4 Staff Sexual Misconduct allegations reported, with the following dispositions: 0 Substantiated, 1 Unsubstantiated, 3 Unfounded and 0 Ongoing Investigations

Cornerstone Programs and Garza County Regional Juvenile Center will continue to remain proactive in taking progressive and preventative steps in their efforts towards



eliminating sexual abuse and sexual harassment victimizations in our facility. The continued proactive steps to be taken are:

- Monitor and review for areas in the facility where “blind spots” may be identified and install additional cameras, as needed. It should be noted that in September 2016, 35 new cameras were added to the facility, expanding the number of cameras in use from 23 to 58. Additionally, the CCTV system was upgraded from an analog black and white system without recording capability to a fully HD color system with recording capability.
- Youth are assigned to housing using a Sexual Victimization Screening Tool that is utilized to allow staff to monitor and assign youth to housing, taking into account, a youth’s propensity to be victimized or act in a predatory manner. This Screening takes into account a youth’s age, stature, criminal history and/or LGBT status to ensure appropriate facility housing.
- During shower times, all youth are secured in their rooms, with the exception of the youth who are showering.
- Conduct Unannounced rounds/visits of the facility by shift supervisors, unit managers and facility administrators on all shifts monthly.
- Ensure that “Zero Tolerance” and “Break the Silence” posters are conspicuously displayed throughout the facility.
- Ensure that any the use of Safe Housing is only as a last resort and only after less restrictive measures are inadequate to keep a youth or other youth safe and only until an alternative means of keeping all youth safe can be arranged.
- Ensure that any youth in Safe Housing receive a daily visit from mental health and medical staff, as well as have access to large muscle exercises, education services/special education services. To the extent possible, while preserving safety and security, access to other programming or work details will be offered.
- Every 30 days, any youth in Safe Housing will be reviewed to ascertain if a need still exists to warrant the youth remaining in isolation.
- Monitor facility surveillance footage (live and recorded) weekly to ensure that youth are free from sexually abusive behaviors, as well as free from sexually harassing behaviors.
- Ensure that a 1 to 12 staff to youth ratio is maintained at all times during program hours.



- Ensure that all youth are accounted for by way of informal counts conducted randomly throughout the shift, as well as during formal counts.
- Ensure that staff maintain direct line of sight observation of youth at all times.
- Ensure that facility staff are trained in PREA during their orientation and then annually thereafter.
- Ensure that when a staff member of the opposite gender enter an area where youth may be showering, changing clothing or showering, announce themselves by stating, “Female on the Floor” or “Male on the Floor”.
- Ensure that all youth are oriented on PREA and informed on how to report any sexual misconduct allegation via the hotline, to staff, volunteers, through a formal grievance, advising a parent or a third party.
- Continue to conduct Criminal Records Check and Child Abuse Registry check on new employees, volunteers and contractors annually.
- If necessary, place vulnerable and or predatory youth on safety plans and monitor behaviors.
- Any youth who allege any sexual misconduct will be monitored for at least 90 days to ensure that retaliation does not occur.
- All victims of sexual abuse will receive trauma counseling services by a victim advocate at the University Medical Center Rape Crisis Center.
- The Facility Review Team will conduct Sexual Abuse Reviews for all unsubstantiated and substantiated incidents of sexual abuse or sexual harassment within 30 days of their disposition. If applicable, any recommendation made by the review team with regard to staffing, additional surveillance equipment or physical plant modifications will be forwarded to Cornerstone Programs Corporate leadership for review and if appropriate, implementation. All recommendations made during a Sexual Abuse Review should be taken into consideration to prevent sexual abuse and sexual harassment incidents from occurring.

A comparison was made between the 2015 and 2016 statistics in each reporting categories to ascertain progression or regression in the respective categories. As a result, it should be noted that there was a reduction in Youth on Youth sexual harassment allegations from 1 in 2015 to 0 in 2016, but there was an increase in Staff Sexual Misconduct allegations from 2 in 2015 to 4 in 2016.



Although none of the allegations made by youth in 2016 were substantiated, through review of the allegations, it was determined that the addition of cameras throughout the facility was a need. By installing additional cameras and moving from an analog black and white system to a full HD color system with recording capability, the facility would be able to produce video evidence that would help to determine the dispositions in a more expedient and effective manner. Additionally, it would help to deter youth from making false allegations against other youth and staff, while providing an additional measure of protection, by deterring individuals from acting out in inappropriate ways.

Through review of the allegations made by youth in 2016, no recommendations for additional staff, revisions to the staffing pattern or modifications to the physical plant were made, with the exception of upgrading the facility electronic surveillance system. Moving forward, facility staff and youth will be updated/trained on PREA requirements, as well as methods of reporting. Unannounced PREA checks will continue to monitor staff and youth safety, as well as to ensure that the Zero Tolerance policy is maintained and enforced.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Breedlove". The signature is fluid and cursive.

Michael Breedlove
GCRJC Facility Director/PREA Coordinator