



Memorandum

To: Mr. Joseph Newman, President/CEO Cornerstone Programs
From: Michael Breedlove, Facility Director/PREA Coordinator
Date: 12/28/2020
Re: 2019 PREA in Review

Mr. Newman,

The content of this memorandum is a review of the sexual abuse and sexual harassment allegations made in 2019 and a plan of action.

It was reported that there was 1 report of sexual victimization allegations for 2019. This represents a 50% decrease in sexual victimization allegations when compared to the 2 sexual victimization allegations that were reported in 2018.

These numbers were reported for 2019 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 1 Youth-on-Youth Sexual Harassment reported.
- There were 0 Staff Sexual Misconduct allegations reported, with the following depositions: 0 Substantiated, 0 Unsubstantiated, 0 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. The program continues to utilize the camera system which was upgraded in 2018.
- 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. No youth were assigned in safe housing in 2019.
- 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 8 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 or changing clothing, 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 2018 and 2019 statistics in each reporting categories to ascertain progression or regression in the respective categories. As a result, it should be noted that there was an increase in Youth-on-Youth sexual harassment allegations from 0 in 2018 to 1 in 2019. However, there was a significant reduction in Staff Sexual Misconduct allegations from 2 in 2018 to 0 in 2019.

Although the allegation made by youth in 2019 was not substantiated, a sexual abuse review was conducted. No changes to the physical plant, policy or augmentation of the facility surveillance system were suggested.



Through review of the allegations made by youth in 2019, no recommendations for additional staff, revisions to the staffing pattern or modifications to the physical plant were made. 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 blue ink, appearing to read "Michael Breedlove".

**Michael Breedlove
GCRJC Facility Director/PREA Coordinator**

Approved:

A handwritten signature in blue ink, appearing to read "Joseph Newman".

**Joseph Newman
President/CEO Cornerstone Programs**