



# Memorandum

**To:** Mr. Joseph Newman, CEO

**From:** Michael Breedlove, Facility Director/PREA Coordinator

**Date:** 12/27/2019

**Re:** 2018 PREA in Review

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Mr. Newman,

The content of this memorandum is a review of the sexual abuse and sexual harassment allegations made in 2018 and a plan of action.

It was reported that there were 2 reports of sexual victimization allegations for 2018. This represents no change in sexual victimization allegations when compared to the 2 sexual victimization allegations that were reported in 2017.

These numbers were reported for 2018 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 2 Staff Sexual Misconduct allegation reported, with the following disposition: 0 Substantiated, 0 Unsubstantiated, 2 Unfounded and 0 Ongoing Investigations
- There was 0 Staff Sexual Harassment allegation reported, with the following disposition: 0 Substantiated, 0 Unsubstantiated, 0 Unfounded and 0 Ongoing Investigations
- There were no youth placed in Safe Housing during 2018.



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 calendar year 2018, 3 new cameras were added to the facility, expanding the number of cameras in use from 69 to 72.
- 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 2017 and 2018 statistics in each reporting category to ascertain progression or regression in the respective categories. As a result, it should be noted that there was a decrease in Staff on Youth sexual harassment allegations from 1 in 2017 to 0 in 2018, however, there was an increase in Staff Sexual Misconduct allegations from 1 in 2017 to 2 in 2018.



Through review of the allegations made by youth in 2018, no recommendations for additional staff, revisions to the staffing pattern or modifications to the physical plant were made, with the exception of installation of additional cameras. Moving forward, facility staff and youth will continue to be 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', with a long horizontal flourish extending to the right.

Michael Breedlove  
GCRJC Facility Director/PREA Coordinator