



## 2020 Prison Rape Elimination Act (PREA) Annual Report

**Introduction** The Prison Rape Elimination Act was originally developed for adult prison inmates. Even though Crossroads for Youth is not a prison, the agency has residential custody of youth. Therefore, we fall under the Juvenile Standards of this act.

The agency has developed policies and procedures in compliance with PREA, and the Department of Human Services has approved them. The purpose of the agency practices is to ensure that all employees, interns, regular volunteers, and contractors understand and comply with these policies and procedures, and the youth are aware of their rights.

This Act came about because of the increase in sexual assault, abuse, and harassment in adult prisons over the last couple decades. A person under the care of people with authority over him is in a vulnerable state, and authority figures can sometimes abuse their power. Residents may also seek to make victims of other residents in residential care, and may take advantage of hidden spaces and staff's lack of attention to perpetrate these acts. This Act helps residential institutions learn to prevent, detect, and respond to incidents of sexual abuse, assault, and harassment, whether perpetrated by a staff or another resident.

### Investigations and Incidents

#### Zero Tolerance Policy

Crossroads for Youth has established a zero tolerance policy for sexual abuse and sexual harassment. Zero tolerance means that there are no exceptions to the requirement of fully following the policies and procedures. Any violation of the policies and procedures will result in one or more of the following actions for: staff in violation—discipline, criminal charges, termination; or youth in violation—removal from the Agency, loss of privileges, criminal charges.

- Allegations of youth-on-youth nonconsensual sexual acts: 0
- Allegations of youth-on-youth abusive sexual contacts: 0
  - Allegations substantiated: 0
  - Allegations unsubstantiated: 0
  - Allegations unfounded: 0
  - Allegations ongoing: 0
- Allegations of youth-on-youth sexual harassment: 0
- Allegations of staff sexual misconduct: 0
  - Allegations substantiated: 0
  - Allegations unsubstantiated: 0
  - Allegations unfounded: 0
  - Allegations ongoing: 0
- Allegations of staff sexual harassment: 0



### Daily Population Report

Month	Total Monthly Admissions	Total Monthly Discharges	Total Youth Served
January	4	4	17
February	2	4	15
March	1	1	12
April	1	5	12
May	0	1	7
June	0	1	6
July	3	0	8
August	7	3	15
September	4	3	16
October	1	3	14
November	2	0	13
December	5	3	18
		Total Served Annually	153

### Reporting

Anyone can report an allegation or suspected incident of sexual abuse or sexual harassment; including youth, staff, or third parties. This can include allegations that may have occurred at another facility. At Crossroads for Youth, there are multiple options to file a report; including, but not limited to:

- Send a letter to the PREA Coordinator or Compliance Manager(s) at the listed administrative address:  
 930 East Drahner Oxford, MI 48371.  
 Attention: Rebecca Price, PREA Coordinator  
 Attention: Robyn Ankawi, PREA Compliance Manager  
 Attention: Cynthia Villa, PREA Compliance Manager
- Youth may notify any staff member either verbally or in writing or they may call the main line and submit an anonymous report: 248-628-2561 ext. 200
- Staff may report allegations via their chain of command or anonymously through the above main line, in addition to calling CPS. 855-444-3911
- Staff and third parties may contact the agency's PREA Coordinator, Compliance Manager(s), file a grievance, call CPS, and/or notify the youth's caseworker (may do so anonymously).

It is not required that any personal information be provided. However, the more information that can be provided regarding dates, times, locations, witnesses, and as much detail about the alleged incident as is known serves to assist staff and law enforcement in their efforts to successfully conduct the investigations.



## **Definitions**

**Sexually Abusive Contact:** Touching without penetration of the genitalia, anus, groin, breast, inner thigh, or buttocks, either directly or through clothing, of another person.

**Sexually Abusive Penetration:** Contact between the penis and vagina or the penis and anus, contact between the mouth and the penis, vagina, or anus, or penetration of the anal or genital opening of another person by hand, finger, or other object.

**Indecent Exposure:** The display by a staff member of his/her genitalia, buttocks, or breast in the presence of a youth.

**Voyeurism:** An invasion of the youth's privacy by a staff member unrelated to official duties, such as peering at a youth who is showering or undressing or requiring a youth to expose him or herself for reasons unrelated to official duties.

**Sexual Harassment:** Repeated verbal statements, comments, or behaviors of a sexual nature to a youth by any individual including threats, extortion, bribery, demeaning references to gender, derogatory comments about body or clothing, or profane or obscene language, gestures, or written comments.

**Note:** Youth in residential care sometimes make inappropriate sexual comments or gestures, and sometimes expose their privates. In these cases, although not considered sexual abuse, the acts are certainly inappropriate and should result in an Incident Report and the youth should be held accountable. If a youth has sexually abusive contact with a staff, the agency will contact the police and appropriate follow-up action will occur.

## **PREA Coordinator Review of Corrective Actions**

§ 115.313 Supervision and monitoring:

(e) Each secure facility shall implement a policy and practice of having intermediate-level or higher level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Such policy and practice shall be implemented for night shifts as well as day shifts. Each secure facility shall have a policy to prohibit staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility.

**Corrective Action Steps:** Crossroads for Youth previously implemented the MDHHS-5830-PREA Unannounced Rounds form in 2019 but after an initial MDHHS audit in 2020, a technical assistance was provided to maximize the usage of this form and process. In the Comments section, "No PREA" was being used for the unannounced rounds. Per the MDHHS auditor, the agency now records a description of staff placement in relation to youth, making note of any potential line-of-sight issues. In addition, unannounced rounds were not being conducted during "peak times;" (between 2-4am) the agency ensures "peak time" rounds are being made on an ongoing basis.