



2021 Wolverine Human Services PREA Annual Report

BACKGROUND: The Prison Rape Elimination Act (PREA) was passed by Congress and signed into law by President George W. Bush in 2003 to detect, prevent, and respond to sexual abuse that occurs in confinement settings. The National Prison Rape Elimination Commission developed national standards for reducing prison rape, which became final on June 20, 2012, when they were published by the Department of Justice (DOJ) in the Federal Register. PREA applies to all adult prisons and jails, juvenile residential treatment facilities, lockups, and community confinement facilities. Implementation of the PREA standards in combating sexual abuse in juvenile residential treatment facilities will be contingent upon effective agency and facility leadership, and the development of an agency's principles prioritizing efforts to combat sexual abuse. The prevention of rape, sexual assault, or sexual misconduct is a top priority for Wolverine Human Services. We have zero tolerance for any incidence of rape, sexual assault, or sexual misconduct; and make every effort to comply with applicable components of PREA.

Pursuant to PREA standard 115.387; (a) the agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions, (b) the agency shall aggregate the incident-based sexual abuse data at least annually, (c) the incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice, (d) the agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews, € the agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents, (f) upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

Subsequently, these statistics are published in an annual report made public via the Wolverine Human Services website, the annual report covers the reporting period from January 1, 2021, to December 31, 2021.

DEFINITIONS: Once a report of sexual abuse has been accepted and investigated, the incident will be classified using one of the following findings:

SUBSTANTIATED – allegation is supported by preponderance of the evidence (51%), indicating that it is more probable than not that the incident took place. A determination that an allegation is substantiated under PREA guidelines is not a determination of guilt.

UNSUBSTANTIATED – insufficient evidence to prove or disprove the allegation.

UNFOUNDED – allegation is false or the agency that completes the investigation states that the allegation is unfounded.

Client on Client sexually abusive penetration - any sexual penetrations by a client of another client. The sexual acts included are contact between the penis and the vagina or the anus; contact between the mouth and the penis, vagina or anus; or penetrations of the anal or genital opening of another client by hand, finger, or other object.

Client on Client sexually abusive contact – non-penetrating touching (either directly or through the clothing) of the genitalia, anus, groin, breast, inner thigh, or buttocks without penetration by a client of another client, with or without the latter’s consent, or of a client who is coerced into sexual contact by threats of violence, or of a client who is unable to consent or refuse.

Client on Client sexual harassment – repeated and unwelcome sexual advances, requests for sexual favors, verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one client directed toward another.

Staff on Client sexually abusive penetration – sexual penetration by a staff member of a client, including contact between the penis and vagina or anus; contact between the mouth and the penis, vagina or anus, or penetration of the anal or genital opening of a client by hand, finger, or other object.

Staff on Client sexually abusive contact – includes non-penetrating touching (either directly or through the clothing) of the genitalia, anus, groin, breast, inner thigh, or buttocks by a staff member of a client that is unrelated to official duties.

Staff on Client sexual harassment – repeated verbal comments or gestures of a sexual nature to a client by a staff member. Such statement include demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or profane or obscene language or gestures.

Staff on Client indecent exposure – the display by a staff member of his or her uncovered genitalia, buttocks, or breast in the presence of a client.

Staff on Client voyeurism – an invasion of the client’s privacy by staff for reasons unrelated to official duties or when otherwise not necessary for safety and security reasons.

Staff sexual misconduct – includes any behavior or act of a sexual nature directed toward a student by an employee, volunteer, contractor, official visitor, or other agency representative. Sexual relationships of a romantic nature between staff and client(s) are included in this definition.

Sexual exploitation – includes allowing, permitting, or engaging a client to engage in prostitution, or allowing permitting, encouraging, or engaging in the photographing, filming, or depicting of a client engaged in a sexual act.

PREA Allegations January 1, 2021 – December 31, 2021, Data Reported

There were six allegations received, five of which were Client-on-Client and one of Staff-on-Client.

Client on Client

Of the five allegations, three were sexually abusive penetration, one was sexually abusive contact, and one was sexual harassment.

Staff on Client

The allegation was sexual misconduct.

Allegations by program site, classification, and determination:

PWLC (1)

Client on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0
Abusive Penetration	0	0	1
Sexual Harassment	0	0	0
TOTAL:	0	0	1
Staff on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0
Abusive Penetration	0	0	0
Sexual Harassment	0	0	0
Indecent Exposure	0	0	0
Voyeurism	0	0	0
Sexual Misconduct	0	0	0
Sexual Exploitation	0	0	0

TOTAL:	0	0	0
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Vassar House (2)

Client on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0
Abusive Penetration	0	0	1
Sexual Harassment	0	0	0
TOTAL:	0	0	1
Staff on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0
Abusive Penetration	0	0	0
Sexual Harassment	0	0	0
Indecent Exposure	0	0	0
Voyeurism	0	0	0
Sexual Misconduct	0	0	1
Sexual Exploitation	0	0	0
TOTAL:	0	0	1

WSTC (3)

Client on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	1	0	0
Abusive Penetration	0	0	1
Sexual Harassment	1	0	0
TOTAL:	2	0	1
Staff on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0
Abusive Penetration	0	0	0
Sexual Harassment	0	0	0
Indecent Exposure	0	0	0
Voyeurism	0	0	0
Sexual Misconduct	0	0	0
Sexual Exploitation	0	0	0
TOTAL:	0	0	0

CFC (0)

Client on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0

Abusive Penetration	0	0	0
Sexual Harassment	0	0	0
TOTAL:	0	0	0
Staff on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0
Abusive Penetration	0	0	0
Sexual Harassment	0	0	0
Indecent Exposure	0	0	0
Voyeurism	0	0	0
Sexual Misconduct	0	0	0
Sexual Exploitation	0	0	0
TOTAL:	0	0	0

WGRC (0)

Client on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0
Abusive Penetration	0	0	0
Sexual Harassment	0	0	0
TOTAL:	0	0	0
Staff on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0
Abusive Penetration	0	0	0
Sexual Harassment	0	0	0
Indecent Exposure	0	0	0
Voyeurism	0	0	0
Sexual Misconduct	0	0	0
Sexual Exploitation	0	0	0
TOTAL:	0	0	0

Wolverine Center (0)

Client on Client	Substantiated	Unsubstantiated	Unfounded
Abusive Contact	0	0	0
Abusive Penetration	0	0	0
Sexual Harassment	0	0	0
TOTAL:	0	0	0
Staff on Client	Substantiated	Unsubstantiated	Unfounded

Abusive Contact	0	0	0
Abusive Penetration	0	0	0
Sexual Harassment	0	0	0
Indecent Exposure	0	0	0
Voyeurism	0	0	0
Sexual Misconduct	0	0	0
Sexual Exploitation	0	0	0
TOTAL:	0	0	0

PREA Compliance Activities and Investigations of Allegations

Wolverine Human Services has a zero-tolerance policy relating to sexual assault/rape of a client and will cooperate in any investigation and prosecution of anyone involved in a sexual assault/rape of a client. The primary responsibility of all Wolverine Human Services employees is client safety. This policy shall be followed in conjunction with all Federal and State mandatory reporting requirements.

All sexual abuse allegations are reported to the proper authorities for investigation. WHS cooperates with the investigative agency and follows up with any findings or recommendations from the investigation.

WHS PREA Coordinator conducts internal Critical Incident Reviews on reported sexual abuse allegations. The review consists of environmental factors, human factors, system factors, as well as any corrective actions items that need to be addressed. If system issues are identified, these are shared with other Wolverine Human Services programs to ensure that each program has an effective process in place for the safety of our residents.

2021 PREA Audit for PWLC

In March 2021, PWLC was audited by the State of Michigan and Department of Justice. The auditors found PWLC to be compliant.

2021 PREA Audit for Vassar House

In March 2021, Vassar House was audited by the State of Michigan and Department of Justice. The auditors found Vassar House to be compliant.

Submitted By,

Todd Butterfield, LLMSW, CADC

WHS PREA Coordinator

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Todd Butterfield LLMSW CADC

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