



Annual PREA Report (Clarence Fischer Center)

1. Facility Information

- **Facility Name:** Clarence Fischer Center
 - **Facility Type:** Residential Treatment
 - **Facility Address:** 1020 Commerce Dr., Vassar, MI 48768
 - **Agency Name:** Wolverine Human Services
 - **Reporting Period:** Calendar Year
 - **PREA Coordinator:** Tierra Steward
 - **Contact Information:** stewardt@wolverinehs.org
 - **PREA Compliance Manager:** Rachel Craig
 - **Contact Information:** craigr@wolverinehs.org
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2. Statement of Zero Tolerance

Wolverine Human Services has zero-tolerance for sexual abuse and/or sexual harassment of clients and has implemented a variety of prevention methods to achieve this that are in place at each juvenile justice residential facility. In addition, Wolverine Human Services will respond effectively to all allegations of sexual abuse or harassment to rapidly restore safety, attend to and support the victim, and promptly initiate the investigative process.

3. PREA Policies & Procedures

Wolverine Human Services has a zero-tolerance policy relating to sexual assault/rape of a resident and will cooperate in the investigation and prosecution of anyone involved in a sexual assault/rape of a Wolverine Human Services resident. The primary responsibility of all Wolverine Human Services employees is resident 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 followed up on. If system issues are identified, these are shared with other WHS programs to ensure that each program has an effective process in place for the safety of our residents.

WHS has reviewed and updated our PREA policy and supporting documents/forms to ensure full compliance is met per PREA and DCWL rules. Most recent PREA policy is dated January 2026.

4. Allegations of Sexual Abuse & Sexual Harassment

A. Allegations Received

Category	Number of Allegations
Youth-on-Youth Sexual Abuse	0
Staff-on-Youth Sexual Abuse	0
Sexual Harassment	12
Total Allegations	12

B. Disposition of Allegations

Outcome	Number
Substantiated	0
Unsubstantiated	1
Unfounded	11

C. Referrals

Type of Referral	Number
Michigan State Police / Local Law Enforcement	0
Michigan Centralized Intake (MDHHS)	0
Administrative Action	1

D. Trends or Patterns Identified

Of the 12 allegations received, 11 involved resident-on-resident sexual harassment and one involved staff-on-client sexual harassment by an individual external to the agency. The resident-on-resident allegations were reviewed and determined to be unfounded, and were instead classified as sexual acting-out behaviors. The staff-on-client allegation was determined to be unsubstantiated, and the external employee's contract with Wolverine Human Services was subsequently terminated.

5. Reporting, Investigations & Response

Pursuant to § 115.387 of the PREA standards (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. (e) 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, 2025 to December 31, 2025.

WHS provides individual therapy. WHS contracts with tele-psychiatrists and maintains an MOU with Tuscola County Child Advocacy Center.

6. Staff Training

All staff, contractors, and volunteers working directly with any of Wolverine's juvenile justice residents must be effectively trained in methods by which to both prevent sexual harassment, assault, and/or abuse and to respond to any allegations of harassment, assault, and/or abuse. To achieve this, Wolverine Human Services provides initial training and subsequent annual refresher training to all Staff, contractors, and volunteers.

WHS employed 83 employees during the 2025 calendar. All new employees were trained on our PREA and supporting policies during new employee orientation. Annual refresher trainings are scheduled throughout the year to review current policies and address updates and revisions made to said policies.

7. Youth Education

The Wolverine Human Services Resident orientation process includes policy and procedures relating to prevention of and response to reports of sexual assault/rape. Orientation is provided within the first 72-hours of a clients admission and comprehensive PREA education are provided within 10 days of intake. A refresher is provided annually thereafter. The information provided must include but is not limited to:

- a. Wolverine Human Services *Prevention of Sexual Assault and/or Sexual Harassment Policy*.
- b. Self-protection including avoiding risky situations related to sexual assault prevention/intervention.
- c. Reporting Procedures; how to report rape, sexual activity, sexual abuse, or sexual harassment. Multiple reporting options at WOLVERINE include: 1) Verbally to any Staff, counselor, or Administrator; 2) in writing to any Staff, counselor, or Administrator; 3) in writing through the Resident and family Grievance process; and 4) Externally by telephoning Children's Protective Services toll free. Anonymous and third-party reports must also be accepted.
- d. Treatment and counseling, how to obtain counseling services and/or medical assistance if victimized.
- e. Protection against retaliation.
- f. Risks and potential consequences for engaging in any type of sexual activity while at the Facility.
- g. Potential disciplinary action(s) for making false allegations.

The information will be provided verbally and in written form, and the information must be presented in a language and format that each resident can understand, so that all clients are enabled to benefit from the full protections and rights afforded by PREA. In the event a client's disability, such as being deaf, visually impaired or otherwise disabled, a qualified outside source will be brought to the facility to interpret the information in the appropriate manner.

The use of resident interpreters is prohibited except in limited circumstances when delay in translation could compromise resident safety or the performance of first responder duties.

8. Staffing, Supervision & Monitoring

- **Staffing plan in place:** Yes
- **Video monitoring utilized:** Yes
- **Unannounced supervisory rounds conducted:** Yes

All staff must maintain vigilant supervision in accordance with Prison Rape Elimination Act (PREA) standards, recognizing that sexual assault can occur in any area of a residential facility. Required staff-to-resident ratios must be upheld at all times, with supervision during waking hours not exceeding one staff member to three residents (1:3) and during non-waking hours not exceeding one staff member to six residents (1:6). Staff must remain alert to behavioral warning signs that may indicate a resident has been sexually assaulted or fears sexual assault, including but not limited to isolation, depression, aggression toward others, refusal to shower, suicidal thoughts or actions, or seeking protection from staff. Staff must also be able to identify sexually aggressive behaviors, such as a history of sexual offenses, extortion or intimidation tactics, targeting vulnerable residents, voyeuristic or exhibitionistic behavior, and difficulty controlling anger. To ensure resident privacy and safety, all staff of the opposite gender must announce their presence when entering resident housing units and any areas where residents may be showering, changing clothing, or performing bodily functions.

Wolverine Human Services installed a video monitoring system prior to August 20, 2012. The system is actively monitored and is loop-recorded for use in post-incident investigations.

9. Corrective Actions & Continuous Improvement

Our CFC facility began serving the juvenile justice population on 7/15/24. All PREA policies have been reviewed and updated as needed to meet PREA standards and DCWL rules. WHS has filled the roles of PREA Coordinator and PREA Manager as required by the PREA standards. Annual staffing plan will be reviewed in February 2026. Initial PREA audit will occur in April 2026.

10. PREA Audits

- **Date of most recent PREA audit:** April 2026
- **Auditor / Auditing Body:** Bridgette Collins
- **Audit conducted under DOJ PREA audit cycle:** Yes
- **Audit outcome summary:** TBD
- **Corrective action plan status (including Michigan oversight, if applicable):** TBD

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11. Data Review & Approval

This report has been reviewed and approved by agency leadership.

- **Name:** Rachel Craig
- **Title:** Compliance Manager

• **Signature:** *Rachel Craig*

• **Date:** 2/4/2026

12. Public Availability

Wolverine Human Service's annual PREA reports are made publicly available while protecting confidentiality, consistent with PREA §115.387 and Michigan transparency requirements. You can view the annual PREA reports on our agency website at www.wolverinehs.org.

This report is prepared in accordance with the Prison Rape Elimination Act (28 CFR Part 115, Subpart D – Juvenile Facilities) and applicable Michigan laws, MDHHS licensing rules, and contractual requirements.