



M I R R O R

P 785.783.3274

F 785.215.6087

www.MirrorInc.org

2016 PREA Annual Report

Melissa Goodman, PREA Compliance Manager

Reviewed and approved by: Ken McGill, PREA Coordinator

January 4, 2017

Mirror is committed to meeting the requirements of the Prison Rape Elimination Act of 2003 and enhancing the safety and security for all Mirror residents. This report is a summary of the agency's efforts in PREA compliance. By examining the collection and aggregation of agency data, Mirror is dedicated to improving the effectiveness of sexual abuse detection, prevention, and response.

Purpose:

This document serves as an annual review to assess and improve the effectiveness of sexual abuse prevention, detection, and response policies, practices, and training Mirror provides pursuant to §115.288 and §115.289 of the national PREA standards. Therein, Mirror is required to:

1. Review and aggregate incident-based sexual abuse data annually in order to improve the effectiveness of sexual abuse prevention, detection, and response policies, practices, and training to include:
 - a. Identifying problem areas;
 - b. Taking corrective action on an on-going basis; and
 - c. Preparing an annual report of its findings.
2. Compare the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse.
3. Publish the annual report on the Mirror website of its findings and corrective actions for each facility, as well as for the agency as a whole.

Aggregated Data:

Mirror collects data from the referrals for investigation of sexual abuse and sexual harassment; both offender-on-offender and staff-on-offender. The data in this section is based off of the 2015 Survey of Sexual Victimization, which will soon be compared upon the completion of the 2016 Survey of Sexual Victimization. For now, the figures below represent a culmination of the incidents, allegations and investigations of sexual abuse and sexual harassment at the Residential Reentry Centers for Mirror: Topeka RRC; Toben RRC; Pattie RRC. The data below includes all sexual abuse and sexual harassment allegations from all Mirror RRC facilities in CY2015 (Calendar Year= CY).

PREA Reports	Substantiated	Unsubstantiated	On-going Investigations
Resident Sexual Harassment	0	0	0
Resident Sexual Abuse	0	0	0
Staff on resident sexual harassment	0	0	0
Staff on resident sexual abuse	0	0	0
Total for Agency:	0	0	0

*The one PREA report that was made for the agency in CY 2016 was due to an incident reported regarding an incident that occurred at a transferring institution. The PREA report was passed on directly to the Bureau of Prisons by the PREA Coordinator. There were no in-house PREA reports made regarding any incidents that occurred at any of the three Mirror facilities. In CY 2015, the agency received no reports of sexual harassment or sexual abuse.

Problems Identified and Corrective Actions Taken:

In September of 2016, Mirror employed the services of Educorr Training to complete all necessary and required staff PREA training. The agency utilized the Educorr training model to standardize all PREA requirements for Mirror employees. In order to ensure adherence to policy, the agency network will now alert RRC Directors if a new employee has not completed their PREA training. Prior to September 2016, Mirror RRCs had yet to utilize a PREA screening tool that satisfied PREA standards 115.241 and 115.242. Mirror staff developed a screening tool that was found to be adequate for use, which has been used to screen all Mirror residents. With the implementation of the new screening tool, housing assignments are now made in accordance with the PREA screening results. The PREA audit also identified the following problem areas:

- MOUs were needed for the rape crisis centers and the local law enforcement agencies –**All Mirror RRC sites have completed MOUs to satisfy this standard as of 1/3/17**
- Applications did not have adequate language to inquire as to whether a new hire had previous allegations or charges for sexual abuse or harassment –**The agency has updated the employment application to satisfy this standard**
- RRC staff needed to acknowledge the training that they had received, as well as acknowledge that they had read and understand the PREA policy –**All staff reviewed the new PREA policy and signed an acknowledgement of training provided through Educorr**
- There was a need to formalize grievance procedures –**Documents and procedures were combined to formalize an internal and external grievance procedure process for the agency, which has now been added to all new intake binders for residents**

- Although several RRC staff are bilingual, there was a need to have a contract in place to utilize a translation service if there ever was such a need –**As of October 2016, Mirror now has an agreement with Universe Translation Services**
- Mirror needed a more comprehensive PREA Policy to ensure adherence to all PREA standards related to community confinement – **A thorough and comprehensive PREA policy was compiled and adopted by the Board of Directors for Mirror in October 2016**
- Mirror lacked the necessary PREA documents to be posted on the agency website –**SSVs, Annual Report for 2016, as well as the updated PREA policy have now been added to the agency website**
- Residents were initially being screened within a 3 day timeframe and were not routinely re-screened –**All residents will be screened immediately upon arrival, as well as re-screened within 30 days. All current residents have been re-screened with the new PREA screening instrument**
- A formalized staffing plan was deemed necessary to establish documentation of standard 115.213 –**The agency now has a formalized staffing plan that will be reviewed on an annual basis by the PREA Coordinator, PCMs, and RRC Directors**
- Mirror lacked a formal document to inquire about past sexual misconduct when a new employee came from a correctional facility –**A personal inquiry waiver has been created to send out to correctional facilities to ensure that Mirror does its best to not hire any transferring staff with current or past sexual misconduct allegations**
- The agency lacked a formal document to track retaliation monitoring –**The agency now has a 90-day retaliation monitoring form to be utilized following PREA reports**
- Program Technician staff needed to be more familiar and comfortable with their duties related to first responder duties –**All staff have been trained specifically on first responder duties, as well as supplied this information electronically with a reminder sheet that details these duties**
- A need was identified to ensure that all staff have access to PREA documentation through a shared facility drive –**The following documents are now readily available on the facility drive for all RRC staff: updated PREA policy, PREA screening tool, first responder duties, coordinated response, PREA checklist**

Continued Needs for Compliance:

- Documentation of Annual PREA Trainings
- Continued implementation of PREA screening instrument at all Mirror RRCs, which will then be used to determine appropriate housing
- Update to surveillance systems
- Continued focus on PREA training for all new staff
- Utilization of personal inquiry waiver for all new staff who are transferring from a correctional facility
- Enhanced data collection and aggregation
- Implementation of Sexual Abuse Incident Reviews
- Hiring of key security staff to implement safety plans for increased populations in 2017

Agency Goals for 2017:

It is the goal of Mirror that every resident in our care understand and exercise their right to be free from sexual abuse and sexual harassment from other residents, contractors, volunteers and staff. Mirror continues to implement best practice and requirements of the PREA standards in order to address allegations of sexual abuse and sexual harassments of offenders. Mirror is dedicated to

ensuring the sexual safety of all residents and every facility, which is a direct results of creating a culture that fully integrates and embraces the intent of the PREA standards and the highest level of sexual safety. Mirror will continuously identify problem areas in policies and practice at the agency level. The changes that have taken place in 2016 are a concerted effort for all Mirror employees to truly represent a zero-tolerance approach to sexual harassment and sexual abuse.