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**2014 Annual Internal Report on Sexual Assault Data**  
An Analysis of 2013 & 2014 Data within ODRC: The Initial PREA Effect

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**I. Introduction**

Each year, the Ohio Department of Rehabilitation and Correction collects accurate, uniform data for every allegation of sexual abuse and completes the Survey of Sexual Violence (SSV) report. The SSV report provides information on every allegation of inmate on inmate and staff on inmate sexual abuse and is posted on the DRC Internet to make available to the public. The following analysis is DRC's annual internal report that targets confirmed inmate on inmate and staff on inmate sexual abuse incidents. This report provides a comparison of incidents from 2013 and 2014 and will be utilized by the DRC PREA Coordinator to identify problem areas and formulate corrective measures in efforts of reducing future incidents of sexual abuse. This report is the third internal report since DRC's full implementation of the PREA standards audit cycle in 2014.

**II. Data**

The table attached to this report (**ODRC Sexual Assault Data 2013 & 2014**) provides the number of confirmed Staff on Inmate Contact Sexual Assaults and confirmed Inmate on Inmate Contact Sexual Assaults.

As depicted in the table, the number of staff on inmate contact sexual assaults increased from 3 incidents in 2013 to 14 incidents in 2014. About half of the staff on inmate incidents involved contractors and the other half were ODRC staff. Likewise, the number of inmate on inmate contact assaults also rose from 18 in 2013 to 28 in 2014. There does not appear to be a prevailing rationale or identifiable systemic issue for these increases other than PREA tools implementation. It is believed that the increases are likely attributed to the amount of investigative tools (ie. cameras) and significant measures implemented with PREA standard compliance strategies. It is critical to note that this is the first year of data (2014) presented during the PREA implementation efforts that went into full effect in January 2014. DRC's first 8 facilities successfully completed their initial PREA certification audits in calendar year 2014. The multitude of efforts and measures involved during this timeframe undoubtedly also impacted the number of reported allegations and substantiated cases.

In relation to inmate on inmate confirmed sexual assaults there are notable increases within this category at a few of the male facilities while female incidents have remained nearly identical to the previous year. An attributing factor to the increases is certainly due to the expansion of what is considered sexual abuse with the full onboarding of PREA definitions. In fact, there are no real graphic or serious cases of sexual assault within the 28 confirmed reports. Rather, the vast

majority of these incidents involved unwelcome touching types and other less threatening types of inappropriate physical contact. Prior to the PREA definitions of sexual assault applying, such cases were not consistently treated or classified as "sexual assaults".

**III. Problem Area Identification & Corrective Measures: The following highlights findings and corrective actions reported from confirmed sexual assaults for the agency as a whole. Findings and corrective actions for each facility with substantiated and unsubstantiated cases are also reviewed individually by the Agency PREA Coordinator and/or assigned PREA Audit Administrator. Each case's findings and corrective measures are shared directly with each facility's Operational Compliance Manager.**

**Staff on Inmate Contact Assaults**

- 1. Location of Incidents:** All substantiated incident locations were reviewed during the Sexual Assault Review Team process and measures to minimize blind spot concerns were implemented. There were some unsubstantiated cases however that were not reviewed timely.

**Corrective Measures:** Recently, the Regional PREA Audit Administrators implemented a more regular review of facility PREA incident logs. Additionally, BAPOC implemented a weekly review process of PREA incidents and other related information at the facility level with Operational Compliance Managers. More regular reviews will assist in identifying all SART applicable cases (substantiated and unsubstantiated) so that cases will not miss reviews. Additionally, all unsubstantiated and substantiated cases have a complete review at the Operations Support Center level and again this type of measure will ensure locations of incidents are properly evaluated and addressed if blind spot concerns are identified.

- 2. After-Incident Review Information:** The need for more readily accessible information from incidents still exists. It was projected that ODRC's PREA Incident Reporting System was being implemented in early 2015. However, due to competing information technology projects throughout the agency, the PREA Incident Reporting System was delayed and is still not implemented.

**Corrective Measures:** ODRC is on back on track to have a fully operational PREA incident reporting system implemented in early 2016. A snapshot of the system was actually presented in December 2015. Joint Application Development testing sessions have been scheduled for February 2016 with an implementation and training date projected soon afterward.

**Inmate on Inmate Contact Assaults**

- 1. Facility Types:** In 2014, the majority of the 28 confirmed cases occurred within a dorm-type setting (18) as opposed to a cell setting (10). The information available is limited from the SSV report in that it does not drill down further into actual location within the type of setting without a review of all paperwork for each incident. Despite the limited SSV information, all cases were reviewed at the OSC level by the Agency PREA Coordinator and PREA Audit Administrators.

**Corrective Measures:** The case reviews did not reveal any identifiable environmental differences (dorm vs. celled) in relation to sexual assault rates. A few cases did present unique areas of systemic concern (ie. recreation areas, isolated areas). 2015 case information will be more closely tracked for these types of systemic areas of concern to ensure proper blind spot controls are implemented to reduce occurrences.

- Inmate Disciplinary Actions:** Confirmed sexual assault is a behavior that clearly meets the criteria of ODRC's highest security level placement – 5B. Despite meeting the criteria, reviews have found that this is inconsistently being pursued by facilities.

**Corrective Measures:** The Bureau of Agency Policy & Operational Compliance will require confirmed sexual assault cases to be immediately reported upon the conclusion of the investigation. This measure will ensure that 5B placements are pursued in all applicable cases. Successful 5B placements that are warranted are critical to establishing a zero tolerance stance on sexual assault rather than merely increasing security levels by one step. One level increase often places an offender in yet another general population setting with some higher degree security controls thereby eliminating any potential deterrent effect.

- PREA Assessment & Classification Processes:** The ODRC PREA assessment and classification system is well functioning but there have been some systemic inefficiencies identified.

**Corrective Measures:** In addition to dedicated assessment training sessions with direct users, BAPOC worked with the field to develop the highest priority recommended improvements for the assessment system. A top priority list was presented to the system programmers and all options that were able to be adjusted were implemented. BAPOC PREA Audit Administrators will continually monitor and review field user feedback on the system adjustments to ensure optimal efficiencies are being achieved.

- Inmate Reporting Methods:** The establishment of the third party reporting system for inmates to utilize has definitely increased the number of allegations being reported. However, safety and anonymity concerns existed with having to utilize phone hotlines specifically in restrictive housing areas.

**Corrective Measures:** The third party reporting hotline method for ODRC has been successful in implementing more timely responses to allegations and facilitating a condition for offenders to be more apt to report by offering anonymity. However, it is very difficult to achieve being anonymous in a restrictive housing environment where phone locations can be visible to other offenders. Additionally, security concerns exist with having to move our most violent inmates out of cells for purposes of phone calls. Consistent with the PREA Resource Center FAQ's, ODRC established an MOU with the Department of Youth Services where offenders in restrictive housing areas can report allegations via mail. Anonymous mail collection processes not involving assigned officers have been implemented statewide as well with an immediate reporting system between DYS and ODRC.

#### **IV. Conclusion**

The data presented for 2014 indicating increases in both the number of Staff on Inmate and Inmate on Inmate sexual assaults was predicted in last year's report. 2014 marked the first year of ODRC's extensive efforts in fully implementing all aspects of the PREA standards. Parallel thinking to last year's report, it is expected that numbers may continue to increase during 2015 as well. ODRC's reporting and investigative strategies, to include continually enhanced surveillance systems, are still improving. Most notably, the PREA implementation plan continues to reinforce a zero tolerance environment that is absolutely shifting the culture that promotes victims to report rather than discouraging them.

Several corrective measures identified in last year's report have been completed. Successful actions include improving the annual DRC Staffing Plan process, added after-incident review strategies have been implemented, ODRC PREA policies were revised to improve clarity and direction to the field, PREA assessment and classification training efforts were targeted, and the PREA Compliance Review process was expanded so that each facility was evaluated. However, not all identified issues were entirely resolved. Therefore, in addition to this report's corrective measures, the previous internal report's actions must continue as follows:

1. The automated PREA Incident Reporting system needs to be fully implemented. This tool is critical in facilitating much easier information retrieval from all types of sexual assault cases. Additionally, the tool will improve all Investigator's abilities to handle all case documentation in one secure location.
2. PREA Assessment and Classification processes will need to continually improve by ensuring that PREA classified offenders are being managed in accordance with their classification. Related to assessments, PREA Accommodation Strategy Team documentation with accommodation requests must be maintained on all Transgender/Intersex offenders.
3. PREA Incident Summary case logs along with Sexual Assault Review Team documentation has to be reviewed on all internal management audits in efforts of decreasing time lapses with the identification of improperly handled cases and/or corrective actions not being implemented as recommended to Wardens.

A few final thoughts need to include mention of ODRC's ongoing PREA audit success. To date, 21 out of 27 adult correctional institutions have successfully achieved their PREA certification status with no formal corrective actions being required. PREA certification efforts are essential to the continued cultural and climate changes necessary within ODRC facilities that work towards eliminating sexual assault.

Some other factors contributing to ODRC's PREA efforts warrant recognition as well. Over the past year, several specialized training sessions were organized, led, and facilitated by BAPOC: 2016 PREA Facilities Planning Session 9/2015, Victim Support Training 10/2015, PREA Risk Assessment Training 10/2015, Operational Compliance Manager Training 11/2015, SAFE/SANE Training 11/2015, and Statewide Investigator Training 12/2015. The Agency PREA Coordinator also presented Ohio's PREA assessment system at the national ACA Conference in Long Beach, CA in February 2015. Further enhancing DRC's PREA compliance efforts is the fact that three

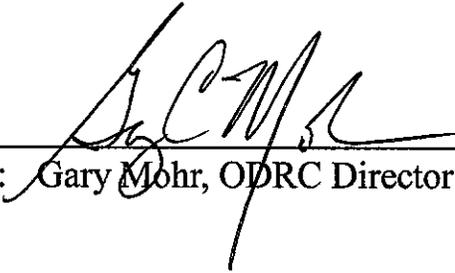
of the four assigned Audit Administrators within BAPOC are certified DOJ PREA auditors. The BAPOC Chief also completed the required DOJ training in September 2015 and is expected to be officially certified in early 2016.

The upcoming 2016 audit year is the final segment of the initial 3 year PREA certification cycle with only six adult correctional facilities left. The above overview, findings, and recommendations will serve as a primary guide for ODRC's continued PREA efforts. Efforts will also be modified as necessary by any rulings and/or standard changes set forth by the PREA Resource Center/DOJ FAQ guidance.



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ODRC Agency PREA Coordinator  
January 20, 2016



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Approved By: Gary Mohr, ODRC Director

**Ohio Department of Rehabilitation and Correction  
Sexual Assault Data 2013 & 2014**

	Staff on Inmate Contact Sexual Assault	Inmate on Inmate Confirmed Sexual Assault	Staff on Inmate Contact Sexual Assault	Inmate on Inmate Confirmed Sexual Assault
	2013	2013	2014	2014
AOCI	0	0	0	1
BECI	0	1	1	0
CCI	0	2	0	4*
CRC	0	1	0	2*
DCI	0	1	0	0
FMC	0	0	0	0
GCI	0	0	0	1
LECI	1	0	1	0
LOCI	0	2	1	1*
LORCI	0	1	0	1
MACI	0	0	2	1
MANCI	1	2	0	0
MCI	0	0	0	0
NCI	0	0	0	0
NEPRC	0	2	3	3
ORW	1	5	2	5*
OSP	0	0	0	0
PCI	0	0	0	5*
RICI	0	0	3	2
RCI	0	1	0	0
SCC	0	0	0	0
SOCF	0	0	0	0
TOCI	0	0	0	0
TCI	0	0	0	0
WCI	0	0	2*	2*
<b>TOTAL</b>	<b>3</b>	<b>18</b>	<b>15</b>	<b>28</b>

\*adjusted from SSV report



Department of  
Rehabilitation & Correction

John R. Kasich, Governor  
Gary C. Mohr, Director

**Privately Operated Facilities Housing Ohio Offenders  
PREA Incident Information for Calendar Year 2014**

**LAKE ERIE CORRECTIONAL INSTITUTION**, 501 Thompson Road, Conneaut, Ohio 44030  
Corrections Corporation of America – Nashville, Tennessee

*Sexual Misconduct Cases*

Inmate on Inmate Nonconsensual Sexual Acts	<b>Total 2</b>	Substantiated	0	Unsubstantiated	1	Unfounded	1
Inmate on Inmate Abusive Sexual Contacts	<b>Total 1</b>	Substantiated	0	Unsubstantiated	1	Unfounded	0
Staff Sexual Misconduct	<b>Total 5</b>	Substantiated	1	Unsubstantiated	2	Unfounded	2

*Sexual Harassment Cases*

Inmate on Inmate	<b>Total 5</b>	Substantiated	0	Unsubstantiated	4	Unfounded	1
Staff on Inmate	<b>Total 5</b>	Substantiated	0	Unsubstantiated	4	Unfounded	1

**NORTH CENTRAL CORRECTIONAL COMPLEX**, 670 Marion Williamsport Road, Marion, Ohio 43302  
Management & Training Corporation – Centerville, Utah

*Sexual Misconduct Cases*

Inmate on Inmate Nonconsensual Sexual Acts	<b>Total 0</b>	Substantiated	0	Unsubstantiated	0	Unfounded	0
Inmate on Inmate Abusive Sexual Contacts	<b>Total 4</b>	Substantiated	0	Unsubstantiated	3	Unfounded	1
Staff Sexual Misconduct	<b>Total 1</b>	Substantiated	0	Unsubstantiated	1	Unfounded	0

*Sexual Harassment Cases*

Inmate on Inmate	<b>Total 14</b>	Substantiated	1	Unsubstantiated	12	Unfounded	1
Staff on Inmate	<b>Total 5</b>	Substantiated	0	Unsubstantiated	3	Unfounded	2

PREA Standard 115.87e