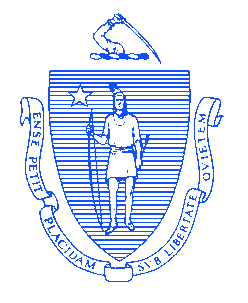
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##### The Commonwealth of Massachusetts

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# **CHARLES D. BAKER**

# **Governor**

**KARYN E. POLITO**

**Lieutenant Governor**

# **MARYLOU SUDDERS**

**Secretary**

#### 

#### **PETER J. FORBES**

### Commissioner

**ANNUAL REPORT**

**TO:** Peter J. Forbes , Commissioner

**FROM:** The Investigations Unit

**SUBJECT:** PREA Annual Report for January 2017 - December 2017

**DATE:** April 4, 2019

The Prison Rape Elimination Act (PREA) enacted in 2003, prohibits sexual misconduct in correctional settings such as prisons, jails, lockups, and juvenile facilities. Pursuant to 28 C.F. R. Part 115, the National PREA Standards to Prevent, Detect, and Respond to Prison Rape took effect on August 20, 2012; however, the Department of Youth Services (DYS) began implementing the standards in 2005, while they were still in draft form, and has been an active participant in the development and modifications of the standards.

The purpose of this report is to provide an accounting of the PREA related incidents processed by DYS in 2017, including corrective action undertaken to improve the effectiveness of our response policies and practices. This is the sixth annual PREA report by DYS. It includes a summary of new incidents and proposed corrective actions as well as an assessment of progress made toward any corrective actions identified in last year’s report. This allows us to continually gauge our progress and improve the effectiveness of our prevention, detection and response policies, practices and training.

As there were no policy or programmatic issues requiring corrective action identified in the 2016 report, DYS has continued its training and monitoring regarding PREA and the reporting process.

In 2017, DYS received twenty-two reports from youths alleging sexual abuse by program staff and thirteen reports from youths alleging sexual abuse by other youths.

**Sexual abuse** by staff is comprised of two categories under 28 C.F.R. §115.6: sexual misconduct and sexual harassment. Sexual misconduct by program staff under 28 C.F.R. §115.6 is defined as:

Sexual abuse of an inmate, detainee, or resident by a staff member, contractor, or volunteer includes any of the following acts, with or without consent of the inmate, detainee, or resident:

(1) Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;

(2) Contact between the mouth and the penis, vulva, or anus;

(3) Contact between the mouth and any body part where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

(4) Penetration of the anal or genital opening, however slight, by a hand, finger, object, or other instrument, that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

(5) Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, groin, breast, inner thigh, or the buttocks, that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

(6) Any attempt, threat, or request by a staff member, contractor, or volunteer to engage in the activities described in paragraphs (1) through (5) of this definition;

(7) Any display by a staff member, contractor, or volunteer of his or her uncovered genitalia, buttocks, or breast in the presence of an inmate, detainee, or resident, and

(8) Voyeurism by a staff member, contractor, or volunteer.

**Sexual harassment by program staff** under 28 C.F.R. §115.6 is defined as:

(1) Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one inmate, detainee, or resident directed toward another; and

(2) Repeated verbal comments or gestures of a sexual nature to an inmate, detainee, or resident by a staff member, contractor, or volunteer, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.

The Survey of Sexual Victimization prepared by the U.S. Department of Justice, Bureau of Justice Statistics (“the Survey”), defines sexual abuse by other youths as comprising three categories: nonconsensual sexual acts, abusive sexual contact, and sexual harassment. **Nonconsensual sexual acts** are defined as:

Sexual contact or any person without his or her consent, or of a person who is unable to consent or refuse;

AND

Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;

OR

Contact between the mouth and the penis, vulva, or anus;

OR

Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument.

**Abusive sexual contact** by one youth against another youth is defined by the Survey as:

Sexual contact of any person without his or her consent, or of a person who is unable to consent or refuse;

AND

Intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person.[[1]](#footnote-1)

Finally, the Survey defines **sexual harassment of a youth by another youth** as:

Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one youth directed toward another.

There were thirteen allegations of staff sexual misconduct reported: one was substantiated; eight were unsubstantiated;[[2]](#footnote-2) and four were determined to be unfounded.[[3]](#footnote-3) There were nine allegations of staff sexual harassment reported: seven were found to be unsubstantiated and two were determined to be unfounded. There were two allegations of youth upon youth nonconsensual sexual acts reported: one was unfounded and one was unsubstantiated. There were six allegations of youth upon youth abusive sexual contact reported: one was substantiated, four were unsubstantiated, and one was determined to be unfounded. There were five allegations of youth upon youth sexual harassment reported: four were substantiated and one was unsubstantiated.

The following section is a summary of investigation activity regarding the twenty-two allegations[[4]](#footnote-4) of staff sexual abuse.

**Staff Sexual Misconduct Allegations**

**Staff Secure Treatment Programs – 6 reported allegations**

**Response Description, Allegation #1**: An allegation that a staff neglected a youth by failing to properly monitor youth was reported to the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”). DCF screened in the report and investigated. DYS also investigated the allegation. The allegation of sexual misconduct arose during the investigation of the failure to monitor.

**Findings**: DCF supported the allegation of neglect, for failure to monitor, but the allegation of sexual misconduct was unsupported.[[5]](#footnote-5) The DYS investigation determined that the allegation of sexual misconduct was unsubstantiated.

**Corrective Actions**: The employee was terminated. No other policy or programmatic issues requiring corrective action were identified.

**Staff Sexual Misconduct Allegations**

**Staff Secure Treatment Programs – cont’d**

**Response Description, Allegation #2**: The allegation of abuse based on sexual misconduct was reported to the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”). DCF screened in the report and investigated the allegations. DYS also investigated the allegation.

**Findings**: DCF found the allegation to be unsupported. The DYS investigation determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description, Allegation #3**: The allegation of sexual misconduct was reported in an anonymous survey. The program submitted an Internal Review of the allegation. This matter was also the subject of an investigation by DYS.

**Findings**: The Internal Review and DYS investigation determined that the allegation was unfounded.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description, Allegation #4**: The allegation of sexual misconduct was reported by a youth to staff. The allegation was then reported to the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”). DCF screened in the report and investigated. DYS also investigated the allegation.

**Findings**: DCF found the allegation to be unsupported. The DYS investigation determined that the allegation was unsubstantiated.

**Corrective Actions:** The employee resigned. No other policy or programmatic issues requiring corrective action were identified.

**Response Description, Allegation #5**: An allegation of neglect was reported by staff to the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”). DCF screened in the report and investigated. DYS also investigated the allegation. The allegation of sexual misconduct arose during the investigation.

**Findings**:DCF found the allegation of neglect to be supported due to staff’s action in harboring the youth who had escaped from the program, but the allegation of sexual misconduct was unsupported. The DYS investigation determined that the allegation of sexual misconduct was unsubstantiated.

**Corrective Actions:** The employee resigned. No other policy or programmatic issues requiring corrective action were identified.

**Response Description, Allegation #6**: An allegation was reported by a youth to a staff person. The program submitted an Internal Review of the allegation. DYS also investigated the allegation.

**Findings**:The Internal Review and DYS investigation determined that the allegation was unfounded.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Staff Sexual Misconduct Allegations**

**Staff Secure Detention Program – 1 reported allegation**

**Response Description**: An anonymous complaint alleging sexual misconduct was received via an internet tip line. The program submitted an Internal Review of the allegation. DYS also investigated the allegation.

**Findings**: The Internal Review and DYS investigation determined that the allegation was unfounded.

**Corrective Actions:** No policy or programmatic issues requiring corrective action were identified.

**Staff Sexual Misconduct Allegations**

**Staff Secure Transitional Program – 1 reported allegation**

**Response Description:** An allegation of neglect was reported by staff to the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”). DCF screened in the report and investigated. DYS also investigated the allegation. The allegation of sexual misconduct arose during the investigation.

**Findings**: DCF found the allegation of neglect to be supported, but the allegation of sexual misconduct was unsupported. The DYS investigation determined that the allegation of sexual misconduct was unsubstantiated.

**Corrective Actions:** The employee was terminated. No other policy or programmatic issues requiring corrective action were identified.

**Staff Sexual Misconduct Allegations**

**Hardware Secure Treatment Programs -– 2 reported allegations**

**Response Description #1**: A staff person overheard youths discussing alleged sexual misconduct.

The program submitted an Internal Review of the allegation. DYS also investigated the allegation.

**Findings**: The Internal Review and DYS investigation determined that the allegation was unfounded.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #2**: The youth verbally reported to staff an allegation of staff sexual misconduct. The allegation was reported by staff to the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”). DCF screened in the report and investigated. DYS also investigated the allegation.

**Findings**: DCF found the allegation of sexual misconduct to be unsupported. The DYS investigation found the allegation to be substantiated.

**Corrective Actions**: The employee was terminated. No other policy or programmatic issues requiring corrective action were identified.

**Staff Sexual Misconduct Allegations**

**Hardware Secure Detention Programs – 3 reported allegations**

**Response Description #1**: The youth’s mother made an allegation regarding sexual misconduct by a former employee to staff. The allegation was reported by staff to the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”). DCF screened in the report and investigated. DYS also investigated the allegation and the program submitted an Internal Review of the allegation.

**Findings**: DCF found the allegation to be unsupported. The Internal Review and DYS investigation determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #2**: The youth made a verbal allegation of sexual misconduct to a staff person. The allegation was reported by staff to the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”). DCF screened in the report and investigated. DYS also investigated the allegation.

**Findings**: DCF found the allegation to be unsupported. The DYS investigation determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #3**: The youth made an allegation of sexual misconduct to a staff person and also asked permission to call the DCF Hotline, but did not complete a filing of the allegations with the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”). The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review determined that the allegation was unfounded.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Staff Sexual Harassment Allegations**

**Hardware Secure Treatment Programs – 4 reported allegations**

**Response Description #1**:[[6]](#footnote-6) The youth submitted a written grievance. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #2**: The youth submitted seven written grievances against unnamed staff. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review determined that the allegation was unfounded.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #3**: The youth submitted a written grievance. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #4**: An anonymous email reported the allegation. DYS investigated the allegation.

**Findings**: The DYS investigation determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Staff Sexual Harassment Allegations**

**Hardware Secure Detention Programs – 4 reported allegations**

**Response Description #1**: The youth verbally reported an allegation to a staff person. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #2**: The youth verbally reported an allegation to staff and the allegation was reported to the Department of Children and Families as possible neglect pursuant to M.G.L. c. 119, section 51A (“51A”) DCF screened in the report and investigated. DYS also investigated this matter.

**Findings**: DCF found the allegation of neglect to be unsupported. The DYS investigation determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #3**: The youth verbally reported an allegation to staff and the allegation was reported as neglect to the Department of Children and Families pursuant to M.G.L. c. 119, section 51A (“51A”) DCF screened in the report and investigated. DYS also investigated the allegation.

**Findings**: DCF found the allegation of neglect to be unsupported. The DYS investigation determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #4**: The youth verbally reported an allegation to staff. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Staff Sexual Harassment Allegations**

**Hardware Secure Assessment Program – 1 reported allegation**

**Response Description**: The youth verbally reported an allegation to staff. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review determined that the allegation was unfounded.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Youth on Youth Sexual Abuse Allegations**

As stated previously, there were a total of thirteen reports from youths alleging sexual abuse by other youths. There were two allegations of youth upon youth nonconsensual sexual acts reported: one was unfounded and one was unsubstantiated. There were six allegations of youth upon youth abusive sexual contact reported: one was substantiated, four were unsubstantiated, and one was determined to be unfounded. There were five allegations of youth upon youth sexual harassment reported: four were substantiated and one was unsubstantiated.

The following section is a summary of investigation activity regarding the thirteen reports[[7]](#footnote-7) of youth on youth sexual abuse.

**Allegations of Youth on Youth Nonconsensual Sexual Acts**

**Hardware Secure Programs – 2 reported allegations**

**Response Description #1**: The allegation of a nonconsensual sexual act by one youth against another youth was reported in an anonymous survey. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review determined that the allegation was unfounded.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #2**: The allegation of a nonconsensual sexual act by one youth against another youth was reported by a youth to a social worker. The program submitted an Internal Review of the allegation. DYS also investigated the allegation.

**Findings**: The Internal Review by the program and the DYS investigation determined that the allegation was unsubstantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Allegations of Youth on Youth Abusive Sexual Contact**

**Staff Secure Programs – 2 reported allegations**

**Response Description #1**: The allegation of youth on youth abusive sexual contact was made by a youth’s mother. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review by the program determined that the allegation was unfounded.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #2**: The allegation of youth on youth abusive sexual contact was made by a youth to a clinician. The program submitted an Internal Review of the allegation. DYS also investigated the allegation.

Findings: The Internal Review by the program and the DYS investigation determined that the allegation was unsubstantiated.

Corrective Actions: No policy or programmatic issues requiring corrective action were identified.

**Allegations of Youth on Youth Abusive Sexual Contact**

**Hardware Secure Programs – 4 reported allegations**

**Response Description #1**: The allegation of youth on youth abusive sexual contact was made by a staff person who observed two youths in a bedroom. The program submitted an Internal Review of the allegation.

**Findings:** The Internal Review by the program determined that the allegation was unsubstantiated.

**Corrective Actions:** No policy or programmatic issues requiring corrective action were identified.

**Response Description #2**: The allegation of youth on youth abusive sexual contact in a former program was made by a youth to staff at a new program. The former program submitted an Internal Review of the allegation. This matter was also the subject of an investigation by DYS.

**Findings:** The Internal Review by the program and the DYS investigation determined that the allegation was unsubstantiated.

**Corrective Actions:** No policy or programmatic issues requiring corrective action were identified.

**Response Description #3**: The allegation of youth on youth abusive sexual contact was made by youth to staff. The program submitted an Internal Review of the allegation.

**Findings:** The Internal Review by the program determined that the allegation was unsubstantiated.

**Corrective Actions:** No policy or programmatic issues requiring corrective action were identified.

**Response Description #4**: The allegation of youth on youth abusive sexual contact at a former program was made by a youth to a clinician at the youth’s new program. The former program submitted an Internal Review of the allegation.

**Findings:** The Internal Review by the former program determined that the allegation was unsubstantiated.

**Corrective Actions:** No policy or programmatic issues requiring corrective action were identified.

**Allegations of Youth on Youth Sexual Harassment**

**Staff Secure Programs – 4 reported allegations**

**Response Description #1**: The allegation of youth on youth sexual harassment was observed by and reported by staff. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review by the former program determined that the allegation was substantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Allegations of Youth on Youth Sexual Harassment**

**Staff Secure Programs – cont’d**

**Response Description #2**: The allegation of youth on youth sexual harassment was observed by and reported by staff. The program submitted a Serious Incident Report.

**Findings**: The Serious Incident Report by the program and reviewed by the Director of Investigations determined that the allegation was substantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #3**: The allegation of youth on youth sexual harassment was reported by a youth to staff. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review by the program determined that the allegation was substantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Response Description #4**: The allegation of youth on youth sexual harassment was reported by a youth to staff. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review by the program determined that the allegation was substantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**Allegations of Youth on Youth Sexual Harassment**

**Hardware Secure Programs – 1 reported allegation**

**Response Description #1**: The allegation of youth on youth sexual harassment was reported by a youth to staff. The program submitted an Internal Review of the allegation.

**Findings**: The Internal Review by the program determined that the allegation was substantiated.

**Corrective Actions**: No policy or programmatic issues requiring corrective action were identified.

**DEPARTMENT OF YOUTH SERVICES-PREA INVESTIGATION SUMMARY**

**Report for: January 2017-December 2017**

\*see legend

|  |  |  |  |
| --- | --- | --- | --- |
| **Date** | **Method of Report\*** | **Type of Program** | **Status** |
| **February** | **S, V** | **HWS** | **Closed** |
| **February** | **R, V** | **HWS** | **Closed** |
| **March** | **S, W** | **HWS** | **Closed** |
| **May** | **R, W[[8]](#footnote-8)** | **SS** | **Closed** |
| **May** | **S, V[[9]](#footnote-9)** | **SS** | **Closed** |
| **May** | **R, V** | **HWS** | **Closed** |
| **May** | **R, W[[10]](#footnote-10)** | **HWS** | **Closed** |
| **May** | **S, V** | **SS** | **Closed** |
| **May** | **S, V[[11]](#footnote-11)** | **HWS** | **Closed** |
| **May** | **R, V** | **SS** | **Closed** |
| **May** | **GB** | **HWS** | **Closed** |
| **May** | **GB** | **HWS** | **Closed** |
| **June** | **R, V** | **HWS** | **Closed** |
| **June** | **S, V** | **SS** | **Closed** |
| **June** | **R, V** | **HWS** | **Closed** |
| **June** | **R, V** | **SS** | **Closed** |
| **July** | **R, V** | **HWS** | **Closed** |
| **July** | **R, V** | **HWS** | **Closed** |
| **July** | **R, V** | **SS** | **Closed** |
| **September** | **R, V** | **HWS** | **Closed** |
| **September** | **R, V** | **HWS** | **Closed** |
| **September** | **R, V** | **HWS** | **Closed** |
| **September** | **S, V** | **SS** | **Closed** |
| **October** | **S, V** | **SS** | **Closed** |
| **October** | **R, V** | **HWS** | **Closed** |
| **October** | **R, V** | **SS** | **Closed** |
| **October** | **A, W** | **SS** | **Closed** |
| **October** | **R, V** | **SS** | **Closed** |
| **November** | **S, V** | **SS** | **Closed** |
| **November** | **A, W** | **HWS** | **Closed** |
| **November** | **R, V** | **HWS** | **Closed** |
| **November** | **R, V** | **SS** | **Closed** |
| **December** | **R, V** | **HWS** | **Closed** |
| **December** | **GB** | **HWS** | **Closed** |
| **December** | **R, V** | **HWS** | **Closed** |
| **Unknown[[12]](#footnote-12)** | **R, V** | **HWS** | **Closed** |

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| --- |
| **Legend for Method of Report** |
| **R: resident reported** |
| **S: staff reported** |
| **W: written** |
| **V: verbal** |
| **GB: grievance box** |
| **A: anonymous report, other than via grievance box** |

|  |
| --- |
| **Legend for Type of Program** |
| **HWS: Hardware Secure** |
| **SS: Staff Secure** |
| **ALP: Overnight Arrest** |
| **RC: Reception Center** |
| **IL: Independent Living** |

1. The definition specifically excludes incidents in which the contact was incidental to a physical altercation. [↑](#footnote-ref-1)
2. An unsubstantiated allegation means an allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred. 28 C.F.R. §115.5. [↑](#footnote-ref-2)
3. An unfounded allegation means an allegation that was investigated and determined not to have occurred. *Id*. [↑](#footnote-ref-3)
4. Program name and location have been redacted to preserve the confidentiality of the involved parties as well as maintain safety and security of the specific facility. [↑](#footnote-ref-4)
5. Once DCF receives a 51A report, it makes a quick “screening” decision. If DCF “Screens Out” the 51A report, DCF makes notifications and takes no further action. Common reasons for a DCF “Screen Out” decision include that the person alleged to be responsible is not a “caretaker”, the injured person is not a “child,” or the facts do not meet the DCF definition of “abuse” or “neglect.” 110 C.M.R. 4.21.

   If DCF screens in a 51A report, it assigns a DCF investigator to conduct a DCF investigation, known as the 51B investigation. The DCF investigator produces a 51B report at the end of the 51B investigation which results in DCF finding the allegations in the 51A report are “Supported” or “Unsupported.” If DCF finds the 51B investigation is “Unsupported,” DCF takes no further action. [↑](#footnote-ref-5)
6. The alleged incident occurred at the end of 2016, but the Internal Review was not submitted until 2017. [↑](#footnote-ref-6)
7. Program name and location have been redacted to preserve the confidentiality of the involved parties as well as maintain safety and security of the specific facility. [↑](#footnote-ref-7)
8. The written report was contained in an anonymous survey given to all youths in the program. [↑](#footnote-ref-8)
9. The youth’s mother reported the allegation to the program. [↑](#footnote-ref-9)
10. The written report was contained in an anonymous survey given to all youths in the program. [↑](#footnote-ref-10)
11. The youth’s mother reported the allegation to the program. [↑](#footnote-ref-11)
12. This report was made by a youth in 2017 who was unable to identify the date of the alleged youth-youth nonconsensual sexual act. The program identified has been closed for several years. [↑](#footnote-ref-12)