

Holy Cross Services contracts with the State of Michigan to provide juvenile justice residential services and is, therefore, required to adopt and comply with all standards of the federal Prison Rape Elimination Act (PREA).

Holy Cross Services' PREA Policy states that all agency personnel have zero tolerance for sexual abuse and sexual harassment of residents. Facilities must have preventive plans in place and, should allegations regarding sexual abuse or harassment be made, all personnel must be appropriately trained to take action to rapidly restore safety, attend to and support the victim, and promptly initiate the investigative process. Audits are required to ensure compliance with PREA standards.

Reporting Sexual Abuse or Harassment

Holy Cross Services' policy requires that all residential facilities provide youth with multiple ways to report sexual abuse and harassment, including suspected sexual abuse, and youth must be given an orientation on the multiple reporting options available to them. Facilities must ensure that youth who report sexual abuse or harassment and supporting witnesses are protected from retaliation. Facilities must inform youth that they will be protected from retaliation. Reporting options include:

- Verbally or in writing to any staff, counselor or administrator.
- In writing through the youth and family grievance process.
- Verbally or in writing to an advocate or parent.
- Externally by telephoning Children's Protective Services at **(855) 444-3911** or via the Agency's Compliance Hotline at **(517) 423-7666**.

2018 Aggregate Sexual Abuse Data

This report addresses clients in programming at Holy Cross Services facilities falling under PREA (Prison Rape Elimination Act) requirements. The residential facilities providing data for this report are **ML King House** and **St. Vincent Home-Matthew Hall**.

| Demographic Data | | |
|--|-------------------|--------|
| Data Type | Data Points | Number |
| Number of youth held in HCS Juvenile Justice facilities on December 31, 2017 | Male | 21 |
| | Female | 0 |
| | Total | 21 |
| Age of the youth held in HCS Juvenile Justice facilities | Age 17 or younger | 16 |
| | Ages 18-20 | 5 |
| | Age 21 or older | 0 |
| | Total | 21 |
| Number of youth admitted to HCS Juvenile Justice facilities and discharged from these facilities in 2016 | Admitted | 32 |
| | Discharged | 32 |
| Total Resident Incidents Reported | | 0 |

Reporting & Allegation Statistics

In 2017, the following statistics were reported by the above-referenced facility:

- All HCS Juvenile Justice facilities are required to keep a record of all allegations of youth-on-youth and staff-on-youth nonconsensual sexual acts, contact, or harassment, whether the allegation was substantiated or not.
- In 2017, there was one (1) substantiated youth-on-youth non-consensual sexual act and zero (0) staff-on-youth sexual acts, contact, or harassment, either substantiated or unsubstantiated.

| Resident-on-Resident Incidents Reported | | |
|--|---------------------------------|----------------------------|
| Incident Type | Outcome of Investigation | Number of Incidents |
| Resident-on-Resident Non-Consensual Sexual Acts | Substantiated | 0 |
| | Unsubstantiated | 0 |
| | Unfounded | 0 |
| | Investigation Ongoing | 0 |
| Resident-on-Resident Abusive Sexual Contact | Substantiated | 0 |
| | Unsubstantiated | 0 |
| | Unfounded | 0 |
| | Investigation Ongoing | 0 |
| Resident-on-Resident Sexual Harassment | Substantiated | 0 |
| | Unsubstantiated | 0 |
| | Unfounded | 0 |
| | Investigation Ongoing | 0 |
| Total Resident Incidents Reported | | 0 |
| Staff Incidents Reported | | |
| Staff Sexual Misconduct | Substantiated | 0 |
| | Unsubstantiated | 0 |
| | Unfounded | 0 |
| | Investigation Ongoing | 0 |
| Staff Sexual Harassment | Substantiated | 0 |
| | Unsubstantiated | 0 |
| | Unfounded | 0 |
| | Investigation Ongoing | 0 |
| Total Staff Incidents Reported | | 0 |