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**Pathway Programs Annual PREA Report
 Pathway of Baldwin County**

In compliance with the Prison Rape Elimination Act, Pathway has adopted a PREA Policy that aims to provide guidelines and procedures that reduce the risk of sexual abuse and sexual harassment at all Pathway owned and operated facilities. It is a written plan to coordinate actions taken in response to an incident of sexual abuse among staff, clients/residents, volunteers, contractors, and facility leadership. Pathway is committed to a zero-tolerance standard for sexual abuse and sexual harassment either by staff or by another client/resident.

The purpose of this report is to gather data that will assist in reducing the risk that sexual abuse and/or sexual harassment would occur within Pathway’s facilities.

Summary of 2021 reporting data:

Client on Client Incident Type	Number of incidents	Number Substantiated	Number Unsubstantiated	Number Unfounded
Non-Consensual Sexual Act	0	0	0	0
Abusive Sexual Contact	3	2	1	0
Sexual Harassment	1	1	0	0
Consensual Sexual Contact	1	0	1	0

Staff on Client Incident Type	Number of Incidents	Number Substantiated	Number Unsubstantiated	Number Unfounded
Staff Sexual Misconduct	1	0	0	1
Staff Sexual Harassment	3	1	0	2

Frequency and Severity of sexual abuse/sexual harassment and trends:

Review of the 2020 data indicates a decrease this reporting period in the overall number of PREA related allegations by 10%. There were 9 reported incidents during the reporting period as opposed to 10 in 2020. The most serious of these allegations was an incident of staff to client sexual harassment, which was not criminal in nature; however, the staff member was terminated. There were two reports of staff to client sexual harassment and staff to client sexual misconduct that were unfounded based on interviews with clients, other staff members, and review of camera footage. It is noteworthy that one of these incidents appears to be the result of client paranoia, for which this client was monitored closely by therapist. Also noteworthy, one investigation

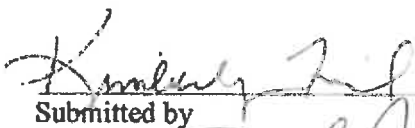
of staff sexual harassment resulted in an acknowledgement by the alleged victim that the report was made falsely in an attempt to get the staff member fired. There were three reports of client-on-client abusive sexual contact, two of which were substantiated and appear to be the result of horseplay. There was one allegation of client-on-client sexual harassment which resulted in a client being removed from the program. Lastly, there was one allegation of client-on-client consensual sexual contact that was unsubstantiated based on interviews with all clients involved, staff members and review of camera footage.

Deficiencies Identified:

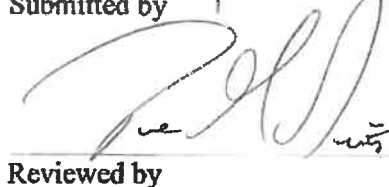
There were no physical barriers identified that allowed abuse to occur. No recommendations were made for changes to the physical plant or additional staffing. A recommendation was made to add audio to certain areas of camera footage to assist in the investigation process.

Corrective Action Plan:

One staff member was terminated after an investigation due to statements made to clients that appeared to be made in a joking manner. Regardless of the nature of the comments made, Pathway enforces a no tolerance policy for sexual abuse or harassment of any kind.


Submitted by

1/19/2022
Date


Reviewed by

1-19-2022
Date