

Date Created: 4/17/2018

Revised: 4/14/2021 – LeWanda Martin, L.V.N., PREA Compliance Officer

Reviewed: 4/01/2021 Dr. Dale Underwood, Ed. D., Acting PREA Coordinator

This staffing plan was developed to provide adequate staffing to protect residents against sexual abuse and sexual harassment pursuant to PREA standard 115.313. Gulf Coast Trades Center complies with the *State Minimum Standards and Prison Rape Elimination Act (PREA) Standards.*

Quarter One, 2021

1. There have not been any findings of inadequacies from any Federal investigative agencies. There are not any corrective actions that need be taken nor any deficiencies that need to be corrected at this time.
2. GCTC discontinued accepting CPS youth to our program and dissolved our contract with DFPS. The contract ended when the last CPS youth was exited from our program on February 21, 2021. Since this time, GCTC has experienced no hotline calls by youth in placement, one AWOL attempt on February 22, and no issues requiring extra supervision after CPS youth exited our program. In short, increased supervision/high risk behaviors previously exhibited by CPS youth and probation youth influenced through them have all but ceased.
3. GCTC experienced a barrage of open investigations, almost completely from CPS youth and Heightened Monitoring investigators interviewing CPS youth. 23 of these investigations were found to be “no finding” or “no ruling”. One investigation gave us a deficiency for out-of-ratio.
4. GCTC was officially removed from Heightened Monitoring after the last CPS youth was removed from our program.
5. The winter storm that lasted four days in February 15-19, 2021 also caused the school to be closed for the 16th-18th. Youth were sheltered and ratio was maintained throughout the storm by outstanding Residential staff efforts to make it to work despite snow and ice conditions and 6°F weather. Hot meals were served. Generators were operational throughout. Maintenance crews were on site and dealt with broken pipes. Medical staff were also on site throughout the emergency weather conditions. The school day was picked up by residential staff who maintained 1:8 ratio. Heightened Monitoring even braved the conditions on one day and found this to be true, although no comment of commendation was heard.

6. The following protocols were discussed in all-staff meetings and looked for by AOD's during this quarter:
- Bathrooms: the shower ratio is 1 resident in restroom at a time for 5 minutes,
 - Recreation: staff are positioned in ratio of 1 to 8 youth according to the activity. Staff are dispersed strategically to maintain maximum supervision in-door or outside,
 - Transition: staff move with youth in single file from door-to-door and announce their movements over the radio,
 - Facility Physical Plan: Weekly walk-through's continue and staff are reminded to be mindful of "blind spots" and areas where residents could be isolated,
 - Staff experienced monthly training that included: Cultural Competency, PREA, TBRI, Peer-to-Peer, Emergency Operations Planning, Communicable Diseases, Blood Borne Pathogens, and any staff who needed timely updates received training in 'Handle With Care' restraint/de-escalation, psychotropic medications, Pull/Pass Med's documentation,
 - New-Hire classes were also conducted February and March including 48 hours of pre-service training and 40 hours of OJT.

Youth and Staff Composition

1. The composition of the resident population is as follows:

Male Youth Age 15-18 who are either under the jurisdiction of County Courts, delinquent youth under the jurisdiction of Texas Juvenile Justice Department. Youth under the jurisdiction of Texas Department of Family and Protective Services were phased out of the GCTC program with the last leaving February 21, 2021. Within the 72 Hour Screening Plan any increase in negative behaviors (e.g., gang involvement, mental health issues, increase in number of GCTC youth with violent offenses, increase in the number of GCTC residents with sexual abuse histories, etc.) are noted and addressed by the GCTC case management services and referred to on-site counseling services if needed.

2. There is a Residential Director, 1 Assistant Director, 1 receptionist, 4 Shift Supervisors, 12 full-time group workers, 4 part-time relief group workers, 3 Dorm Advocates, 1 Campus Monitor, 1 Recreation Aide, providing a minimum of one Supervisor per shift. In their absence a Program Specialist provides additional oversight. They are continuously moving throughout the facility. In addition to the regular staff, Administrator's On Duty (AOD) are on campus to provide support and leadership to residential and educational staff, as dorm team leaders, during visitation on Saturday's, and after hours as administrative support. In addition, 1 L.V.N. and 2 medical staff are trained to pass med's and provide medical services.

Program Schedule and Ancillary Services

1. Education: Monday-Friday 8:00 a.m.-4:00 p.m., excluding holidays
2. Counseling: Monday-Friday 9:00 a.m.-6:00 p.m.; Saturday and Sunday as needed for trauma response
3. Residential: Monday-Friday 4:00p.m.-12:00 a.m., and 12:00 a.m.-8:00 a.m.; Saturday-Sunday 12:00 a.m.-12:00 p.m., and 12:00 p.m.-12:00 a.m.
4. Texas Minimum Standards and Texas State Laws are applicable to Gulf Coast Trades Center.
5. Medical: Monday-Friday 6:00 a.m.-9:00 p.m.; Saturday and Sunday 8:00 a.m.-10:00 a.m., and 7:00 p.m.-9:00 p.m.. Medical supervisor (L.V.N.) on call 24/7.

Plan Review and Investigation

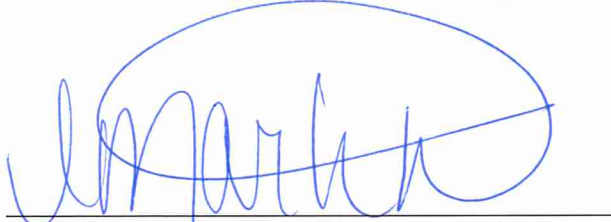
1. The draft of this plan was presented to Dr. Dale Underwood, Executive Director, for review and approval. April 1, 2021.
2. The prevalence of substantiated and unsubstantiated incidents of sexual abuse or sexual harassment; these numbers change due to the rotation of our population through admission and discharge throughout the year. When incidents of sexual abuse or sexual harassment occur on the GCTC campus, the Sexual Abuse Incident Review (SAIR) team investigates. GCTC has 5 team members, each person designated from key department roles on the GCTC campus. All members of the SAIR Team are trained and certified in Specialized Investigation Training for Sexual Abuse in Confinement Settings as well as Medical, Mental Health Care staff are trained in Medical, Mental Health Care training for Sexual Abuse in Confinement Settings. New and continuing staff are also trained continuously in how to respond to both Sexual Abuse and Sexual Harassment allegations as a Sexual Abuse Response Team (SART) Team member. This includes a review of the prevalence of sexual abuse and sexual harassment allegations, investigation outcomes, and other relevant issuers related to resident safety.

Deviations/Program Adjustments

- A.** During this quarter there were 4 instances when residential staff were out of ratio. GCTC administration investigated and found that COVID-19 was the culprit. Some staff who contracted the illness had to stay away from work for an extended period to not infect other staff or youth. When GCTC staff reported this to Heightened Monitoring investigators, we were informed this was understandable. However, these documented incidents have become part of the pending RCCL probation. Residential administration have since expanded the part-time pool of staff to draw from in order to combat ratio deficiencies. In addition, as soon as we can get Licensing to come to campus, we have asked them to inspect the re-built Dorm 4/Dorm 5 complex for occupancy. The plan is to move all youth into Dorms 4a, 4b, 5a, and 5b. Each dorm holds a maximum of 8 youth. In this way, GCTC will never be out of ratio on any shift as this creates a 1 staff to 8 youth for all shifts (awake and sleeping hours). Calls have been sent in to Licensing, and we await their movement to make this happen.
- B.** Deviations from this plan will be documented on the deviation report completed by the Residential Director (or, designee) before the end of the 8 and 12 hour shifts during which the deviation takes place, noting the reason and duration for the deviation. The report will be submitted prior to the end of the shift when the deviation takes place.
- C.** Ratios will be maintained as required except during limited and discrete exigent circumstances which will be fully documented on a deviation report and the exigent circumstances log. Residential Staff will be the only staff to count in the ratios. Other GCTC staff may be pulled in to work in dorms if needed and would be counted in staff ratio.
- D.** Monthly, the PREA Compliance Officer will review the staffing plan deviation reports and look for trends that can be corrected. Within the report, longitudinal tracking will be included that identifies the most common reasons for deviating from the plan. Data for the report will accumulate to and be maintained for 12 months of data.

- E.** The staffing plan will be reviewed every 90 days or, if deemed appropriate, more often. A vulnerability assessment is conducted semi-annually by the PREA Compliance Officer, Executive Director, Maintenance Staff and Residential Director to determine if any action on the campus is warranted to ensure safety of the residents;
- i. PREA 115.313(d) (1),(2),(3),(4)
 - ii. To best protect the youth from sexual abuse and or sexual harassment should staffing levels fall below an adequate level the Residential Supervisors, contacts the Residential Director in order to call any part time staff available to come in. In the event that no additional group workers staff are available, an off duty supervisory staff or the Residential Director, or Residential Assistant Director shall respond to campus and perform the duties required.
 - iii. The staffing plan ratio of staff to residents is:
 - 1:8 during awake program hours
 - *State Minimum Standards* require 1:24 during sleeping hours. GCTC plans to maintain 1:8 during sleeping hours, as well, when we are approved to move into the Dorm 4/5 complex.
- F.** The staffing plan is presented to the Executive Director by the Residential Director and LCCA for approval. The Executive Director, in turn, notifies the Board of Directors that the staffing plan has been updated quarterly.
- G.** A copy of all reviews or updated staffing plans is maintained in the office of the PREA Compliance Officer.
- H.** Unannounced rounds are conducted to identify and deter staff and/or resident sexual abuse and sexual harassment. The Administrators on Duty (AOD) will conduct unannounced rounds when necessary, but at least four per month, on each shift and document the rounds on the approved GCTC form.
- I.** The Administrator on duty will walk through in all areas where youth are physically present. The date, time, entry point where the unannounced visit was initiated, areas visited, exit point (where the visit terminated), and a description of what was seen or encountered will be documented on the Unannounced Rounds Form.
- J.** Staff, contractors, volunteers will not alert other staff when an unannounced supervisory round occurring. Staff found to have engaged in such conduct (i.e., alerting other staff about unannounced supervisory rounds) will be subject to administrative disciplinary sanctions, up to and including termination of employment.


- K. Once per month the PREA Compliance Officer, or designee, will review the Unannounced Rounds forms to confirm that unannounced rounds are occurring during all shifts (i.e., day and night), and that the staff conducting these rounds are visiting all areas of the campus and documenting what was seen or encountered.



LeWanda Martin, PREA Compliance Officer

4/1/2021

Date



Dale Underwood Ed.D., Executive Director, LCCA