



***2024 Annual Prison Rape
Elimination Act (PREA) Report***

January 2025

Iowa Department of Health and Human Services (HHS) 2024 Annual Prison Rape Elimination Act (PREA) Report

This report reflects the efforts, commitment, and changes made as the Iowa Department of Health and Human Services (HHS) continues toward compliance with the Prison Rape Elimination Act (PREA) Juvenile Standards. The HHS is committed to keeping the students we serve at the State Training School (STS) safe and free from harm and has zero tolerance for sexual abuse and sexual harassment.

This report covers allegations that were reported from January 1, 2024, through December 31, 2024.

Staffing

Protecting students from sexual abuse and harassment and compliance with the PREA Standards is a priority for the Iowa HHS and staff at the STS in Eldora. HHS has assigned a State PREA Coordinator responsible for overseeing the agency's PREA efforts. The STS has assigned a PREA Compliance Manager responsible for PREA compliance at the facility.

Policy and procedure have been developed to support compliance with PREA standards and protect students from sexual harassment and abuse.

Training

All staff employed at the STS have participated in annual training to prevent, detect, intervene, and respond to incidents of sexual abuse or sexual harassment. Selected staff have also completed specialized training in investigations.

Every student participates in lessons providing information and instruction on recognizing sexual harassment and sexual abuse, how to protect themselves and how to report any incidents. Staff and students understand that the STS has a **Zero Tolerance** policy for sexual harassment, sexual abuse, or sexual contact of any nature.

Policies

Iowa HHS and STS policies address **Zero Tolerance**, training requirements, and facility response and investigation requirements for reports of sexual harassment and abuse. Policies are reviewed annually and revised as needed.

Support Services

The STS has agreements with the University of Iowa Health Care (UIHC) in Iowa City, Iowa for treatment of students. The UIHC employs Sexual Assault Forensic Examiner (SAFE) / Sexual Assault Nurse Examiner (SANE) personnel that are trained in forensic examinations. The STS also maintains an agreement with Crisis Intervention Services. This agency maintains a toll-free hotline for reporting incidents of sexual abuse. The agency also provides victim advocacy for students. All students have access to this hotline. Criminal investigations are referred to the Eldora Police Department when appropriate. When abuse is suspected, and the alleged perpetrator is an employee, contracted employee, or volunteer, referrals are made to the Iowa Department of

Inspections, Appeals, and Licensing (DIAL) to conduct an independent investigation to determine if the alleged act constituted child abuse.

Audits

The STS conducts internal audits of PREA Standards periodically. Additionally, the PREA Coordinator and PREA Compliance Manager meet weekly to discuss PREA topics, review pending and/or completed investigations, and conduct quality assurance audits related to the STS's efforts to fully implement all applicable PREA Standards and remain complaint.

Pursuant to PREA Standard 115.401, the STS completed an audit with a qualified auditor in April of 2023, scoring 100% compliance with all applicable PREA standards.

The next PREA audit has been scheduled to be completed by the end of April 2026.

2024 Sexual Incident Investigations & Reviews

Data Review for Corrective Action and Publication

In compliance with PREA Standard 115.388, facility PREA Compliance Manager has reviewed data collected and aggregated pursuant to PREA Standard 115.387 and incident specific data to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training including:

- Identifying problem areas.
- Taking corrective action on an ongoing basis; and
- Preparing an annual report of its findings and corrective actions.

Also, in compliance with PREA Standard 115.389, the Iowa HHS will make all aggregated sexual abuse data readily available to the public at least annually by publishing data in a report and linking it the Department's website.

General Definitions as defined by the PREA Standard 115.5

Substantiated allegation - means an allegation that was investigated and determined to have occurred.

Unfounded allegation - means an allegation that was investigated and determined not to have occurred.

Unsubstantiated allegation - means an allegation that was investigated, and the investigation produced insufficient evidence to make a final determination as to whether the event occurred.

Student on Student Sexual Abuse is defined by PREA Standard 115.6 and includes the following:

Nonconsensual Sexual Acts:

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

1. Sexual contact between the penis and the vulva or the penis and the anus including penetration, however slight; or
2. Contact between the mouth and the penis, vulva, or anus; or
3. Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument.

Abusive Sexual Contact:

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

1. Intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person.
2. EXCLUDE incidents in which the contact was incidental to a physical altercation.

Student on Student Sexual Harassment:

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

State Training School (STS) -Eldora Reported Incidents of Student-on-Student Allegations

Student-on-Student Allegations					
Reported and Investigated	2020	2021	2022	2023	2024
Nonconsensual Sexual Acts	0	1	0	0	0
Abusive Sexual Contact	2	8	4	1*	4
Sexual Harassment	5	16	5	5*	7
Total Allegations	7	25	9	6	11

Data Assessment

After a review of investigation data and corrective actions taken by the STS, the State-Operated Specialty Care Division Director and STS Institutional Superintendent will continue to monitor the STS's progress in preventing and reducing sexual violence at the facility. The STS continues to implement PREA requirements and to make changes that are necessary through on-going review.

***NOTE:** The 2023 Annual Report contained an error within the Student-on-Student Allegations Table. The numbers in the Abusive Sexual Contact and Sexual Harassment categories were reversed. This was corrected for this 2024 Annual Report.

Staff on Student Sexual Abuse is defined by PREA Standard 115.6 and includes the following:

Staff Sexual Misconduct:

Any behavior or act of a sexual nature directed toward a student by an employee, volunteer, contractor, official visitor, or other agency representative (exclude family, friends, or other visitors).

Sexual relationships of a romantic nature between staff and students are included in this definition. Consensual or nonconsensual sexual acts include:

1. Intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks that is unrelated to official duties or with the intent to abuse, arouse, or gratify sexual desire; **or**
2. Completed, attempted, threatened, or requested sexual acts; **or**
3. Occurrences of indecent exposure, invasion of privacy, or staff voyeurism for reasons unrelated to official duties or for sexual gratification.

Staff Sexual Harassment

Repeated verbal statements, comments, or gestures of a sexual nature to a student by an employee, volunteer, contractor, official visitor, or other agency representative (exclude family, friends, or other visitors). Include:

1. Demeaning references to gender; or sexually suggestive or derogatory comments about body or clothing; **or**
2. Repeated profane or obscene language or gestures.

**State Training School (STS) - Eldora
Reported Incidents Staff-on-Student Allegations**

Staff-on-Student Allegations					
Reported and Investigated	2020	2021	2022	2023	2024
Staff Sexual Misconduct	5	2	5	9	3
Staff Sexual Harassment	5	0	3	7	2
Total Allegations	10	2	8	16	5

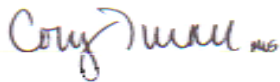
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The following are some examples of changes that have occurred over this review period to increase safety, security, and overall service for the students and staff at STS:

1. STS continued to install additional cameras throughout 2024 in offices and other areas students frequent. During 2025, STS plans to install additional cameras in school classrooms, areas outside of buildings, and other areas that may be identified. As always student privacy is considered before placement of any camera.
2. The PREA Compliance Manager continues to meet regularly with the new PREA Coordinator to ensure STS is meeting PREA standards, review investigations, and identify areas for continued improvement in anticipation of the next comprehensive audit in 2026.
3. STS continues to utilize PREA language in the trainings and communication throughout campus for both the students and the staff. STS has revised the PREA training to clearly identify roles in the chain of reporting, and new responsibilities for individuals in those roles.
4. STS continues to review and revise the policies annually, as well as train staff and students on reporting allegations of abuse. All PREA investigators have participated in specialized training to conduct PREA investigations.
5. STS continues to train all staff and contract employees annually on PREA.



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1/21/2025

Date