



**MONTGOMERY COUNTY**  
**OLEN UNDERWOOD JUVENILE JUSTICE CENTER**  
**200 ACADEMY DRIVE**  
**CONROE, TEXAS 77301**

**BRUCE GUSLER,**  
Director

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To: Bruce Gusler, Director

From: Derek Henderson, Quality Development Supervisor/PREA Coordinator

Date: July 06, 2022

Re: Requirements of agency Policy 1.2.2 and PREA standards §115.387 & §115.388:  
Annual review of sexual abuse allegations/incidents in the Montgomery County  
Juvenile Detention Center and in contracted secure post-adjudication facilities.

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In order to comply with PREA §115.388 (a-d), the Montgomery County Juvenile Detention Center (MCJDC) shall review data collected and aggregated pursuant to PREA standard §115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including:

- (1) Identifying problem areas;
- (2) Taking corrective action on an ongoing basis; and
- (3) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.

The following administrators met to discuss the PREA Coordinator's findings:

- Deputy Director Josh Henry
- Assistant Deputy Director (ADD) of Detention Rick Sutton
- Assistant Casework Supervisor/Placement Supervisor Matt Miller
- Quality Development Supervisor/PREA Coordinator Derek Henderson

**MCJDC Sexual Abuse Allegation/Incident Review:**

**Total sexual abuse allegations in 2021: 0**

The agency's PREA Coordinator and Deputy Director (who is the agency's Facility Administrator) reviewed the sexual abuse allegation/incidents for calendar year 2021, and it was determined the MCJDC had **ZERO** allegations/incidents of sexual abuse in 2021. To support this conclusion, the following documents and logs were reviewed:

- The facility's Serious Incident Log;
- The facility's Quarterly Reports;
- The PC's PREA Sexual Harassment and Sexual Abuse Allegation/Incident Log; and
- The facility's Year over Year Analysis of PREA Data.

**MCJDC Sexual Harassment Allegation/Incident Review:**

**Total sexual harassment allegations in 2021: 1 (unfounded)**

The facility received one allegation of resident-on-resident sexual harassment in calendar year 2021, in which the allegation was immediately reported by a Juvenile Supervision Officer to the on-shift supervisor. The on-shift supervisor ensured the alleged victim was separated from the alleged perpetrator and promptly began an initial inquiry into the allegation. The on-shift supervisor then notified the PREA Coordinator (PC), who began an internal investigation into the allegation on the next business day. During the investigation, the alleged victim who made the sexual harassment report recanted the allegation, and upon completion of the investigation, the PC concluded the allegation to be unfounded.

**Contracted Post-Adjudication Review:**

The Assistant Supervisor over Placements is responsible for conducting annual compliance inspections of all contracted post-adjudication placement facilities. The inspections include a comprehensive on-site and clinical evaluation, as well as requesting each placement complete a Contract Facility Incident Summary form that documents the number of sexual abuse allegations, as well as the number of substantiated, unsubstantiated, and unfounded investigative dispositions. The review of each placement the agency contracted with in 2021 that housed MCJPD youth concluded there were **ZERO** allegations of sexual abuse involving MCJPD's juveniles in calendar year 2021. Upon the Assistant Supervisor's annual review of each contracted post-adjudicated program, it was determined the contracted facilities provided satisfactory care for residents and the contractual agreements were continued.

**Comparison of the current year's data and corrective actions with those from prior years to assess the agency's progress in addressing sexual abuse:**

As indicated in the agency's 2021 Annual Review of Sexual Abuse Incidents and Aggregate Data Report, the MCJDC had zero substantiated allegations of sexual abuse in 2020 and, therefore, no corrective action is available to assess or address in this report.

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As required by PREA standard §115.388 (c), the agency's report shall be approved by the agency head and made readily available to the public through its website.

Respectfully submitted,



Derek Henderson  
Quality Development Supervisor/PREA Coordinator

I have reviewed and approve the contents of this report and approve for the report to be published on the agency's website:



Bruce Gusler  
Director

# MCJDC

## PREA YEAR-OVER-YEAR ANALYSIS (PREA §115.387)

Criteria	1/1/2016- 12/31/16	1/1/17- 12/31/17	1/1/18- 12/31/18	1/1/19- 12/31/19	1/1/20- 12/31/20	1/1/21- 12/31/21	1/1/22- 12/31/22	
1. Number of <i>alleged</i> Y on Y nonconsensual sexual abuse incidents.	0	0	0	0	0	0		
2. Number of <i>substantiated</i> Y on Y sexual abuse incidents.	0	0	0	0	0	0		
3. <i>Substantiated</i> sexual abuse rate (# <i>substantiated</i> divided by # <i>alleged</i> ).	n/a	n/a	n/a	n/a	n/a	n/a	%	
4. Number of <i>alleged</i> Y on Y abusive sexual contact acts (less severe).	0	0	0	0	0	0		
5. Number of <i>substantiated</i> Y on Y abusive sexual contact acts.	0	0	0	0	0	0		
6. <i>Substantiated</i> abusive sexual contact rate (# <i>substantiated</i> divided by <i>alleged</i> )	n/a	n/a	n/a	n/a	n/a	n/a	%	
7. Number of <i>alleged</i> Y on Y sexual harassment incidents.	0	0	0	0	1	1		
8. Number of <i>substantiated</i> Y on Y sexual harassment incidents.	0	0	0	0	0	0		
9. <i>Substantiated</i> sexual harassment rate (# <i>substantiated</i> divided by # <i>alleged</i> ).	n/a	n/a	n/a	n/a	0%	0%	%	
10. Number of <i>alleged</i> retaliation incidents.	0	0	0	0	0	0		
11. Number of <i>substantiated</i> retaliation incidents.	0	0	0	0	0	0		
12. <i>Substantiated</i> retaliation rate (# <i>substantiated</i> divided by # <i>alleged</i> ).	n/a	n/a	n/a	n/a	n/a	n/a		
13. Number of <i>alleged</i> staff sexual misconduct	0	0	1	0	0	0		
14. Number of <i>substantiated</i> staff sexual misconduct	0	0	0	0	0	0		
15. <i>Substantiated</i> staff sexual misconduct rate (# <i>substantiated</i> divided by # <i>alleged</i> ).	n/a	n/a	0%	n/a	n/a	n/a	%	
16. Number of <i>alleged</i> staff sexual harassment	0	0	0	0	0	0		
17. Number of <i>substantiated</i> staff sexual harassment	0	0	0	0	0	0		

18. <i>Substantiated</i> staff sexual harassment rate (# substantiated divided by # alleged)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	%
19. Are <i>substantiated</i> Y on Y nonconsensual sexual abuse incidents trending upward?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
20. Are <i>substantiated</i> Y on Y abusive sexual contact incidents trending upward?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
21. Are <i>substantiated</i> Y on Y sexual harassment incidents trending upward?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
22. Are <i>substantiated</i> retaliation incidents trending upward?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
23. Are <i>substantiated</i> staff sexual misconduct incidents trending upward?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
24. Are <i>substantiated</i> staff sexual harassment incidents trending upward?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
25. Did facility have a PREA audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
a. Did facility meet or exceed PREA standards?	<input checked="" type="checkbox"/> Meets <input type="checkbox"/> Exceeds	<input type="checkbox"/> Meets <input type="checkbox"/> Exceeds	<input type="checkbox"/> Meets <input type="checkbox"/> Exceeds	<input checked="" type="checkbox"/> Meets <input type="checkbox"/> Exceeds	<input type="checkbox"/> Meets <input type="checkbox"/> Exceeds	<input type="checkbox"/> Meets <input type="checkbox"/> Exceeds	<input type="checkbox"/> Meets <input type="checkbox"/> Exceeds	<input type="checkbox"/> Meets <input type="checkbox"/> Exceeds
26. Did facility provide a copy of facility's annual report?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
a. Did annual report identify any PREA compliance issues?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

y/y – youth/youth      s/y – staff/youth      y/s – youth/staff

**Nonconsensual Sexual Acts** – Sexual contact of any person without his/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** – Sexual contact of any person without his/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. Excluding incidents in which the contact was incidental to a physical altercation.

**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 youth directed toward another.

**Staff Sexual Misconduct** – Any behavior or act of a sexual nature directed toward a youth 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 youth are included in this definition. Consensual or nonconsensual sexual acts include – 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 Completed, attempted, threatened, or reasons unrelated to official duties or for sexual gratification.

**Staff Sexual Harassment** – Repeated verbal statements, comments or gestures of a sexual nature to a youth by an employee, volunteer, contractor, official visitor, or other agency representative, (exclude family, friend, or other visitors). Include – Demeaning references to gender; or sexually suggestive or derogatory comments about body or clothing; or Repeated profane or obscene language or gestures.

**Substantiated** – the investigation determined the event to have occurred based on a preponderance of evidence. **Unsubstantiated** – the investigation concluded the evidence was insufficient to determine if the event did or did not occur. **Unfounded** – the investigation determined the event did not occur.

## 2021 Contract Facility Annual PREA Incident Summary

Facility	Staff on Resident SA Allegations/Incidents				Resident on Resident SA Allegations/Incidents			
	Total #	Substantiated	Unsubstantiated	Unfounded	Total #	Substantiated	Unsubstantiated	Unfounded
*The Oaks	1	0	1	0	0	0	0	0
Lake Granbury Youth Services (ROP)	2	0	1	1	0	0	0	0
*Woodward Academy	5	0	4	1	8	0	8	0
*Center for Success & Indep. @ Rockdale	0	0	0	0	6	2	4	0
Pegasus (non-secure post)	1	1	0	0	1	0	1	0
*TX Monarch Academy for Girls (ROP)	1	1 (verbal)	0	0	5	5	0	0
Grayson County Post Adjudication	0	0	0	0	0	0	0	0
Azleway	0	0	0	0	0	0	0	0
*Victoria Co. Secure Post Adjudication	1	0	1	0	1	0	1	0
Nueces County Post Adjudication	0	0	0	0	0	0	0	0

SA: Sexual Abuse

*\*no MCJPD youth placed in calendar year 2021*

## 2020 Contract Facility Annual PREA Incident Summary

Facility	Staff on Resident SA Allegations/Incidents				Resident on Resident SA Allegations/Incidents			
	Total #	Substantiated	Unsubstantiated	Inconclusive	Total #	Substantiated	Unsubstantiated	Inconclusive
The Oaks	1	0	1	0	0	0	0	0
Lake Granbury Youth Services (ROP)	1	0	1	0	1	0	1	0
Woodward Academy	7	0	7	0	3	0	3	0
Center for Success & Indep. @ Rockdale	1	1	0	0	7	0	7	0
Pegasus	1	0	1	0	3	0	3	0
TX Monarch Academy for Girls (ROP)	0	0	0	0	0	0	0	0
Gulf Coast Trade Center	1	0	1	0	6	0	5	1
Grayson County Post Adjudication	0	0	0	0	0	0	0	0
Nueces County Post Adjudication	0	0	0	0	0	0	0	0

\*SA - Sexual Abuse

*Only includes contracted facilities that held MCJPD juveniles in 2020.*