

PENNSYLVANIA ASSOCIATION FOR RATIONAL SEXUAL OFFENSE LAWS (PARSOL) PA DEPARTMENT OF CORRECTIONS REQUESTS

INTRODUCTION: *The Pennsylvania Association for Rational Sexual Offense Laws (PARSOL) believes all sexual abuse is unacceptable and that prevention, treatment, and healing are possible. We take a person-first approach to criminal justice reform that cultivates a fair and just society, honors inherent dignity and promotes respect and fairness. People can and do change. As such, PARSOL advocates for sexual offense public safety measures and resources that work for all through prevention-based, trauma-and-treatment-informed, and healing-focused legislative and public policy initiatives that respect our Constitution and all people's dignity.*

We share responsibility for each other and for the common good. We all grow and change over time and need a chance to start over when things go wrong. To foster redemption, we must provide conditions that allow people to develop, rebuild, and reclaim full responsibility for their lives. For persons with a history of criminal sexual behavior, that includes coming to terms with their past actions and ensuring safeguards are in place to not re-offend. Yet, our constituents are faced with misleading, inaccurate, and untruthful statements about themselves on a daily basis, which stand in the way of progress and even, at times, basic human needs.

Therefore, we ask the Pennsylvania Department of Corrections to honor the following requests.

REQUEST 1: Designate specific regional facilities specially equipped to treat persons who offend sexually, including units for special populations, with placement based on risk assessment.

- To maximize the effectiveness of qualified staff, training, and other resources and to provide the best programming for persons with crimes of a sexual nature, the DOC should designate specific regional facilities. These facilities would specialize in treating sexual offenses (see **Request 2**). The Adult Diagnostic and Treatment Center (ADTC) at the New Jersey Department of Corrections Avenel, NJ campus is an excellent model for treatment and training programs. See: <https://crimesolutions.ojp.gov/ratedprograms/501#4-0>
- Regional facilities and units will allow people to stay closer to home while receiving needed and prescribed treatment. Post-incarceration support often hangs on the level of connection maintained during incarceration, which staying close to home reinforces.
- At least two of these facilities should have special population units for those who have specific mental health diagnoses that require special treatment, including those with sexually violent crimes, co-occurring substance use and/or other mental health disorders, and individuals with developmental disabilities including [autism spectrum disorders](#).
- Such facilities should align with vocational and educational programs per Request 3.
- These facilities should employ correctional staff trained in strength-based enforcement and shame-reduction strategies. The dehumanizing nature of incarceration need not be exacerbated by shame-based treatment or past-focused shaming. This includes the use of derogatory language (i.e. “pedo”, “chomo”) or telling inmates, “if you don’t like it here, you shouldn’t have...”

REQUEST 2: Facilities offering Sex Offender Treatment Programs (SOTP) under [Pa.C.S.42 § 9718.1](#). Sexual offender treatment should use a uniform, evidence-based, best practices model that is implemented in the same manner throughout all DOC facilities by qualified treatment providers using the same standards for qualification as the Pennsylvania SOAB

- Facilities should use evidence-based best practices in treatment programs. Examples of such programs include:

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- The [Road to Freedom](#) curriculum by Levenson & Morin. This curriculum includes accepting responsibility, understanding sexual behavior, managing these behaviors, self-awareness, victim impact, healthy relationship and communication skills, overcoming distorted thinking and healthy thinking skills, and relapse prevention.
- The [Good Lives Model](#) curriculum framework is a strength-based treatment model for people who have sexually abused with treatment pathways for [Men](#) and [Women](#) published by Safer Society Press.
- A supplemental curriculum, [Facing the Shadow](#) by Patrick Carnes, Ph.D. is based on Carnes' [30-task model approach to treatment](#) and is a trauma-informed approach to overcoming compulsive sexual behaviors through a trauma-informed lens of accepting responsibility, identifying sexual dependencies, creating healthy and non-deviant boundaries, overcoming distorted thinking by addressing their developmental sources, and relapse prevention.
- Treatment providers should meet the [minimum standards](#) set forth by the [PA Sex Offender Assessment Board](#) that is:
 - The provider shall have at least three years of appropriate experience treating sex offenders, collaborating with other agencies, and working with probation and parole departments and agencies. The provider shall be licensed in his or her respective discipline. In addition, the provider shall have had a minimum of 2000 postgraduate degree supervised hours of face-to-face clinical contact with persons who sexually offend.
 - Any unlicensed person on the program's staff who provides treatment services shall be under the direct supervision of a qualified Pennsylvania licensed professional. All unlicensed staff members shall have at least a bachelor's degree.
- Pennsylvania-based clinicians and service providers are available to consult on or lead these kinds of program changes.

REQUEST 3: Consider program and reentry challenges during classification

- According to the 2024 PARSOL Reentry Survey, when SOTP participants move from facility to facility, they frequently restart their treatment program due to disparities in program delivery between sites (See Request 1). This is, seemingly, not the same for other programs. Consider not moving inmates who are completing these programs if treatment parity is not achieved between sites.
- When evaluated for vocational and educational programs, consider the post-incarceration challenges a person with a crime of a sexual nature may face. Many sexual offenses are grounds for license denial. Check [Act 53](#) for specific information. This includes barber, cosmetology, and optical licensure, among others.

REQUEST 4: Provide a clear, uniform process for a reentrant to receive a copy of their complete medical record, including any medical, psychiatric, or psychological risk assessments and treatment program completion records compliant with [45 CFR § 164.524](#).

- Reentrants should not need to file a HIPAA complaint or hire legal counsel to solicit copies of their complete medical record.

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- While the DOC may, under HIPAA standards (under section 164.524(a)(1)(ii)) , withhold information compiled in reasonable anticipation of, or for use in, a civil, criminal, or administrative action or proceeding, this kind of information can be valuable to outside treatment providers and should not be withheld whenever possible.

REQUEST 5: Ensure Community Corrections and Parole Supervision Officers know statutory and policy-related restrictions and requirements.

- Reentrants who must register under the Sex Offender Registration and Notification Act (SORNA), commonly called “PA Megan’s Law” must update their registry status within three business days of any change to their information or face criminal prosecution under [18 Pa. C.S. § 4915.1](#). Including the following changes:
 - A change in name, including an alias.
 - A commencement of residence, change in residence, termination of residence, or failure to maintain a residence makes the individual a transient.
 - Commencement of employment, a change in the location or entity in which the individual is employed or a termination of employment.
 - Initial enrollment as a student, a change in enrollment as a student or termination as a student.
 - An addition or a change in telephone number, including a cell phone number, or a termination of telephone number, including a cell phone number.
 - An addition, a change in and termination of a motor vehicle owned or operated by an offender, including watercraft or aircraft. In order to fulfill the requirements of this paragraph, the individual must provide any license plate numbers, registration numbers, and other identifiers and an addition to or change in the address of the place where the vehicle is stored.
 - A commencement of temporary lodging, a change in temporary lodging, or a termination of temporary lodging. In order to fulfill the requirements of this paragraph, the individual must provide the specific length of time and the dates during which the individual will be temporarily lodged.
 - An addition, change in or termination of e-mail address, instant message address or any other designations used in Internet communications or postings.
 - An addition, change in or termination of information related to occupational and professional licensing, including type of license held and license number.
- The fact that a person [must register in person](#) by statute creates a problem for those at housing facilities with departure and supervision travel restrictions, especially if the closest registration site may be outside the person’s primary county of residence.
- Reentrants frequently change housing, may be placed in a hotel or temporary shelter, get a new phone number, start driving a new vehicle, or establish a new email account. Parole officers should advise the reentrant to accomplish as much as possible during a 48-hour period to allow them to register this information once, especially if traveling to a registration site is prohibitive.
- Furthermore, it should be DOC policy that statutory registration requirements should supersede any house policy or travel restrictions, and a travel pass provided.

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REQUEST 6: DOC Legislative and Policy Liaisons OPPOSE Statutory Program Carveouts based on Crime Category

- Pennsylvania statutes prohibit inmate participation in many diversionary and other supportive, strengths-based programming based on a person's being forced to register. The DOC should oppose such carveouts as they protect nobody and only create additional barriers to success.
- DOC policy should also align with the PA Parole Board's twin goals of supplying an "opportunity for the offender to become a useful member of society" and diverting appropriate offenders from prison. 61 Pa.C.S. § 6102(1)-(2).

REQUEST 7: The DOC is asked to provide data on reentry services and program utilization by individuals with sexual offenses on a regular basis.

- What is the percentage of reentrants who must register versus those who don't – who achieve stable housing within 30, 60, or 90 days? Break out data for SVPs if possible.
- What is the percentage of inmates with a registerable offense who qualify for the LTO program but do not participate?
- How many registrants are at each DOC facility by min/max sentence, SVP status, and treatment program status?
- What percentage of beds at a Community Corrections Center (CCC) are held for registrant reentrants? Occupied?
- How many and/or what percentage of inmates with a registerable offense would qualify for diversionary programs if not statutorily prohibited?
- How many community corrections officers have been trained in PA's registration requirements?
- How many inmates in the DOC with a sexual offense have been identified as having an intellectual or developmental disability? Specifically, autism spectrum disorder? Are they accommodated in the autism unit at SCI Albion? Do SOTP programs there accommodate this disability?