



# DISTRICT OF COLUMBIA DEPARTMENT OF CORRECTIONS

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## Program Statement

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Subject:                Environmental Safety and  
                              Sanitation Inspections

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1. **PURPOSE AND SCOPE.** To establish procedures for identifying and correcting maintenance and sanitation problems at the DC Department of Corrections (DOC) Central Detention Facility (CDF) and for documenting necessary independent environmental health and safety audits and inspections.
2. **POLICY**
  - a. It is DOC policy to ensure CDF complies with all applicable laws and regulations and there is at least annual inspection(s) and documentation by an independent, outside source that any past deficiencies noted in inspections have been corrected.
  - b. It is DOC policy to ensure that the CDF is clean, sanitary and environmentally safe, consistent with all applicable local regulations, standards and policy by requiring:
    - 1) A qualified DOC staff member to conduct weekly sanitation inspections of all facility areas;
    - 2) A DOC Safety/Sanitation Specialist to conduct monthly inspections; and
    - 3) Designated employees to conduct regular internal inspections of the facility.
3. **NOTICE OF NON-DISCRIMINATION**
  - a. In accordance with the DC Human Rights Act of 1977, as amended, DC Official Code section 2-1401.01 *et seq.*, (Act) the District of Columbia does not discriminate on the basis of actual or perceived: race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, familial status, family responsibilities, matriculation, political affiliation, disability, source of income, or place of residence or business. Sexual harassment is a form of sex discrimination which is also prohibited

by the Act. In addition, harassment based on any of the above protected categories is prohibited by the Act. Discrimination in violation of the Act will not be tolerated. Violators will be subject to disciplinary action.

- b. DOC prohibits discrimination against inmates based on an inmate's race, religion, national origin, gender, sexual orientation, disability or any other type of prohibited discrimination when making administrative decisions and in providing access to programs.

4. **PROGRAM OBJECTIVES.** The expected results of this program are that:

- a. DOC and external safety, health and sanitation specialists shall conduct routine inspections of the CDF to identify and document deficiencies. DOC shall ensure adequate corrective action is taken in a timely manner.
- b. The Warden, Deputy Wardens, Program Managers and executive staff shall conduct inspections of the facility in order to evaluate conditions and ensure corrective action that reduces environmental, safety and fiduciary risks.
- c. When environmental and sanitation problems stem from inoperable equipment at the CDF, housing unit officers, supervisors and maintenance tradesmen shall enter the problems into the automated reporting system as outlined in PS 7500.2 "Facilities Maintenance".
- d. Staff, who conduct prescribed inspections and managers responsible for corrective action shall ensure abatement of deficiencies in accordance with the Environmental Safety and Sanitation Program.

6. **DIRECTIVES AFFECTED**

a. **Directives Rescinded**

None

b. **Directives Referenced**

- 1) PS 2120.3            Food Service Program
- 2) PS 2920.1            Fire Safety Inspections
- 3) PS 2920.2            Abatement Plan of Action Program
- 4) PS 2920.3            Hazardous Materials Management
- 5) PS 2920.4            Environmental Safety and Sanitation Program
- 6) PS 2920.6            Housekeeping Plan

- 7) PS 2920.7 Clothing and Linen Exchange
- 8) PS 7500.2 Facilities Maintenance

7. **AUTHORITY.** DC Code § 24-211.02. Powers; Promulgation of Rules

8. **STANDARDS REFERENCED**

- a. American Correctional Association (ACA) 2<sup>nd</sup> Edition Standards for Administration of Correctional Agencies: 2-CO-4D-01.
- b. American Correctional Association (ACA), 4<sup>th</sup> Edition, Performance-Based Standards for Adult Local Detention Facilities: 4-ALDF-1A-01 and 4-ALDF-1A-07.

5. **RESPONSIBILITIES**

- a. Environmental Safety and Sanitation Officer. The Warden shall appoint an Environmental Safety and Sanitation Officer (hereafter the Environmental Safety Officer) to:
  - 1) Ensure day-to-day oversight for compliance with applicable safety and environmental health regulations, codes and standards.
  - 2) Conduct monthly facility inspections pursuant to this directive.
  - 3) Coordinate inspections conducted by the DC Department of Health (DOH) and DC Occupational Safety and Health (OSH).
- b. The Food Services Contract Monitor shall pursuant to *PS 2120.3 Food Service Program*, inspect the food service areas each day for compliance with safe food handling and environmental safety and sanitation.
- c. The Health Services Administrator pursuant to the contractual agreement shall conduct visits and inspections to ensure contractor compliance with environmental and safety standards for health care.
- d. Duty Administrative Officers assigned on a weekly rotation shall during visits to CDF, conduct inspections of randomly selected portions of the CDF.
- e. The Fleet Management Officer shall in accordance with PM 2830.1B “Use of Government Vehicle—Fleet Management” ensure that vehicles receive annual safety inspections by a qualified individual pursuant to local law, ensures safety repairs are readily completed and maintained in a manner that prevents environmental harm as mandated by local regulations.

- f. The Risk Manager and other DOC executives shall conduct visits and subsequent evaluations for risk exposure review. Risk Exposure reviews include identification of the hazard; frequency, severity and level of seriousness for public and employee safety; steps needed to eliminate or reduce the risk; cost projections to rectify the condition and anticipated savings or productivity gains that may result from implementation
- g. Managers and staff shall routinely conduct inspections, report deficiencies and take action as outlined in this directive to ensure satisfactory levels of sanitation.
- h. The OIC or designated staff shall conduct daily inspections of housing units as set forth in this directive.

## 6. **DAILY INSPECTIONS OF THE FOOD SERVICES PROGRAM**

- a. *DOC Culinary OIC.* Within one hour of commencement of the shift, the Culinary OIC shall perform daily sanitation inspections and input findings into a PDA.
- b. *DOC Food Service Contract Monitor*
  - 1) The Contract Monitor shall pursuant to PS 2120.3 Food Services Program, monitor DOC and contractor staff compliance with the environmental safety and sanitation program and input findings into a Personal Data Assistant (PDA).
  - 2) The Contract Monitor shall pursuant to *PS 2120.3 Food Service Program* monitor the contractor's compliance with prompt culinary equipment repair, replacement and contingency operations when equipment breakdowns result in but not limited to menu changes, delayed meal service, and styroform tray use
- c. *Food Services Contractor.* The contractor shall conduct and document daily inspections of the culinary and of all food service equipment pursuant to the contractual agreement and local laws.

## 7. **DAILY HOUSING UNIT INSPECTIONS**

- a. **General Cleanliness.** The Unit OIC shall upon assumption of the housing unit visually inspect tiers, cells, showers, gyms/recreation areas, dayrooms, closets, the control bubble and any other general areas and ensure immediate corrective action for any of the following issues:
  - 1) Cells – Inmate's cells are not clean or are in disarray. Mattresses are torn.

- 2) Floors – dirty or there is a wax buildup
  - 3) Walls – dirty or contains graffiti
  - 4) Trash cans – Filled with trash or require cleaning
  - 5) Vents – are covered with paper or other obstructions
  - 6) Exits – obstructed or exit lights are not broken
  - 7) Vermin – Insects and other pests are seen or there is evidence such as rodent droppings
- b. Environmental Safety. The Unit OIC or designated staff shall visually inspect and document findings of all of the following areas in a Personal Data Assistant PDA.
- 1) Cells (*Only on the #2 and #3 Shift*). The Unit OIC or designated staff shall inspect each cell and shall ensure that the inmate(s) occupying each cell demonstrate(s) that the toilet, sink and lights are working.
  - 2) Cell Block Common Areas. The Unit OIC or designated staff shall visually inspect showers, dayrooms, on-unit classrooms and recreation areas, chase closets and storage areas supply closets, cell tiers, and the control bubble.
  - 3) Lighting. Staff shall monitor lighting to ensure all lights are working properly.
  - 4) Plumbing. Staff shall monitor toilets, sinks, showers and drains to ensure they are functioning properly and are free from leaks.
  - 5) Doors. Staff shall monitor that cell and all other doors in the housing unit to determine that they are operational and locks are functioning properly.
8. **MAINTENANCE.** When equipment and maintenance related deficiencies are entered into the PDA, the data is migrated to the DOC Facilities Management database, MICROMAIN and a work report is automatically generated.
9. **HOUSING UNIT INSPECTIONS SUPERVISION AND MANAGEMENT**
- a. Zone Supervisors shall obtain Crystal Reports to verify that housing unit/designated staff recorded inspections in the PDA. Zone Supervisors may view this information from the computer in the Floor Control Unit.

- b. During the course of each shift, Zone Supervisors shall visit each assigned housing unit to conduct a general visual inspection for cleanliness, that adequate cleaning supplies are available and equipment and fixtures are operational.

10. **WEEKLY FACILITY INSPECTIONS AND ABATEMENT**

- a. Food Services Program. The Environmental Safety Officer and the Culinary Contract Monitor, shall document weekly inspections of food service areas and equipment pursuant to *PS 2120.3 Food Service*.
- b. Housing Units
  - 1) The Warden and designated CDF senior managers shall conduct and shall document weekly inspections of housing units (Attachment A and Attachment B).
  - 2) The Warden shall ensure appropriate corrective actions are taken.
- c. General Facility Inspections
  - 1) *Program Managers and Office Chiefs* at the CDF shall conduct and document weekly inspections of offices and general areas that are under their responsibility and document findings to the appropriate Deputy Warden (Attachment B).
  - 2) General areas include but are not limited to the: Maintenance Shop, Supply Warehouse, Loading Dock, Canteen, Staff Entrance, Command Center, Male and Female Receiving & Discharge (R&D), Clothing Issue, Laundry, Recreation Yard, Administrative Suite, OMITS, Records Office, Mail Room, Chapel, Law Library, Academic Classrooms, Visiting Halls, Training Academy, ODR, Staff Lounge, Classification and Chaplain/Volunteer Offices, Pool Room, the Medical Unit and common areas in inmate housing units.
  - 3) Inspections shall include but not be limited to:
    - a) Cleanliness and orderliness of offices and storage areas.
    - b) Safety compliance in offices (ex: electrical cords, combustible material storage, unobstructed vents, floor safety, other safety hazards, first aid kits).
    - c) Fire extinguisher inspection checks and equipment placement.
    - d) Lights, exit signs, plumbing.
    - e) Chemical control, storage, inventory and MSDS compliance.

- f) Trash/garbage schedule compliance and pest control.
  - g) Reporting malfunctioning equipment or safety hazards.
- d. Corrective Plan of Action
- 1) The program manager or affected department shall take immediate corrective action such as submitting a work order to facilities management.
  - 2) When immediate corrective action is not possible, the Environmental Safety Officer, Fire Safety Officer, Contract Monitor, Correctional Program Managers/Office Chiefs, Correctional Program Officer or other senior manager will generate a POA and forward a copy to the Correctional Program Specialist designated to coordinate quality assurance for the environmental safety and sanitation program and the appropriate Deputy Warden.
  - 3) The affected manager shall forward successfully closed out Plan of Action(s) to the Environmental Safety Officer and the Deputy Warden for Support Services.

## 11. MONTHLY INSPECTIONS

- a. Sanitation
- 1) The Environmental Safety Officer shall conduct a comprehensive and thorough monthly inspection to ensure that the facility complies with applicable environmental safety and sanitation standards and regulatory codes (Attachment C).
  - 2) Each program manager or designee shall be present when the Environmental Safety Officer performs inspections of areas such as the medical unit, the warehouse, storage rooms, shops, canteen, food services, etc. It is expected that joint inspections shall result in collaborative resolution of problems and deficiencies.
  - 3) The Environmental Safety Officer shall document whether there is compliance with prevention, identification and abatement activities.
- b. Pest Control
- 1) The Deputy Warden shall ensure a qualified person conducts monthly vermin and pest control inspections and can either document that pest control treatments are effective or recommend appropriate abatement.

- 2) The Environmental Safety Officer or designee shall monitor pest control and file a weekly report, noting any findings and remedial action.
  - e. Hazardous Materials. The Environmental Safety Officer shall pursuant to *PS 2920.3 Hazardous Materials Management*, conduct and document the annual hazards assessment, to include associated risks and appropriate response assessment for compliance with the use and maintenance of potentially hazardous areas, storage, and use of hazardous materials, equipment installation and use, and other safety-related issues.
  - f. The Environmental Safety Officer or designee shall conduct monthly inspections of portable eyewash stations to ensure performance compliance with the manufacturer's specifications. If a fixed eyewash station is used, the Environmental Safety Officer shall test water quality and to test water flow for a minimum of fifteen (15) minutes.
  - g. The Facilities Maintenance manager shall ensure preventative maintenance, routine and emergency inspections, repairs and other appropriate corrective action are completed and documented in accordance with *PS 7500.2 Facilities Maintenance*.
12. **LOCAL AND INDEPENDENT INSPECTIONS.** The Warden may delegate responsibility to the Environmental Safety Officer for scheduling annual independent inspections.
- a. The Environmental Safety Officer shall ensure that appropriate fire safety and facilities maintenance staff accompany external inspectors; making immediate corrections where possible, promptly taking other more complex corrective action and requesting re-inspection prior to the external inspector's departure; and submitting plans of action and documentation of more long term action.
  - b. The Environmental Safety Officer shall ensure correction and documentation of past deficiencies cited from inspections conducted by the DC Departments of Health, Occupational Safety and Health Administration, DC Fire and Emergency Management and other independent consultants that the Director has designated.
  - c. Department of Health
    - 1) The Department of Health (DOH) will conduct at least annual inspections for environmental safety and sanitation compliance at the CDF.
    - 2) The DOH Food Protection Branch conducts an annual inspection of the food services operation to include issues regarding the health and

safety of food service workers and those offenders and staff who use the food service program.

- 3) Upon receipt of the DOH report of findings, the Deputy Director shall ensure corrective actions are documented pursuant to *PS 2920.2 Abatement Plan of Action Program* plans shall be completed within 15 days of receipt of the inspection report and corrective action obtained within 10 additional days.
- d. DC Fire and Emergency Medical Services (DCFEMS)
    - 1) Local fire and life safety codes, Building Officials Codes, and Code Administrators fire prevention codes are applied in the inspections conducted by the DCFEMS.
    - 2) A written report, identifying any deficiencies or non-compliance, shall be forwarded to the Deputy Director for corrective action.
    - 3) The Fire Protection Specialist shall ensure that corrective actions are completed in compliance with ACA Standards local environmental regulations and PS 2920.1B "Fire Safety (3/9/01)".
  - e. Water Supply. Facilities Management shall ensure that the facility's potable water source and supply is annually certified by an independent outside source as compliant with applicable laws and regulations.

13. **ABATEMENT PLAN OF ACTION.** Upon receipt of a cited deficiency the Warden or designee, the affected Safety Officer and responsible managers shall develop a plan of corrective action, implement procedures to address the problem(s) and document actions taken pursuant to *PS 2920.4 Inspections and Abatement*.

#### 14. **DOCUMENTATION**

- a. The Environmental Safety Officer shall maintain documentation of DC Department of Health inspections at CDF and corrective action plans and abatement.
- b. The Facility Maintenance Manager shall maintain documentation of inspections, abatement and certification in the following areas:
  - 1) Certification of the institution's water supply by an independent qualified person that ensures compliance with all applicable local laws and regulations.

- 2) Water and sewage systems approved by local and state health departments and operated in continual compliance with local regulations.
  - 3) Inspection and testing of water and sewage systems and the food preparation areas conducted by local health inspector.
- c. The Fire Protection Specialist shall maintain documentation of inspections, abatement and certification in the following areas:
- 1) Compliance with all applicable fire safety codes.
  - 2) Certification by a qualified inspector that travel distances to exits are in compliance with the National Fire Safety Code and that defective or inoperable fire equipment has been repaired or replaced.



Devon Brown  
Director

#### Attachments

Attachment A	CDF Weekly Inspection Report – Warden/Program Managers
Attachment B	CDF Weekly Inspection Report Supplement – Warden’s Team
Attachment C	CDF Monthly Environmental Safety Inspection Report