



**DISTRICT OF COLUMBIA
DEPARTMENT OF CORRECTIONS**

Program Statement

OPI
Number: 2920.1C
Date: December 15, 2007
Supersedes: 2920.1B (3/9/01)
Subject: Fire Safety Inspections
and Abatement

1. **PURPOSE.** To establish procedures for the fire safety inspection program at the DC Department of Corrections (DOC) Grimke Building and Central Detention Facility (CDF).
2. **POLICY.** It is DOC policy to require designated employees to conduct regular fire safety inspections of facilities and take corrective action to provide a safe environment for staff, visitors and inmates.
3. **PROGRAM OBJECTIVES.** Compliance is achieved through DOC response to safety inspections conducted by the DC Fire and Emergency Management Services (DCFEMS), the DC Office of Occupation Health and Safety as well as use of the DOC fire safety plan to systematically monitor facilities to locate, report and document repair/correction of hazards.
4. **NOTICE OF NON-DISCRIMINATION**
 - a. In accordance with the D.C. Human Rights Act of 1977, as amended, D.C. Official Code § 2.1401.01 et seq., (Act) the District of Columbia does not discriminate on the basis of race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, familial status, family responsibilities, matriculation, political affiliation, genetic information, disability, source of income, or place of residence or business. Sexual harassment is a form of sex discrimination that is also 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 services, programs and activities.

5. DIRECTIVES AFFECTED

a. Directives Rescinded

PS 2920.1B Fire Safety (3/9/01)

b. Directives Referenced

- 1) PS 1280.2 Reporting and Notification Procedures-Significant Incidents and Extraordinary Occurrences
- 2) PS 1311.9 After Action Reviews and Reports
- 3) PS 2920.4 Environmental Safety and Sanitation Inspections and Abatement
- 4) PM 2920.5 Emergency Response and Evacuation Plan
- 5) PS 5031.1 CDF Emergency Plan
- 6) PS 7500.2 Facilities Management

6. AUTHORITY

- a. DC Code 24-442

7. STANDARDS REFERENCED

- a. National Fire Protection Association, NFPA, National Fire Codes (NFC) and NFPA 101, the Life Safety Code.
- b. American Correctional Association (ACA) 2nd Edition Standards for Administration of Correctional Agencies: 2-CO-3B-O1
- c. American Correctional Association (ACA) 4th Edition Performance Based Standards for Adult Local Detention Facilities: 4-ALDF-1C-07, 4-ALDF-1C-08, 4-ALDF-1C-09, and 4-ALDF-1C-10.

8. RESPONSIBILITIES

- a. The DOC Risk Manager shall:
- 1) Ensure that this directive is reviewed annually and updated, as needed,
 - 2) Review and comment on all facility/office site and area specific fire plans,

- 3) Promote standardization of fire and life safety processes and procedures ensuring consistency between DOC facilities, and
 - 4) Coordinate the fire safety program at the Grimke Building to include monthly, quarterly and annual inspections and abatement as well as emergency response and evacuation activities pursuant to PM 2920.5 *Emergency Response and Evacuation Plan*.
- b. Contractors. Pursuant to federal and local regulations and contractual requirements, contractors shall comply with the DOC fire safety program.
- c. Contracting Officer Technical Representatives (COTR). DOC managers assigned as the COTR and Contract Monitors, in conjunction with the Fire Safety Officer shall generally monitor and document contractor compliance with life safety requirements cited during the contractor's internal reviews, the COTR's inspections/audits and external inspector's reports.
- d. Warden. The Warden shall ensure compliance with the following critical life safety program functions at the CDF.
- 1) Fire protection equipment is adequately placed and maintained throughout the CDF,
 - 2) There is a systematic schedule of inspections and audits to ensure the fire and safety program is operational,
 - 3) Violations and corrective actions are documented in accordance with *PS 2920.4 Inspections and Abatement Program*,
 - 4) Review plans of action when abatement can not be readily achieved,
 - 5) Conduct follow-up inspections and when needed have the Fire Safety Officer to inspect remedial action(s) the contractor takes when DOC or another external authority cite non-compliance of fire safety requirements,
 - 6) Staff and inmates are trained in the fire protection and life safety prevention program, and
 - 7) Propose other appropriate remedial action for continued deficiency or failure to comply.
- e. Fire Safety Officer. The Fire Safety Officer shall:
- 1) As qualified, conduct tests or otherwise coordinate and maintain a record of required tests, inspections, plan(s) of action, and certifications of fire extinguishers, smoke management systems, fire

sprinkler systems, chemical suppression systems, fire alarm and automatic detection systems, standpipes, fire hydrants, and other systems as required for compliance with all applicable federal, DC, and/or local fire safety codes,

- 2) Compile comprehensive documentation of inspections, certifications, and tests and promptly distribute a test summary with deficiencies noted,
 - 3) In conjunction with the responsible program manager(s) initiate, periodically update and coordinate the completion of a plan of corrective action,
 - 4) Conduct designated monthly and quarterly inspections; submitting documented deficiencies to the Warden within fourteen (14) calendar days of knowledge of non-compliance,
 - 5) Conduct and monitor testing procedures, fire drills and other fire safety activities and address deficiencies observed,
 - 6) Inspect the emergency key system to ensure key rings and key cabinets are color coded, keys are color coded and notched, test keys and locks to ensure they function properly and inspect doors to ensure they open properly and are not obstructed,
 - 7) Conduct and document weekly inspections and take corrective action to ensure all flammable, toxic and caustic materials in CDF are stored in approved containers and in secured areas,
 - 8) In conjunction with managers and supervisors, ensure the removal of flammable materials, trash and any hazardous materials,
 - 9) Input repair orders pursuant to *PS 7500.2 Facilities Management*,
 - 10) Train, provide guidance and monitor operations to ensure managers, contract monitors, floor wardens comply with the fire safety program, and
 - 11) Develop, implement and provide oversight for appropriate fire safety training for inmates.
- f. Floor Wardens. Pursuant to PM 2920.5 *Emergency Response and Evacuation Plan*, Floor Wardens shall:
- 1) Coordinate emergency response and evacuation of the Grimke and CDF administrative buildings by ensuring personnel leave their work area(s) and proceed to assigned stairwells or exits,

- 2) Conduct and document designated weekly fire safety inspections, and
 - 3) Participate in monthly fire safety inspections with the Fire Safety Officer.
- g. Facilities Management. Facilities Maintenance staff shall:
- 1) Inspect, test, repair and or replace fire safety equipment pursuant to the preventive maintenance plan,
 - 2) Conduct weekly inspections of the emergency generators and quarterly load testing,
 - 3) Ensure sprinklers, alarms, fire suppression equipment, furnaces and other heat producing appliances are tested and certified quarterly and immediately serviced/repared as required, and
 - 4) When deficiencies are observed during the course of preventive maintenance and other repair call requests, input repair work orders.
- h. DOC employees (includes contract employees, interns and volunteers) shall:
- 1) Adhere to requirements for the fire safety program in this directive,
 - 2) Seek advice for fire safety compliance when needed, and
 - 3) Report possible or known fire safety hazards/violations to the supervisor and to the Fire Safety Officer.
9. **DAILY FIRE SAFETY INSPECTIONS IN HOUSING UNITS.** On each shift, the housing unit OIC shall inspect and document:
- a. Exit signs are illuminated
 - b. Exits are free from obstruction
 - c. Locking mechanisms operate without restriction (unit, tier, and cells)
 - d. First Aid kits are present and the seals are not broken.
10. **WEEKLY FIRE SAFETY INSPECTIONS**
- a. CDF. Program Managers/Unit heads shall conduct, document and forward results of weekly fire safety inspections of their work areas to the Fire Safety Officer. Units heads shall include but may not be limited to positions as follows:

- 1) Administration Building. The Deputy Warden for Support, OMITS, Records Office Chief, Law Librarian, Chief Case Manager, Principal, Training, Medical, Facilities Maintenance, Environmental Safety and Sanitation (offices and chemical rooms), Food Services (Culinary and Staff Dining room), Warehouse (to include the loading dock), Command Center, R&D Control, R&D Processing, Inmate Property and Laundry.
 - 2) Secure Building. The Zone Supervisor shall inspect housing units; floor control hallways, control bubble and escalators; inmate visiting halls; staff lounge and locker rooms; and sally port.
- b. Grimke. Designated Floor Wardens shall conduct and document weekly fire safety inspections (Attachment A).
 - c. When deficiencies are noted, the manager/department head/ floor warden shall direct staff to comply with fire safety rules for their work space; generate a repair order request in the facilities maintenance database when applicable and submit their inspection reports to the Warden and Fire Safety Officer for appropriate action.
 - d. Weekly fire safety inspections shall primarily consist of but may not be limited to:
 - 1) *Fire Extinguishers*. Conduct weekly visual inspections of the assigned fire extinguishers in their area of responsibility and document whether:
 - a) The extinguisher is in its designated place,
 - b) There are no obstructions to accessing equipment,
 - c) Operating instructions are legible and facing outward,
 - d) Safety seals are not missing or broken, and
 - e) There is no obvious physical damage, corrosion, or leakage.
 - 2) *Emergency Equipment and Supplies*
 - a) Emergency flashlights and battery operated radios are operational, and
 - b) First aid kits have the seal that verifies all required supplies are enclosed.
 - c) Order supplies to replenish the first aid kit and ensure repair/replacement of all emergency equipment.

- 3) *Emergency Evacuation Plans.* Conduct and document the weekly inspection of posted evacuation plans to ensure that they are not altered, defaced or covered with other materials.

11. MONTHLY INSPECTIONS

- a. CDF. The DOC Fire Safety Officer shall conduct a monthly inspection of the CDF.
- b. Grimke Building. The DOC Fire Safety Officer shall conduct a monthly inspection of Grimke and submit a written inspection report to the responsible manager and when appropriate, to support services to include but not be limited to Facilities Management and the Risk Manager.
- c. Monthly Inspections shall include but may not be limited to:
 - 1) *Fire Extinguishers.* Fire extinguishers when they are initially placed into service and thereafter at monthly intervals. The inspector shall date and sign that each inspection was completed either on a tag or label attached to the fire extinguisher, on a inspection checklist or in an electronic database (Attachment B).
 - 2) *Sprinkler Systems.* Sprinkler systems shall be visually inspected and documented as whether a wet or dry system; the condition of gauges and control valves and gauges readings. Quarterly inspections shall be conducted of alarm device flow switches, test valves, and hose connections.
 - 3) *Standpipes.* Standpipes shall be visually inspected and documented for operation of control valves and the housing/cabinet. They shall be inspected quarterly for operating pressure regulating devices, piping, hose connections and alarm device flow switches.
 - 4) *Fire Alarms.* Fire alarm backup batteries, power supplies, lamps/LED's, alarm notification equipment and smoke/heat/duct detectors/infrared transmitting devices shall be visually inspected and conditions documented.
 - 5) *Exit Signs.* Not less than thirty (30) second functional testing.
 - 6) *Emergency Exits.* Conditions of door handles, hinges, locking and automatic closing mechanisms; exit signs and posted evacuation plans shall be visually inspected and documented.
 - 7) *Hazardous Chemicals/Materials Storage Areas.* Chemicals/materials are controlled, dispensed, labeled, inventoried and stored in accordance with applicable safety codes and MSDS information

pertaining to each chemical/material is stored near the item.

- d. If deficiencies are identified in the inspection report the Fire Safety Officer shall consult with the responsible manager for appropriate action.
- e. The manager(s) and other affected parties shall submit a plan of corrective action to the Fire Safety Officer pursuant to *PS 2920.4 Environmental Safety and Sanitation Inspections and Abatement*.
- f. The manager(s) and other affected parties shall submit documentation to the Fire Safety Officer that corrective action was completed.
- g. The Fire Safety Officer shall conduct a follow-up inspection and either approve/document successful completion or shall make further recommendations for remedial action.
- h. *Monthly Fire Safety Inspections*. Participate in monthly fire safety inspections with the Fire Safety Officer and in annual DCFEMS and OSH fire safety inspections.

12. FIRE DRILLS

- a. The Fire Safety Officer shall conduct and document fire drills at least quarterly on all shifts in the CDF housing units, secure facilities and quarterly in administrative areas of the facility. The Fire Safety Officer shall conduct fire drills twice a year at the Grimke Building.
- b. Fire drills shall include the evacuation of all inmates with the exception of special management, protective custody, mental health or other inmates whose participation would pose a threat to facility security. Staff assigned to units housing this class of inmates shall be required to perform all of their fire evacuation related duties short of actually releasing inmates during fire drills.
- c. Manual release mechanisms shall be utilized to release inmates from cells during fire drills.
- d. Emergency key drills shall be conducted in conjunction with fire drills.
- e. Fire drills shall be timed. The fire drill shall begin when the drill and location are announced. The drill ends when all staff and inmates are arrive at the evacuation site.
- f. An official count shall be conducted following fire drills where inmates are evacuated.

13. FIRE INVESTIGATIONS

- a. Following an emergency response by the fire department, the DCFEMS officer-in-charge at the scene shall investigate the existence of suspected or reported fires, gas leaks, or other hazardous conditions or situations.
- b. The Fire Safety Officer shall compile documentation from DCFEMS and any findings and recommendations that the Fire Safety Officer shall make upon any required subsequent investigation.
- c. The Fire Safety Officer shall appropriately investigate all reported fires in the facility/office, no matter how minor.
- d. The Fire Safety Officer shall prepare a written investigative report and forward it pursuant to PS 1280.2 *Reporting and Notification Procedures for Significant Incidents and Extraordinary Occurrences*.
- e. Suspicious fires shall be reported to the Office of Internal Affairs for appropriate action.

14. **AFTERACTION BRIEFINGS.** The Fire Safety Officer shall participate in after action briefings that involve fire safety issues pursuant to PS 1311.9 *After Action Reviews and Reports*.

15. **ANNUAL FIRE SAFETY INSPECTIONS**

- a. DOC shall request annual DCFEMS inspections of the CDF and Grimke Building to monitor compliance with applicable fire and safety codes.
- b. The DC Department of Health (DOH) inspects the CDF three (3) times a year.
- c. The DC Office of Occupational Safety and Health conducts periodic inspections at CDF and Grimke Building.
- d. The Fire Safety Officer, the Environmental Safety Officer and Facilities Management Chief (and Floor Wardens as assigned) shall participate in each inspection.
- e. Program Managers/Unit Heads shall participate in the inspection of their specific areas of operation/responsibility.
- f. Whenever possible, the managers listed in ¶ d. and ¶ e. above, shall ensure immediate corrective action is taken and documented as deficiencies are noted during the inspection.

- g. The DCFEMS inspector will issue the written findings and recommendations to the Warden and Risk Manager about CDF and to the Risk Manager for inspections conducted at the Grimke Building.
- h. If deficiencies are identified in the CDF inspection report, the CDF Warden shall develop a Plan of Corrective Action and submit it to the Risk Manager. The Risk Manager shall submit it to the inspecting authority when required. The Risk Manager, in conjunction with the CDF Warden shall periodically review progress to abate the deficiencies.
- i. If deficiencies are identified at the Grimke Building, the Risk Manager shall in conjunction with the Fire Safety Officer develop a Plan of Corrective Action pursuant to PS 2920.4.



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Director

Attachment A	Weekly/Monthly Safety Inspection Report
Attachment B	Fire Extinguisher Inspection
Attachment C	Fire Drill Inspection Report