



**DISTRICT OF COLUMBIA
DEPARTMENT OF CORRECTIONS**

Program Statement

OPI
Number: 2920.4B
Date: January 15, 2008
Supersedes: PM 2920.4 (2/15/07)
Subject: Inspections and
Abatement Program

1. **PURPOSE AND SCOPE.** The environmental safety and sanitation program provides requirements and procedures for daily housekeeping, preventive maintenance and life safety inspections and corrective actions necessary to provide a safe work environment at the Central Detention Facility (CDF).
2. **POLICY.** It is DC Department of Corrections (DOC) policy to, consistent with applicable codes and standards, ensure action is taken to prevent, identify and document correction of sanitation, health and safety problems and deficiencies at DOC and contract facilities.
3. **APPLICABILITY.** This directive applies to all DOC employees, contract employees, volunteers and inmates assigned to the CDF.
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 programs.
5. **PROGRAM OBJECTIVES.** The expected results of this program are that:
 - a. DOC shall conduct daily, weekly and monthly inspections as set forth by policy and external agencies shall conduct not less than annual inspections of safety, health and sanitation at the CDF.

- b. DOC shall generate a plan of action any time a deficiency requiring a written response is identified during an internal or external audit, facility inspection or walk through and shall document the corresponding corrective action.

6. DIRECTIVES AFFECTED

a. Directives Rescinded

PS 2920.4A Environmental Sanitation Program (2/15/07)

b. Directives Referenced

- 1) PS 2120.3 Food Service Program
- 2) PS 2920.1 Fire Safety Program
- 3) PS 2920.3 Hazardous Waste Management
- 4) PS 2920.5 Environmental Safety and Sanitation Inspections
- 5) PS 2920.6 Housekeeping Plan
- 6) PS 4210.2 Inmate Institutional Work Programs
- 7) PS 7500.2 Facilities Maintenance

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

8. 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-4D-01.
- c. American Correctional Association (ACA), 4TH Edition, Performance-Based Standards for Adult Local Detention Facilities: 4-ALDF-1A-01, 4-ALDF-1A-08, 4-ALDF-IC-09.

9. RESPONSIBILITIES

- a. *Annual Independent Inspections.* The Environmental Safety Officer shall coordinate and maintain documentation of life safety inspections at the CDF and Corrections Corporation of America-operated Correctional Treatment Facility. These inspections include but may not be limited to the

DC Fire and Emergency Management Services (DCFEMS) and DC Department of Health. Inspectors shall be given unfettered access to pertinent areas of the institution, and reports and recommendations shall be issued to the Warden and responsible agency executives for corrective action.

- b. *The Risk Assessment and Control Committee.* Chaired by the agency Risk Manager, the committee shall meet monthly to resolve issues including environmental safety and sanitation conditions, fire safety and facilities maintenance. These issues may include deficiencies that were cited but not abated within the designated time frame, that require additional action and deficiencies that require resolution beyond the Committee's control. The Committee may be composed of the Warden, the Safety Officer, the Fire Protection Specialist, Facilities Management Manager and a Union Representative. Deputy Wardens, the Chief Engineer, Program Managers, Office Chiefs, Zone Lieutenants and the Environmental Lieutenant may be called upon when needed.
- c. *The Warden* is responsible for the implementation of the environmental safety and sanitation program at the CDF.
- d. *The Deputy Warden for Support* shall at the CDF manage the fire and environmental safety and sanitation programs, ensure compliance with acceptable health and sanitation standards, and provide advice and assistance in correcting deficiencies.
- e. *The Deputy Warden for Operations* shall ensure all uniformed staff at CDF performs their responsibilities related to environmental safety and sanitation.
- f. *The Environmental Safety and the Fire Safety Officers* shall respectively:
 - 1) Conduct regular environmental safety and fire safety inspections, cite deficiencies and assist with appropriate corrective action activities.
 - 2) Inspect corrective action(s) to ensure the problem is adequately abated.
 - 3) Provide technical support to staff and managers and ensure staff and inmates receive appropriate orientation and refresher training in the performance of their related duties..
- g. *The Facility Maintenance Manager* shall oversee the contracted Facilities Management program to ensure preventive maintenance, routine and emergency repairs are completed
- h. *The Food Services Contract Monitor* shall inspect/monitor contactor compliance for food service operations.

- i. *Program Managers and Office Chiefs* shall regularly inspect work areas under their responsibility for compliance with life safety requirements.
- j. *Uniformed Staff*
 - 1) The *Environmental Supervisor* shall manage and/or supervise environmental officers and the inmate environmental work details and arrange schedules and other logistics for the major cleaning projects.
 - 2) *Environmental Officers* shall supervise the inmate environmental squad workers.
 - 3) *Zone Supervisors* shall manage day-to-day operations within the four (4) zones at the CDF. They shall regularly monitor housing unit inspections.
 - 4) *Unit Officer-in-Charge (OIC) and Cellblock Officers* shall conduct inspections and ensure cellblocks are clean and safe; monitor and supervise inmate's use of cleaning equipment and ensure equipment is maintained in a locked, secure area. The Unit OIC shall supervise the housing unit detail squad.
- k. *Employees*. DCDC employees are responsible for ensuring their respective work areas are clean, safe and in full compliance with this and supportive directives.
- l. *Inmates*. Inmates shall keep their cell and personal living space clean.

10. ACCOUNTABILITY FOR CORRECTIVE ACTION(S)

- a. When a housing unit is cited for deficiencies, responsible managers and staff shall be given an opportunity to improve their level of attention given to the inspection process or to ensure that inmate workers clean deficient areas.
- b. The Environmental or Fire Safety Officer shall ensure that on-the-job or formal remedial training are provided when appropriate.
- c. Continuous failure to correct deficiencies after retraining shall result in corrective action.
- d. Managers and supervisors are subject to corrective action for failure to comply with responsibilities and procedures set forth in this directive.
- e. Inmates who fail to maintain their personal areas in accordance with this directive, or who otherwise contribute to citations, shall be subject to disciplinary action in accordance with PM 5300.1C "Inmate Disciplinary and Administrative Housing Board Procedures."

- f. Inmates assigned to work details may be given an opportunity to improve their performance however, failure to improve work performance or repeated deficiencies may result in loss of detail assignment.

11. PLAN OF ACTION(S)

- a. In all cases when an inspection is performed by an outside agency, the Correctional Program Specialist designated to coordinate quality assurance for the environmental safety and sanitation program shall upon receipt of the deficiency notice, generate the Plan of Action (POA) within fifteen (15) days of receipt of the inspection report and forward it to the Warden for review and approval. Upon approval the POA will then be forwarded to the appropriate Deputy Warden for implementation).
- b. The plan of action will include the area where the deficiency was discovered, the date of the audit, the type of audit conducted, the total number of POA's generated, the reference number used in the inspection report identifying the particular deficiency, the statement of non-compliance, the strategies to abate the deficiency, the person responsible for corrective action and the target completion date.
- c. The target date should be set as soon as practical. If the abatement requires staffing, funding, equipment, etc. the target date should be set for no more than sixty (60) days. Such abatement activity shall be consistent with regulations and programs for funding and procurement of good and services.
- d. The Deputy Warden shall ensure the responsible program manager/office chief receives a copy of the POA and implements the necessary strategies.
- e. The responsible program manager/office chief shall consult when needed with other facility managers, quality assurance coordinators or the Risk Assessment Committee to coordinate corrective action or to seek managerial/administrative guidance for implementing the strategies/action steps as indicated on the POA within the established target date.
- f. Upon abatement of all noted deficiencies the senior manager shall forward a signed copy of the POA to the Correctional Program Specialist responsible for quality assurance. The Correctional Program Specialist will confirm the deficiencies were corrected.
- g. Internal Inspections
 - 1) Internal informal POA's developed from facility walk-throughs do not require the approval process. 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 senior manager shall forward the POA to the Correctional Program Specialist when corrective action is successfully completed.

12. MONITORING/FOLLOW-UP

- a. The Correctional Program Specialist responsible for quality assurance shall monitor completion of determined strategies/action steps. Outstanding POA's will be reviewed every thirty (30) days.
- b. In the event that a POA cannot be completed by the target date, the Correctional Program Specialist shall meet with the senior program manager to determine if additional time is required. If an extension is necessary the Warden or when required the Deputy Director will approve the extension.

13. CERTIFICATION

- a. Upon completion of strategies/action steps Correctional Program Specialist and the Warden shall sign the POA certifying that all strategies/action steps were completed and the deficiency is corrected.
- b. The Correctional Program Specialist shall close out the deficiency in the tracking system.
- c. The Correctional Program Specialist shall coordinate with the Risk Manager for issuance of notice of completed corrective action to external agencies.


Devon Brown
Director