

**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF THE INSPECTOR GENERAL**

**DEPARTMENT OF HUMAN SERVICES  
801 EAST SHELTER**

**REPORT OF SPECIAL EVALUATION**

**August 2012**



**CHARLES J. WILLOUGHBY  
INSPECTOR GENERAL**

## **Inspections and Evaluations Division**

# **Mission Statement**

The Inspections and Evaluations (I&E) Division of the Office of the Inspector General is dedicated to providing District of Columbia (D.C.) government decision makers with objective, thorough, and timely evaluations and recommendations that will assist them in achieving efficiency, effectiveness and economy in operations and programs. I&E's goals are to help ensure compliance with applicable laws, regulations, and policies, identify accountability, recognize excellence, and promote continuous improvement in the delivery of services to D.C. residents and others who have a vested interest in the success of the city.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Office of the Inspector General**

Inspector General



August 1, 2012

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Dear Mr. Berns and Ms. Marshall:

This report is part of a special evaluation addressing the conditions and services provided at select District homeless shelters.<sup>1</sup> This report covers the Office of the Inspector General's (OIG) observations from fieldwork conducted at the 801 East Housing Assistance Center (801 East)<sup>2</sup> from July 2011 - February 2012. OIG special evaluations comply with standards established by the Council of Inspectors General on Integrity and Efficiency, and pay particular attention to the quality of internal control.<sup>3</sup>

### Scope

This report is part of an ongoing special evaluation addressing the services and conditions at select District homeless shelters. The team limited its site visits and review to 801 East's low-barrier shelter program.<sup>4</sup>

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<sup>1</sup> There are 65 homeless shelters in the District according to materials received from The Community Partnership for the Prevention of Homelessness (TCP) in April 2011.

<sup>2</sup> According to an 801 East senior manager, this shelter is called "801 East because the building used to be the DHS headquarters located on 801 North Capitol Street NE. When the headquarters was moved to St Elizabeths grounds, the DHS administration decided to keep the name 801 Making life Better lane [sic]. The building is located East of the St. Elizabeth[s] campus, hence [it is called] 801 East Building."

<sup>3</sup> "Internal control" is synonymous with "management control" and is defined by the Government Accountability Office as comprising "the plans, methods, and procedures used to meet missions, goals, and objectives and, in doing so, supports performance-based management. Internal control also serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud." STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, Introduction at 4 (Nov. 1999).

<sup>4</sup> A low-barrier shelter is defined as "an overnight housing accommodation for individuals who are homeless, provided directly by, or through contract with or grant from, the District, for the purpose of providing shelter to

The team conducted an announced site observation at 801 East on July 29, 2011, an unannounced site visit on February 22, 2012, and personnel and client file reviews on July 27 and August 2, 2011. The team also interviewed Catholic Charities and 801 East employees, 801 East clients, and District agency employees. This report addresses the team's observations in the following order: 1) security; 2) medications; 3) services; and 4) documentation at 801 East.

## Background

### Office of Shelter Monitoring (OSM)

On March 14, 2007, the D.C. Code was amended to create OSM within the Department of Human Services (DHS).<sup>5</sup> OSM "monitor[s] shelters and services provided by the District and its contractors to clients who are homeless."<sup>6</sup> This office monitors the services and conditions at homeless shelters, including:

- (1) Health, safety, and cleanliness of shelters;
- (2) Policies, practices, and program rules;
- (3) Accessibility of shelters to clients with disabilities;
- (4) Appropriateness of shelters for families;
- (5) Respect for client rights . . . ;
- (6) Compliance with provider standards . . . ;
- (7) Comments of shelter clients and program staff;
- (8) Ability of the program to facilitate transition from homelessness to permanent housing; and
- (9) Any other information deemed appropriate.[<sup>7</sup>]

According to internal DHS policies and procedures, in carrying out its monitoring function, OSM must conduct annual inspections of all District homeless shelters within the Continuum of Care<sup>8</sup> and all shelters receiving funding from either the District of Columbia or the federal government if the funds are administered by DHS.<sup>9</sup> OSM may conduct more than one inspection per year and may conduct announced or unannounced inspections.<sup>10</sup> Following each site visit, OSM must issue a report summarizing its findings.<sup>11</sup> According to DHS internal policies and procedures (Policy no. FSA-HSRA-003-FY07, p.5), these reports must provide "a list of deficiencies and required corrective action." Generally, providers have 7 days to correct

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individuals without imposition of identification, time limits, or other program requirements." D.C. Code § 4-751.01(26).

<sup>5</sup> See *id.* § 4-754.51.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* § 4-754.52(a).

<sup>8</sup> The "Continuum of Care" is the "the comprehensive system of services for individuals and families who are homeless or at imminent risk of becoming homeless and [is] designed to serve clients based on their individual level of need. The Continuum of Care may include crisis intervention, outreach and assessment services, shelter, transitional housing, permanent supportive housing, and supportive services." *Id.* § 4-751.01(8); see also 29 DCMR § 2544.1; D.C. Code § 4-754.52(c).

<sup>9</sup> See D.C. Code §§ 4-754.52(b), 4-754.01; see also 29 DCMR § 2453.17.

<sup>10</sup> See 29 DCMR § 2453.3.

<sup>11</sup> D.C. Code § 4-754.53(a); see also *id.* § 4-754.52(d).

safety-related deficiencies and 30 days to correct non-safety-related deficiencies. The provider must correct the noted deficiencies and submit documentation to DHS of corrective actions taken within required timeframes.

### 801 East

801 East is a low-barrier shelter<sup>12</sup> located at 2700 Martin Luther King Jr., Avenue, S.E., Washington, D.C. 20032. The shelter serves up to 380 male clients, 18 years of age and older. Catholic Charities<sup>13</sup> operates 801 East through a contract with The Community Partnership for the Prevention of Homelessness (TCP).<sup>14</sup> In fiscal year (FY) 2009, 801 East's budget was \$1,503,072. It was \$1,279,200 in FY 2010, \$1,392,820 in FY 2011, and \$2,228,000 in FY 2012.<sup>15</sup>

801 East is open from 7:00 p.m. to 7:00 a.m., 7 days a week. Clients also may enter the facility between 7 a.m. and 7 p.m. to use the restrooms or meet with employees who are available 24 hours a day. If there is a hypothermia or hyperthermia alert,<sup>16</sup> the shelter is open to clients 24 hours daily until the alert has ended.

Unity Healthcare<sup>17</sup> operates an on-site health clinic from 8:00 a.m. to 11:30 a.m. and 5:00 p.m. to 8:30 p.m., Monday through Friday. Shelter clients can also receive medical health referrals to Christ House,<sup>18</sup> United Medical Center,<sup>19</sup> and the Department of Mental Health (DMH).<sup>20</sup>

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<sup>12</sup> The shelter has two programs: a 12-hour low-barrier program and a 24-hour transitional program known as the Transitional Rehabilitative Program (TRP) "for men ready to take the next step past substance abuse and toward independent living." [Http://www.catholiccharitiesdc.org/page.aspx?pid=359](http://www.catholiccharitiesdc.org/page.aspx?pid=359) (last visited May 25, 2012).

<sup>13</sup> Catholic Charities' mission is to "strengthen[] the lives of all in need by giving help that empowers and hope that lasts." [Http://www.catholiccharitiesdc.org/page.aspx?pid=444](http://www.catholiccharitiesdc.org/page.aspx?pid=444) (last visited July 5, 2012).

<sup>14</sup> According to its website, TCP was established in 1989 with the mission of "serv[ing] as a focal point for efforts to reduce and prevent homelessness in the District of Columbia." [Http://www.community-partnership.org/cp\\_aboutUs.php](http://www.community-partnership.org/cp_aboutUs.php) (last visited May 23, 2011).

<sup>15</sup> Catholic Charities receives this money through a subcontract with TCP, which has a contract with DHS.

<sup>16</sup> A hyperthermia alert occurs "whenever the actual or forecasted temperature or heat index rises above 95 degrees Fahrenheit." D.C. Code § 4-751.01(20). A hypothermia alert occurs "whenever the actual or forecasted temperature, including the wind chill factor, falls below 32 degrees Fahrenheit." *Id.* § 4-751.01(21).

<sup>17</sup> Unity Healthcare's mission is to "offer[] a citywide network of quality health and human services to the medically underserved, regardless of race, ethnic background, or ability to pay." [Http://www.unityhealthcare.org/AboutMission.html](http://www.unityhealthcare.org/AboutMission.html) (last visited Aug. 18, 2011).

<sup>18</sup> The mission of Christ House is to "provide comprehensive health care to sick, homeless men and women from the District of Columbia, and to assist them in addressing critical issues to help break the cycle of homelessness." [Http://www.christhouse.org/about/index.html](http://www.christhouse.org/about/index.html) (last visited Aug. 18, 2011).

<sup>19</sup> United Medical Center's mission is to "be a comprehensive health care organization that cares for the sick and provides quality, cost-competitive services in a financially successful environment while improving the health and well being [sic] of our community." [Http://www.united-medicalcenter.com/united\\_medical\\_center\\_mission.html](http://www.united-medicalcenter.com/united_medical_center_mission.html) (last visited Aug. 18, 2011).

<sup>20</sup> The mission of DMH is to "develop, manage and oversee a public mental health system for adults, children and youth and their families that is consumer driven, community based, culturally competent and supports prevention, resiliency and recovery and the overall well being [sic] of the District of Columbia." [Http://dmh.dc.gov/dmh/cwp/view,a,3,q,515952,dmhNav\\_GID,1480,dmhNav,%7C31269%7C,.asp](http://dmh.dc.gov/dmh/cwp/view,a,3,q,515952,dmhNav_GID,1480,dmhNav,%7C31269%7C,.asp) (last visited Aug. 18, 2011).

Clients who want to sleep at 801 East must line up outside of the building before 7:00 p.m.<sup>21</sup> and are served on a “first come, first served” basis. For safety reasons, an 801 East employee or a security guard searches each client and his belongings to check for prohibited items, such as containers of alcohol, illegal drugs, drug paraphernalia, and weapons. Once clients have been searched, they check in at the staff desk. Clients may provide identifying information if they wish, but it is not a requirement. On a client’s first visit to the shelter, he is asked to meet with a staff person to receive a copy of the program rules and to complete an intake form. Once checked in, clients are assigned bed spaces in 1 of 6 dormitories, each of which sleeps 62-65 people.

### **Recent OSM oversight activities**

In March 2009, April 2010, and July 2011, OSM monitors visited 801 East and completed a Monitoring Inspection Form for each visit.<sup>22</sup> They reviewed client files and personnel files, interviewed clients and employees, and conducted a fire safety check and general inspection of the facility. Monitors also obtained documentation from 801 East employees, Catholic Charities, and TCP to help them complete the Monitoring Inspection Form.

OSM’s March 2009 Monitoring Inspection Form noted that 801 East was “in compliance with the Common Standards and meets the additional standards for providers as specified in the Homeless Services Reform Act. The staff is appropriately trained, qualified[,] and supervised.” However, the form also noted some deficiencies, including: 1) a broken kitchen sink drain; 2) showers that needed cleaning; 3) leaking bathroom faucets; 4) poor hot water pressure in showers; 5) holes in the walls; and 6) staff insensitivities toward clients.

OSM’s April 2010 Monitoring Inspection Form noted that 801 East generally complied with applicable requirements, noting that it was “in compliance with the Common Standards and applicable additional standards by providing a temporary facility with meals, clean bedding, working showers, toilets and access to case management services.” However, this form also noted some deficiencies, including: 1) torn mattresses; 2) missing/torn shower curtains; and 3) a broken air conditioner.

OSM’s July 2011 Monitoring Inspection Form noted that 801 East generally complied with applicable requirements, and that it was “in compliance with the Common Standards and applicable additional standards by providing a temporary facility with meals, clean bedding, working showers, toilets and access to case management services.” However, this form also noted some deficiencies, including: 1) torn mattresses; and 2) non-functioning exit signs in the first floor dining room.

An 801 East manager stated that OSM informed them of deficiencies via email or verbally during visits. However, this manager noted that he/she did not receive a copy of OSM’s Monitoring Inspection Forms and indicated that it would be helpful to receive these reports to address deficiencies quickly. Catholic Charities received copies of OSM’s Monitoring

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<sup>21</sup> There are exceptions in which a bed will be held for a client until 8 p.m.

<sup>22</sup> OSM’s monitoring tool assesses both services provided and conditions at homeless shelters.

Inspection Forms in 2009 and 2010.<sup>23</sup> The team observed that 801 East managers corrected most of the deficiencies cited in OSM's Monitoring Inspection Forms.<sup>24</sup>

## Observations

### Security

According to the Homeless Services Reform Act of 2005 (HSRA), homeless shelter providers are required to "[m]aintain safe, clean, and sanitary facilities."<sup>25</sup> Likewise, Section C.5.1.19 of DHS's contract with TCP stipulates that TCP "shall provide homeless shelter sites that are safe and secure by providing security services for low-barrier shelter and other shelters/programs as needed." The team found a number of security issues at 801 East, including non-functioning magnetometers and a backup electric power generator that may not automatically start in the event of a power outage.

#### 1. Non-functioning magnetometer creates security concerns at 801 East.

DHS's memorandum of understanding (MOU) with the Department of General Services's (DGS) Protective Services Police Department (PSPD)<sup>26</sup> covers some security-related services (e.g., arrests, police services) at District homeless shelters on a "fee-for-service" basis. PSPD also provides x-rays and a magnetometer at 801 East, leases these items to the shelter, and is responsible for the equipment's maintenance.

PSPD leased a magnetometer to DHS for the 801 East facility in December 2009 but hesitated placing it at the shelter because, according to a PSPD employee, the shelter entryway is not wide enough to accommodate a magnetometer. Additionally, 801 East's entryway does not provide separate areas for ingress and egress, and using the magnetometer for both ingress and egress may damage it if individuals attempt to enter and exit the facility simultaneously and bump into the magnetometer (see Appendix 1 for a photograph of the doorway).

Although PSPD employees tried working with 801 East employees to add a door or designate a separate exit door, this did not occur, and PSPD "reluctantly" installed a magnetometer at 801 East in December 2009.

On December 14, 2010, the magnetometer at 801 East became damaged during an incident involving a security officer and a client. According to a PSPD employee, the incident damaged the magnetometer due to the limited space within 801 East's small entryway. In January 2012, PSPD installed a replacement magnetometer costing PSPD \$4,223. An 801 East

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<sup>23</sup> OSM had not yet distributed its 2011 Monitoring Inspection Forms as of February 2012. OSM sent Catholic Charities its 2009 Monitoring Inspection Form on April 15, 2009, and its 2010 Monitoring Inspection Form on May 25, 2010.

<sup>24</sup> Some deficiencies may remain. For example, in OSM's 2009 801 East monitoring reports, clients complained about the quality of meals and the team received similar complaints in July 2011.

<sup>25</sup> D.C. Code § 4-754.21(2).

<sup>26</sup> PSPD "ensure[s] a safe and welcoming environment at District owned and leased buildings."  
<http://dres.dc.gov/DC/DRES/Services/Building+Security/Contact+PSPD> (last visited Aug. 22, 2011).

senior manager stated that the week after PSPD installed this replacement magnetometer, it failed. When the team visited the shelter in February 2012, the magnetometer was not working. According to an 801 East senior manager, it failed because of the entranceway arrangement, and if the magnetometer was repaired again it would fail soon thereafter. Hence, the problem is not the magnetometer, but 801 East's entranceway. In February 2012, the team asked PSPD employees about the issue, and they did not know that 801 East's magnetometer needed repair.

801 East senior management informed the team that, ideally, the shelter should have a separate entrance and exit door in the same entranceway as the magnetometer, allowing clients to enter through one entranceway and exit through another. However, a reconfiguration requires remodeling and, therefore, may be expensive. 801 East's senior management noted that another possible solution is to use an existing doorway, located by the loading station, as the building's exit. This doorway requires a security officer's presence to prevent clients from entering the building through the exit door, thereby avoiding magnetometers. According to 801 East's senior management, the shelter lacks enough security officers to station one at an additional exit.

A PSPD official and an 801 East employee indicated that a magnetometer allows 801 East security personnel to screen clients efficiently. Before installation of this magnetometer, the shelter security officers screened people with a hand wand or by a pat-down search. A PSPD official informed the team that magnetometers are effective as a primary security screening method, while hand wands and pat-downs are good secondary screening methods. The team observed that in lieu of magnetometers, 801 East security officers were conducting pat-downs of clients as they entered the facility.

801 East serves a large number of clients, and, therefore, manual wand screening and pat-downs of each client may be impractical and may result in undetected weapons entering the facility. Also, time-constraints may prevent sufficiently thorough searches with these secondary screening methods. Although an 801 East client stated that drugs and weapons were not a "problem" at the shelter and clients feel safe at the facility, this individual indicated that occasionally "stuff slips through." 801 East's senior management showed the team a weapon that was confiscated at the shelter. (See Appendix 2 for a picture of this weapon.) Likewise, OSM's March 2009 Monitoring Inspection Form noted that clients complained about drugs and weapons in the shelter. Therefore, the team believes that 801 East would be a safer facility with an operational magnetometer.

**2. 801 East's backup electric power generator may not automatically start in the event of a power outage.**

801 East managers expressed concern regarding the facility's electric power generator because it does not automatically start during a power outage. An employee stated that the current generator configuration may compromise security, as there can be a 2- to 3-hour delay or even longer, before the generator is manually started following a power outage. During this delay, "[t]he focus of staff and security personnel [is] . . . the entrance areas and exits, hence removing focus on the dorms" and providing a time period when "certain clients can engage in mischief because the facility is dark in some areas." The automatic switch that starts the

generator has not worked for 3 to 4 years, despite repair requests from 801 East to the Department of Real Estate Services (DRES)/DGS.<sup>27</sup> Although DGS attempted to repair the generator, 801 East management informed the team that a replacement generator is needed. In contrast, a DGS employee stated that the electric generator at 801 East is “operable” and the automatic switch is “functional;” therefore, any plans to replace the electric generator have “yet to be determined.” This individual further noted that “no immediate need to replace it [the generator] has been identified.” The team was unable to view the generator during a power outage, and therefore, is unable to determine whether the generator is completely “operable” and whether the generator automatically turns on in the event of a power outage. If the generator does not automatically start, 801 East employees and clients may be at risk of harm from other individuals who may become agitated, and perhaps aggressive, or attempt to steal from others in a power outage situation. Additionally, maneuvering through a darkened shelter with numerous clients and beds may increase an individual’s likelihood of accidental injury.

### **3. 801 East management expressed concerns regarding ground patrol.**

During the course of this special evaluation, 801 East managers noted a concern that did not rise to the level of a finding but was worthy of discussion. An 801 East senior manager stated that ground patrol is a “large issue” at the shelter because of loitering outside of 801 East as well as the abandoned buildings around the shelter. According to this individual, ground patrols are not conducted consistently or frequently enough. The team followed up with PSPD, and learned that ground patrols are conducted at 801 East at least once per shift, for a minimum of three times per day (each shift lasts 8 hours). Ground patrol monitors client loitering and vacant buildings in the area and also checks to make sure 801 East’s contract security (which monitors the security inside 801 East) is properly licensed. Although a PSPD employee stated that PSPD could “always use more ground patrol in every location,” this individual noted that the amount of ground patrol at 801 was “sufficient.” While ideally 801 East would receive more ground patrol checks, the team did not assess whether the frequency of ground patrols provided is adequate.

## **Medications**

### **4. 801 East does not safeguard many of its clients’ prescription medications, a situation which, given the communal nature of the accommodations, poses a significant threat to clients’ health and safety.**

In 2012, DHS amended its rules regarding storage of homeless shelter client medications. According to DHS’s former contract with TCP, homeless shelter providers must “label and store client medications in a secure area that will be accessible to designated staff.” However, this contract was amended in January 2012 and Section C.5.1.33.6 now states, “no shelter or housing

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<sup>27</sup> “The Department of General Services (DGS), a newly established District agency, provides cost-effective, centralized facility management services. In October of 2011, the agency assumed the functions and responsibilities of the Department of Real Estate Services (DRES), Office of Public Education Facilities Modernization (OPEFM), . . . and the capital construction and real property management functions of several other District agencies.” [Http://dgs.dc.gov/DC/DGS/About+DGS/Who+We+Are?nav=0&vgnextrefresh=1](http://dgs.dc.gov/DC/DGS/About+DGS/Who+We+Are?nav=0&vgnextrefresh=1) (last visited Feb. 22, 2012).

program, without prior approval from the Contractor [TCP], stores or otherwise handles client medications, except upon request by the client as a reasonable accommodation and approved by the Contractor.” 801 East’s program rules likewise state that shelter “[s]taff is not permitted to hold, monitor, or administer medications for clients. For medication that needs to be refrigerated, a small medications refrigerator is available for client use . . . . Storage of medication in this refrigerator is at the client’s own risk.” *Id.* at 17.

Refrigerated medications are stored at 801 East “in a designated refrigerator in a designated room on the fi[rst floor,” at a client’s own risk. Clients keep their non-refrigerated prescription medications on their persons. According to a DHS employee, homeless shelter staff historically managed non-refrigerated prescription medicine, but a discussion with homeless advocates ensued regarding whether this was an invasion of privacy rights. As a result, homeless clients maintain their own prescription medications. According to an 801 East employee, the shelter does not have the personnel capacity to monitor client medications.

Given the likely presence of prescription medications in clients’ rooms and cubicles, room sharing by unrelated men, and the open nature of homeless shelters, the team was concerned by the lack of safe and secure storage of clients’ medications and the potential for accidental or deliberate ingestion by someone other than the prescribed user. One DHS employee expressed concern regarding the potential for theft of unsecured prescription medications by homeless clients or visitors. Purloined medications could be used, sold, or exchanged for other drugs, making them an attractive commodity. Additionally, the health of residents whose prescription medications are lost or stolen may be at risk if they are unable to replace vital medicine.

## Services

5. **A lack of shuttles from 801 East to downtown D.C. may result in “clamoring” to get onboard shuttles and loitering outside of 801 East during the day, which may create security and safety concerns in the vicinity.**

TCP contracts with the United Planning Organization (UPO)<sup>28</sup> to provide scheduled and unscheduled transportation to and from shelters. Scheduled transportation is “limited and is designed to provide general transportation in the mornings and evenings from and to specific locations for groups of individuals [who] are homeless . . . .” Unscheduled transportation “is provided to shelter from random locations based on requests from individuals and families.” UPO’s shuttle service runs year-round from 801 East to downtown D.C. at 6:30 a.m., 7:15 a.m., and 8:15 a.m. and from downtown D.C. to 801 East at 6:30 p.m., 7:15 p.m., and 8:15 p.m.

According to a TCP employee, the purpose of UPO’s shuttle service “is to transport individuals from outlying shelter locations to locations convenient to other services they need to access.” A UPO employee informed the team that these shuttles help homeless shelter clients meet obligations and obtain services (e.g., access to meal programs, transportation to

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<sup>28</sup> UPO’s mission is “Uniting People with Opportunities.” [Http://www1.upo.org/AU0-Main.php](http://www1.upo.org/AU0-Main.php) (last visited Apr. 25, 2012).

appointments and jobs). The District's Winter Plan<sup>29</sup> states that although shuttle service is provided by UPO, "[i]deally, those who are homeless should be enabled to utilize the comprehensive and convenient public transportation system in the District of Columbia (Metrorail and Metrobus) in cases where it is cost effective to do so."

According to a UPO employee, UPO utilizes a 25-person shuttle that can only transport 75 men in three shifts in the mornings and afternoons, but 801 East has a capacity of approximately 380 men. Therefore, the majority of the shelter's clients are not transported downtown or to 801 East through UPO's shuttle service. An 801 East manager stated that approximately 60 to 70 percent of the shelter's clients wish to be transported downtown daily.

UPO's contract with TCP requires UPO to make only "three runs" to and from 801 East daily. However, UPO sometimes conducts more than three runs when there is a need to do so. According to an 801 East manager, the number of runs from the shelter to downtown D.C. are insufficient, and the lack of transportation results in some men refusing to leave the shelter in the morning. Additionally, men "clamor[]" to get aboard the UPO shuttles and loiter around 801 East during the day. The team believes this "clamoring" and loitering may lead to safety and security concerns within the vicinity. Further, 801 East clients may not be able to access services or meet other obligations without transportation. However, clients who cannot fit onboard UPO's shuttles could utilize the Washington Metropolitan Area Transit Authority's (WMATA) bus service. According to WMATA's website and a UPO employee, a bus operates in close proximity (0.1 mile) to 801 East's facility (the A8 bus).<sup>30</sup> However, an 801 East manager indicated that clients currently do not use this option because they have difficulty obtaining free fare cards for public transportation. Some 801 East clients are able to obtain fare cards from nonprofit organizations in the District. However, TCP does not provide clients with fare cards (they are not contractually required to do so), and 801 East employees only provide clients with fare cards for "special projects" (e.g., work/vocational trainings).

## Documentation

### **6. 801 East's personnel records were missing required information, and OSM incorrectly noted in its monitoring reports that the shelter's personnel records contained all required information.**

According to Section C.5.1.34.5.4 of DHS's contract with TCP, homeless shelter providers must maintain "an individual personnel file for each staff member." Each personnel file must include: 1) the employee's application for employment; 2) professional and personal references; 3) applicable credentials/certifications; 4) personnel actions; 5) training history;<sup>31</sup> 6) annual evaluations; 7) any allegations of misconduct and any action with respect to any

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<sup>29</sup> The Winter Plan was "developed by the Interagency Council on Homelessness (ICH) to describe how member agencies and their partners will coordinate to provide hypothermia shelter for those who are homeless, consistent with the right of consumers to shelter in severe weather conditions." [Http://ich.dc.gov/ich/lib/ich/pdf/2011-2012\\_Winter\\_Plan.pdf](http://ich.dc.gov/ich/lib/ich/pdf/2011-2012_Winter_Plan.pdf) (last visited Mar. 7, 2012).

<sup>30</sup> See <http://www.wmata.com/index.cfm> (last visited Mar. 7, 2012).

<sup>31</sup> According to DHS's contract with TCP, homeless shelter employee training must include, but is not limited to, training on: common standards, best practices, cardio pulmonary resuscitation (CPR), and emergency first aid.

allegations; 8) the date and reason for any employee termination; and 9) documentation of a current tuberculosis test.<sup>32</sup>

According to an OSM monitor, OSM reviews homeless shelter employee personnel files by utilizing:

a personnel files checklist that feature[s] required information that the files should contain. We will review a percentage or sampling of files to get a consensus of how well the files are organized and in compliance. Some shelters[,] depending on the number of staff employed, we could review files for the entire staff in the program [sic].

OSM review of an unspecified number<sup>33</sup> of personnel records in March 2009, April 2010, and July 2011 at 801 East, noting that “[p]ersonnel files contain all the required documentation to ensure staff members are appropriately trained, qualified, and supervised,” and that 801 East’s personnel records “continue[] to maintain excellent standards.” OSM’s March 2009, April 2010, and July 2011 Monitoring Inspection Forms all noted that 801 East employees had current cardiopulmonary resuscitation (CPR) and first aid training certifications in their personnel files. OSM’s July 2011 Monitoring Inspection Form noted that more “seasoned” 801 East employees lacked reference checks.

In July 2011, the team randomly selected ten 801 East personnel files to review at Catholic Charities.<sup>34</sup> Overall, the team observed that the personnel files were very well-organized, with each file containing its own table of contents. Despite their commendable organization, these files lacked some required information. Out of the 10 personnel files reviewed:

- 4 lacked reference checks;
- 1 lacked an annual employee evaluation;<sup>35</sup>
- 2 lacked CPR training confirmations, and 4 others contained expired CPR training confirmations;<sup>36</sup>
- 3 contained expired first aid training confirmations; and
- 1 lacked tuberculosis test results (additionally, 2 of the tuberculosis test results were positive).

According to a Catholic Charities employee, employee reference checks, tuberculosis test results, employee evaluations, and training records should have been in 801 East’s personnel

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<sup>32</sup> This contract does not define what “current” means. However, according to TCP’s subcontract with Catholic Charities, tuberculosis tests must be completed annually.

<sup>33</sup> OSM’s Monitoring Inspection Form did not specify the number of personnel files it reviewed.

<sup>34</sup> 801 East has a total of 27 employees.

<sup>35</sup> Two of the 10 employees were recent hires, and therefore, although 3 files did not contain annual employee evaluations, only 1 annual employee evaluation was “missing.”

<sup>36</sup> According to a human resources manager at Catholic Charities, each employee and his or her supervisor is responsible for ensuring that all trainings are up-to-date.

files. A human resources manager at Catholic Charities stated that he/she tries to ensure that all employee personnel records are complete upon hiring. However, there are some items that need to be updated on a recurring basis (e.g., CPR certifications). This individual is in charge of auditing 801 East's personnel records annually, but was unable to do so recently because of a staffing change at Catholic Charities (one employee recently left the organization). Therefore, Catholic Charities was unaware of deficient 801 East personnel files. This individual further noted that personnel record deficiencies, such as missing tuberculosis tests, could be due to administrative oversight or misfiled records.

The lack of documentation regarding actions taken for the two employees with positive tuberculosis tests concerns the team because homeless shelter employees and clients may be at risk of contracting tuberculosis, and the District is at risk of legal liability.<sup>37</sup> Without current CPR and first aid certifications, Catholic Charities and 801 East management do not know whether employees received proper, up-to-date training. The team also is concerned that Catholic Charities has not recently audited 801 East's personnel records, and OSM monitors did not notice some personnel record deficiencies during their annual site visits to 801 East.

#### **7. 801 East does not maintain fire drill records.**

According to Section C.5.1.29.6 of DHS's contract with TCP, TCP shall conduct fire drills at all shelter facilities every 30 to 60 days "to ensure the safety of residents and staff. Following each fire drill, a fire drill form shall be completed and filed for review in a fire drill logbook." Likewise, according to page 9 of TCP's contract with Catholic Charities, Catholic Charities:

shall conduct fire drills at all shelter locations every thirty to sixty days to ensure the safety of residents and staff. Fire drill logs including the time and date of drills, number of participants, weather conditions, time required to complete the exit of the facility and the name and signature of the drill conduct[or] shall be completed and filed at the facility(ies).

Finally, 801 East's internal policies and procedures (Facilities Fire Safety & Fire Drills 08-14-07, p. 4) state that "[a]ll fire drills are to be recorded on the attached Fire Drill Report (or another form that covers the same information) and these will be filed and retained . . . at each facility." According to 801 East employees, fire drills are conducted monthly at the shelter, but there are no fire drill records. Consequently, the team was unable to verify that fire drills were actually conducted.

801 East's internal policies and procedures state that "[f]ire is one of the most potentially hazardous events that can occur in a facility. In order to assure a high level of preparedness, fire safety training, fire safety inspections, and fire drills will be conducted on a regular basis." *Id.* at

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<sup>37</sup> See <http://washingtonexaminer.com/local/dc/2011/06/metroaccess-riders-exposed-tuberculosis-sue-transit-agency> (last visited June 29, 2011).

1. Without adequate documentation, there is no proof that fire drills are conducted at the 801 East facility. The team believes that recording fire drills is necessary, not only to fulfill TCP's and Catholic Charities' contractual requirements, but also to document that shelter employees take necessary fire preparedness steps. Additionally, the records could be reviewed periodically for trends in problems with individuals exiting safely from the premises and accounting for individuals during a fire drill so that they can be proactively addressed.

## **Conclusion**

The team is concerned about non-functioning magnetometers inside of 801 East; the possible lack of automation in 801 East's electric power generator; the lack of storage for clients' prescription medications; and the lack of transportation options for 801 East clients, as these deficiencies could cause safety issues. Additionally, during the team's visit to 801 East and upon reviewing 801 East's documentation, the team noted other issues regarding the operation of the facility, such as incomplete personnel records and lack of fire drills records. Correcting these deficiencies will create a safer, more positive environment for clients at the 801 East shelter.

## **Recommendations:**

- (1) That the Director of the Department of Human Services (D/DHS): 1) collaborate with DGS, TCP, and 801 East management to determine the optimal building configuration that would provide separate doors for egress and ingress, thereby ensuring a functional space for a magnetometer at 801 East; and 2) ensure that the magnetometer is repaired once 801 East's building can accommodate it.
- (2) That D/DHS collaborate with DGS to: 1) assess the capabilities and limitations of 801 East's backup electric power generator; and 2) determine whether the generator needs to be repaired or replaced.
- (3) That D/DHS coordinate with DGS to conduct a thorough security evaluation of the 801 East facility.
- (4) That D/DHS, TCP, and 801 East management, in consultation with qualified medical professionals, implement a system for labeling, securing, logging, and providing residents access to their prescription medications.
- (5) That D/DHS coordinate with TCP, UPO, and 801 East management to determine the shelter population's transportation needs and address them to the satisfaction of all parties.
- (6) That D/DHS collaborate with TCP and Catholic Charities to ensure that 801 East personnel files contain all contractually required information and ensure that OSM accurately evaluates and records personnel file practices at homeless shelters.
- (7) That D/DHS collaborate with TCP and Catholic Charities to ensure that 801 East employees maintain adequate fire drill records.

The issues resulting from this special evaluation will necessitate OIG follow-up to our recommendations. To aid in this process, I request that you provide information and periodic updates to this Office regarding any corrective actions that you direct. If you have any questions about the report, please contact Alvin Wright, Jr., Assistant Inspector General for Inspections and Evaluations, on (202) 727-2540.

Sincerely,



Charles J. Willoughby  
Inspector General

CJW/al

cc: See **Distribution List**

**DISTRIBUTION:**

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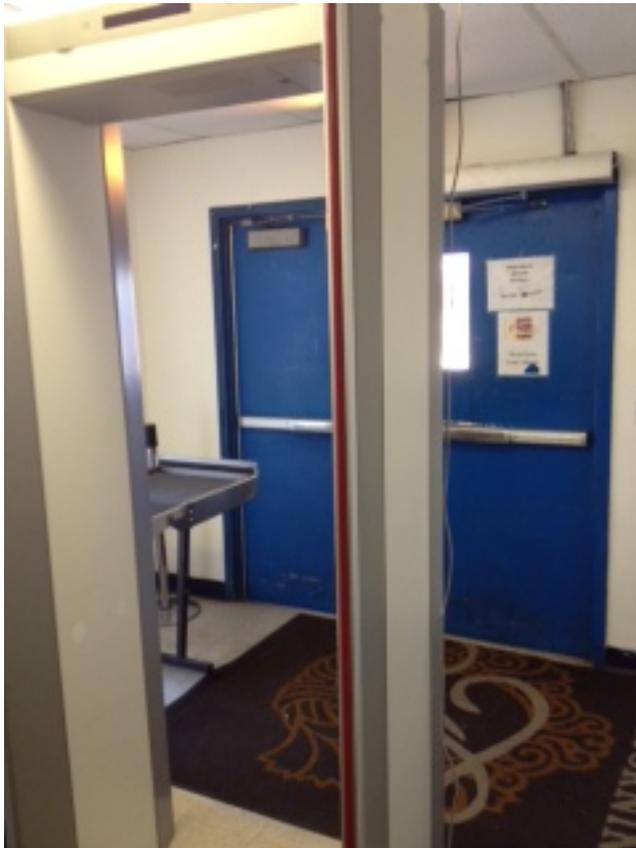
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General Government, Attention: Marianne Upton (via email)

The Honorable Jerry Moran, Ranking Member, Senate Subcommittee on Financial Services and  
General Government, Attention: Dale Cabaniss (via email)

### **Appendix 1: Doorway at 801 East**

801 East's entryway does not provide for a separate area for ingress and egress. Clients entering and exiting 801 East may cause damage to the magnetometer if someone attempts to exit the facility while another individual tries to enter the facility, causing someone to bump into the magnetometer.



**Appendix 2: Weapon confiscated at 801 East**





The Community Partnership  
For The Prevention  
of Homelessness

15235

2012 SEP 18 PM 2:57

August 28, 2012

Charles J. Willoughby  
Inspector General  
Office of the Inspector General  
717 4<sup>th</sup> Street, NW  
Washington, DC 20005

RE: OIG Control Number 12-I-004JA

Dear Mr. Willoughby;

The Community Partnership is in receipt of the Report of Special Evaluation of the 801 East Shelter dated August 2012. The report has seven specific recommendations that require the Director of the Department of Human Services coordinate and collaborate with the Community Partnership and Catholic Charities to resolve the identified issues. The responses below reflect the steps that have been taken to address each recommendation.

- (1) That the Director of the Department of Human Services (D/DHS): 1) collaborate with DGS, TCP, and 801 East Management to determine the optimal building configuration that would provide separate doors for egress and ingress, thereby ensuring a functional space for a magnetometer at 801 East; and 2) ensure that the magnetometer is repaired once 801 East's building can accommodate it.

*These structural issues have been previously communicated by Catholic Charities and the Community Partnership to the DC Department of Human Services (DHS) and the DC Department of General Services (DGS). Both TCP and Catholic Charities are prepared to continue working with the partner agencies to resolve this issue recognizing that any modifications to the building must be approved and implemented by the city as this is a District owned facility.*

- (2) That D/DHS collaborate with DGS to: 1) assess the capabilities and limitations of 801 East's backup electric power generator; and 2) determine whether the generator needs to be repaired or replaced.

*Ongoing issues with the existing generator and concerns about the limitations of electrical power at 801 east have been previously communicated by TCP and Catholic Charities to DHS and DGS. Both TCP and Catholic Charities are prepared to continue working with the partner agencies to resolve this issue recognizing that any repairs or replacement of existing equipment must be approved and implemented by the city as this is a District owned facility.*

- (3) That D/DHS coordinate with DGS to conduct a thorough security evaluation of the 801 East facility.

*Concerns related to the 801 east campus security issues have been communicated by TCP and Catholic Charities to DHS and the DC Protective Services Department (PSD). Both TCP and Catholic Charities are prepared to work with the above partner agencies to support the conduct of a security evaluation.*

- (4) That D/DHS, TCP, and 801 East Management, in consultation with qualified medical professionals, implement a system for labeling, securing, logging, and providing residents access to their prescription medications.

*As stated on page 7 of the OIG's Report of Special Evaluation, the TCP contract with DHS states the following:*

**C.5.1.33.6** The Contractor shall ensure that no shelter or housing program, without prior approval from the Contractor, stores or otherwise handles client medications, except upon request by the client as a reasonable accommodation and approved by the Contractor.

*Catholic Charities is not contracted to provide this service and the practice is not encouraged in programs other than those for which the program design includes restricting access to individual medications such as substance abuse programs.*

- (5) That D/DHS coordinate with TCP, UPO, and 801 East Management to determine the shelter population's transportation needs and address them to the satisfaction of all parties.

*Concerns related to limited shuttle service for clients at the 801 East Men's Shelter have been previously communicated by TCP and Catholic Charities to DHS and the United Planning Organization (UPO). TCP, UPO and Catholic Charities are prepared to work with the partner agencies to find a solution to this issue.*

- (6) That D/DHS collaborate with TCP and Catholic Charities to ensure that 801 East personnel files contain all contractually required information and ensure that OSM accurately evaluates and records personnel file practices at homeless shelters.

*All personnel files for Catholic Charities staff are stored and maintained in the central human resources office for the agency located at 924 G Street, NW. An internal file audit was recently performed for all staff employed at the 801 East Men's Shelter and concluded the following:*

1. 11 staff members require updated CPR and/or First Aid certification documentation in their files
2. 31 staff members require updated health screening documentation in their files.

Catholic Charities has taken the following actions to address these file audit findings:

1. All 11 staff members requiring updated CPR and/or First Aid certification documentation have been registered for training provided by Catholic Charities' Professional Development Department. Trainings began on August 23, 2012 and will be completed by September 27, 2012. Updated documentation will be included in the personnel files for each staff member upon successful completion.
2. All 31 staff members requiring updated health screening documentation have been scheduled for health screening at Providence Hospital. Health screenings will begin September 5, 2012 and be completed by September 11, 2012. Updated documentation will be included in the personnel files for each staff member once received from Providence Hospital.

- (7) That D/DHS collaborate with TCP and Catholic Charities to ensure that 801 East employees maintain adequate fire drill records.

Fire drill records for the 801 East facility are stored in the administrative office at the shelter facility. Twenty five fire drills were conducted between January 2011 and August 2012. Documentation of these drills is available for review. Fire drill data is recorded on a standardized fire drill report form. The fire drill report form included the following required elements listed on page 11 of the OIG's Report of Special Evaluation:

1. Time and date of drill
2. Number of participants
3. Weather conditions
4. Time required to complete the exit of the facility
5. Signature of the drill conductor

We look forward to working with the Department of Human Services, Department of General Services, Catholic Charities and other partner agencies to successfully address the recommendations detailed in the Report of Special Evaluation. Written confirmation of all completed action items will be provided. Please let me know if you have any questions or require further information.

Sincerely,



Sue A. Marshall  
Executive Director