

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

**DEPARTMENT OF HUMAN SERVICES  
D.C. GENERAL 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 20, 2012

David A. Berns  
Director  
Department of Human Services  
64 New York Avenue, N.E., 6th Floor  
Washington, D.C. 20002

Sue Marshall  
Executive Director  
The Community Partnership for the Prevention of Homelessness  
801 Pennsylvania Avenue, S.E., Suite 360  
Washington, D.C. 20003

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 D.C. General Emergency Hypothermia Family Shelter Program (D.C. General)<sup>2</sup> from May 2011 through February 2012.

**Scope**

The primary objectives of this special evaluation were to assess: (1) operations and physical conditions at homeless facilities under the Office of Shelter Monitoring's (OSM) purview; and (2) monitoring and oversight conducted by OSM.

D.C. General's campus has two buildings, the main building and Building 12, which house the homeless. The main building is the larger of the two locations and, therefore, the team limited its site observations to that facility. The OIG team conducted an announced site observation at D.C. General on May 23, 2011, an unannounced site visit on February 13, 2012, and personnel and client file reviews at D.C. General and at The Community Partnership for the Prevention of Homelessness (TCP) on May 25 and 26, 2011. Additionally, the team conducted interviews with D.C. General employees, D.C. General clients, and TCP management. This

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<sup>1</sup> In total, there are 65 shelters in the District that receive District funding.

<sup>2</sup> A hypothermia shelter is a "a public or private building that the District shall make available, for the purpose of providing shelter to individuals or families who are homeless and cannot access other shelter, whenever the actual or forecasted temperature, including the wind chill factor, falls below 32 degrees Fahrenheit." D.C. Code § 4-751.01(21) (Supp. 2012).

report addresses the team's observations in the following order: 1) personnel files; and 2) conditions and cleanliness at D.C. General.

## Background

### OSM

On March 14, 2007, the D.C. Code was amended to create OSM within the Department of Human Services (DHS).<sup>3</sup> OSM "monitor[s] shelters and services provided by the District and its contractors to clients who are homeless."<sup>4</sup> This office monitors 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>5</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>6</sup> and all shelters receiving funding from either the District of Columbia or the federal government if the funds are administered by DHS.<sup>7</sup> OSM may conduct more than one inspection per year and may conduct announced or unannounced inspections.<sup>8</sup> Following each site visit, OSM must issue a report summarizing its findings.<sup>9</sup> According to DHS internal policies and procedures, these reports must provide "a list of deficiencies and required corrective action."<sup>10</sup> Generally, providers have 7 days to correct 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.

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<sup>3</sup> See D.C. Code § 4-754.51 (2008).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* § 4-754.52(a).

<sup>6</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." D.C. Code § 4-751.01(8).

<sup>7</sup> DHS Policy No. FSA-HSRA-003-FY07, Section 5(d). See also D.C. Code §§ 4-754.52(b), 4-754.01.

<sup>8</sup> See DHS Policy No. FSA-HSRA-003-FY07, Section 7(o).

<sup>9</sup> D.C. Code § 4-754.53(a); see also *id.* § 4-754.52(d).

<sup>10</sup> DHS Policy No. FSA-HSRA-003-FY07, Section 7(f).

## D.C. General

D.C. General is a hypothermia family shelter that consists of two buildings located at 1900 Massachusetts Avenue, S.E., Washington, D.C. 20003. D.C. General's capacity recently expanded to house 160 families, with one family in each unit.<sup>11</sup> This number is expected to grow to 253 families in 2012 because of renovations at D.C. General. The main building houses families on the second, third, fourth, and fifth floors while the second building (Building 12) is smaller and houses 48 families. In fiscal year (FY) 2010, D.C. General's budget was \$2,576,208. It was \$2,705,018 in FY 2011 and \$11,833,687 in FY 2012.<sup>12</sup>

TCP manages D.C. General. In the past, Families Forward, Inc. (Families Forward) managed D.C. General. However, due to allegations of sexual misconduct between D.C. General employees and clients, Families Forward lost its contract with DHS on April 2, 2010, and TCP became the interim services provider for the shelter.<sup>13</sup> As of February 2012, TCP remains the service provider.<sup>14</sup>

### Recent OSM Oversight Activities

From January 2010 through February 2011, OSM reported that it visited D.C. General 19 times. In June 2009 and January 2011, monitors visited D.C. General with a Monitoring Inspection Form, noting corrective actions and deficiencies. OSM did not complete an annual site visit at D.C. General in 2010, despite the requirement to do so.

OSM's June 2009 Monitoring Inspection Form evaluated D.C. General under its former management, Families Forward, whereas OSM's January 2011 Monitoring Inspection Form evaluated D.C. General under its current management. In January 2011, monitors reviewed case records and personnel files, interviewed clients and employees, and conducted a fire safety check and a general inspection of the facility. Monitors also obtained documentation from D.C. General and TCP employees, noting D.C. General's compliance with applicable requirements and that it "has adequately complied with the Common Standards and applicable additional standards by providing a temporary facility with meals, clean bedding, working showers, toilets and case management services during the hypothermia season and beyond." However, this Monitoring Inspection Form also listed some deficiencies at D.C. General, including: 1) incomplete personnel records (e.g., missing reference checks, job descriptions, tuberculosis test results, annual employee evaluations, and training records); 2) incomplete client records (missing release of information forms and assessments); 3) client complaints (including complaints about fights amongst clients, the age of D.C. General's facility, employee conduct, broken lights and

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<sup>11</sup> During the team's site visit at D.C. General in May 2011, there were 424 people housed at D.C. General (consisting of 166 adults and 258 children).

<sup>12</sup> FY 2010 and 2011 budgets reflect only the service contract and not food and security. The combined cost in FY 2010 and 2011 was approximately \$7 million annually. The increase in 2012 reflects the capacity increase and associated costs in food, operations, security, and supportive services.

<sup>13</sup> See Darryl Fears, *D.C. Mayor Fires Shelter Operator Families Forward*, WASH. POST, Apr. 3, 2010, available at <http://www.washingtonpost.com/wp-dyn/content/article/2010/04/02/AR2010040201099.html> (last visited May 12, 2011).

<sup>14</sup> D.C. General's employees are TCP employees.

heating, the quality of meals, and rodent infestations); and 4) overdue fire extinguisher inspections in Building 12.

### **Summary of the Past Three Hypothermia Seasons in the District of Columbia**

In the District, individuals and families have a right to shelter during “severe weather conditions,”<sup>15</sup> defined in the D.C. Code as “the outdoor conditions whenever the actual or forecasted temperature, including the wind chill factor or heat index, falls below 32 degrees Fahrenheit or rises above 95 degrees Fahrenheit.”<sup>16</sup>

D.C. Village was the hypothermia shelter for homeless families in the District before closing in 2008;<sup>17</sup> thereafter, D.C. General became the only hypothermia site available for families. This shelter was only open during hypothermia season. Starting in the winter of 2009, however, D.C. General remained opened year-round because demand for family shelter increased. From 2008 to 2011, “family homelessness in the District increased by 46%” and from 2011 to 2012, the number of families in the city’s hypothermia shelters increased by 138%.<sup>18</sup> As a result, D.C. General reached capacity during the winters of 2010/11 and 2011/12. Consequently, DHS employees needed additional locations to house homeless families throughout the winter, when there is a right to shelter.<sup>19</sup> D.C. General expanded each year, from 75 units in winter 2009 to 135 units in winter 2010 to 160 units in 2012. In 2012, the shelter is expected to continue to expand to 253 shelter units.

During winter 2010, D.C. General housed approximately 200 families within the shelter, with a capacity to serve only 135 families, forcing families to double-up in rooms and sleep in common areas. DHS used slots in permanent supportive housing (PSH)<sup>20</sup> to supplement D.C. General’s limited capacity. In March 2010, DHS housed approximately 70 families in PSH units. Entering winter 2011/12, DHS faced the same problem as in winter 2010/11.

Although DHS’s housing program, called the short-term exit assistance program (STEAP),<sup>21</sup> was designed to assist families with the bed shortage at D.C. General, families did not want to participate in this program. According to a senior Family Services Administration (FSA) manager, families hesitated to participate in this program because they were not able to find affordable units during the 12-month STEAP subsidy or cover the rent obligations required under the STEAP program.

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<sup>15</sup> See D.C. Code § 4-754.11(5) (2008).

<sup>16</sup> *Id.* § 4-751.01(35) (Supp. 2012).

<sup>17</sup> See Sylvia Moreno, *District Closing ‘Inhumane’ D.C. Village*, WASH. POST, Oct. 23, 2007, available at <http://www.washingtonpost.com/wp-dyn/content/article/2007/10/22/AR2007102202211.html> (last visited June 22, 2011).

<sup>18</sup> [Http://washingtonlegalclinic.wordpress.com/2012/04/10/real-life-hunger-games-are-children-being-sacrificed-in-our-nations-capital](http://washingtonlegalclinic.wordpress.com/2012/04/10/real-life-hunger-games-are-children-being-sacrificed-in-our-nations-capital) (last visited Apr. 17, 2012).

<sup>19</sup> See D.C. Code § 4-754.11(5).

<sup>20</sup> Permanent supportive housing is defined as “supportive housing for an unrestricted period of time for individuals and families who were once homeless and continue to be at imminent risk of becoming homeless . . . for whom self-sufficient living may be unlikely and whose care can be supported through public funds.” 25 DCMR § 2599.1.

<sup>21</sup> STEAP provided families with subsidies to assist them in paying rent for 12 months, but provided this money on a sliding scale, each month requiring families to contribute a larger portion of their rent.

Starting in January 2011, to prevent overcrowding, D.C. General placed families in hotels. Families arrived at Virginia Williams Family Resource Center (VWFRC), the “central intake office for all families requesting emergency housing and assistance in the District of Columbia,”<sup>22</sup> for intake interviews. If VWFRC employees deemed these families as priority 1<sup>23</sup> during a hypothermia alert, and D.C. General was at capacity, DHS placed them in a hotel. DHS placed approximately 75 families in hotels during winter 2010/11 and approximately 275 families during winter 2011/12.

According to FSA’s senior management, placing families in hotels was beneficial because it prevented overcrowding at D.C. General but there were challenges, including the expense. During winter 2010/11, DHS spent \$335,509 placing families in hotels. After winter 2011/12, a DHS senior manager speculated that hotels costs would reach the million dollar range during winter 2011/12. In addition to the hotel costs, the District paid for its employees to coordinate hotel placements. The hotels also provided other challenges. For example, Motel 6 directed some families to checkout when they were not required to do so. Additionally, by placing families in hotels, the demand for shelter increased. According to an FSA senior manager, people prefer to stay in hotels over shelters. Although these individuals do not have a “choice” regarding where they will stay, families may have opted to go to VWFRC when they learned that DHS was placing families in hotels in lieu of D.C. General. Additionally, the team learned that, after hypothermia season, some families refused to be transferred from hotels to D.C. General and, as a result, a FSA senior manager speculated to the team that these families may not have been priority 1 clients (e.g., if the families had somewhere else to sleep, they would be priority 2 or 3 clients). DHS was only placing priority 1 families in hotels during hypothermia alerts, but may have inadvertently used funds to place priority 2 or 3 families in hotels, costing the District money. Finally, disruptive client conduct issues occurred at hotels, such as clients inviting guests to the hotels.

At the end of winter 2010/11’s hypothermia season, DHS transferred families in hotels to D.C. General when space became available. As a result, VWFRC did not place new families at

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<sup>22</sup> [Http://www.dccfh.org/VirginiaHse.php](http://www.dccfh.org/VirginiaHse.php) (last visited June 22, 2011).

<sup>23</sup> Priority levels (or degrees of homelessness) are defined as:

- (1) A family that is homeless and:
  - (A) Living in a place not intended as a residence, such as outdoors, in a vehicle, or in a condemned or abandoned building; or
  - (B) Living in any situation that is dangerous to the health or safety of any household member, shall be given the first priority;
- (2) A family that is homeless and living with another household or in another living situation that is tenuous and in which the family’s right to remain has been revoked shall be given the second priority; and
- (3) A family that is at imminent risk of becoming homeless, such as when the family is at risk of foreclosure or eviction, or is living with another household but the family’s right to remain has not yet been revoked shall be given the third priority . . . .

<sup>29</sup> DCMR § 2508.1(a).

D.C. General during non-hypothermia season because it was full.<sup>24</sup> At the end of winter 2011/12, the team learned of the following development of note: DHS was in the process of moving families from the shelter system into housing to open up space at D.C. General.<sup>25</sup> The team acknowledges that there is no “easy solution” for placing families that need shelter, but urges DHS to continue to work with the Mayor, D.C. Council, and stakeholders to find a workable plan to prevent future overcrowding in shelters and the need for hotel placements, while still providing shelter to families in need. The team also suggests that DHS assess the outcomes of referring homeless families to CFSA, and how such referrals benefit these families.

## Observations

### Personnel Files

1. **Some D.C. General employees who had direct contact with families and children lacked criminal background checks, drug and alcohol testing, or tuberculosis screening as required by contract and D.C. law, and OSM incorrectly noted in its January 2011 monitoring report that D.C. General personnel records contained background checks and drug and alcohol test results.**

#### *Criminal background checks and substance abuse screenings.*

According to D.C. Code §§ 4-1501.03(a) and (g), individuals working for a “covered child or youth services provider” must be subject to a background check. A covered child or youth services provider is defined (in pertinent part) as:

any District government agency providing direct services to children or youth and any private entity that contracts with the District to provide direct services to children or youth, or for the benefit of children or youth, that affect the health, safety, and welfare of children or youth, including individual and group counseling, therapy, case management, supervision, or mentoring.<sup>26</sup>

Pursuant to this definition, D.C. General is a covered child or youth services provider. TCP’s policies and procedures likewise dictate that TCP employees working at D.C. General must

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<sup>24</sup> If DHS cannot place a family in shelter, and the family does not have a safe place to sleep, DHS currently makes referrals to the Child and Family Services Agency (CFSA). According to a DHS employee, an unsafe sleeping arrangement could be a car, an abandoned building, the street, etc. This individual stated that these referrals are not necessarily “abuse or neglect” referrals, but are made because families are sleeping in unsafe quarters. CFSA is the “public child welfare agency in the District of Columbia responsible for protecting child victims and those at risk of abuse and neglect and assisting their families.”

<http://cfsa.dc.gov/DC/CFSA/About+CFSA/Who+We+Are?nav=0&vgnnextrefresh=1> (last visited June 25, 2012).

<sup>25</sup> A Mother’s Plea to City Leaders, <http://washingtonlegalclinic.wordpress.com/2012/07/13/a-mothers-plea-to-city-leaders> (July 13, 2012) and DC Council, We thank You and So Do Families!, <http://washingtonlegalclinic.wordpress.com/2012/05/16/dc-council-we-thank-you-and-so-do-families> (last visited May 16, 2012).

<sup>26</sup> D.C. Code § 4-1501.02(3).

receive a pre-employment background check, as well as periodic criminal background checks, while employed at the shelter.<sup>27</sup> However, D.C. General employees who have only supervised contact with children are not subject to criminal background checks.<sup>28</sup>

Additionally, District employees and applicants for safety-sensitive positions “whose performance . . . or . . . duties in the normal course of employment may affect the health, welfare, or safety of children or youth” must be subject to drug and alcohol testing.<sup>29</sup> D.C. Code § 1-620.36 states:

Each private provider that contracts with the District of Columbia to provide employees to work in safety-sensitive positions . . . shall establish mandatory drug and alcohol testing policies and procedures . . . .

DHS’s contract with TCP states that all drug and alcohol test results will be submitted to DHS’s Contract Administrator.

OSM’s 2009 and 2011 Monitoring Inspection Forms note that D.C. General personnel records contained confirmations of employee criminal background checks and drug and alcohol testing. When asked how OSM employees determined that the shelter employees received the required background checks and drug and alcohol testing, an OSM monitor noted that D.C. General’s senior manager told this individual that shelter employees were subjected to required background checks and drug and alcohol testing and that this information was not maintained in personnel files, but maintained in a separate file. This OSM monitor did not verify this statement by reviewing documentation, but rather “took . . . [the senior manager] on [his or her] word.”

In May 2011, the team reviewed all of D.C. General’s personnel records and criminal background check results. The team found that only 49 of 65 employee records contained criminal background checks and, of these, 6 people had records beyond traffic violations, and 5 people admitted to a conviction of a felony. Additionally, the team reviewed substance abuse screening results and found that only 48 of the 65 employee records contained documentation of drug and alcohol testing.

When asked about employee criminal background checks and drug and alcohol testing, a TCP employee noted that all D.C. General employees receive pre-employment criminal background checks and pre-employment drug and alcohol testing but “[t]here are at times a lag in filing [this information in personnel records] due to staff leaves, etc.” The team was unable to confirm that all D.C. General employees received these screenings because D.C. General

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<sup>27</sup> According to the D.C. Code “[t]he information obtained from the criminal background check shall not create a disqualification or presumption against employment or volunteer status of the applicant unless the . . . the applicant poses a present danger to children or youth.” *Id.* § 4-1501-05a(a). The District of Columbia Municipal Regulations (DCMR) provide that DHS’s Contracting Officer’s Technical Representative (COTR) is responsible for determining, *inter alia*, the employment status of an applicant, employee, or volunteer who has certain offenses on his or her criminal background record. *See* 27 DCMR § 503.3.

<sup>28</sup> *See* 27 DCMR § 500.3(a); *see also* D.C. Code § 4-1501.03(d).

<sup>29</sup> D.C. Code § 1-620.31(10)(C).

personnel records did not contain this information and, despite repeated requests, TCP did not furnish this information to the OIG. A TCP employee also noted that DHS's contract with TCP "does not require employees to have repeated criminal background checks done." However, this contradicts TCP's internal policies and procedures, which inform D.C. General employees that they will be subject to periodic background checks.

A TCP employee informed the team that TCP "uses a standard of no felony convictions less than ten years old, no pending charges, and no misdemeanor drug or weapons charges in the last 5 years" to determine whether an individual with a prior criminal record can be employed at D.C. General. This individual noted that "[s]elf-admission of felony or misdemeanor convictions by current employees are handled on a case-by-case basis depending on the nature and status of the charges." This TCP employee further indicated that all of D.C. General's employees, including the six with criminal convictions, who "came to us [TCP] from Families Forward were grandfathered in" regardless of their criminal background. According to the DCMR, DHS's COTR is responsible for determining when an individual with a criminal background can be employed at a homeless shelter, not TCP.

The safety of children and youths receiving direct services from employees who do not have complete and satisfactory background checks and drug and alcohol testing may be at risk. Additionally, the District may be liable if an employee without a complete and satisfactory criminal background check or drug and alcohol test results harms a child or youth for whom she or he is providing direct services.

### ***Tuberculosis testing and other personnel records deficiencies.***

According to Section 5.1.34.5.4 of DHS's 2012 contract with TCP, TCP must maintain "an individual personnel file for each staff member."<sup>30</sup> 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; 6) annual evaluation; 7) any allegations of misconduct and any action with respect to any allegations; 8) the date and reason for any employee termination; and 9) documentation of a "current" tuberculosis test.<sup>31</sup>

OSM reviewed an unspecified number of D.C. General personnel records in January 2011 and noted some personnel record deficiencies, including missing: 1) reference checks; 2) tuberculosis test results; 3) annual employee evaluations;<sup>32</sup> 4) training records; and 5) employee first aid/cardiopulmonary resuscitation (CPR) certifications. OSM's report (page 2) stated that D.C. General's personnel files were "lacking significant documentation based on the required standards for an emergency family shelter."

In May 2011, the team reviewed all of D.C. General's personnel records and found them lacking some required information. Of the 65 personnel files reviewed:<sup>33</sup>

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<sup>30</sup> The companion provision in TCP's 2005 contract is Section C.3.3.9.

<sup>31</sup> This contract does not define what "current" means.

<sup>32</sup> According to TCP management, annual employee evaluations were not yet required as TCP had not managed employees at D.C. General for 1 year by January 20, 2011.

<sup>33</sup> The files reviewed were for current employees (as of May 2011).

- 5 lacked applications and/or resumes (noting credentials);
- 47 lacked reference checks;
- 46 lacked job descriptions;
- 65 lacked training records;<sup>34</sup>
- 46 lacked tuberculosis test results;
- 62 lacked annual employee evaluations;
- 35 lacked CPR training confirmations; and
- 32 lacked first aid training confirmations.

In addition to the aforementioned personnel records deficiencies, TCP employees were unaware of some of the information in personnel files. For example, when asked what happens if an employee tests positive for tuberculosis, a TCP employee noted that this had never occurred, stating “[a]n employee who test[s] positive for TB [tuberculosis] . . . would be allowed to return to work following appropriate medical treatment to ensure that they were no longer contagious. If this occurred it would be noted in the employee’s personnel file. This situation has not arisen yet.” However, the team’s review of personnel records found that 1 employee (of the 19 employees who received tuberculosis testing) tested positive for tuberculosis. Therefore, the team is concerned that these test results are not routinely and thoroughly reviewed.

When tuberculosis test results are not reviewed, homeless shelter employees and clients are at risk of contracting tuberculosis, and the District is at risk of legal liability.<sup>35</sup> Without complete job applications, reference checks, and job descriptions, TCP lacks assurance that its employees are capable of carrying out their job functions and employees may not be aware of their job responsibilities. Without complete training records, TCP does not know whether employees received proper training needed to carry out job functions. Employees also may not be receiving feedback on their performance, as 62 of the reviewed personnel files lacked employee evaluations. Without employee evaluations, TCP may not be aware of unsatisfactory employee performance and employees may not be aware of areas where they need to improve.

### **Conditions, Cleanliness**

#### **2. The common areas (hallways, day rooms, restrooms, and shower facilities) at D.C. General appeared clean and well-maintained.**

Despite prior reports of poor physical conditions at many District homeless shelters, including D.C. General, the team found D.C. General’s hallways, restrooms, kitchen areas, and employee offices clean and orderly. During the course of fieldwork, the team never encountered any condition suggesting neglect of D.C. General’s facilities. Further, D.C. General repaired

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<sup>34</sup> The team did not review personnel files for training records because, according to a TCP employee, all D.C. General training records are centrally stored, and not maintained in individual personnel files. However, DHS’s contract with TCP states that these records must be individually stored in personnel records.

<sup>35</sup> See <http://washingtonexaminer.com/local/dc/2011/06/metroaccess-riders-exposed-tuberculosis-sue-transit-agency> (last visited June 29, 2011).

physical issues that OSM monitors previously identified, including: no posting of disability notices in Spanish; a non-functioning shower; and no posting of evacuation plans.

According to D.C. General employees, utility workers assigned to each floor help ensure that D.C. General's facility remains clean, and shelter employees conduct "rounds" every 30 minutes to ensure that the facility is clean. D.C. General clients reported good conditions at the shelter and praised the on-site computer lab, as it allows them to apply for jobs.

However, in February 2012, the team visited D.C. General and had difficulty reading the small font on the posted evacuation plans.<sup>36</sup> If these plans are not easily readable, they may not be helpful to D.C. General clients and employees in the event of an emergency, and clients and employees may have difficulty exiting the building rapidly.

## **Conclusion**

Overall, the team found the conditions at D.C. General satisfactory and was impressed by the cleanliness of the facility. However, during the team's visit and upon reviewing documentation, the team noted issues with respect to the operation of this facility. Most notably, the team is concerned about the lack of D.C. General employee background checks, substance abuse screenings, and tuberculosis test results. The team also noted that the evacuation plans were difficult to read. These deficiencies, once corrected, will assist in providing a safe, positive environment for families living in the shelter.

### **Recommendations:**

- (1) That the Director of the Department of Human Services (D/DHS) collaborate with TCP and DHS's COTR to: 1) obtain and evaluate background checks, substance abuse screenings, and tuberculosis tests for all D.C. General employees; and 2) ensure that D.C. General personnel files contain all contractually required information and that OSM monitors accurately evaluate and record personnel file practices at homeless shelters.
- (2) That D/DHS ensure that D.C. General updates its posted evacuation signs to improve readability.

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.

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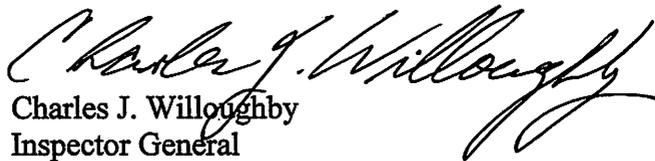
<sup>36</sup> According to Section C.5.1.29.5 of TCP's 2012 contract with DHS, each shelter site must "have posted evacuation plans (a diagram of the facility directing the residents where to exit in case of a fire) at all shelter facilities. The evacuation plans shall be posted in all areas near exits and exit signs, fire extinguishers, and fire escapes."

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Sincerely,

A handwritten signature in cursive script, reading "Charles J. Willoughby". The signature is written in black ink and is positioned above the printed name and title.

Charles J. Willoughby  
Inspector General

CJW/al

cc: **See Distribution List**

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The Honorable Darrell Issa, Chairman, House Committee on Oversight and Government Reform, Attention: Howie Denis (via email)  
The Honorable Elijah Cummings, Ranking Member, House Committee on Oversight and Government Reform, Attention: Yvette Cravins (via email)  
The Honorable Trey Gowdy, Chairman, House Subcommittee on Health Care, the District of Columbia, the Census and the National Archives, Attention: Anna Bartlett (via email)  
The Honorable Danny Davis, Ranking Member, House Subcommittee on Health Care, the District of Columbia, the Census, and the National Archives, Attention: Yul Edwards (via email)  
The Honorable Joseph Lieberman, Chairman, Senate Committee on Homeland Security and Governmental Affairs, Attention: Holly Idelson (via email)  
The Honorable Susan Collins, Ranking Member, Senate Committee on Homeland Security and Governmental Affairs, Attention: Daniel Jenkins (via email)  
The Honorable Daniel K. Akaka, Chairman, Senate Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Attention: Aaron Woolf (via email)  
The Honorable Ron Johnson, Ranking Member, Senate Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia  
The Honorable Harold Rogers, Chairman, House Committee on Appropriations, Attention: Kaitlyn Eisner-Poor (via email)

The Honorable Norman D. Dicks, Ranking Member, House Committee on Appropriations,  
Attention: Laura Hogshead (via email)

The Honorable Jo Ann Emerson, Chairman, House Subcommittee on Financial Services and  
General Government, Attention: John Martens (via email)

The Honorable José E. Serrano, Ranking Member, House Subcommittee on Financial Services  
and General Government, Attention: Laura Hogshead (via email)

The Honorable Daniel K. Inouye, Chairman, Senate Committee on Appropriations, Attention:  
Charles Houy

The Honorable Thad Cochran, Ranking Member, Senate Committee on Appropriations

The Honorable Richard Durbin, Chairman, Senate Subcommittee on Financial Services and  
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)