

CHARLES D. BAKER Governor

KARYN E. POLITO Lieutenant Governor

The Commonwealth of Massachusetts Executive Office of Health and Human Services Department of Public Health Bureau of Environmental Health Community Sanitation Program 180 Beaman Street, West Boylston, MA 01583 Phone: 508-792-7880 Fax: 508-792-7706 TTY: 508-835-9796

MARYLOU SUDDERS Secretary

MONICA BHAREL, MD, MPH Commissioner

> Tel: 617-624-6000 www.mass.gov/dph

April 18, 2018

David H. Tuttle, Superintendent Worcester County House of Corrections and Jail 5 Paul X. Tivnan Drive West Boylston, MA 01583

Re: Facility Inspection - Worcester County House of Corrections and Jail, West Boylston

Dear Superintendent Tuttle:

In accordance with M.G.L. c. 111, §§ 5, 20, and 21, as well as Massachusetts Department of Public Health (Department) Regulations 105 CMR 451.000: Minimum Health and Sanitation Standards and Inspection Procedures for Correctional Facilities; 105 CMR 480.000: Storage and Disposal of Infectious or Physically Dangerous Medical or Biological Waste (State Sanitary Code, Chapter VIII); 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments (State Sanitary Code Chapter X); the 1999 Food Code; 105 CMR 520.000 Labeling; and 105 CMR 205.000 Minimum Standards Governing Medical Records and the Conduct of Physical Examinations in Correctional Facilities; I conducted an inspection of the Worcester County House of Corrections and Jail on March 16 and 20, 2018 accompanied by Patrick Ryan, Environmental Health and Safety Officer. Violations noted during the inspection are listed below including 272 repeat violations:

HEALTH AND SAFETY VIOLATIONS

(* indicates conditions documented on previous inspection reports)

Entrance

Waiting Area

No Violations Noted

Fisher Conference Room

No Violations Noted

Hallway

No Violations Noted

Assistant Deputy Superintendent's Office

No Violations Noted

Deputy's Office

Staff Locker Room

No Violations Noted

Staff Bathroom

No Violations Noted

Control Room

105 CMR 451.200* Food Storage, Preparation and Service: Food preparation not in compliance with

105 CMR 590.000, interior of microwave oven dirty

Control Bathroom

105 CMR 451.123* Maintenance: Handwash sink dirty
105 CMR 451.123* Maintenance: Faucet fixture corroded
105 CMR 451.123* Maintenance: Light shield missing

Key Room

No Violations Noted

Herman Building

105 CMR 451.320* Cell Size: Inadequate floor space in all cells

105 CMR 451.343* Electric Fixtures in Cell: No electrical outlet in all cells

A2 Block

Control Booth

105 CMR 451.353* Interior Maintenance: Floor dirty

Control Bathroom

105 CMR 451.123 Maintenance: Ceiling vent dusty

Day Room

No Violations Noted

Chemical Storage Room

No Violations Noted

Paper Goods Storage

No Violations Noted

Staff Room

105 CMR 451.353* Interior Maintenance: Floor tiles damaged

Slop Sink Room (Upstairs)

No Violations Noted

Cells (Upstairs)

105 CMR 451.353* Interior Maintenance: Floor paint damaged in cell # 45

105 CMR 451.353 Interior Maintenance: Floor paint damaged in cell # 36, 39, 40, 47, and 48

105 CMR 451.103 Mattresses: Mattress damaged in cell # 42

Showers (Upstairs)

No Violations Noted

Slop Sink (Downstairs)

Cells (Downstairs)

105 CMR 451.353* Interior Maintenance: Floor paint damaged in cell # 50 and 52

105 CMR 451.353 Interior Maintenance: Floor paint damaged in cell # 53, 55, 57, and 59

Showers (Downstairs)

105 CMR 451.123* Maintenance: Bottom of door frame rusted in shower # 1

Hallway

No Violations Noted

Storage Closet

No Violations Noted

A1 Block

Control Booth

105 CMR 451.353* Interior Maintenance: Floor dirty

105 CMR 451.353* Interior Maintenance: Ceiling tiles loose

Control Bathroom

105 CMR 451.123* Maintenance: Floor dirty

105 CMR 451.123* Maintenance: Floor paint damaged

Day Room

No Violations Noted

Room # 6

No Violations Noted

Storage # 5

No Violations Noted

Storage #4

No Violations Noted

Room # 3

No Violations Noted

Room # 2

No Violations Noted

Room # 1

No Violations Noted

Slop Sink (Upstairs)

No Violations Noted

Cells (Upstairs)

105 CMR 451.123* Maintenance: Toilet damaged in cell # 16

Showers (Upstairs)

No Violations Noted

Slop Sink (Downstairs)

Cells (Downstairs) 105 CMR 451.353*

Interior Maintenance: Floor paint damaged in cell # 22, 29, and 31

Showers (Downstairs)

No Violations Noted

Rec Area

Unable to Inspect – Under Construction

MAXI B

105 CMR 451.320* Cell Size: Inadequate floor space in all cells

Control

105 CMR 451.353* Interior Maintenance: Ceiling tiles water damaged outside control

105 CMR 451,200 Food Storage, Preparation and Service: Food preparation not in compliance with

105 CMR 590.000, interior of microwave oven dirty

Control Bathroom

105 CMR 451.123* Maintenance: Floor dirty
105 CMR 451.123* Maintenance: Wall damaged

Lower Right Tier

Day Room

No Violations Noted

Slop Sink

No Violations Noted

Showers

105 CMR 451.353 Interior Maintenance: Wall paint damaged in shower # 2

Cells

105 CMR 451.353* Interior Maintenance: Wall vent dusty in cell # 110, 122, 132, and 136
105 CMR 451.353 Interior Maintenance: Wall vent dusty in cell # 114, 124, 128, 144, 146, and 150
105 CMR 451.140 Adequate Ventilation: Inadequate ventilation, wall vent blocked in cell # 116
105 CMR 451.353 Interior Maintenance: Debris in wall vent in cell # 134 and 142

Lower Left Tier

Day Room

No Violations Noted

Cells

105 CMR 451.353* Interior Maintenance: Wall vent dusty in cell # 107, 115, 129, 141, 145, and 147 105 CMR 451.353 Interior Maintenance: Wall vent dusty in cell # 101, 103, 105, 119, 123, 127, 135, and 143

105 CMR 451.140* Adequate Ventilation: Inadequate ventilation, wall vent blocked in cell # 149
105 CMR 451.140 Adequate Ventilation: Inadequate ventilation, wall vent blocked in cell # 107, 119,

and 121

Showers

105 CMR 451.123 Maintenance: Wall paint damaged in shower # 1 and 2

Slop Sink

Chemical Closet

No Violations Noted

Lower Disciplinary Unit

Unable to Inspect -Not Used

Upper Left Tier

Day Room

No Violations Noted

Cells

105 CMR 451.353* Interior Maintenance: Wall vent dusty in cell # 303 and 305

105 CMR 451.353 Interior Maintenance: Wall vent dusty in cell # 313, 317, 337, 345, and 351 105 CMR 451.140 Adequate Ventilation: Inadequate ventilation, wall vent blocked in cell # 307

Slop Sink

No Violations Noted

Showers (Unable to Inspect Shower # 1 – In Use)

105 CMR 451.123 Maintenance: Soap seum on shower eurtain in shower # 2

Upper Disciplinary Unit

No Violations Noted

Upper Right Tier

Day Room

105 CMR 451.200 Food Storage, Preparation and Service: Food preparation not in compliance with

105 CMR 590.000, interior of microwave oven dirty

Cells

105 CMR 451.353* Interior Maintenance: Wall vent dusty in cell # 330, 332, and 346

Interior Maintenance: Wall vent dusty in cell # 308, 312, 314, 328, 338, 340, and 348
105 CMR 451.140

Adequate Ventilation: Inadequate ventilation, wall vent blocked in cell # 306 and 350

Showers

105 CMR 451.123* Maintenance: Epoxy damaged on wall in shower # 1

Slop Sink

No Violations Noted

Chapel

No Violations Noted

Office (Right of Altar)

No Violations Noted

Health Services

Interview Room # 1

No Violations Noted

Interview Room # 2

Infirmary Ward Bunk Room

105 CMR 451.320* Cell Size: Inadequate floor space in all cells

Bathroom & Shower

105 CMR 451.123 Maintenance: Soap scum on shower curtain in shower 105 CMR 451.123 Maintenance: Grout missing between wall tiles in shower

Examiner's Room

Unable to Inspect - In Use

Nurse's Room

No Violations Noted

Pharmacy

No Violations Noted

Mental Health Offices

No Violations Noted

Break Room

No Violations Noted

Supply Room w/o Sink

No Violations Noted

Bathroom

No Violations Noted

Staff Bathroom

No Violations Noted

Supply Closet with Sink

No Violations Noted

Biohazard Storage

No Violations Noted

Central Control

No Violations Noted

Control Bathroom

105 CMR 451.123* Maintenance: Wall dirty near sink 105 CMR 451.123* Maintenance: Handwash sink dirty

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, sink slow to drain

105 CMR 451.123 Maintenance: Light shield missing

Property

No Violations Noted

Gymnasium

Slop Sink Closet (Hallway)

Basketball Court

105 CMR 451.350*Structural Maintenance: Floor damaged105 CMR 451.350*Structural Maintenance: Wall damaged105 CMR 451.350*Structural Maintenance: Ceiling damaged105 CMR 451.353*Interior Maintenance: Ceiling paint damaged

105 CMR 451.353* Interior Maintenance: Gym equipment padding damaged

Bathroom with Showers

(Unable to Inspect Showers – Not Used)

105 CMR 451.126

Water Supply: No hot water supplied to handwash sink # 1

105 CMR 451.123

Maintenance: Insects observed in handwash sinks

Booth

No Violations Noted

Staff Bathroom

No Violations Noted

Bathroom without Showers

105 CMR 451.123

Maintenance: Insects observed in handwash sinks

VISITING ROOM

Inmate Visiting Side

105 CMR 451.353* Interior Maintenance: Counter top damaged in booth # 1, 10, 12, and 14
105 CMR 451.353* Interior Maintenance: Wall damaged near phone in booth # 19 and 20

105 CMR 451.353 Interior Maintenance: Wall damaged near phone in booth # 7

Non-Inmate Visiting Side

105 CMR 451.353* Interior Maintenance: Floor paint damaged throughout area 105 CMR 451.353* Interior Maintenance: Wall damaged near phone in booth # 2 105 CMR 451.353 Interior Maintenance: Wall damaged near phone in booth # 4

Female Handicapped Bathroom

105 CMR 451.123* Maintenance: Mirror rusted

105 CMR 451.124* Water Supply: Insufficient water supply in quantity and pressure at handwash sink

Male Handicapped Bathroom

105 CMR 451.124* Water Supply: Insufficient hot and cold water supply in quantity and pressure at

handwash sink

Female Bathroom

105 CMR 451.123 Maintenance: Stall partition detached from wall

Male Bathroom

105 CMR 451.123* Maintenance: Wall paint damaged near urinal

MAXI C

105 CMR 451,320* Cell Size: Inadequate floor space in all cells

Control Booth

105 CMR 451.353* Interior Maintenance: Light shield not secured to light fixture 105 CMR 451.353* Interior Maintenance: Light shield missing above door

105 CMR 451.200 Food Storage, Preparation and Service: Food preparation not in compliance with

105 CMR 590.000, interior of microwave oven dirty

Booth Bathroom 105 CMR 451.123* Maintenance: Bathroom generally dirty

Maintenance: Handwash sink dirty 105 CMR 451.123*

105 CMR 451.123* Maintenance: Toilet dirty

Upper Tier

Left-Side Day Room

Unable to Inspect - In Use

Right-Side Day Room

No Violations Noted

Cells

105 CMR 451.353* Interior Maintenance: Ceiling paint damaged in cell # 430 Interior Maintenance: Ceiling paint damaged in cell # 418 105 CMR 451.353

Mattresses: Mattress damaged in cell # 427 and 432 105 CMR 451.103

(Unable to Inspect Shower # 1 and 3 – In Use) Showers

No Violations Noted

Slop Sink

No Violations Noted

Old Segregation

Unable to Inspect - Not Used

Lower Tier

Left-Side Day Room

105 CMR 451.344 Illumination in Habitable Areas: Light not functioning properly, 1 light out

Right-Side Day Room

105 CMR 451.344 Illumination in Habitable Areas: Light not functioning properly, 2 lights out

Cells

105 CMR 451.103 Mattresses: Mattress damaged in cell # 242

105 CMR 451.140 Adequate Ventilation: Inadequate ventilation, wall vent blocked in cell # 205

Slop Sink

No Violations Noted

Showers

Maintenance: Wall paint damaged in shower # 1 105 CMR 451.123*

Maintenance: Soap scum on shower curtain in shower # 1 and 2 105 CMR 451.123

Segregation

Unable to Inspect - Not Used

Chemical Area

Deignan Building

105 CMR 451.320* Cell Size: Inadequate floor space in all cells

Control Booth

105 CMR 451.200 Food Storage, Preparation and Service: Food preparation not in compliance with

105 CMR 590.000, interior of microwave oven dirty

105 CMR 451.200 Food Storage, Preparation and Service: Food storage not in compliance with

105 CMR 590.000, interior of refrigerator dirty

Control Booth Bathroom

Unable to Inspect -- In Use

Upper West

Showers

105 CMR 451.123* Maintenance: Floor tiles damaged outside of showers 105 CMR 451.123 Maintenance: Soap scum on shower curtain in shower # 2

105 CMR 451.123 Maintenance: Soap seum on walls in shower # 2

Cells

105 CMR 451.353 Interior Maintenance: Light shield damaged in cell # 64

Slop Sink Room

105 CMR 451.353* Interior Maintenance: Wall dirty around slop sink

Bathroom

105 CMR 451.123* Maintenance: Sink basin damaged at sink # 1 and 2

Lower West

Showers

105 CMR 451.123 Maintenance: Soap seum on shower curtain in shower # 1 and 2

105 CMR 451.123 Maintenance: Shower curtain damaged in shower # 2

Bathroom

105 CMR 451.123* Maintenance: Floor paint damaged

105 CMR 451.123* Maintenance: Sink basin damaged at sink # 1

105 CMR 451.123* Maintenance: Ceiling vent dusty 105 CMR 451.123* Maintenance: Heater rusted

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, faucet loose at handwash sink # 3

Cells

105 CMR 451.353* Interior Maintenance: Wooden door damaged in cell # 41 105 CMR 451.353 Interior Maintenance: Wooden door damaged in cell # 44

Common Area

105 CMR 451.344 Illumination in Habitable Areas: Light not functioning properly, 4 lights out

Interview Room

Unable to Inspect – Locked

Dry Storage

No Violations Noted

Chemical Closet

No Violations Noted

451-18(1)-West Boylston-Worcester-Report 4-18-18

Lower East

Showers

105 CMR 451.123 Maintenance: Soap seum on shower curtain in shower # 1

Bathroom

105 CMR 451.123 Maintenance: Wall tile damaged by toilet # 2

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, faucet loose at handwash sink # 1

Cells

105 CMR 451.353* Interior Maintenance; Floor damaged in cell # 2

105 CMR 451.353 Interior Maintenance: Light shield damaged in cell # 12

Slop Sink Room

No Violations Noted

Upper East

Slop Sink Room

105 CMR 451.353* Interior Maintenance: Light shield missing

105 CMR 451.130* Plumbing: Plumbing not maintained in good repair, drain cover missing on slop sink

Cells

105 CMR 451.353* Interior Maintenance: Wooden door damaged in cell # 32

Showers

105 CMR 451.123 Maintenance: Paint damaged on access panel in shower # 2
105 CMR 451.123 Maintenance: Soap seum on shower curtain in shower # 1 and 2

105 CMR 451.123 Maintenance: Insects observed in shower # 1

Bathroom

105 CMR 451.123* Maintenance: Unfinished wood on ceiling above toilet # 2

105 CMR 451.123 Maintenance: Heater rusted

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, handwash sink # 3 leaking 105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, handwash sink # 4 clogged

Mini 5 Building

105 CMR 451,320* Cell Size: Inadequate floor space in all cells

Booth

No Violations Noted

Booth Bathroom

105 CMR 451.126 Hot Water: Hot water temperature recorded at 97⁰F

Corridor 2 (Right Side)

TV Room

No Violations Noted

Showers

105 CMR 451.130 Hot Water: Shower water temperature recorded at 97°F

105 CMR 451.123 Maintenance: Soap scum on shower curtain in shower # 1 and 2

Cells

105 CMR 451.350* Structural Maintenance: Wall damaged above top bunk in cell # 9

451-18(1)-West Boylston-Worcester-Report 4-18-18

Middle Corridor

Chow Area

No Violations Noted

Weight Room

105 CMR 451.353* Interior Maintenance: Gym equipment padding damaged

Chemical Closet

105 CMR 451.353* Interior Maintenance: Light shield missing

Office

No Violations Noted

Corridor 1 (Left Side)

Hallway

No Violations Noted

Showers

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, faceplates missing on shower and tub

faucet in shower # 1

105 CMR 451.123 Maintenance: Soap seum on shower curtain in shower # 1 and 2

105 CMR 451.123 Maintenance: Soap scum on walls in shower # 2 105 CMR 451.123 Maintenance: Soap scum on floor in shower # 2 105 CMR 451.123 Maintenance: Floor tile damaged in shower # 2

Office with Bathroom

105 CMR 451.123* Maintenance: Light shield not secure

Cells

No Violations Noted

Food Service

Staff Dining Room

No Violations Noted

Staff Serving Line

No Violations Noted

Spice Closet

No Violations Noted

Staff Bakery

FC 3-304.14(B)(2) Preventing Contamination from Linens: Wet cloth not stored in sanitizer bucket

Inmate Food Prep Area

No Violations Noted

Milk Cooler

No Violations Noted

Produce Cooler

Prep Cooler

FC 6-501.11* Maintenance and Operation; Repairing: Facility not in good repair, floor tiles damaged

Tool Storage

No Violations Noted

Control

No Violations Noted

Control Bathroom

No Violations Noted

Freezer

FC 4-501.11(A)* Maintenance and Operation, Equipment: Equipment not maintained in a state of good

repair, 2 fans not working

Dry Goods

No Violations Noted

Entry 5 Area (Near Dry Goods)

FC 6-202.15(A)(3) Design, Construction, and Installation; Functionality: Outer door not weather and

vermin tight

Receiving Area

FC 4-501.11(A)* Maintenance and Operation, Equipment: Equipment not maintained in a state of good

repair, exterior of several food carts damaged

Chemical Closet

No Violations Noted

Dishwasher Area

FC 4-204.115* Design and Construction, Functionality: Thermometer not functioning properly on

warewashing machine, rinse gauge temperature not working

3-Compartment Sink #1 and 2

No Violations Noted

Pasta Room

FC 6-501.111(B) Maintenance and Operations; Pest Control: Ants observed on floor

Can Room

No Violations Noted

Inmate Serving Area

FC 3-501.16(A) Limitation of Growth of Organisms, Temperature and Time Control: Potentially

hazardous food not held at the proper hot holding temperature, chicken cacciatore

temperature recorded at 131°F

Inmate Bathroom

105 CMR 451.123* Maintenance: Toilet dirty

105 CMR 451.123* Maintenance: Handwash sink dirty

School

Office (near entrance)

No Violations Noted

451-18(1)-West Boylston-Worcester-Report 4-18-18

Education Director's Office

No Violations Noted

Deputy's Office

No Violations Noted

Break Area in Hall

105 CMR 451.200* Food Storage, Preparation and Service: Food storage not in compliance with

105 CMR 590,000, gaskets damaged on right side refrigerator

105 CMR 451.200* Food Storage, Preparation and Service: Food storage not in compliance with

105 CMR 590.000, disposable utensils not kept covered

105 CMR 451.200 Food Storage, Preparation and Service: Food preparation not in compliance with

105 CMR 590.000, microwave oven handle broken

Substance Abuse Office

105 CMR 451.353* Interior Maintenance: Ceiling tiles water damaged

Male Staff Bathroom

Unable to Inspect - In Use

Classroom # 5

No Violations Noted

Teacher's Office

105 CMR 451.200 Food Storage, Preparation and Service: Food storage not in compliance with

105 CMR 590.000, no functioning thermometer in refrigerator

Classroom # 4

No Violations Noted

Classroom # 3

No Violations Noted

Classroom # 2

No Violations Noted

Social Worker's Office

No Violations Noted

Female Staff Bathroom

No Violations Noted

Slop Sink Room

105 CMR 451.353 Interior Maintenance: Wet mop stored in bucket

Library

Unable to Inspect - Locked

Parole Office

No Violations Noted

Receiving

County Lock Up

Holding Area # 1

No Violations Noted

Intake Cages

No Violations Noted

Holding Area # 2

No Violations Noted

Shakedown

No Violations Noted

Property Room

No Violations Noted

Records

105 CMR 451.200 Food Storage, Preparation and Service: Food storage not in compliance with

105 CMR 590,000, no functioning thermometer in refrigerator

Food Storage, Preparation and Service: Food storage not in compliance with

105 CMR 590.000, refrigerator gaskets damaged

Record's Bathroom

105 CMR 451.123* Maintenance: Sink faucet rusted

Utility Closet

No Violations Noted

Offices/Medical

105 CMR 451.353* Interior Maintenance: Floor paint damaged in back offices

ID Room

No Violations Noted

Classification

No Violations Noted

Maintenance Corridor

Staff Bathroom

105 CMR 451.123 Maintenance: Light shield not secure

Inmate Bathroom

No Violations Noted

Staff Bathroom inside Office

No Violations Noted

Laundry Area

No Violations Noted

Tool Crib

No Violations Noted

Electrical Shop

Welding Area

105 CMR 451.350* Structural Maintenance: Exterior door not rodent and weathertight

Tool Cage

No Violations Noted

EHSO Office (Waste Log)

No Violations Noted

Modular Administration Building

Lobby

Waiting Area

No Violations Noted

Male Bathroom

105 CMR 451.123* Maintenance: Wall tiles missing

Female Bathroom

105 CMR 451.123* Maintenance: Floor tiles damaged

Mail Room

No Violations Noted

Control 3

105 CMR 451.353* Interior Maintenance: Floor damaged throughout break area

105 CMR 451.353* Interior Maintenance: Floor dirty

Control Bathroom

105 CMR 451.123* Maintenance: Floor tiles missing and damaged 105 CMR 451.126 Hot Water: Hot water temperature recorded at 98°F

Special Services Corridor

Female Bathroom

105 CMR 451.123* Maintenance: Wall tile damaged near toilet

Male Bathroom

105 CMR 451.123* Maintenance: Faucet fixture corroded

Slop Sink Room

No Violations Noted

D-Board Office

105 CMR 451.353* Interior Maintenance: Floor damaged at doorway

Dispatch

No Violations Noted

Evidence Closet

No Violations Noted

3 Offices

Female Locker Room

105 CMR 451.123* Maintenance: Wall cracked in handicapped shower 105 CMR 451.123* Maintenance: Floor dirty in handicapped shower 105 CMR 451.123 Maintenance: Floor dirty in shower # 1 and 2

105 CMR 451.123 Maintenance: Ceiling tile missing

Male Locker Room

105 CMR 451.123* Maintenance: Grab bar rusted in handicapped shower
105 CMR 451.123* Maintenance: Shower curtain dirty in shower # 1
105 CMR 451.123* Maintenance: Ceiling tiles water damaged
105 CMR 451.123 Maintenance: Floor dirty in shower # 1, 2, and 4

Staff Training Room A & B (Unable to Inspect Room B – In Use)

No Violations Noted

Investigations Office

No Violations Noted

2nd Floor

Personnel Offices

No Violations Noted

Break Room

No Violations Noted

Copy Room

No Violations Noted

Closet with Microwave

No Violations Noted

Deputy's Office/Legal

No Violations Noted

Director of Maintenance Office

105 CMR 451.200* Food Storage, Preparation and Service: Food storage not in compliance with

105 CMR 590.000, no functioning thermometer in refrigerator

North Male Bathroom (near slop sink)

No Violations Noted

Slop Sink Room

105 CMR 451,353* Interior Maintenance: Floor tiles missing

North Female Bathroom (near slop sink)

No Violations Noted

Assistant Superintendent's Office

Unable to Inspect - Locked

South Male Bathroom

No Violations Noted

South Female Bathroom

No Violations Noted

451-18(1)-West Boylston-Worcester-Report 4-18-18

Internal Affairs

No Violations Noted

Trap

Pedestrian Trap

No Violations Noted

Bathroom in Pedestrian Trap

No Violations Noted

Visits Waiting Area

105 CMR 451.353* Interior Maintenance: Baseboard damaged near trap and door leading to exterior

Modular Gym

Inmate Bathroom # 104

105 CMR 451.123* Maintenance: Dead flies in light shield

105 CMR 451.126* Water Supply: No hot water supplied to handwash sink

105 CMR 451.124* Water Supply: Insufficient cold water supply in quantity and pressure at handwash sink

Staff Bathroom # 105

105 CMR 451.123* Maintenance: Wall access panel rusted 105 CMR 451.123* Maintenance: Shower floor dirty

Sprinkler Room/Mop Closet

No Violations Noted

Storage Room # 108

No Violations Noted

Gym

105 CMR 451.350* Structural Maintenance; Wall damaged

105 CMR 451.353* Interior Maintenance: Walls dirty throughout gym

105 CMR 451.141* Screens: Several screens damaged

Control # 102

No Violations Noted

Modular Infirmary

2nd Floor

Inmate Bathroom # 244

105 CMR 451.123* Maintenance: Wall tiles missing 105 CMR 451.123* Maintenance: Floor tiles damaged

Office # 256

No Violations Noted

Holding Cell

No Violations Noted

Nurse's Station # 233

105 CMR 451,353* Interior Maintenance: Floor tiles damaged

Room # 234

105 CMR 451.340 Illumination: Insufficient lighting, 1 light out

Slop Sink # 245

No Violations Noted

Room # 236

No Violations Noted

Male Bathroom # 243

105 CMR 451.123* Maintenance: Ceiling water damaged

105 CMR 451.123* Maintenance: Wood left unfinished under sink and toilet

X-Ray Room # 242

No Violations Noted

Room # 237

No Violations Noted

Slop Sink Room # 238

No Violations Noted

Lieutenant's Office # 239

No Violations Noted

Room # 241

No Violations Noted

Mental Health Office # 248

105 CMR 451.353* Interior Maintenance: Ceiling tile missing 105 CMR 451.350* Structural Maintenance: Ceiling leaking

Parole Office # 250

105 CMR 451,141* Screens: Screens damaged

Dentist Room # 253

105 CMR 451.141 Screens: Screens damaged

Room # 254

105 CMR 451.353* Interior Maintenance: Floor tiles missing

105 CMR 480.100(B) Storage: Absorbent flooring in waste storage area, floor damaged exposing untreated

wood

Diabetic Office (in Room # 254)

No Violations Noted

Office # 246

Unable to Inspect - Not Used

Female Bathroom # 258

105 CMR 451.123* Maintenance: Floor tiles damaged

Nurse's Office # 232

105 CMR 451.353 Interior Maintenance: Floor tiles damaged

Break Room (Medical Records) # 214

No Violations Noted

Room # 230

Unable to Inspect - Not Used

Cell # 226-229

Unable to Inspect - Not Used

Handicapped Shower

Unable to Inspect - Not Used

Captain's Office

No Violations Noted

Optometrist's Office # 222

No Violations Noted

Administrator's Office

No Violations Noted

HIV Office

No Violations Noted

Supply Closet

No Violations Noted

Cell # 206-209

Unable to Inspect - Not Used

DOL Unit

Unable to Inspect - Not Used

Medical Closet (End of Hallway)

No Violations Noted

1st Floor

Mod Med Line

Unable to Inspect – Not Used

Classrooms

Unable to Inspect - Not Used

Hallway between Classrooms

105 CMR 451.353* Interior Maintenance: Door frame damaged and rusted on door leading to exterior

Roll Call Room (New)

105 CMR 451.353* Interior Maintenance: Floor tiles damaged

105 CMR 451.141* Screens: Screens damaged

Classroom Office

Unable to Inspect - Not Used

Roll Call Room (Old)

Unable to Inspect – Not Used

451-18(1)-West Boylston-Worcester-Report 4-18-18

Break Area

Unable to Inspect - Not Used

Bathroom # 108

Unable to Inspect - Not Used

Slop Sink # 109

Unable to Inspect - Not Used

Storage Area

Unable to Inspect - Not Used

Modular Visiting Area

Visiting Sections

Section A (Non-Inmate Side)

No Violations Noted

Classifications Office

No Violations Noted

Additional Offices

No Violations Noted

Section B (Non-Inmate Side)

No Violations Noted

Section C (Non-Inmate Side)

No Violations Noted

Social Workers Office

105 CMR 451.353* Interior Maintenance: Floor tiles missing outside of office

Section A-C (Inmate Side)

105 CMR 451.353* Interior Maintenance: Floor tiles damaged and missing

Back Area

Bathroom near Slop Sink

105 CMR 451.123* Maintenance: Floor dirty

105 CMR 451.123* Maintenance: Ceiling vent dusty

105 CMR 451.126* Hot Water: Hot water temperature recorded at 98°F

105 CMR 451.123* Maintenance: Faucet fixture dirty

105 CMR 451.353* Interior Maintenance: Floor tiles missing outside bathroom

Slop Sink

105 CMR 451.353* Interior Maintenance: Floor tiles missing

Social Worker Interview Area

105 CMR 451.353* Interior Maintenance: Small holes in floor throughout area

105 CMR 451,353* Interior Maintenance: Floor tiles damaged

IP Break Room

105 CMR 451.353* Interior Maintenance: Floor tiles damaged

105 CMR 451.200* Food Storage, Preparation and Service: Food storage not in compliance with

105 CMR 590.000, refrigerator gaskets damaged

Inmate Interview Room

105 CMR 451.353* Interior Maintenance: Floor tiles damaged 105 CMR 451.353* Interior Maintenance: Counter tops dirty

Side Door Exit to Yard

105 CMR 451.353* Interior Maintenance: Floor tiles missing at door

Receiving

Entrance Hallway

105 CMR 451.353* Interior Maintenance: Floor tiles damaged

Personal Property # 1

105 CMR 451.353* Interior Maintenance: Floor tiles missing and damaged 105 CMR 451.353* Interior Maintenance: Hole in ceiling in far back corner

105 CMR 451.353* Interior Maintenance: Ceiling water damaged

105 CMR 451.353* Interior Maintenance: Ceiling vent not secured to ceiling

Chemical Room

No Violations Noted

Personal Property # 2

105 CMR 451,353* Interior Maintenance: Wall paint damaged

Urinalysis Storage

105 CMR 451.353* Interior Maintenance: Ceiling panel not secured

Urinalysis Office

105 CMR 480.500(A)(3) Procedures; Records; Record-Keeping Log: Urine testing chemicals stored in the

refrigerator with food

Slop Sink Room

No Violations Noted

Inmate Bathroom # 119

105 CMR 451.123* Maintenance: Wall and wall tiles damaged near toilet

105 CMR 451.110(A) Hygiene Supplies at Toilet and Handwash Sink: No paper towels at handwash sink

Staff Bathroom # 120

No Violations Noted

Shower # 118

No Violations Noted

Shower # 117

No Violations Noted

Processing Area

105 CMR 451.353* Interior Maintenance: Floor tiles damaged

Waiting Room

105 CMR 451.353* Interior Maintenance: Floor paint damaged

Break Area

105 CMR 451.353* Interior Maintenance: Floor tiles damaged

Back Area

Sally Port

105 CMR 451.353* Interior Maintenance: Floor tiles damaged

105 CMR 451.350* Structural Maintenance: Exterior door not rodent and weathertight

105 CMR 451.353 Interior Maintenance: Wall damaged

Clothing Room

105 CMR 451.353* Interior Maintenance: Floor tile damaged

Court Storage

105 CMR 451.353* Interior Maintenance: Floor tiles missing

105 CMR 451.353* Interior Maintenance: Light rusted

105 CMR 451.353* Interior Maintenance: Walls left unfinished 105 CMR 451.353* Interior Maintenance: Ceiling tiles missing

Cells (Unable to Inspect Cell # 106 – In Use)

105 CMR 451.353* Interior Maintenance: Window sill damaged in cell # 104
105 CMR 451.353 Interior Maintenance: Wall damaged by door in cell # 105
105 CMR 451.353 Interior Maintenance: Ceiling damaged in cell # 105

Back Exit

105 CMR 451.350 Structural Maintenance: Walls unfinished

VOC Laundry

1st Floor

Inmate Bathroom

105 CMR 451.123* Maintenance: Floor paint damaged

Laundry

No Violations Noted

Chemical Storage

105 CMR 451.353* Interior Maintenance: Wet mop stored in bucket

Clothing Storage Room

No Violations Noted

Office

No Violations Noted

Slop Sink Closet

No Violations Noted

Staff Bathroom

105 CMR 451.123* Maintenance: Floor paint damaged

C	lassrooms	1	D
N 24	Wasi Ouna	/1-	,,

No Violations Noted

IT Break Area

105 CMR 451.200 Food Storage, Preparation and Service: Food preparation not in compliance with

105 CMR 590,000, interior of microwave oven dirty

105 CMR 451.200 Food Storage, Preparation and Service: Food storage not in compliance with

105 CMR 590,000, no functioning thermometer in refrigerator

Hallway

No Violations Noted

2nd Floor

Room # 203

105 CMR 451.353* Interior Maintenance: Ceiling tiles water damaged 105 CMR 451.353* Interior Maintenance: Wall vent missing grille/louver

Room # 210

No Violations Noted

Room # 202

105 CMR 451.360* Protective Measures: Bird droppings observed on floor

105 CMR 451,350 Structural Maintenance: Wall louver removed, not weathertight

105 CMR 451.360 Protective Measures: Bird observed

H Building

105 CMR 451.320* Cell Size: Inadequate floor space in all cells

105 CMR 451.343* Electric Fixtures in Cell: No electrical outlet in all cells

Control Booth

105 CMR 451.350* Structural Maintenance: Ceiling tiles damaged

105 CMR 451.353 Interior Maintenance: Floor tiles missing and damaged

Control Bathroom

105 CMR 451.123* Maintenance: Floor tiles missing in bathroom 105 CMR 451.126* Hot Water: Hot water temperature recorded at 95°F

105 CMR 451.123 Maintenance: Floor dirty

Cells

105 CMR 451.350* Structural Maintenance: Unable to open or close window in cell # 108, 109, 110, 112,

115, 120, and 126

105 CMR 451.350*Structural Maintenance: Window leaking in cell # 113105 CMR 451.353*Interior Maintenance: Ceiling paint damaged in cell # 131105 CMR 451.353*Interior Maintenance: Wall paint damaged in cell # 117 and 131

105 CMR 451.353 Interior Maintenance: Wall paint damaged in cell # 120, 128, 132, 137, 143, and 148

105 CMR 451.353 Interior Maintenance: Wall damaged above bed in cell # 144
105 CMR 451.353 Interior Maintenance: Wall damaged under window in cell # 141

Day Room

No Violations Noted

Chemical Room

Interview Room

No Violations Noted

Showers

105 CMR 451.123 Maintenance: Soap scum on shower curtain in shower # 1, 3, and 10

I Building

Control Booth

105 CMR 451.350* Structural Maintenance: Ceiling tiles damaged

Control Bathroom

105 CMR 451.123* Maintenance: Floor paint damaged

Cells

105 CMR 451.350* Structural Maintenance: Unable to open and close window in cell # 176, 178, and 194

105 CMR 451.353 Interior Maintenance: Uncovered junction box in cell # 196

Interview Room

Unable to Inspect - Locked

Slop Sink

105 CMR 451.353* Interior Maintenance: Floor paint damaged

Day Room

105 CMR 451.353 Interior Maintenance: Seat padding damaged at tables

Showers

105 CMR 451.123* Maintenance: Soap seum on walls in shower # 2 105 CMR 451.123 Maintenance: Floor dirty in shower # 3 and 5

Maintenance: Soap seum on floor in shower # 4, 8, and 9

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, shower # 5 leaking 105 CMR 451.123 Maintenance; Column outside shower damaged at shower # 3 and 7

J Building

Cells

105 CMR 451.350* Structural Maintenance: Unable to open or close window in cell # 240 and 241

105 CMR 451.103 Mattresses: Mattress damaged in cell # 233

105 CMR 451.353 Interior Maintenance: Wall paint damaged in cell # 222

Day Room

No Violations Noted

Slop Sink Room

No Violations Noted

Interview Room

No Violations Noted

Showers

105 CMR 451.123* Maintenance: Column outside shower damaged at shower # 3 and 7 105 CMR 451.123 Maintenance: Soap seum on shower curtain in shower # 1 and 8

105 CMR 451.123 Maintenance: Floor dirty in shower # 5

105 CMR 451,123 Maintenance: Wall paint damaged in shower # 5

K Building 105 CMR 451.320* Cell Size: Inadequate floor space in all cells Electric Fixtures in Cell: No electrical outlet in all cells 105 CMR 451.343* Control Booth No Violations Noted Control Bathroom No Violations Noted Day Room 105 CMR 451.353 Interior Maintenance: Seat padding damaged at tables Cells 105 CMR 451.350* Structural Maintenance: Unable to open or close window in cell # 303 Interior Maintenance: Uncovered junction box in cell # 305 105 CMR 451.353* Interior Maintenance: Uncovered junction box in cell # 306 and 315 105 CMR 451.353 Interior Maintenance: Wall paint damaged in cell # 285 105 CMR 451.353 Interior Maintenance: Ceiling paint damaged in cell # 296 105 CMR 451.353 Illumination: Insufficient lighting, ceiling light and light over sink out in cell # 326 105 CMR 451.340 Showers Maintenance: Column outside shower rusted at shower # 4 and 7 105 CMR 451.123* 105 CMR 451.123 Maintenance: Soap seum on shower curtain in shower # 4, 6, 8, 9, and 10 Chemical Room 105 CMR 451.353* Interior Maintenance: Wall paint damaged around slop sink Interview Room No Violations Noted L Building 105 CMR 451.320* Cell Size: Inadequate floor space in all cells 105 CMR 451.343* Electric Fixtures in Cell: No electrical outlet in all cells Day Room No Violations Noted Cells Structural Maintenance: Unable to open or close window in cell # 354, 357, 360, and 385 105 CMR 451.350* Interior Maintenance: Uncovered junction box in cell # 363 and 386 105 CMR 451.353 Showers Maintenance: Soap scum on walls in shower # 4 and 5 105 CMR 451.123* Maintenance: Column outside shower rusted at shower # 8 105 CMR 451.123 Maintenance: Wall paint damaged in shower # 2 and 3 105 CMR 451.123 Maintenance: Floor dirty in shower # 1 105 CMR 451.123

Plumbing: Plumbing not maintained in good repair, hot water faucet not working

Plumbing: Plumbing not maintained in good repair, sink drain cover missing

No Violations Noted

Chemical Room

Interview Room 105 CMR 451.130*

105 CMR 451.130*

Work Release

Control Booth

No Violations Noted

Strip Search Room

105 CMR 451.353* Interior Maintenance: Ceiling tiles water damaged

105 CMR 451.353* Interior Maintenance: Floor tiles damaged

Chemical Closet

105 CMR 451.353* Interior Maintenance: Ceiling tiles water damaged

Office

No Violations Noted

Day Room

No Violations Noted

Storage Room

No Violations Noted

Laundry

105 CMR 451.353* Interior Maintenance: Floor tiles damaged

Right Corridor

Cells

105 CMR 451.353* Interior Maintenance: Ceiling paint damaged near window in cell # 11

105 CMR 451.350* Structural Maintenance: Window pane broken in cell # 7 105 CMR 451.353 Interior Maintenance: Light shield damaged in cell # 9

Showers

105 CMR 451.123* Maintenance: Floor tiles damaged in shower # 2, 3, and 4

Staff Bathroom

105 CMR 451.123* Maintenance: Ceiling paint damaged

Inmate Bathroom

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, faucet loose at handwash sink # 2

and 3

Left Corridor

Cells

105 CMR 451.353* Interior Maintenance: Ceiling damaged in cell # 5 105 CMR 451.353 Interior Maintenance: Light shield missing in cell # 4 105 CMR 451.340 Illumination: Insufficient lighting, light out in cell # 4

105 CMR 451.123 Maintenance: Wall paint damaged in cell # 4

Slop Sink Room

105 CMR 451.130* Plumbing: Plumbing not maintained in good repair, faucet leaking Plumbing: Plumbing: Plumbing not maintained in good repair, drain cover missing

Showers	
105 CMR 451.123*	Maintenance: Ceiling louver/grille missing
105 CMR 451.123*	Maintenance: Mold observed on ceiling tiles
105 CMR 451.123*	Maintenance: Floor tiles missing in shower # 3 and 5
105 CMR 451.123*	Maintenance: Wall tiles damaged in shower # 5
105 CMR 451.123	Maintenance: Ceiling vent rusted
Inmate Bathroom	
105 CMR 451.123*	Maintenance: Partitions damaged in stall # 2 and 3
105 CMR 451,130*	Plumbing: Plumbing not maintained in good repair, faucet loose at handwash sink # 1
105 CMR 451.123*	Maintenance: Unfinished wood on wall
Chow Hall and Storage Rooms	
105 CMR 451.353*	Interior Maintenance: Seats damaged at dining tables
105 CMR 451.353*	Interior Maintenance: Wall damaged near door
105 CMR 451.200	Food Storage, Preparation and Service: Food storage not in compliance with
	105 CMR 590.000, food warmer gaskets damaged
	·

Tower

Old Kitchen Area

1 st Floor	
105 CMR 451.353*	Interior Maintenance: Floor dirty
2 nd Floor	
105 CMR 451.350*	Structural Maintenance: Wall damaged
105 CMR 451.350*	Structural Maintenance: Ceiling damaged
105 CMR 451.353*	Interior Maintenance: Wall paint damaged
105 CMR 451.344*	Illumination in Habitable Areas: Light not functioning properly, light out
105 CMR 451.126*	Hot Water: Hot water temperature recorded at 89°F at handwash sink
105 CMR 451.123*	Maintenance: Handwash sink dirty
105 CMR 451.123*	Maintenance: Floor dirty
3 rd Floor	
105 CMR 451.350*	Structural Maintenance: Wall damaged
105 CMR 451.353*	Interior Maintenance: Wall board missing
105 CMR 451.344*	Illumination in Habitable Areas: Light not functioning properly, missing light bulbs in light fixture
105 CMR 451.200*	Food Storage, Preparation and Service: Food storage not in compliance with 105 CMR 590.000, excessive ice buildup in freezer
105 CMR 451.200	Food Storage, Preparation and Service: Food preparation not in compliance with 105 CMR 590.000, interior of microwave oven dirty
105 CMR 451,200	Food Storage, Preparation and Service: Food storage not in compliance with 105 CMR 590.000, no functioning thermometer in refrigerator

Warehouse Building (outside)

Staff Gym

Weight Area	
105 CMR 451.353*	Interior Maintenance: Dead insects observed in light shield
105 CMR 451.353	Interior Maintenance: Equipment padding damaged

Female Bathroom/Locker Room

105 CMR 451.123* Maintenance: Wall water damaged near toilet
105 CMR 451.123* Maintenance: Dead insects observed in light shield
105 CMR 451.123 Maintenance: Grout damaged around drain in shower

Male Bathroom /Locker Room

(Unable to Inspect Toilet – In Use)

105 CMR 451.123*

Maintenance: Column damaged outside shower

105 CMR 451.123* Maintenance: Mold observed on bench seat in shower

Chemical Room

No Violations Noted

Office

No Violations Noted

Warehouse

Office

No Violations Noted

Break Area

No Violations Noted

Inmate Bathroom

No Violations Noted

Staff Bathroom

No Violations Noted

Chemical Room

No Violations Noted

Walk-In Freezer

No Violations Noted

Dry Storage Closet

No Violations Noted

Exterior Cooler # 1

No Violations Noted

Exterior Cooler # 2

No Violations Noted

Garage

Transportation Office

No Violations Noted

Kitchen Area

No Violations Noted

Bathroom

105 CMR 451.126 Hot Water: Hot water temperature recorded at 81°F

Staff Bathroom

No Violations Noted

Tool Room

No Violations Noted

Wash Room

No Violations Noted

Garage Room

No Violations Noted

Key Control

105 CMR 451.200 Food Storage, Preparation and Service: Food preparation not in compliance with

105 CMR 590,000, interior of microwave oven dirty

Annex

105 CMR 451.322* Cell Size: Inadequate floor space

Control Booth

No Violations Noted

Control Bathroom

105 CMR 451.126 Hot Water: Hot water temperature recorded at 153°F

Visiting Area (outside)

No Violations Noted

Female Staff Bathroom

No Violations Noted

Staff Locker Room

No Violations Noted

Male Staff Bathroom/Storage

No Violations Noted

Visiting Area (inside)

105 CMR 451.130* Plumbing: Plumbing not maintained in good repair, bubbler out-of-order

Food Service Area

No Violations Noted

Dining Area

105 CMR 451.350 Structural Maintenance: Exterior door not rodent and weathertight

Social Worker's Office

No Violations Noted

Showers

105 CMR 451.123 Maintenance: Soap scum on floor in shower # 2, 6, and 12

105 CMR 451.123 Maintenance: Wall paint damaged

Storage/Boiler Room

Unable to Inspect - Locked

3 4	r	* *	
11/1	01	11/	al
2 Y 3	Си		Let

105 CMR 451.353 Interior Maintenance: Exam table padding damaged

Chemical Closet with Books

No Violations Noted

7	0	il	ets

105 CMR 451.124*	Water Supply: Insufficient cold water supply in quantity and pressure at handwash
	sink/toilet unit # 1, 5, and 8
105 CR (D. 451 104	

105 CMR 451.124 Water Supply: Insufficient hot water supply in quantity and pressure at handwash

sink/toilet unit # 11

105 CMR 451.124* Water Supply: Insufficient water supply in quantity and pressure at handicapped

handwash sink/toilet unit

105 CMR 451.117 Toilet Fixtures: Toilet fixtures dirty in handicapped stall

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, handwash sink # 2 clogged

Sink Area

105 CMR 451.124* Water Supply: Insufficient water supply in quantity and pressure at handwash sink # L2

105 CMR 451.126* Water Supply: No cold water supplied to middle handwash sink and # L3

105 CMR 451.123 Maintenance: Handwash sink # 1 dirty

TV Area

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, bubbler out-of-order

Sleeping Area

105 CMR 451.101 Blankets: Blanket damaged at bed # 36

Meeting Room # I

105 CMR 451.340 Illumination: Insufficient lighting, 1 light out

Laundry

No Violations Noted

Observations and Recommendations

1. The inmate population was 986 at the time of inspection.

- 2. The Department recommends that all showers be identified with a numbering system. This will assist the Department and correctional employees to better identify where issues exist.
- 3. There were areas of the Modular Infirmary Building that were no longer used and certain areas had restricted access. Inmates have been re-located to the Health Services Infirmary Ward Bunk Room. The Department requests to be kept apprised of any additional changes to the usage of this building.

This facility does not comply with the Department's Regulations cited above. In accordance with 105 CMR 451.404, please submit a plan of correction within 10 working days of receipt of this notice, indicating the specific corrective steps to be taken, a timetable for such steps, and the date by which correction will be achieved. The plan should be signed by the Superintendent or Administrator and submitted to my attention, at the address listed above.

To review the specific regulatory requirements please visit our website at www.mass.gov/dph/dcs and click on "Correctional Facilities" (available in both PDF and RTF formats).

To review the Food Establishment regulations please visit the Food Protection website at www.mass.gov/dph/fpp and click on "Food Protection Regulations". Then under "Retail" click "105 CMR 590,000 - State Sanitary Code Chapter X - Minimum Sanitation Standards for Food Establishments" and "1999 Food Code".

To review the Labeling regulations please visit the Food Protection website at www.mass.gov/dph/fpp and click on "Food Protection Regulations". Then under "General Food Regulations" click "105 CMR 520.000: Labeling."

This inspection report is signed and certified under the pains and penalties of perjury.

Sincerely,

Amy Medeiros, MPH

Meds

Environmental Health Inspector, CSP, BEH

cc: Jana Ferguson, Director, BEH

Steven Hughes, Director, CSP, BEH

Marylou Sudders, Secretary, Executive Office of Health and Human Services

Thomas Turco, Commissioner, DOC

Patrick Ryan, EHSO

Diane M. Cook, WSCO Policy, Accreditation & Program Development Coordinator

Danielle Gagnon, Administrator/Health Inspector, West Boylston Board of Health

Clerk, Massachusetts House of Representatives

Clerk, Massachusetts Senate

Daniel Bennett, Secretary, EOPSS

Nelson Alves, Director, Policy Development and Compliance Unit