

The Commonwealth of Massachusetts

Executive Office of Health and Human Services

Department of Public Health

Bureau of Environmental Health

Community Sanitation Program

5 Randolph Street, Canton, MA 02021

MARYLOU SUDDERS

Secretary

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| CHARLES D. BAKER  Governor  KARYN E. POLITO  Lieutenant Governor |

April 6, 2016

Joseph D. McDonald, Jr., Sheriff

Plymouth County Correctional Facility

26 Long Pond Road

Plymouth, MA 02360

Re: Facility Inspection - Plymouth County Correctional Facility

Dear Sheriff McDonald:

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: Minimum Requirements for the Management of 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 Plymouth County Correctional Facility on February 22 and 23, 2016 accompanied by Captain Eugene Irvine, Environmental Health and Safety Officer. Violations noted during the inspection are listed below including 85 repeat violations:

**HEALTH AND SAFETY VIOLATIONS**

(*\* indicates conditions documented on previous inspection reports*)

**Administration/Entrance Area**

**Front Lobby**

*Main Area*

No Violations Noted

*Janitor’s Closet*

No Violations Noted

*Male Bathroom*

No Violations Noted

*Female Bathroom*

No Violations Noted

**Main Hallway**

*Janitor’s Closet – 1027*

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

**Female Locker Room**

105 CMR 451.123\* Maintenance: Ceiling vent dusty

*Showers*

No Violations Noted

**Male Locker Room**

105 CMR 451.123\* Maintenance: Ceiling vent dusty

*Showers*

No Violations Noted

**Staff Gym**

No Violations Noted

**Administration Area – 1018**

*Break Room - 1014*

No Violations Noted

*Male Bathroom – 1013*

No Violations Noted

*Female Bathroom – 1015*

No Violations Noted

*IPS Office*

No Violations Noted

**Kitchen**

FC 6-201.11\* Design, Construction and Installation: Floor damaged in many areas

*Staff Dining Area*

No Violations Noted

*Staff Serving Line*

FC 6-201.11\* Design, Construction and Installation: Floor damaged

*Kitchen Entrance*

No Violations Noted

*Warming Units*

No Violations Noted

*Ice Machine*

No Violations Noted

*Office*

No Violations Noted

*Office Bathroom*

No Violations Noted

*Dry Storage*

No Violations Noted

*Tool Closet*

No Violations Noted

*Cooler # 2*

No Violations Noted

*Inmate Break Area*

No Violations Noted

*Inmate Bathroom*

Unable to Inspect – In Use

*Janitor’s Closet*

No Violations Noted

*Freezer # 1*

No Violations Noted

*Cooler # 3*

No Violations Noted

*Cooler # 4*

No Violations Noted

*Cooler # 5*

No Violations Noted

*Freezer # 6*

No Violations Noted

**Prep Area**

*Kettle Area*

No Violations Noted

*Bakery Area*

FC 5-205.15(B) Plumbing System, Operations and Maintenance: Plumbing system not maintained in good repair, sink leaking

**3-Bay Sink Area**

FC 5-205.15(B) Plumbing System, Operations and Maintenance: Plumbing system not maintained in good repair, sink leaking

**Dishwashing Machine Area**

FC 6-201.11\* Design, Construction and Installation: Floor damaged

FC 6-501.12(A)\* Maintenance and Operation; Cleaning: Facility not cleaned properly, standing water around dishwashing machine

**Chapel/Contact Room**

105 CMR 451.350\* Structural Maintenance: Water leak behind wall

**Medical Corridor**

105 CMR 451.350\* Structural Maintenance: Ceiling leaking

105 CMR 451.353\* Interior Maintenance: Ceiling tiles damaged

105 CMR 451.350\* Structural Maintenance: Door leading to exterior not rodent and weathertight

**HSU**

*Kitchen*

No Violations Noted

*Nurse’s Station – M106*

No Violations Noted

*Soiled Utility – M133*

No Violations Noted

*Room – M132*

No Violations Noted

*Autoclave – M131*

No Violations Noted

*Staff Bathroom – M130*

No Violations Noted

*Pharmacy – M128*

No Violations Noted

*Janitor’s Closet – M127*

No Violations Noted

*Laboratory – M126*

105 CMR 451.126\* Hot Water: Hot water temperature recorded at 770F

*Dentist – M124*

No Violations Noted

*X-Ray Room – M123*

No Violations Noted

*Inmate Bathroom – M122*

No Violations Noted

*Exam Room – M121*

105 CMR 451.126 Hot Water: Hot water temperature recorded at 740F

*Room – M119*

No Violations Noted

*Handicap Bathroom*

No Violations Noted

*Cells M113 - 116*

No Violations Noted

**Laundry**

105 CMR 451.353 Interior Maintenance: Ceiling vent dirty

105 CMR 451.353\* Interior Maintenance: Washing machine out-of-order

*Janitor’s Closet*

105 CMR 451.353 Interior Maintenance: Wet mop stored in bucket

*Office*

No Violations Noted

*Chemical Closet*

No Violations Noted

**Maintenance - 1053**

*Small Tool Room*

No Violations Noted

*Bathroom*

No Violations Noted

*Office*

No Violations Noted

*Office Bathroom*

No Violations Noted

**Inmate Bathroom – 1058**

Unable to Inspect – No Access

**Loading Dock**

No Violations Noted

**Gymnasium**

No Violations Noted

**Hallway**

*Female Staff Bathroom – 1039*

No Violations Noted

*Male Staff Bathroom – 1040*

No Violations Noted

*Janitor’s Closet - 1084*

105 CMR 451.353 Interior Maintenance: Ceiling vent dusty

*Staff Bathroom – 1090*

No Violations Noted

*Janitor’s Closet – 1095*

105 CMR 451.353\* Interior Maintenance: Ceiling vent dusty

*Staff Bathroom – 1098*

No Violations Noted

*Staff Bathroom – 1099*

No Violations Noted

*Staff Bathroom – 1107*

No Violations Noted

*Janitor’s Closet – 1108*

No Violations Noted

*Unit Manager’s Office – 1112*

Unable to Inspect – In Use

*Classroom – 1102*

No Violations Noted

*Staff Bathroom – 1102*

No Violations Noted

*Classroom – 1110*

No Violations Noted

**Library**

No Violations Noted

**Human Services - 1079**

105 CMR 451.353\* Interior Maintenance: Floor tiles damaged at cubicles

105 CMR 451.350\* Structural Maintenance: Ceiling leaking

105 CMR 451.353\* Interior Maintenance: Appearance of mold on floor

*Break Room*

FC 4-601.11(A)\* Cleaning of Equipment and Utensils, Objective: Food contact surface dirty, toaster oven dirty

*Offices*

105 CMR 451.350\* Structural Maintenance: Ceiling leaking in office # 1071

105 CMR 451.353 Interior Maintenance: Ceiling dirty in office # 1072

*Staff Bathroom – 1069*

105 CMR 451.123 Maintenance: Floor tiles separating

*Janitor’s Closet – 1064*

No Violations Noted

**Booking**

*Main Area*

No Violations Noted

*Office – R112*

No Violations Noted

*Records – R106*

No Violations Noted

*Inmate Toilet – R105*

No Violations Noted

*Inmate Bathroom – R118*

No Violations Noted

*Janitor’s Closet – R126*

105 CMR 451.353 Interior Maintenance: Unlabeled chemical bottle

*Showers*

105 CMR 451.123\* Maintenance: Floor dirty in shower # 1 and 2

*Staff Bathroom – R127*

No Violations Noted

*Kitchen Area*

FC 4-501.11(B) Maintenance and Operation, Equipment: Equipment components not maintained in a state of good repair, refrigerator gaskets damaged

*Officer’s Landing*

No Violations Noted

*Cells*

105 CMR 451.353 Interior Maintenance: Ceiling vent blocked in cell # R116

**Property**

No Violations Noted

**Cell Blocks/Pods**

**A1**

*Trap*

105 CMR 451.353\* Interior Maintenance: Ceiling dirty

*Main Area - Bunks*

105 CMR 451.322\* Cell Size: Inadequate floor space in dorm area

*Slop Sink*

No Violations Noted

*Showers*

105 CMR 451.123\* Maintenance: Ceiling vent dusty

*Bathroom*

No Violations Noted

*Cells A107 - 110*

No Violations Noted

**E1**

*Main Area*

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

105 CMR 451.353 Interior Maintenance: Ceiling tiles dirty outside cell # 237 and 238

*Slop Sink*

105 CMR 451.353\* Interior Maintenance: Wall vent dusty

*Showers*

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, shower leaking in shower # 7

*Recreation Area*

105 CMR 451.353 Interior Maintenance: Bird nests in rafters

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

105 CMR 451.353\* Interior Maintenance: Ceiling tiles damaged in cell # 238

**H1**

*Main Area*

105 CMR 451.353 Interior Maintenance: Ceiling tiles dirty outside cell # 237 and 238

105 CMR 451.353 Interior Maintenance: Ceiling diffusers rusted

*Slop Sink*

No Violations Noted

*Showers*

105 CMR 451.123\* Maintenance: Appearance of mold outside showers

105 CMR 451.350 Structural Maintenance: Staircase rusted outside showers

*Recreation Area*

No Violations Noted

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

105 CMR 451.350\* Structural Maintenance: Ceiling damaged in room # 237

105 CMR 451.353 Interior Maintenance: Ceiling tiles damaged in room # 238

105 CMR 451.140 Adequate Ventilation: Inadequate ventilation, wall ventilation grille blocked in cell # 104, 119, 130, and 206

105 CMR 451.353 Interior Maintenance: Wall paint peeling in cell # 118, 122, and 208

**FN1**

*Main Area*

No Violations Noted

*Slop Sink*

No Violations Noted

*Recreation Area*

No Violations Noted

*Showers – 1st Floor*

No Violations Noted

*Showers – 2nd Floor*

105 CMR 451.123\* Maintenance: Ceiling tiles rusted outside showers

105 CMR 451.123 Maintenance: Light shield dirty in shower # 5

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

**FS1**

*Main Area*

105 CMR 451.353\* Interior Maintenance: Ceiling tiles damaged near recreational door

105 CMR 451.353\* Interior Maintenance: Ceiling tiles rusted outside cell # 208

*Slop Sink*

No Violations Noted

*Toilet Area*

No Violations Noted

*Showers – 1st Floor*

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, shower # 1 leaking

*Showers – 2nd Floor*

105 CMR 451.123\* Maintenance: Floor paint peeling outside of showers

*Recreation Area*

No Violations Noted

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

**DN1**

*Main Area*

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

*Slop Sink*

No Violations Noted

*Toilet Area*

No Violations Noted

*Showers – 1st Floor*

No Violations Noted

*Showers – 2nd Floor*

105 CMR 451.123\* Maintenance: Ceiling tiles damaged outside showers

*Recreation Area*

105 CMR 451.353 Interior Maintenance: Bird nests in rafters

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

**DS1**

*Main Area*

No Violations Noted

*Slop Sink*

No Violations Noted

*Showers – 1st Floor*

105 CMR 451.123 Maintenance: Light shield dirty in shower # 1

*Showers – 2nd Floor*

105 CMR 451.123\* Maintenance: Floor paint peeling outside showers

105 CMR 451.123\* Maintenance: Appearance of mold outside showers

105 CMR 451.123 Maintenance: Light shield dirty in shower # 6

105 CMR 451.123 Maintenance: Ceiling vent dirty in shower # 4, 5, 6, and 7

*Recreation Area*

105 CMR 451.353\* Interior Maintenance: Bird nests in rafters

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

**BN101**

*Main Area*

105 CMR 451.353 Interior Maintenance: Ceiling vents dusty

*Bunks*

105 CMR 451.322\* Cell Size: Inadequate floor space in dorm area

*Bathroom*

105 CMR 451.123\* Maintenance: Ceiling tiles rusted outside bathroom

*Showers*

105 CMR 451.123 Maintenance: Shower hook rusted in shower # 1 and 2

**BS101**

*Main Area*

No Violations Noted

*Bunks*

105 CMR 451.322\* Cell Size: Inadequate floor space in dorm area

*Bathroom*

105 CMR 451.123 Maintenance: Toilet out-of-order

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, slop sink leaking

*Showers*

105 CMR 451.123\* Maintenance: Ceiling tiles damaged at bathroom entrance

**BS201**

*Main Area*

No Violations Noted

*Bunks*

105 CMR 451.322\* Cell Size: Inadequate floor space in dorm area

*Bathroom*

105 CMR 451.123\* Maintenance: Ceiling tiles damaged outside bathroom

*Showers*

No Violations Noted

**BN201**

*Main Area*

No Violations Noted

*Bunks*

105 CMR 451.322\* Cell Size: Inadequate floor space in dorm area

*Bathroom*

105 CMR 451.123 Maintenance: Ceiling tiles rusted outside bathroom

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, slop sink leaking

*Showers*

No Violations Noted

**C1**

*Main Area*

105 CMR 451.353\* Interior Maintenance: Ceiling tiles damaged outside cell # 236

105 CMR 451.350\* Structural Maintenance: Recreation deck door not rodent and weathertight

*Slop Sink*

No Violations Noted

*Showers*

105 CMR 451.123 Maintenance: Curtains missing in shower # 1, 3, 5, 6, 7, 8, and 9

*Recreation Area*

105 CMR 451.353\* Interior Maintenance: Bird nests in rafters

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

105 CMR 451.353 Interior Maintenance: Light fixture blocked in cell # 120, 213, 217, 219, 221, and 229

**G Block**

*Main Area*

No Violations Noted

**GE South**

105 CMR 451.353\* Interior Maintenance: Ceiling tiles damaged

105 CMR 451.350\* Structural Maintenance: Ceiling leaking

105 CMR 451.353\* Interior Maintenance: Appearance of mold on ceiling

*Slop Sink*

No Violations Noted

*Showers*

No Violations Noted

*Chemical Storage*

No Violations Noted

*Cells*

105 CMR 451.321 Cell Size: Inadequate floor space in all cells

**GE North**

*Slop Sink*

No Violations Noted

*Showers*

No Violations Noted

*Recreation Deck*

No Violations Noted

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

105 CMR 451.140 Adequate Ventilation: Inadequate ventilation, wall ventilation grille blocked in cell # 116, 118, 214, 215, and 217

105 CMR 451.353 Interior Maintenance: Light fixture blocked in cell # 118

**GW North**

*Main Area*

No Violations Noted

*Slop Sink*

No Violations Noted

*Showers*

105 CMR 451.123 Maintenance: Ceiling vent dusty in shower # 1, 2, and 3

105 CMR 451.123 Maintenance: Floor dirty in shower # 1, 2, and 3

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

105 CMR 451.140 Adequate Ventilation: Inadequate ventilation, wall ventilation grille blocked in cell # 114, 115, 116, 118, 209, 212, and 215

**GW South**

*Main Area*

105 CMR 451.350\* Structural Maintenance: Ceiling leaking

*Slop Sink*

No Violations Noted

*Showers*

105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, shower # 1 leaking

*Cells*

No Violations Noted

**3rd Floor**

**Main Hallway**

*Janitor’s Closet – 3022*

No Violations Noted

*Staff Bathroom – 3021*

No Violations Noted

*Storage – 3020*

Unable to Inspect – No Access

*Janitor’s Closet – 3018*

No Violations Noted

*Classroom – 3015*

No Violations Noted

*Storage – 3011*

No Violations Noted

*Janitor’s Closet - 3010*

No Violations Noted

*Staff Bathroom – 3009*

No Violations Noted

*Storage – 3008*

FC 3-701.11(A)\* Contaminated Food, Disposition: Unsafe, adulterated, or not honestly presented food not properly reconditioned or discarded, expired milk in refrigerator

FC 4-903.11(A)(2)\* Protection of Clean Items, Storing: Single-service items not protected from contamination, utensils left uncovered

*Janitor’s Closet – 3006*

No Violations Noted

*Classroom – 3005*

No Violations Noted

*Staff Bathroom – 3003*

No Violations Noted

**FS3**

*Main Area*

105 CMR 451.353\* Interior Maintenance: Ceiling tiles damaged

105 CMR 451.350 Structural Maintenance: Wall damaged, hole in wall outside cell # 305

105 CMR 451.353 Interior Maintenance: Wall paint peeling outside cell # 305

*Slop Sink*

No Violations Noted

*Medical Room*

No Violations Noted

*Toilet Area*

Unable to Inspect – In Use

*Showers – 1st Floor*

No Violations Noted

*Showers – 2nd Floor*

105 CMR 451.123\* Maintenance: Floor paint peeling outside showers

105 CMR 451.123 Maintenance: Light shield dirty in shower # 6 and 7

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

105 CMR 451.350 Structural Maintenance: Ceiling leaking outside cell # 401

**FN3**

*Main Area*

105 CMR 451.353\* Interior Maintenance: Ceiling vents dusty

*Slop Sink*

No Violations Noted

*Toilet Area*

No Violations Noted

*Showers – 1st Floor*

105 CMR 451.123\* Maintenance: Appearance of mold on ceiling outside showers

*Showers – 2nd Floor*

105 CMR 451.123\* Maintenance: Appearance of mold outside showers

105 CMR 451.123 Maintenance: Light out in shower # 4

105 CMR 451.123 Maintenance: Light shield dirty in shower # 7

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

105 CMR 451.350\* Structural Maintenance: Floor damaged in cell # 402

**H3**

*Main Area*

105 CMR 451.350\* Structural Maintenance: Recreation deck door not rodent and weathertight

105 CMR 451.353 Interior Maintenance: Hole repair left unfinished outside cell # 322

*Slop Sink*

105 CMR 451.353\* Interior Maintenance: Ceiling vent dusty

*Showers*

105 CMR 451.123\* Maintenance: Ceiling vents dusty in shower # 9

105 CMR 451.123 Maintenance: Ceiling vents dusty in shower # 5, 7, and 8

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

105 CMR 451.353\* Interior Maintenance: Ceiling vent dusty in cell # 437

**DN3**

*Main Area*

105 CMR 451.350\* Structural Maintenance: Recreation deck door not rodent and weathertight

*Slop Sink*

No Violations Noted

*Toilet Area*

No Violations Noted

*Showers – 1st Floor*

No Violations Noted

*Showers – 2nd Floor*

No Violations Noted

*Recreation Deck*

No Violations Noted

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

**DS3**

*Main Area*

105 CMR 451.350\* Structural Maintenance: Recreation deck door not rodent and weathertight

105 CMR 451.353 Interior Maintenance: Ceiling tiles damaged

*Slop Sink*

No Violations Noted

*Toilet Area*

105 CMR 451.123 Maintenance: Floor dirty

*Showers – 1st Floor*

No Violations Noted

*Showers – 2nd Floor*

105 CMR 451.123 Maintenance: Light shield dirty in shower # 5, 6, and 7

*Recreation Deck*

No Violations Noted

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

**E3**

*Main Area*

105 CMR 451.353 Interior Maintenance: Wall paint peeling near phones

*Slop Sink*

No Violations Noted

*Showers*

No Violations Noted

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

105 CMR 451.353 Interior Maintenance: Wall paint peeling in cell # 332, 406, 410, 415, and 418

**C3**

*Main Area*

105 CMR 451.350\* Structural Maintenance: Ceiling leaking

*Slop Sink*

105 CMR 451.353 Interior Maintenance: Wet mop stored in slop sink

*Showers*

105 CMR 451.123\* Maintenance: Appearance of mold outside showers

*Recreation Deck*

No Violations Noted

*Cells*

105 CMR 451.321\* Cell Size: Inadequate floor space in all cells

**Warehouse – Support Building**

*Freezer*

No Violations Noted

*Fridge # 1*

No Violations Noted

*Fridge # 2*

No Violations Noted

*Male Bathroom*

No Violations Noted

*Female Bathroom*

No Violations Noted

*Inmate Bathroom*

No Violations Noted

*Janitor’s Closet*

No Violations Noted

**Work Crew Area**

*Bathroom*

No Violations Noted

*Break Area*

No Violations Noted

**K9 Unit**

*Female Bathroom*

105 CMR 451.123\* Maintenance: Vent dusty

*Bathroom # 2*

No Violations Noted

*Janitor’s Closet*

No Violations Noted

*Kitchen Area*

No Violations Noted

**Garage**

*Bathroom – W124*

No Violations Noted

*Janitor’s Closet – W123*

No Violations Noted

**Print Shop**

No Violations Noted

*Inmate Bathroom*

No Violations Noted

*Staff Bathroom*

No Violations Noted

*Janitor’s Closet*

No Violations Noted

*Janitor’s Closet – W111*

No Violations Noted

**Observations and Recommendations**

1. The inmate population was 1122 at the time of inspection.

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](http://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](http://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](http://www.cfsan.fda.gov/%7Edms/fc99-toc.html)”.

To review the Labeling regulations please visit the Food Protection website at [www.mass.gov/dph/fpp](http://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,

Nicholas Gale

Environmental Health Inspector, CSP, BEH

cc: Jan Sullivan, Acting Director, BEH

Steven Hughes, Director, CSP, BEH

Jay Youmans, Director of Government Affairs

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

Carol Higgins O’Brien, Commissioner, DOC

Antone Moniz, Superintendent

Captain Eugene Irvine, EHSO

Michelle Roberts, MA, CHO, Health Director, Plymouth Health Department

Clerk, Massachusetts House of Representatives

Clerk, Massachusetts Senate

Daniel Bennett, Secretary, EOPSS

Jennifer Gaffney, Director, Policy Development and Compliance Unit