Department of Homeless Services
Department of Social Services

NEW YORK CITY DEPARTMENT OF HOMELESS SERVICES

Procedure Number: DHS-PB-2018-011

SUBJECT:	APPLICABLE TO:	ISSUED:
Shelter Inspection Policy	All staff of Facility and Logistics Division, Routine Site Review Inspection (RSRI) Unit, DHS Directly-Operated or Provider Facilities/Programs Serving Homeless Individuals and Families	June 29, 2018

ADMINISTERED BY:	APPROVED BY:
Facility and Logistics Division, Routine Site Review Inspection (RSRI) Unit	Joslyn Carter, Administrator Department of Social Services/ Department of Homeless Services

PURPOSE
The purpose of this procedure is to provide staff instructions in the policy for conducting inspections of Department of Homeless Services (DHS) directly-operated and funded facilities.

INTRODUCTION
The Routine Site Review Inspection (RSRI) Unit conducts inspections of Department of Homeless Services (DHS) directly-operated and funded shelters a minimum of twice per year. The resulting report is DHS' primary tool to determine whether a shelter's physical environment is in compliance with the laws, codes, regulations, and rules governing Temporary Housing Assistance (THA).

POLICY
DHS is required to provide THA in a setting that is safe, habitable, and in compliance with all governing laws, codes, regulations, and rules. In order to ensure this, DHS conducts regular inspections.

TABLE OF CONTENTS

BACKGROUND

The RSRI unit conducts inspections of DHS directly-operated and funded shelters a minimum of twice per year, the resulting report of which is DHS's primary tool to determine whether a shelter's physical environment is in compliance with the laws, codes, regulations, and rules governing THA.

The RSRI Report:

- Helps DHS evaluate the appropriateness and efficiency of Provider's use of City's funds budgeted for the maintenance of a shelter.
- Assists DHS and the Providers with identifying problematic building conditions (i.e., roofs, plumbing, HVAC) to prevent their premature failure.
- Maximizes the utility of preventative maintenance to minimize the number of units being placed offline.

DHS reserves the right to update the RSRI Report form as it deems appropriate. Providers should contact their Program Administrator for a copy of the most recent version of the RSRI Report.

The inspection cycle occurs within a six-month interval, with cycle one covering July to December, and cycle two covering January to June. The RSRI Unit may conduct additional inspections outside of the inspection cycle when DHS deems it necessary.

After inspection of a facility, the Provider must submit a Corrective Action Plan (CAP) for all items identified as unsatisfactory. **Conditions identified as severe must be addressed within 24 hours.**

When necessary, the conditions are re-inspected before the end of the six-month cycle, in order to ensure that all deficiencies were corrected.

If the Provider fails to comply with the directives issued, DHS may refer the matter to the Office of Regulatory Compliance and Accountability (ORCA) for an enforcement conference.

REQUIRED ACTION

Pre-Inspection

The Mayor's Office of Operations oversees the scheduling of DHS' Shelter Repair Squad (SRS) inspections, which are scheduled once every six months. Additionally, DHS reserves the right to inspect a shelter without prior notice. The Office of Operations notifies the Provider of the scheduled inspection and emails DHS' Facilities and Logistics Division the schedule for the following week's inspections.

The RSRI Director assigns the shelter inspection to an Inspector.

The Inspector must:

- Review violations from the last RSRI report.

- Review violations from Enforcement Agencies, including the:
  - Fire Department of the City of New York (FDNY)
  - Housing Preservation and Development (HPD)
  - Department of Buildings (DOB)
  - Department of Health and Mental Hygiene (DOHMH).

- Print out the outstanding violations issued by the Enforcement Agencies.

- Contact the Shelter/Program Director prior to conducting the inspection to confirm the appointment.

Inspection Process

On the day of the inspection, the RSRI Inspector ensures that he/she has copies of the previous violations, and the RSRI Report, which is used as a checklist during the inspection. During the inspection, the RSRI Inspector may be accompanied by any of the following:

- Landlord
- Building Manager
- Director
- Security
- Head of Maintenance
- Owner or representative
- Caseworker
- Other Managerial staff

The RSRI Report contains questions in three main categories: Cleanliness, Building Integrity, and Management:

- **Cleanliness** – Inspectors examine the facility to ensure it is free of dirt, debris, marks, and stains. Floors are inspected for cleanliness, wax build-up, and garbage. Walls and ceilings are inspected for graffiti and stains from water, food residue, and foot prints.

  Windows are inspected for soot and dirt accumulation. Kitchens are inspected for grease build-up.

- **Building Integrity** – Inspectors check for broken/worn items throughout the facility. Various items including water faucets, bathroom doors and partitions, window screens, window guards, light switches and fixtures are inspected to ensure they are properly functioning.

Management – Inspectors review administrative logs and records of fire drills, facility violations, budgets, headcount, supplies, and work order tickets; as well as the results of inspections by FDNY, DOB, New York State, and other oversight agencies.

The responses to the questions of the RSRI Report are rate in one of four categories - Excellent, Very Good, Satisfactory, and Unsatisfactory, as defined below (see Attachment 5 - Scoring Methodology).

- **Excellent** – The building, building component, or individual item works as intended. In the case of cleanliness, no dirt, debris, or graffiti was discovered.

- **Very Good** – The building, building component, or individual item needs minor repair. In the case of cleanliness, minor dirt, debris, or graffiti was discovered.

- **Satisfactory** – The building, building component, or individual item works as intended but needs minor repair to make it 100% operational. In the case of cleanliness, some dirt, debris, or graffiti was discovered in several areas.

- **Unsatisfactory** – The building, building component, or individual item needs major repair in order for it to work as intended or is non-functional. In the case of cleanliness, dirt, debris, or graffiti is discovered in all parts the facility.

Walk-Through Inspection

The Provider must afford access to all parts of the building. The inspection will include, but not limited to, checking the efficacy of:

- hallways
- walls
- ceilings
- stairs
- kitchens
- windows
- plumbing
- electrical
- Dining Rooms/Cafeteria
- client rooms (inspected last)

DHS reserves the right to require the Provider immediately remediate any condition that the RSRI Inspector deems severe, hazardous, or dangerous. In such cases, the RSRI Inspector immediately notifies the building escort (Provider, Building Manager, etc.) and the RSRI Director of the condition(s) requiring immediate remediation. The Provider must either remediate these conditions within 24 hours and submit proof of such remediation, or send a remediation plan to DHS within 24 hours.

If the RSRI Inspector finds that a client's room has deficiencies making it uninhabitable, the room may be taken offline in accordance with the below protocol.

When the room is uninhabitable due to severe deficiencies, the RSRI Inspector immediately:

- Notifies the Shelter Director of his/her recommendation to take the unit offline.

- Sends the RSRI Director the recommendation to take the unit offline, along with supporting documents.
  - The RSRI Director reviews and sends the recommendation to the Assistant Commissioner (AC), Program Administrators and related-shelter staff.

Note: The Facilities and Logistics Division makes the recommendation to take the unit offline only to DHS Senior Management. DHS Senior Management and the Provider operating the shelter make a joint decision to take the room off-line.

At the end of the inspection, the RSRI Inspector conducts an exit conference with the Provider, providing his/her findings, i.e., severe deficiencies and violations. The RSRI Inspector gives the Provider copies of previous violations from Enforcement Agencies.

Post-Inspection

DHS incorporates all field findings into the RSRI Report. The RSRI Inspector has 14 calendar days from the date of the inspection to compile the list of unsatisfactory items identified during the inspection, classify the deficiencies, and provide timeframes for remediation, based on the deficiencies' classifications. The RSRI Report, including a list of the unsatisfactory items, is mailed and emailed to the Provider and the Landlord (if involved). See the below table for a description of the deficiency classifications and corresponding timeframes.

CATEGORY	DEFICIENCY CLASSIFICATION	DEADLINE	DESCRIPTION
1	SEVERE	Remediation or CAP required within 24 hours from the date of Issue of RSRI Report	**Electrical and plumbing systems** failures, extreme flooding, sparking wires, severe structural damage, no heat, radiator issues, lead paint, fire safety, sewer backups, violations, etc.
2	DEFECTIVE	Remediation or CAP within 30 days from the date of Issue if the RSRI Report	Non-functioning light and toilet fixtures, holes in walls, minor leaks, problems with doors and locks, broken and missing tiles, etc.
3	NON-HAZARDOUS	Remediation or CAP within 60 days from the date of Issue of the RSRI Report	Graffiti, broken and missing tiles, etc.

Responding to the RSRI Report and CAP

Once the RSRI reports are issued to the Providers, the Providers must proceed as set forth below:

- For Severe/Category 1 Items Identified at Walk-Through:

- The Provider must address items either through remediation or submission of a remediation plan within 24 hours.

- If a CAP is required for any of the items listed in (ii) and (iii) below, the Provider can indicate in the CAP whether or not remediation has been completed for Severe/Category 1 items identified during the inspection, and attach the responses that it previously submitted to DHS, in accordance with the 24-hour timeframe.

- For Severe/Category 1 items:

  Submit a CAP, which must contain the signature of the Executive Director for all the items identified within (5) days of receipt of the RSRI Report.

  - The CAP must describe the Provider's plan for remediating each Unsatisfactory item within the timeframe(s) described in the RSRI Report.

  - If a CAP is not submitted within five (5) days, DHS will send a reminder letter to the Provider, who must address the item within 24 hours.

  - If there are **severe issues** and the Provider fails to submit a CAP within the required timeframe, the RSRI Inspector sends a "Severe CAP Letter" informing the Provider that the CAP is overdue and must be submitted within 24 hours.

  - If the Provider fails to respond to the "Severe CAP Letter" and has not submitted the CAP, DHS may send a Non-Compliance Referral to ORCA to initiate an Enforcement Conference.

- For item which is **not** Severe/Category 1:
  - Submit a CAP, which must contain the signature of the Executive Director, for any and all items that have been identified as Unsatisfactory within 14 business days from the date of receipt the RSRI Report.

  - The CAP must describe the Provider's plan for remediating each Unsatisfactory item within the timeframe(s) described in the RSRI Report.

  - If the Provider fails to submit a CAP within 14 days, the DHS Inspector sends a "Notice of Non-Compliance" informing the Provider that the CAP must be submitted within three (3) business days.

- If the Provider fails to respond to the "Notice of Non-Compliance" and has not submitted the CAP as required in either (ii) or (iii) above, DHS may send a Compliance submitted the CAP as required in either (ii) or (iii) above, DHS may send a Compliance Referral to ORCA to initiate an Enforcement Conference in accordance with the Department's Compliance Procedure.

- The Provider must send a copy of the RSRI Report to their Executive Director and Chair of the Board when submitting a CAP to DHS.

- Once a CAP is submitted, DHS will review it. DHS reserves the right to reject the CAP, in whole or in part. DHS will work with the Provider to come up with acceptable solutions.

- DHS reserves the right to conduct a re-inspection to verify the remediation of any condition for which it deems the provider's response to be insufficient.

Re-inspection

After the Provider submits the CAP, DHS may schedule a re-inspection, based on the CAP.

- At the facility, the DHS Inspector signs in and waits for the building escort (Provider, Landlord, etc.).

- The Inspector refers to the CAP and proceeds to re-inspect the specified areas.

- At the end of the inspection, the DHS Inspector conducts an exit conference with the escort.

- The DHS Inspector returns to the DHS Office and updates the CAP with the status of the re-inspection.

Enforcement Referrals to ORCA

The Enforcement referral to ORCA is initiated when the Provider:

- Fails to submit a CAP pursuant to a Severe CAP Letter or Notice of Non-Compliance.

- Fails to demonstrate that it has properly addressed the conditions listed in the RSRI Report.

- Fails to demonstrate that it has properly addressed the conditions pursuant to inspections by oversight agencies (Comptroller, DOB, HPD, DOI, etc.).

Exception: Agreed upon conditions, which require capital construction measures that have been identified and addressed in the CAP or other conditions where DHS has approved an extension of time required for repair, will not be subject to Enforcement

Referrals. Such extensions are granted at DHS' discretion. The Facility and Logistics Division will monitor these matters as part of its project management portfolio.

DHS must include all relevant information regarding a Provider's non-compliance when making am Enforcement Referral to ORCA.

The following documents must be submitted with an Enforcement Referral:

- Copy of the RSRI inspection report;
- Provider's CAP or responses;
- Any relevant communications between the responsible DHS Division and the Provider; and
- Copy of the Notice of Non-Compliance

Recoupment and/or Withholding of Funds

- DHS reserves the right to chargeback and/or withhold all expenses incurred by the Department in correcting a Deficiency (including, but not limited to, labor and materials) from funds due or scheduled to become due to the Provider under its contract with DHS or other DHS-funding arrangement.
- In the event DHS chargebacks and/or withholds funds, such chargeback and/or withholding will come from funds allocated in the Budget for Administrative Overhead where the deficiency is the Provider's responsibility either under its lease for the facility or due to the Provider's ownership of the facility. Where the deficiency is the responsibility of the landlord under the lease, the chargeback and/or withholding shall come from funds allocated to Administrative Overhead in the budget.
- The Provider is prohibited from using funds in the budget designated for a purpose other than Administrative Overhead to pay for or offset any chargeback and/or withholding by DHS.

Withholding of Funds

For deficiencies requiring long-term remediation, DHS expects the Provider to adhere to the timeframes described in the scope of work or CAP. Where DHS determines that the Provider's progress towards completing the remediation of a deficiency is not adhering to the agreed upon timeframes, DHS may withhold any funding in the Provider's budget designated for such work.

Withholding of funds may be surrendered at DHS's discretion or as follows:

- 50% of the withheld amount to be released once the Provider submits a plan that demonstrates it has engaged with its consultants, subcontractors, etc. to resolve the deficiency (submitted supporting documentation, i.e., contracts, letters of intent, etc.).

- The remaining 50% to be released once the deficiency has been properly addressed per the requirements set forth in the DHS Maintenance Policy Manual.

The Provider may request the release of withheld funds in extenuating circumstances or undue hardship.

Chargebacks to Contract

- The Department reserves its right to correct any deficiency through the use of its contractors, subcontractors, other entities or staff to resolve any outstanding deficiency. This remedy is in addition to, and not in lieu of, any other remedies the Department may have under its contract with the Provider or law.

- Where the Provider fails to correct any deficiency within the designated timeframe(s) as described in the RSRI Report, and the Department determines to use its resources to correct the deficiency, the Facilities and Logistics Division will issue a Notice to the Provider no less than 24 hours of the expected date of the Department's work to correct the deficiency. The Notice will inform the Provider of the deficiency to be corrected, the expected scope of work to be undertaken by the Department or its agents and the expected date and time of the work. The Notice will also serve as the Department's official notice to the Provider of its intent to recoup all expenses incurred by DHS in correcting the deficiency, in accordance with the Procedure and the Department's contract with the Provider, where applicable.

- The amount of chargeback will be based on the prevailing wage(s)/labor costs and costs of material(s) that the Department used to correct the deficiency(ies), as determined by the Facilities and Logistics Division. Where DHS has corrected any deficiency through the use of its staff, contractors, subcontractors, other entities or staff, the Facilities and Logistics Division will calculate the amount of the recoupment and submit a detailed written determination to the Department's Office of Legal Affairs ("OLA") and Finance Division ("Finance") for review and approval.

- Upon approval of the Facilities and Logistics Division's determination of the amount of the chargeback from funds due or scheduled to become due to the Provider, OLA and Finance will issue a written notification to the Provider describing the basis for such action(s) to be taken.

Effective Immediately

REFERENCES:
18 NYCRR § 352.3
18 NYCRR § 352.8
18NYCRR § 900 et seq, including but not limited to 18 NYCRR §§ 900.5, 900.11, and § 900.12
18 NYCRR § 491 et seq, including but not limited to 18 NYCRR § 491.10

RELATED ITEMS:
DHS Procedure No. 10-210 (Facility Access)
94 ADM 20
Human Services Standard Contract Section 1.01(l)
Consent Decree, Callahan v. Carey (1981)

DEFINITIONS

- **Corrective Action Plan (CAP)** - A detailed proposal which lists deadlines for correcting or curing the deficiencies listed in a Routine Site Review Inspection (RSRI) Report. The CAP may include evidence, e.g., photographs, invoices, etc., which demonstrates the correction of conditions listed in the subject RSRI Report.

- **Enforcement Conference** - A conference convened by the Office of Regulatory Compliance and Accountability (ORCA) and issued pursuant to a Notice of Enforcement and the process outlined in the Department's Shelter Compliance Procedure, DSS contracts (if applicable), laws, codes, regulations and rules governing the provision of temporary housing assistance including, but not limited to, the Housing Maintenance, Building, and Fire Codes.

- **Law(s)** - The New York City Charter (Charter), the New York City Administration Code (Admin. Code), a local rule of the City of New York, the Constitutions of the United States of America and State of New York, a statute of the United States of America or State of New York and any ordinance, rule or regulation having the force of law and adopted pursuant thereto, as amended, and common law.

- **Provider** - Any person, entity, or organization that provides shelter or operates a shelter on behalf of the DHS.

- **Routine Site Review Inspection (RSSI) Report** - An examination conducted by DHS pursuant to the process outlined in this Procedure. An RSRI Report constitutes an inspection and an audit pursuant to Article V of the Human Services Standard Contract and Section 5.04 of Appendix A of the Human Services Standard Contract.

- **Shelter** - Temporary housing as defined by 18 NYCRR Part 352.35 (b) (3), and any unit, hotel room, apartment, apartment building, hotel, or location (contracted or not) utilized by the Department for the provision of THA.

- **Temporary Housing (TH)** - shelters authorized by 18 NYCRR §900 or 352.8 (a) & (b), §352.3 (e) and §491.

- **Temporary Housing Assistance** - A public assistance benefit provided temporarily for an eligible homeless individual or family to meet an immediate need for shelter.

APPENDICES

1. Corrective Action Plan
2. Severe CAP Letter
3. Notice of Non-Compliance
4. Scoring Methodology

Appendix 1

CORRECTIVE ACTION PLAN

RSRI Inspection Date:

Location:

Shelter Director: ____________________

Signature: ____________________ Date:

Defect	Deficiency Type	Comments	Start Date	End Date	Remarks	Tracking No. W/O Number
					☐ Completed by ____/____/______ ☐ To be Completed BY ____/____/______	
					☐ Completed by ____/____/______ ☐ To be Completed BY ____/____/______	
					☐ Completed by ____/____/______ ☐ To be Completed BY ____/____/______	
					☐ Completed by ____/____/______ ☐ To be Completed BY ____/____/______	
					☐ Completed by ____/____/______ ☐ To be Completed BY ____/____/______	
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					☐ Completed by ____/____/______ ☐ To be Completed BY ____/____/______	
					☐ Completed by ____/____/______ ☐ To be Completed BY ____/____/______	

Report Printed on 7/10/2017

Please contact Marie Murray if there are any questions.
Marie Murray (718) 688-8515 or murraym@dhs.nyc.gov
Please remember to include a START and END date for each deficiency.

Page 1 of 1

Appendix 2

Department of Homeless Services
Department of Social Services

Facilities and Logistics

Steven Banks
Commissioner

Joslyn Carter
DHS Administrator

James Russo
Deputy Commissioner

jrusso@dhs.nyc.gov

33 Beaver Street, 12th Floor
New York , NY 10004

212.361.8600 tel
917.637.8002 fax

Date

Name
Address

Re: "Severe CAP Letter"—Notice of Non-Compliance

Dear [addressee]:

On [date], you were sent a copy of the latest Routine Site Review Inspection (RSRI) report for an inspection that was conducted on [date]. As indicated in the cover letter and RSRI report, you were notified that there are/is __ severe condition(s) that required response(s) to verify that the conditions have been remediated or describe a corrective action plan to remediate the condition(s) within 24 hours from receipt of the RSRI report. Our records indicate that you did not respond to the severe condition(s). You must submit your response within 24 hours from the date of receipt of this Notice by [date]. Failure to comply with this Notice may result in a referral to the Department of Social Services' Office of Regulatory Compliance and Accountability for an enforcement conference.

If you wish to request another copy of your facility's results, please contact my Administrative Assistant at (XXX) XXX-XXXX. If you have any questions, please feel free to contact me directly at (XXX) XXX-XXXX.

Sincerely,

James Russo
Deputy Commissioner

Appendix 3

Department of Homeless Services
Department of Social Services

Facilities and Logistics

Steven Banks
Commissioner

Joslyn Carter
DHS Administrator

James Russo
Deputy Commissioner

jrusso@dhs.nyc.gov

33 Beaver Street, 12th Floor
New York, NY 10004

212.361.8600 tel
917.637.8002 fax

Date:

Name
Address

Re: "Notice is Non-Compliance"—Routine Site Review Inspection (RSRI)

Dear:

On [date], you were sent a copy of the latest RSRI report for an inspection that was conducted on [date]. As previously mentioned, items rated less than satisfactory require a written Corrective Action Plan that describes either the completed work done to remediate the unsatisfactory condition(s) or a plan to remediate the unsatisfactory condition(s), including steps already taken and an estimated date of completion for the remediation. This response should have been completed within 14 business days from receipt of the RSRI report and forwarded to my office. Our records indicate that you have not submitted a Corrective Action Plan.

Please note that there were XX unsatisfactory scores on the RSRI report that required a response. You are required to submit the outstanding response(s) within three (3) business days from the date of receipt of this Notice. Failure to comply with this Notice may result in a referral to the Department of Social Services' Office of Regulatory Compliance and Accountability for an enforcement conference.

To request another copy of your facility's results, please contact my Administrative Assistant at (XXX) XXX-XXXX. If you have any questions, please feel free to contact me directly at (XXX) XXX-XXXX.

Sincerely,

James Russo
Deputy Commissioner

Appendix 4

SCORING METHODOLOGY (page 1 of 2)

The following chart outlines the scoring methodology applied to all RSRI Report questions:

SCORING GUIDELINE	CATEGORY BREAKDOWN
1-Excellent: Condition where a building, building component, or individual item *performs as designed.* In the case of cleanliness, no dirt, debris, or graffiti is discovered during the inspection for the item being scored. **2-Very Good**: Condition where a building, building component, or individual item *needs minor repair*. In the case of cleanliness, minor dirt, debris or graffiti is discovered in parts of the facility during the inspection for the item being scored. **3-Satisfactory**: Condition where a building, building component, or individual item performs as it is designed, but *needs minor repair* to make it 100% operational. In the case of cleanliness, some dirt, debris, or graffiti is discovered in several areas during the inspection for the item being scored. **4-Unsatisfactory**: Condition where a building, building component, or individual item *needs major repair* in order to function or is *non-functional*. In the case of cleanliness, dirt, debris, or graffiti is discovered in all parts the facility during the inspection for the item being scored.	**1-Cleanliness**: Inspectors examine the facility to see if the facility is free of dirt, debris, marks, and stains. Floors are inspected for dirt, wax build-up, and garbage. Inspection of walls and ceilings include graffiti and stains from a variety of encounters; including water, food residue, and foot prints. Windows are checked for soot and general household dirt accumulations. In addition, kitchens are inspected for grease build-up. **2-Structural Integrity:** Inspectors identify broken or worn items throughout the facility. Various items are inspected to determine if they are operational and/or missing. Examples include water faucets, bathroom doors and partitions, door closures, window screens and guards, light switches and fixtures, and similar items. **3-Management:** Inspectors review administrative logs and records that include: Fire drills, facility violations, budgets, headcount, recordkeeping related to inventory supplies and work order tickets, and various facility inspections required by the FDNY, DOB, New York State, and other oversight agencies.

Appendix 4

SCORING METHODOLOGY (page 2 of 2)

Each individual RSRI Report question has a point structure. Questions are scored starting with **Excellent** receiving a score of ‘100’ and **Unsatisfactory** receiving a score of ‘0’.

The RSRI Report generates two scores:

a. The **Shelter** score which accounts for all items in the RSRI Report.
b. The **Provider** score.

- Upon mutual, written agreement by both DHS and the Provider, designated questions may be eliminated from scoring due to items that are not classified as maintenance and repair items, but deemed capital projects. While these items are not scored for RSRI Report purposes, they are included as capital projects on the RSRI Report and the Provider shall deliver a capital plan to MRCC.
- Both the operator and the facility score are weighted as follows: 60% for cleanliness, 30% for integrity, and 10% for management.
- Questions that are marked not applicable are eliminated from the scoring system.
- **PERFORMANCE EVALUATION RATING:** To convert the weighted score (numerical) to the equivalent Performance Evaluation Rating, the following chart demonstrates the related values.
- Approximately 13% of the overall Performance Evaluation Rating is directly related to the *RSRI Report* average score for each building.

Numeric Score	Performance Evaluation Rating
> 90	Excellent
81 - 90	Very Good
76 - 80	Satisfactory
<76	Unsatisfactory