

# Violation Abatement Management Protocol (VAMP)



# **VIOLATION ABATEMENT MANAGEMENT PROTOCOL (VAMP)**

**Office of Public Education Facilities Modernization**  
*Safety, Regulatory and Environmental Compliance Section*

## **Violation Abatement Management Protocol (VAMP)**

### **INTRODUCTION**

District of Columbia Public School facilities are subject to inspections and assessments by multiple regulatory agencies whose purpose is to ensure compliance with applicable codes and regulations that have been adopted by the municipal government to protect life and property. In many instances, these inspections result in the identification of deficiencies that require abatement making it necessary to respond within a predetermined period. In order to provide a timely response and to perform immediate action the Violation Abatement Management Protocol was developed to coordinate and manage the necessary resources to resolve these issues.

*Note: This protocol also expands on the Procedural Memorandum for the Abatement of Fire Code Violations as established by Civil Action # 92-3478, Parents United vs. Marion Barry (Appendix A) and includes the DCPS – DOH Cooperative Food Code Abatement Process (Appendix B).*

### **RESPONSIBILITIES**

- Act as the liaison between outside regulatory agencies and its representatives, the District of Columbia Public Schools and the Office of Public Education Facilities Modernization (OPEFM).
- Receive, review and verify citations and/or complaints from the District of Columbia Fire Marshals Office (DCFD), Department of Consumer Regulatory Affairs (DCRA), Occupational Safety and Health Administration (OSHA), DC Government – Office of Risk Management, and the Department of Health (DOH).
- Promptly coordinate Office of Public Education Facilities Modernization (OPEFM) resources necessary to resolve violations or problems.
- Collaborate with the various agencies on code related problems to discuss, review and verify abatement of concerns and/or violations within the required period.
- Coordinate and meet with regulatory agency representatives when necessary and maintain regular communications.
- Meet with principals, administrators, and OPEFM staff to explain safety deficiencies, and recommend solutions.
- Preparation of reports and responses to the outside regulatory agencies as needed, as well as maintaining internal documentation and investigations, including photographs.
- Perform internal property and safety inspections to identify and abate code deficiencies utilizing VAMP prior to the issuance of a citation by a regulatory agency when possible.

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#### PROCEDURES

- 1) The Safety Unit Representative(s) is to accompany the Authority Having Jurisdiction (AHJ) representative(s) (Inspector) during the inspection and receive a copy of the report, review for accuracy and legitimacy, create a working file folder and follow the next steps.
  - a. If legitimate, continue with the abatement process.
  - b. If illegitimate, demonstrate with support of applicable codes, regulations and/or standards; contact the Safety Coordinator who will caucus with AHJ management.
- 2) During the inspection identify the appropriate level and prioritize OPEFM responsibilities; then prioritize Level 1 concerns.
  - a. Level 1 – Principal or custodial staff (School based)
  - b. Level 2 – Operations or Maintenance (OPEFM)
  - c. Level 3 – Capital Projects (OPEFM)

*Note: See Reference 1 for details.*

- i. Priority I – *Emergency* – Abate within 24 hours
- ii. Priority II – *High* – Abate within 10 business days
- iii. Priority III – *Routine* – Abate with-in 20 business days (15)
- iv. Priority IV – *Scheduled* – Abate with-in dates set in a Project Management Plan

*Note: See Reference 2 for details.*

- 3) During the course of the inspection generate a scope of work, based on common terminology, for all level 2 and 3 concerns to be transcribed onto a work order for each issue cited.
  - a. This is necessary if the AHJ did not provide enough detail in the report for the contractor (or shops) to appropriately schedule and conduct repairs (*Appendix D*).
- 4) At the conclusion of the inspection meet with the building administrator (Principal) and explain the deficiencies and Level 1 responsibility(s) for his/her abatement, consult as necessary.
- 5) Insert a copy of the created file into the central working file cabinet located in the Safety, Regulatory and Environmental Compliance main office; update regularly and as indicated.
- 6) Meet with an OPEFM Customer Service Representative to generate the necessary work order(s).
  - a. Use the TMA database to browse and print a work order summary of the violations to be included in the working file (*Appendix C*).
  - b. Review work order summary/work order(s) for correctness, as compared to the original inspection report (e.g. School, scope, assignment, etc.).
  - c. Print copies of any level 2 and 3 work orders for distribution to the contractor through the Contract Services Section.
- 7) Contact and meet with the Contract Services Representative to inform and provide them with the work orders/scope.
- 8) Contract Services will contact and, if necessary, meet with the appropriate contractor at the cited location to provide them a copy of the work order(s) for estimate(s) and scheduling. (Not all work issued will require meeting the contractor; work can be issued electronically and via phone.)
  - a. As needed, the Contract Services representative will walk the building with the contractor to review the scope of work(s), as included on the work order(s), and identify the violations to ensure accuracy.
  - b. Contract Services may contact the Safety Unit Representative to accompany the contractor in addition to, or in lieu of, for the meeting described above, based on need, at their discretion.

*Note: Work to be completed on a Time and Materials Basis.*

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- 9) Contractor will prepare and submit a work plan to include scheduling and staffing that will be provided to the Contract Services Manager.
  - a. Contract Services will communicate and share copies of the approved work plan with the Senior Project Manager, and the Safety Unit.
  - b. Any violation requiring more than one month to abate requires the submission of a Project Management Plan to the appropriate regulatory agency and is communicated to the building administrator (Principal) [Senior Project Manager authorization required].
- 10) The Safety Unit Representative(s) will communicate the repair schedule to the building administrator (Principal), then document in the working file.
- 11) Contract Services will follow-up regularly (determined by priority and schedule) with the contractor and communicate status to the Senior Project Manager, the Safety Unit, and the building administrator (Principal).
- 12) Upon receipt of an invoice from the contractor for completed work at a school (*work in a school is to be completed and submitted as a whole – not piecemeal*), Contract Services will confirm and validate that work is completed, then notify the Safety Unit for re-inspection, and close out the appropriate work orders.
- 13) The Safety Representative(s) will contact the appropriate regulatory agency representative(s) (inspector) to schedule re-inspection, if not already planned, and document in the working file.
  - a. If clearance is awarded, document in the working file and notify management.
  - b. If clearance is not awarded, document and inform management of the deficiencies and restart process.
- 14) The Contract Services Manager will initial the contractor's invoice confirming completion of work, after the AHJ clears the violation, and submits the invoice to the Senior Project Manager for final payment approval.

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**REFERENCE 1 - LEVEL OF VIOLATION RESPONSIBILITY BY CATEGORY**

The cause and/or extent of work required to abate a violation, determines the level of abatement responsibility.

- 1) Level 1 Violation – Building Administration (Principal) Responsibilities include but are not limited to:
  - a) Exit Obstructed - Includes Locked Exits
  - b) Improper Storage - Includes Combustibles
  - c) Extension Cords / Power Strips
  - d) Labeling Issues - Includes Doors & Electrical Panel Boxes
  - e) Reports and Documentation
  
- 2) Level 2 Violation – Operations or Maintenance (OPEFM) Responsibilities include but are not limited to:
  - a) Emergency Power/Generator
  - b) Exit Lights – Light Bulb(s) Replacement
  - c) Fire Alarm/Fire Protection Equipment - Includes Defective Pull Stations, Missing Placards & Automatic Fire Suppression Systems
  - d) Hood and Duct System
  - e) Kitchen Suppression System
  - f) Ceiling Breach \ Ceiling Tile
  - g) Defective Door - Includes Door Not Closing+
  - h) Door Hardware
  - i) Electrical Issues
  - j) Fire Rated Glass – Glazing
  - k) Wall Breach
  - l) Damaged Floor
  - m) Fire Extinguisher - Includes Charging & Tagging
  - n) Water Leaks - Roof
  - o) Water, Waste, and Plumbing Systems - Plumbing Fixtures in Disrepair
  - p) Pests; Pest Droppings; Harborage Conditions
  - q) No Hot Water
  - r) Insufficient Water Capacity
  - s) Trash and Waste Disposal
  - t) Unsafe Drinking Water
  - u) Paint Peeling; Ceiling & Tiles in Disrepair; Holes
  - v) Standing Water
  - w) Blown Lights
  - x) Unshielded Lights
  - y) Outer Openings Unprotected (door sweeps)
  - z) Physical Facilities; Fixtures in Disrepair
  - aa) Exposed Utility Wires
  - bb) Insufficient Lighting Intensity
  
- 3) Level 3 Violation – Capitol Project/Design (OPEFM) Responsibility
  - a) This level is determined after an investigation into the extent of the scope of work required to abate any of the above categories, is beyond that of regular maintenance or contract services.
    - i) This level requires a project management plan.
  
- 4) Office of Food and Nutrition (OOFN) Responsibility
  - a) Food Stored Improperly
  - b) No Certified Food Protection Manager on Duty
  - c) Improper Hot Food Holding Temperatures
  - d) Improper Cold Food Holding Temperatures
  - e) Food Receiving Temperature/Condition
  - f) No Temperature Logs; Logs Not Up to Date
  - g) Employee not Wearing a Hair Restraint

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- h) Wiping Cloths Stored Improperly
- i) Single Service Items Unprotected
- j) Inoperable or Faulty Equipment
- k) Hand Washing Signage
- l) Unclean Equipment, Utensils, and Food Contact Surfaces
- m) Unclean Floors and Non-Food Contact Surfaces
- n) Unnecessary Items on Premises
- o) Unclean Non-food Contact Surfaces
- p) No thermometers Inside Cold Units
- q) No Covered Toilet Room Receptacle
- r) Pest Control Strips in Food Prep Area

**REFERENCE 2 - VIOLATION PRIORITIES BY CATEGORY**

The impact on the overall safety of buildings occupants drives the prioritization of work. Additionally, in order to manage the various concerns work priorities must be utilized when scheduling abatement work.

- 1) Priority I – *Emergency* – Abate within 24 hours
  - a) Exit Obstructed - Includes Locked Exits
  - b) Emergency Power/Generator
  - c) Exit Lights – Light Bulb(s) Replacement
  - d) Fire Alarm/Fire Protection Equipment - Includes Defective Pull Stations, Missing Placards & Automatic Fire Suppression Systems
  - e) Hood and Duct System
  - f) Kitchen Suppression System
  - g) No Hot Water
  - h) Insufficient Water Capacity
  - i) Trash and Waster Disposal
  - j) Pests; Pest Droppings; Harborage Conditions
- 2) Priority II – *High* – Abate within 10 business days
  - a) Improper Storage - Includes Combustibles
  - b) Ceiling Breach \ Ceiling Tile
  - c) Defective Door - Includes Door Not Closing
  - d) Door Hardware
  - e) Electrical Issues
  - f) Fire Rated Glass – Glazing
  - g) Wall Breach
  - h) Water, Waste, and Plumbing Systems - Plumbing Fixtures in Disrepair
  - i) Unsafe Drinking Water
- 3) Priority III – *Routine* – Abate within 20 business days (*Usually input as High in TMA*)
  - a) Extension Cords / Power Strips
  - b) Labeling Issues - Includes Doors & Electrical Panel Boxes
  - c) Reports and Documentation
  - d) Damaged Floor
  - e) Fire Extinguisher - Includes Charging & Tagging
  - f) Water Leaks – Roof
  - g) Paint Peeling; Ceiling & Tile in Disrepair; Holes
  - h) Standing Water
  - i) Blown Lights
  - j) Unshielded Lights
  - k) Outer Openings Unprotected (Door Sweeps)
  - l) Physical Facilities; Fixtures in Disrepair
  - m) Exposed Utility Wires
  - n) Insufficient Lighting Intensity

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- 4) Priority IV – *Scheduled* – Abate within the timeframe set in a project management plan
  - a) Classification (priority adjustment) used for violations requiring contracted services, budgetary constraints, capitol projects, or maintenance plans.
    - i) This level requires a project management plan.

*Note: Any violation requiring more than one month to abate requires the submission of a project management plan.*

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**APPENDIX A - CIVIL ACTION # 92-3478**

**Procedural Memorandum for the Abatement of Fire Code Violations**

**I. Parties To and Scope of Agreement**

This memorandum sets forth the procedures to be followed by the District of Columbia Fire Department (FD) and the District of Columbia Public Schools (DCPS) to inspect, correct, and abate fire code violations in the District of Columbia Public Schools. The Procedures set forth below shall apply to regularly scheduled inspections to be held every 12 months. As further set forth below, the procedures shall also apply in the case of unscheduled inspections resulting from newly reported hazardous conditions or in response to complaints.

**II. District of Columbia Fire Department (FD)**

**A. Responsibilities of the Fire Chief and Fire Marshall**

Shall ensure compliance of FD under this agreement, and in particular shall:

1. Ensure to the degree possible that the same Inspector is assigned to the same school for all inspections and reinspections; and
2. Assist in the resolution of particular questions and problems, providing all final determinations in writing to the Chief Executive Officer (CEO) of DCPS or his designee.

**B. Assignment of Schools to Fire Inspectors**

Supervisory officers shall assign permanently to each Inspector a list of schools, the schools having been equally divided among the Inspectors. The same Inspector will inspect the same school on successive visits and will make a separate report for each visit, regardless of the nature of the visit. Inspectors may be assigned for special inspections when the inspectors permanently assigned to particular schools are not available. An Inspector on special assignment shall follow the procedures set forth here and inspect in the same way, as would the Inspector permanently assigned to the school being inspected.

**C. Responsibilities of the Fire Inspectors**

1. The Inspectors shall inspect each school assigned within 3 months of receiving from the appropriate supervisor a list of the schools to be inspected. Upon receipt of a list each Inspector shall do the following:
  - a. Create a file for each school, maintained in the office of the Fire Marshall and separate from the FD master file. In which the Inspector shall keep a record of all information concerning fire code violations at the school and of all inspection, reinspection, and related reports;
  - b. Review before each inspection the file of the school to be inspected, including prior inspection reports as well as any other current or relevant information on file, to determine the history and last reported status of the facility.
  - c. Take for reference during the inspection a copy of the most recent inspection report for the school being inspected;
  - d. Request that the Principal and the Maintenance Supervisor, or their respective designees, accompany the Inspector during the inspection;
  - e. Conduct the inspection and prepare a field inspection report, noting the name and position of DCPS staff accompanying the Inspector during the inspection; and
  - f. Leave a copy of the field inspection report, setting a reinspection date when violations have been found, with the Principal or designee prior to departing from the school.



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2. The following work day, the Inspector shall:
    - a. Write, sign, and date a final report for each school based on the field inspection report referred to in the preceding section, numbering the pages of the report and ensuring its legibility;
    - b. File the final report in the master file, keep a personal copy for the Inspector's file, and make a copy available for pick-up by DCPS;
    - c. Attach to the final report copies of any action taken, such as, in the case of structural concerns or roof repairs, referrals to DCRA or other appropriate agencies, as well as citations with warning or imposing a fine (collaterals);
    - d. Present the complete report to the supervisory Lieutenant for review and counter signature prior to referral to other agencies.
  3. Upon written notification by DCPS of the correction of the conditions cited, the Inspector shall return to the school and conduct a reinspection, following the procedures set forth above.
  4. If an Inspector is requested to inspect a school not permanently assigned to him or her, the Inspector shall ascertain beforehand the reason for and purpose of the visit, and note on the report why the Inspector permanently assigned is not conducting the inspection.
  5. The Inspector shall inspect for code violations for which FD is responsible pursuant to the District of Columbia Fire Prevention Code Supplement of 1992, Sections F-100.0 to 703 Register, Vol. 39 No. 48 (November 27, 1992), and refer all other violations to the appropriate agency within 48 hours of completion of the inspection.
  6. The Inspector shall document in the file for the school all actions taken by the Inspector, including warnings and fines issued, and any special warnings and fines issued, and any special instructions provided during an inspection.
  7. If the Inspector is not sure whether a condition is a fire code violations, the Inspector shall consult with the Supervisor, who will if necessary visit the school before the inspection is concluded, to determine whether or not a fire code violation exists.
  8. In order to ensure consistency and uniformity in the inspection of schools, and to ensure further that Inspectors benefit shall communicate and consult with one another and with supervisory officers regarding any problems found and the solutions to those problems.
  9. If the Inspector determines that, because conditions at the premises create a danger under the fire code to the life or welfare of the school and others who use the premises, a school should be closed, the Inspector must so inform the Fire Marshall or Assistant Fire Marshall immediately, before any action is taken.
- D. Responsibilities of the Fire Marshall concerning the Closure of schools
1. If the Fire Marshall concurs with an Inspector's recommendation for closure of a school, the Fire Marshall shall inform the Chief Executive Officer of DCPS or his designee immediately upon making a determination.
  2. In such a case, the Fire Marshall shall indicate to the CEO or his designee the conditions that require closure and the action required to abate the violations found and to permit the reopening of the school.
  3. If a school is closed, work must be completed within 3 weeks; provided that, if a longer period of time is needed to abate the violations, the Fire Marshall will determine whether the entire facility will remain closed for the full period of time or whether portions of the facility may open as work is completed in compliance with the instructions provided to DCPS under the preceding paragraph.
  4. If the Fire Marshal allows partial reopening, the Fire Marshal shall also specify, after consultation with DCPS, a time period by which all remaining work must be completed. If

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the work has not been completed at the end of said period of time, the facility will be closed completely pending reinspection of the work performed and a subsequent determination by the Fire Marshal.

5. Any areas closed shall be secured, and access thereto, shall be limited to DCPS officials, employees, and contractors for purposes of abating the fire code violations.
6. When a building is closed fully or partially, the Fire Marshal shall cause the affected areas to be inspected pursuant to regular inspection procedures, and issue citations as needed to ensue abatement of violations.

#### III. District of Columbia Public Schools (DCPS)

##### A. Responsibilities of the Chief Executive Officer of DCPS (CEO)

The CEO shall ensure compliance under this procedural agreement.

##### B. Responsibilities of the Director of Facilities Management

The Director of Facilities Management shall do the following:

1. Directly or through a designee, review the inspection reports submitted by the DCFD for each school within 24 hours of receipt of the submission.
2. Promptly take appropriate action, including the issuance of work orders, to correct the fire code violations identified in the inspection reports.
3. Review the certification of completion of the repairs at each school of the conditions that gave rise to the fire code violations
4. Approve the submission to the DCFD of the report of the completion of the work at each school.
5. Submit the school to the DCFD for reinspection and for a determination of abatement of the violations
6. Maintain in the Director's Office a file of all work and abatement information, providing copies of the same to the CEO and to DCPS Legal Services Office.

##### C. Responsibilities of the Principal

1. Each Principal shall take the necessary action to ensure the safety of children and staff, including by taking direct action to abate fire code violations, by notifying the Director of Facilities when action is necessary beyond the authority of the Principal, and by transferring or evacuating children from schools as necessary.
2. Each Principal shall further ensure that;
  - a. All areas are accessible, neat and clear
  - b. All fire extinguishers are mounted and charged
  - c. All exit doors are unlocked and free of blockage
  - d. All fire drill records and the fire evacuation plan are accessible
3. When advised that an DCFD representative will be inspecting the school building for which he or she is responsible, each Principal or their designee shall accompany the DCFD representative during the inspection, together with a representative of the building maintenance staff
4. At the conclusion of an inspection the Principal shall obtain a copy of the Fire Marshall's field report for the school's record and fax a copy the report to the Director of Facilities Management, or the Director's designee.

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**IV. DCFD/DCPS Cooperative Fire Code Abatement Process**

- D. The process of abating fire code violations requires close and careful cooperation between DCFD and DCPS. Set forth below is the steps that will be taken by staff of the respective agencies in this regard.
1. DCFD inspects a school building accompanied by the Principal and the Maintenance Supervisor or their respective designee.
  2. The DCFD representative leaves a copy of the field inspection report with the Principal and makes a copy available at the office of the Fire Marshall for pick up by Facilities Management.
  3. The Director of Facilities provides a copy of the inspection report to the Customer Service Center (CSC) within 24 hours of receipt from the DCFD.
  4. CSC inputs the data from the inspection report into the work order system to generate work orders corresponding to each violation, categorizing violations as follows:
    - a. Level 1 – conditions that can be corrected by action of the Principal or custodial staff;
    - b. Level 2 – conditions the correction of which involves craft work such as electrical, plumbing and carpentry
    - c. Level 3 – conditions that must be corrected through Capital Construction.
  5. The Director of Facilities receives the work orders and schedules the work within 24 hours, assigning the work according to the level of the violations as follows:
    - a. Level 1 – staff at school issue
    - b. Level 2 – Operations and Maintenance
    - c. Level 3 – Capital Projects
  6. DCPS Managers shall forward any concerns regarding work orders generated from inspection reports to the Director of Facilities Management for resolution. Resolution may require a response from the DCFD or DCRA in the form of a special approval or other written directive, which must be obtained in writing and signed by the Fire Marshall and Director of Facilities Management. A written copy of the determination resolving the concern shall be placed in each school's folder and in the folder for that school at the office of the Director of Facilities Management.
  7. The appropriate Building Service Manager makes a notation that the conditions cited for fire code violations have been corrected
  8. The Director of Facilities Management certifies completion of the work for each item of the inspection report, and compiles a folder for retention at each school to include;
    - a. the field inspection report
    - b. a copy of the work orders, with completion dates,
    - c. any certificates, approvals, or sign offs by DCFD or other officials.
  9. Upon review of the folder, the Director of Facilities Management does one of the following:
    - a. Certifies to the Fire Marshall that the conditions that gave rise to the violations cited have been corrected, and that the school is ready for reinspection and for a determination of abatement or
    - b. Directs that further action be taken to correct such conditions.

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10. When corrective work has been completed, the Fire Inspector who originally inspected the school, if available, or the alternative assigned, reinspects for abatement.
11. The Fire Inspector leaves a copy of the field reinspection report with “abated” notations with the Principal and provides a copy to the Director of Facilities Management.
12. If the school’s fire code violations are abated, the Fire Chief or his designee will so certify to the CEO or his designee.
13. If the Fire Inspector finds that the fire code violations identified in the original inspection have not been abated, or if, after reinspection the Inspector identifies new fire code violations, the procedures set forth above will be followed in applicable part.
14. If the Fire Inspector determines, after consultation, that issuance of a citation for violation of the fire code is appropriate, the Inspector shall serve the citation on the CEO.

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### APPENDIX B – DCPS COOPERATIVE HEALTH CODE ABATEMENT PROCESS

#### DCPS – DOH Cooperative Food Code Abatement Process

##### I. Scope

This document details the abatement responsibilities of Food Code Violations, cited by the District of Columbia Department of Health (DOH), by the Office of Food and Nutrition (OFN), and the Office of Facilities Management (OFM). Additionally, it establishes the process in which DCPS will interact both internally and in conjunction with the Department of Health in regards to inspections, citations, and communications.

##### II. District of Columbia Department of Health

A. The Department of Health enforces the District Food Code, DCMR Title 25 – Food and Food Operations, by assessing school facilities and/or equipment to promote the safeguarding of public health and to ensure that food is safe for consumption by students, staff, and the public.

##### B. Health Inspections

1. Are conducted twice a school year in all school kitchens, starting first in August and then again in January.
2. The Department of Health (DOH) Sanitarian(s) conducts inspections and prepares inspection reports.
3. DOH Sanitarian(s) maintains a file of the inspection reports along with any proof of abatement.
4. DOH Sanitarian(s) conducts re-inspections of the schools. And based on the severity of the Food Code violation, the sanitarian issue Food Establishment Inspection Reports which may document 5-Day Notices which identify critical violations, or 45-Day Notices which identify non-critical violations. DOH Sanitarians may also issue (2) a Notice of Closure/Summary Suspension because of imminent health hazards;

Imminent health hazards can result in the closure of a kitchen if the violation(s) can not be corrected during the course of the inspection and are classified under the following categories, as established by DOH:

1. Operating without a Certified Food Protection Manager on Duty;
2. Selling, exchanging, delivering or receiving adulterated foods;
3. Incorrect hot and cold holding temperatures;
4. Operating with no hot water;
5. Operating with no water/ insufficient water capacity;
6. Operating with a sewage backup;
7. Operating with no electricity;
8. Operating with extensive fire damage or serious flood damage;
9. Failing to allow DOH Inspectors access to kitchen;
10. Interfering with a DOH inspection;
11. Misusing poisonous or toxic materials;
12. Operating without a valid license;
13. Onset of an apparent foodborne illness outbreak at the school;
14. Operating with gross insanitary occurrence or condition that may endanger public health, including but not limited to heavy infestation of vermin;
15. Operating with circumstances that may endanger public health; and
16. Failing to minimize the presence of insects, rodents and other pests on the premises.

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#### III. DCPS Office of Food and Nutrition

- A. The Office of Food and Nutrition is responsible for the safe preparation of food and the distribution of nutritious, balanced meals to students. One of their primary responsibilities is to utilize safe food handling and operational practices while preparing and/or serving meals.
  - 1. Junior High and High Schools prepare foods
  - 2. Elementary and Middle Schools serve prepackaged foods
  
- B. The Food Safety and Sanitation Officer of OFN oversees the food safety program and liaisons with the Department of Health. This individual confirms abatement and prepares responses to DOH.
  - 1. Electronically stores the DOH Inspection Reports and initiates and monitors the overall abatement of violations.
  - 2. Communicates deficiencies and shares reports with the Office of Facilities Management.
  - 3. Monitors compliance and abatement of violations to the Food Code, in which OFN has responsibility under the following categories frequently cited by DOH Sanitarian(s), which include but not limited to:
    - a. Food Stored Improperly
    - b. No Certified Food Protection Manager on Duty
    - c. Improper Hot Food Holding Temperatures
    - d. Improper Cold Food Holding Temperatures
    - e. Food Receiving Temperature/Condition
    - f. No temperature Logs; Logs Not Up To Date
    - g. Employee Not Wearing a Hair Restraint
    - h. Wiping Cloths Stored Improperly
    - i. Single-Service Items Unprotected
    - j. Inoperable or Faulty Equipment
    - k. Hand Washing Signage
    - l. Unclean Equipment, utensils, and Food Contact surfaces
    - m. Unclean Floors and non-Food Contact Surfaces
    - n. Unnecessary Items on Premises
    - o. No Thermometers Inside of Cold Units
    - p. No Covered Toilet Room Trash Receptacle
    - q. Pest Control Strips in Food Prep Area

#### IV. DCPS Office of Facilities Management

- A. The Office of Facilities Management is responsible for repairs to the building and building components including those of the kitchen, less cooking/food preparation equipment. Additionally, OFM has some specialized units that support maintenance, construction and safety functions within the schools.
  
- B. Customer Service Section
  - 1. Receives calls and generates work orders then distributes the work orders and emergencies to the appropriate repair shops, utilizing the appropriate priority level as identified in the Violation Abatement Management Protocol (VAMP).
  - 2. Enters the Food Code violations into the TMA system, generating a work order using codes that align with DOH Inspection Reports.
  - 3. Maintains TMA, tracks all Food Code violations in the database, and reports on status of the same.

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- a. Office of Facilities Management responsibilities are coded between OFN101 – OFN112
  - b. Office of Food and Nutrition responsibilities are coded between OFN201 – OFN217
- C. Maintenance Section
1. Receives work orders and emergencies then makes necessary repairs within the required time frame based on priority level identified in VAMP.
- D. Safety, Regulatory and Environmental Compliance Section
1. Liaisons with both the Department of Health and the Office of Food and Nutrition to monitor compliance and the violation abatement process.
  2. Tracks the status of OFM repairs in conjunction with the Customer Service Unit.
  3. Receives, review and verifies citations and/or complaints from the District of Columbia Department of Health and initiates VAMP procedures.
  4. Coordinates and meets monthly with the Department of Health and the Office of Food and Nutrition to discuss issues and verify abatements.
  5. Manages the Pest Control Unit and the Environmental Unit, in addition to the Safety Unit of OFM.
- E. The Office of Facilities Management is responsible for the abatement of violations of the physical facilities frequently cited by DOH Sanitarian(s), which include but not limited to:
- a. Water, Waste and Plumbing Systems, Fixtures in Disrepair
  - b. Pests: Pest Droppings; Harborage Conditions
  - c. No Hot Water
  - d. Insufficient water capacity
  - e. Trash and waste disposal
  - f. Unsafe Drinking Water
  - g. Paint Peeling; Ceiling and Tiles in Disrepair; Holes
  - h. Standing Water
  - i. Blown Lights
  - j. Unshielded Lights
  - k. Outer Openings Unprotected
  - l. Physical Facilities; Fixtures in Disrepair
  - m. Exposed Utility Wires
  - n. Insufficient Lighting Intensity

#### V. Cooperative Food Code Abatement Process

Cooperation between DCPS Offices of Food and Nutrition and Facilities Management along with the Department of Health is critical for success. The following process will serve as a guideline to demonstrate how citations are received, communicated, tracked, abated and reported to the authority having jurisdiction.

1. DOH Sanitarian(s) conduct unannounced inspections and reinspections of the school kitchen, serving line, and cafeteria area(s) which will proceed with or without a Food Service Manager (Certified Food Manager) or DCPS Representative (*Primary: [OFN] Food Safety and Sanitation Officer; Secondary: [OFM] Code Compliance Officer*) being present.
2. DOH Sanitarian(s) leaves a copy of the inspection report with the Food Service Manager and provides the original to the DCPS Representative to make a direct copy for scanning into the OFN Database (*copies are also available at the DOH Offices for pick up and review if necessary*).

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3. The DCPS Representative initiates corrective actions if possible before completion of the inspection. All “imminent health hazards” are to be called directly into the OFM Customer Service Section at the time of inspection and placed on the Emergency Work Order List for that day (202-576-7676).
4. The DCPS Representative provides a copy of the inspection report to the Safety Unit within 24 hours of receipt to initiate the VAMP procedures (*Alternate: Customer Service Section*).
  - a. OFN scans and enters an electronic copy of the Inspection Report into the OFN DOH Inspection Database.
5. The Safety Unit reviews and verifies the citations as outlined in VAMP and submits work requests along with a copy of the inspection report with any necessary comments to the Customer Service Section.
6. The Customer Service Section inputs the data from the inspection report, and any Safety Unit comments, into the work order system to generate work orders corresponding to each violation, categorizing the work as identified in VAMP and the TMA coding system.
7. The Maintenance Section receives the work orders and schedules the work according to the priorities set forth in VAMP and identified as such on the work order.
  - a. OFN initiates mitigation on any remaining violations not corrected on site, the day of the inspection.
  - b. OFM Managers or OFN Managers may contact the Safety Unit for clarification or concerns about work orders generated from inspection reports.
8. The Maintenance Section completes the necessary repairs and reports the status to the Customer Service Section.
  - a. In some cases it is understood that resources may not be available for the completion of some work, steps must be taken to mitigate any immediate hazard and a project management plan is to be submitted by the Maintenance Manager to the Safety Unit for submission to DOH, per VAMP.
9. The Customer Service Section, Building Service Manager for the area, confirm that the repairs have been made and makes comments if necessary while closing out and signing off on the completed work order.
10. A copy of the signed work order is made and submitted to the Safety Unit for submission to DOH, through the OFN Food Safety and Sanitation Officer.
11. The OFN Food Safety and Sanitation Officer, compiles a comprehensive response to include the abatement of all violations (OFM and OFN responsibilities alike) and submits the package to DOH as proof of abatement.
  - a. A DCPS Representative may accompany the DOH Sanitarian(s) during an unannounced re-inspection. However, the inspection will proceed with or without the DCPS Representative being present. The DCPS Representative must follow the aforementioned steps through to abatement.
12. DOH Sanitarian(s) updates his/her school file showing abatement.
13. In the unfortunate event that DOH is not satisfied with the abatement response, or lack of response, and after consultation at the established monthly meetings, (with the appropriate DCPS Executive Directors if necessary), then a Notice of Infraction may be issued to DCPS.



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#### APPENDIX C – TMA BROWSE PROCEDURES

Step 1 From your desktop main, screen find and click on the TMA icon. Double click to open.



**TMA CSInk**

Step 2 A new screen will appear. Locate the log in box in middle of the screen and double click. A new window will appear with two boxes. The first box should contain your **User name**: The second box will be blank but ask for **Password**: Enter your password in the blank window.

Step 3 After entering your password go to the tool bar located at the top of the screen and click **OK**.

Step 4 After clicking OK another window will open. ON the left side will be a bar that contains the **SO Browse** option. Click the **SO Browse** option.

#### **BROWSE SELECTION CRITERIA**

Step 5 After clicking the SO Browse option another window **Browse Selection Criteria** will open. *(This window in the foreground must be completed before the browse list can be generated. Set search criteria on this window, to populate the Work Order Browse window with the browse list.)*

Each section of the Browse Selection Criteria can expand or restrict your search using these parameters:

- Date Range
- Facility, Building, or Zone
- Open or Closed Work Orders (or both)
- Work Order Type
- Repair Center
- Department
- Shop
- Technician / Crew
- Trade
- Tag No.

Your search will require you to respond to the following windows only:

- Date Range
- Facility, Building, or Zone
- Open or Closed Work Orders (or both)
- Work Order Type

Step 6 Enter the **Beginning Date**: to the right of the beginning date box is a smaller box with a down arrow. Click on this arrow and a calendar will appear.. Use the date that appears on the District of Columbia Fire and EMS Department School Inspection Report as the beginning date. In the calendar month window Double click on the day of the report which will enter that date into the beginning date box.

Step 7 Enter the Ending Date. After selecting the beginning date the ending date box will appear highlighted. The date that appears in this box is today's date. **DO NOTHING WITH THIS BOX**

Step 8 The next box located below the beginning and ending date box is the school selection box. To the right of this box is a down arrow. Click on this down arrow and another window will appear. From this box point to and click on **select school**. Which is the third item from the top of the list.

Step 9 After opening "select school" three additional boxes will appear. Go to the third box from the top which will be empty. To the right of this box will be a small box with an arrow. Click on this arrow. Another Window will appear.

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Step 10 From the Item Selection window select and click on District of Columbia Public schools. To the right another window will appear that contains the name of all schools.

Step 11 From the school list find the name of the school that is listed on the District of Columbia Fire and EMS Department School Inspection Report. Point to that school name and double click. This will enter the school name in the select school box.

Step 12 From the **Service Order Type** window find the line that contains Fire Code which is row 5 from the top. Click on **row 5 Fire Code**.

Step 13 Select **Open** or **Closed** work order status type (tick box).

Step 14 At the top of the screen located the tool bar that contains OK. Click on OK All work request contained in the browse selection criteria you listed will appear.

Step 15 At the top of the screen located the tool bar that contains the box labeled **Print**. Click on the word **Print**. Another window will open with the icon and word **Printer**. Click on the word **Printer**.

Step 16 Form the **Print Setup** window click on OK located at the bottom of the window.

#### *SUMMARY:*

The Browse Selection Criteria window is opened when you select Work Order Browse. This window is enabled in the foreground and must be completed before the browse list can be generated. Set search criteria on this window, to populate the Work Order Browse window with the browse list.

1. Click the WO Browse icon on the TMA Navigation bar, or follow the menu path to open the window.
2. Select the search criteria on the Browse Selection Criteria window. See the selection criteria descriptions for details about each choice.
3. Click the OK button on the TMA toolbar to start the search and close the Browse Selection Criteria window. A message box informs you that the search is "working."
4. When the search is complete, the records that match your criteria are displayed in the Work Order Browse window.

The software retains a Browse selection list until a new one is generated or until you exit the program. If you create a Browse selection and close the Browse List window to work in a different window, that same list is displayed when you return to the Work Order Browse window.

To make a new Browse selection:

1. Click the New Browse Selection button (at lower left of the window).
2. Change the desired fields on the Browse Selection Criteria dialog.
3. Click OK on the TMA toolbar to start the new search.

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**APPENDIX D – WORK ORDER ADDENDUM FORM**

<b>SCHOOL</b>		<b>INSPECTION DATE</b>	
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Page #	Line #	Priority	
Comments			

Page #	Line #	Priority	
Comments			

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