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EILEEN M. SULLIVAN  
 ACTING  
 COMMISSIONER

December 23, 2014

Kelly Ryan, Superintendent  
 MCI Shirley  
 P.O. Box 1218  
 Shirley, MA 01464

Re: Facility Inspection – MCI Shirley

Dear Superintendent Ryan:

In accordance with M.G.L. c. 111, §§ 5, 20, and 21, as well as Massachusetts Department of Public Health (Department) Regulations 105 CMR 451.000: Minimum Health and Sanitation Standards and Inspection Procedures for Correctional Facilities; 105 CMR 480.000: Storage and Disposal of Infectious or Physically Dangerous Medical or Biological Waste (State Sanitary Code, Chapter VIII); 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments (State Sanitary Code Chapter X); the 1999 Food Code; and 105 CMR 205.000 Minimum Standards Governing Medical Records and the Conduct of Physical Examinations in Correctional Facilities. I conducted an inspection of MCI Shirley on December 1, 2 & 3, 2014 accompanied by Corey Hopkins, Environmental Health and Safety Officer. Violations noted during the inspection are listed below including 296 repeat violations:

**HEALTH AND SAFETY VIOLATIONS**

(\* indicates conditions documented on previous inspection reports)

**ADMINISTRATION BUILDING**

**Main Entry**

No Violations Noted

*Hallway*

No Violations Noted

*Male Bathroom*

105 CMR 451.123\*

105 CMR 451.123

Maintenance: Privacy barriers rusted

Maintenance: Three wall tiles damaged

*Female Bathroom*

No Violations Noted

*Female Staff Locker Room*

No Violations Noted

<i>Male Staff Bathroom</i>	No Violations Noted
<i>Female Staff Bathroom</i>	No Violations Noted
<i>Male Staff Bathroom</i>	No Violations Noted
<i>Mail Room</i>	No Violations Noted
<i>Male Bathroom 31</i>	No Violations Noted
<i>Shift Commander</i>	No Violations Noted
<i>Role Call Room</i>	No Violations Noted
<i>Female Bathroom 48</i>	No Violations Noted
<i>Male Bathroom 47</i>	No Violations Noted
<i>Break Room 38</i>	No Violations Noted
<i>Janitor's Closet 46</i> 105 CMR 451.353	Interior Maintenance: Pedestal fan missing ground plug
<i>Vending Area 3</i> 105 CMR 451.353*	Interior Maintenance: Ceiling tiles water damaged

**PROGRAMS BUILDING**

<i>Female Bathroom</i>	No Violations Noted
<i>Male Bathroom</i>	No Violations Noted
<i>Archive File Room</i>	No Violations Noted
<i>Break Room</i>	No Violations Noted
<i>Room 106</i>	Unable to Inspect – Locked

*Mental Health Conference Room*

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

*Inmate Bathroom*

Unable to Inspect – In Use

*Utility Room (C126)*

No Violations Noted

*Utility Closet*

Unable to Inspect – Locked

**EDUCATION BUILDING**

*Supply Room*

No Violations Noted

*Staff Break Room*

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

*Inmate Bathroom*

No Violations Noted

*Mop Closet*

No Violations Noted

*Side Exit*

No Violations Noted

*Library*

No Violations Noted

*Staff Bathroom*

No Violations Noted

*Classroom 104*

No Violations Noted

**VOCATIONAL EDUCATION**

*Main Door*

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

*Canteen Storage*

Unable to Inspect – Locked

*Classroom*

No Violations Noted

*Barber Shop*

No Violations Noted

*CRA Room*

No Violations Noted

*Chapel*

105 CMR 451.350\*  
105 CMR 451.353

Structural Maintenance: Double doors, not rodent and weathertight  
Interior Maintenance: Ceiling water stained

*Classrooms*

No Violations Noted

*Inmate Bathroom*

105 CMR 451.123\*

Maintenance: Ceiling vent dusty

*Sewing Shop*

105 CMR 451.350\*  
105 CMR 451.350\*

Structural Maintenance: Ceiling damaged  
Structural Maintenance: Double doors not rodent and weathertight

*Bathroom (sewing shop)*

No Violations Noted

*Canteen Processing Room*

Unable to Inspect – Locked

*Exterior Door*

105 CMR 451.350\*  
105 CMR 451.353\*  
105 CMR 451.353\*

Structural Maintenance: Double doors, not rodent and weathertight  
Interior Maintenance: Floor tiles damaged, some missing  
Interior Maintenance: Floor tiles missing

*Sewing Shop Storage Door*

105 CMR 451.350\*  
105 CMR 451.350\*

Structural Maintenance: Area not rodent and weathertight  
Structural Maintenance: Ceiling damaged

*Classroom 2*

No Violations Noted

*Staff Bathroom*

No Violations Noted

**OPERATIONS/VISITING ROOM**

*Visiting Area*

No Violations Noted

*Inmate Bathroom*

No Violations Noted

*Male Bathroom*

105 CMR 451.123

Maintenance: Ceiling vent loose

*Female Bathroom*

No Violations Noted

*Janitor's Closet*

No Violations Noted

## **Operations**

### *Female Bathroom*

No Violations Noted

### *Male Bathroom*

No Violations Noted

### *Janitor's Closet*

105 CMR 451.383(B)\*

Fire Safety System: Facility not in compliance with State Building Code provisions on, boxes stored within 18 inches of ceiling

## **GYM**

105 CMR 451.353\*

Interior Maintenance: Insulation falling from ceiling

105 CMR 451.350\*

Structural Maintenance: All doors, not rodent and weathertight

105 CMR 451.350

Structural Maintenance: Roof leaks

### *Weight Room*

No Violations Noted

### *Office*

FC 4-501.11(A)

Maintenance and Operation, Equipment: Equipment not maintained in a state of good repair, refrigerator not maintained, needs defrosting

### *Utility Room*

No Violations Noted

### *Janitor's Closet*

No Violations Noted

### *Staff Bathroom*

105 CMR 451.123\*

Maintenance: Wall damaged behind door

105 CMR 451.123

Maintenance: Ceiling vent dusty

### *Inmate Bathroom*

No Violations Noted

### *Storage Room*

105 CMR 451.350\*

Structural Maintenance: Ceiling damaged

105 CMR 451.350

Structural Maintenance: Roof leaks

## **OUTSIDE RECREATIONAL AREA**

No Violations Noted

## **FOOD SERVICE**

FC 6-201.11\*

Design, Construction and Installation: Floor not easily cleanable, floor has pulled away from the walls throughout the building

FC 6-501.11\*

Maintenance and Operation; Repairing: Facility not in good repair, floor not secured to the walls

FC 6-501.11\*

Maintenance and Operation; Repairing: Facility not in good repair, the outside wall near the inmate entrance ramp is protruding out away from the building

### *Inmate Dining Area*

FC 6-202.15(A)(2)\*

Design, Construction, and Installation; Functionality: Outer door not weather and vermin tight

105 CMR 451.350

Structural Maintenance: Baseboard damaged

<i>Serving Area</i>	No Violations Noted
<i>Dish Room</i>	No Violations Noted
<i>Grill Area</i>	No Violations Noted
<i>Mop Sink Area</i>	No Violations Noted
<i>Inmate Bathroom</i>	No Violations Noted
<i>FSDS Storage</i>	No Violations Noted
<i>Mop/Barrel Room</i>	No Violations Noted
<i>Pig Cooler</i>	No Violations Noted
<i>Tool Crib</i>	No Violations Noted
<i>Diet Area</i>	No Violations Noted
<i>Walk-In Freezer 2</i>	No Violations Noted
<i>Cooler</i> FC 6-501.11	Maintenance and Operation; Repairing: Facility not in good repair, missing light cover
<i>Kettle Area</i> FC 6-201.11*	Design, Construction and Installation: Floor not easily cleanable, floor damaged
<i>Dry Storage</i>	No Violations Noted
<i>Hallway near Loading Dock</i> 105 CMR 451.350	Structural Maintenance: Roof leaks
<i>Rear Loading Dock</i> 105 CMR 451.350*	Structural Maintenance: Floor damaged
<i>Staff Bathroom – Left</i>	Unable to Inspect – Locked
<i>Staff Bathroom – Right</i>	No Violations Noted

*Janitor's Closet*

No Violations Noted

*Dumpster*

No Violations Noted

**CULINARY ARTS**

*Kitchen*

No Violations Noted

*Dry Storage*

No Violations Noted

*Dining Area*

No Violations Noted

**PROPERTY**

105 CMR 451.383(B)

Fire Safety System: Facility not in compliance with State Building Code provisions on, boxes stored within 18 inches of ceiling

*Bathroom*

No Violations Noted

*Laundry Area*

No Violations Noted

**SMU BUILDING**

*Visiting Room*

No Violations Noted

*Triage Room*

105 CMR 480.500(B)(2)\*

Record-Keeping Log; Missing for biohazard waste

*Captain's Office*

Unable to Inspect – Locked

*Office*

No Violations Noted

*Staff Bathroom*

No Violations Noted

*Sergeant's Office*

No Violations Noted

*Janitor's Closet*

No Violations Noted

**Control**

105 CMR 451.353\*

Interior Maintenance: Ceiling tiles water stained

105 CMR 451.353\*

Interior Maintenance: Missing light covers

105 CMR 451.350\*

Structural Maintenance: Window in area # 2 cracked

*Bathroom*

105 CMR 451.123\*

Maintenance: Ceiling tiles water stained

**SMU 1**

105 CMR 451.353\*

Interior Maintenance: Ceiling tiles water stained in block

*Cells*

105 CMR 451.350\*

Structural Maintenance: Window damaged in cell # 28

*Showers Lower Level*

105 CMR 451.123\*

Maintenance: Wall paint peeling in shower A, B, & C

105 CMR 451.123\*

Maintenance: Floor paint peeling in shower A, B, & C

*Showers Upper Level*

105 CMR 451.123\*

Maintenance: Shower dirty in shower D & E

105 CMR 451.123\*

Maintenance: Floor paint peeling shower D & E

**SMU 2**

*Law Library*

No Violations Noted

*Cells*

105 CMR 451.353

Interior Maintenance: Walls paint peeling in cell # 7, 23, 27, & 30

105 CMR 451.353

Interior Maintenance: Walls paint peeling in cell # 5, 6, 9, 11, 19, 21, 22, & 29

*Showers*

105 CMR 451.123\*

Maintenance: Ceiling dirty in shower A, B, & C

105 CMR 451.123

Maintenance: Walls dirty in shower A, B, & C

105 CMR 451.123\*

Maintenance: Soap scum on walls in shower A, B, & C

105 CMR 451.123\*

Maintenance: Paint peeling in shower A, C, D, & E

105 CMR 451.123

Maintenance: Window damaged in shower B

**HSU BUILDING**

**Booking**

*Cell 2*

No Violations Noted

*Cell 3*

No Violations Noted

*Holding Cell*

No Violations Noted

*Strip Room*

No Violations Noted

**Assisted Daily Living (ADL)**

*Trauma Room*

No Violations Noted

<i>Medical Room</i>	No Violations Noted
<i>Main Ward</i>	No Violations Noted
<i>Day Room</i>	No Violations Noted
<i>Room 1</i>	No Violations Noted
<i>Room 2</i>	No Violations Noted
<i>Hallway</i>	No Violations Noted
<i>Staff Bathroom</i>	No Violations Noted
<i>Janitor's Closet</i>	No Violations Noted
<i>Cell 7</i>	No Violations Noted
<b>Med Line</b>	No Violations Noted
<i>Male Staff Bathroom 124</i>	No Violations Noted
<i>Female Staff Bathroom</i>	No Violations Noted
<i>Office 136</i>	No Violations Noted
<i>Treatment 1</i>	No Violations Noted
<i>Optical Room C 127</i> 105 CMR 451.110(A)*	Hygiene Supplies at Toilet and Handwash Sink: No access to sink, blocked by equipment
<i>Staff Break Room</i>	No Violations Noted
<i>Inmate Bathroom 123</i>	No Violations Noted
<i>Hallway</i>	No Violations Noted

<i>Medical Records - Front</i>	No Violations Noted
<i>Medical Records - Back</i>	No Violations Noted
<i>Staff Room 103</i>	No Violations Noted
<i>Janitor's Closet C114</i>	No Violations Noted
<i>Dental Office</i>	Unable to Inspect – Locked
<i>Medical Storage C118</i>	No Violations Noted
<i>Dorm 128</i>	No Violations Noted
<i>Dorm 127</i> 105 CMR 451.123*	Maintenance: Wall damaged by shower area
<i>Janitor's Closet C111</i>	No Violations Noted
<i>Dorm 129</i>	No Violations Noted
<i>Dorm 126</i>	No Violations Noted
<i>Dorm 125</i>	No Violations Noted
<i>Dialysis Unit (124)</i>	No Violations Noted
<i>PT Room</i>	No Violations Noted
<i>Staff Bathroom</i>	No Violations Noted
<i>Showers</i>	No Violations Noted
<i>Kitchen (113)</i>	No Violations Noted
<i>Biohazard Storage</i> 105 CMR 480.500(B)(2)*	Record-Keeping Log; Missing for biohazard waste

**MAINTENANCE/INDUSTRIES/LAUNDRY**

**Laundry**

105 CMR 451.350\* Structural Maintenance: Area not rodent and weathertight, exterior door damaged at bottom  
105 CMR 451.353\* Interior Maintenance: Fan missing center shield

*Toxic/Caustic Room 128*

No Violations Noted

*Office*

105 CMR 451.353 Interior Maintenance: Ceiling paint peeling

*Hazardous Storage*

No Violations Noted

**Hallway to Maintenance**

105 CMR 451.353\* Interior Maintenance: Floor paint peeling

*Staff Bathroom*

No Violations Noted

*Inmate Bathroom*

No Violations Noted

*Utility Room*

105 CMR 451.350\* Structural Maintenance: Ceiling damaged  
105 CMR 451.140\* Adequate Ventilation: Inadequate ventilation, ceiling vent blocked

*Loading Dock*

No Violations Noted

*Chemical & Supply Crib (125)*

105 CMR 451.350\* Structural Maintenance: Ceiling damaged  
105 CMR 451.353\* Interior Maintenance: Light shield missing

*Janitor's Closet*

No Violations Noted

*Office 132*

No Violations Noted

**Maintenance Shop**

105 CMR 451.353\* Interior Maintenance: Ceiling paint peeling  
105 CMR 451.353\* Interior Maintenance: Wall paint peeling

*HVAC Area*

105 CMR 451.383(B)\* Fire Safety System: Facility not in compliance with State Building Code provisions on, boxes stored within 18 inches of ceiling

*Tool Crib*

105 CMR 451.353\* Interior Maintenance: Wall paint peeling  
105 CMR 451.353\* Interior Maintenance: Ceiling damaged  
105 CMR 451.353\* Interior Maintenance: Wall damaged  
105 CMR 451.353\* Interior Maintenance: Appearance of a mold like substance on wall

105 CMR 451.350\* Structural Maintenance: Roof leaks

**Industries (not in use)**  
No Violations Noted

*Room 111*  
No Violations Noted

*Storage Warehouse*  
No Violations Noted

*Janitor's Closet*  
No Violations Noted

*Male Staff Bathroom*  
No Violations Noted

*Female Staff Bathroom*  
105 CMR 451.126\* Hot Water: Hot water temperature recorded at 80°F

*Inmate Bathroom*  
No Violations Noted

**TOWERS**

*Tower 1*

*Lower Level, Vehicle Trap*  
No Violations Noted

*Upper Area*  
No Violations Noted

*Tower 2*  
105 CMR 451.141\* Screens: Screen missing  
105 CMR 451.350\* Structural Maintenance: Door frame damaged  
105 CMR 451.350\* Structural Maintenance: Ceiling damaged  
105 CMR 451.353\* Interior Maintenance: Chair damaged, back support  
105 CMR 451.126\* Hot Water: Hot water temperature recorded at 100°F  
105 CMR 451.350\* Structural Maintenance: Wall supports cracked on all four support corners

*Tower 3*  
105 CMR 451.141\* Screens: Screen missing  
105 CMR 451.353\* Interior Maintenance: Ceiling tile damaged  
105 CMR 451.350\* Structural Maintenance: Wall damaged next to toilet  
105 CMR 451.353\* Interior Maintenance: Baseboards damaged  
105 CMR 451.350\* Structural Maintenance: Roof leaking  
105 CMR 451.353\* Interior Maintenance: Paint peeling, lower level  
105 CMR 451.130\* Plumbing: Plumbing not maintained in good repair, faucet leaks

**WAREHOUSE**

105 CMR 451.344\* Illumination in Habitable Areas: The side storage area lacks lighting

*Medium Freezer*

FC 6-501.11\*

Maintenance and Operation; Repairing: Facility not in good repair, missing light shield

*Medium Walk-In Cooler*

No Violations Noted

*Hot Water Heating Room*

No Violations Noted

*Medium Bathroom*

No Violations Noted

**A-1 HOUSING**

105 CMR 451.350\*

Structural Maintenance: Exterior of building damaged, near cell # 37

105 CMR 451.350\*

Structural Maintenance: Roof leaks

105 CMR 451.320\*

Cell Size: Inadequate floor space in all cells

105 CMR 451.353\*

Interior Maintenance: Main block ceiling vent dusty

*Control Area*

105 CMR 451.353\*

Interior Maintenance: Chair damaged

*Cells*

105 CMR 451.350\*

Structural Maintenance: Wall damaged in cell # 36

105 CMR 451.350

Structural Maintenance: Wall damaged in cell # 34

105 CMR 451.353\*

Interior Maintenance: Wall paint peeling in cell # 2

105 CMR 451.350

Structural Maintenance: Floor tiles damaged in cell # 34, 35, & 36

*Janitor's Closet (up)*

No Violations Noted

*Showers Upper Level*

105 CMR 451.123\*

Maintenance: Paint peeling on walls in shower A, B, & C

105 CMR 451.123\*

Maintenance: Soap scum on walls in showers A, B, & C

105 CMR 451.123\*

Maintenance: Wall damaged in shower A & B

105 CMR 451.123\*

Maintenance: Ceiling vent dusty in shower A, B, & C

*Showers Lower Level*

105 CMR 451.123\*

Maintenance: Paint peeling on walls in shower D, E, & F

105 CMR 451.123\*

Maintenance: Soap scum on walls in shower D, E, & F

105 CMR 451.123\*

Maintenance: Door damaged in shower E

105 CMR 451.123\*

Maintenance: Ceiling vent dusty in shower F, H, I, & J

*Staff Bathroom*

No Violations Noted

*Staff Office*

No Violations Noted

*Janitor's Closet (down)*

No Violations Noted

**A-2 HOUSING**

105 CMR 451.320\*

Cell Size: Inadequate floor space in all cells

*Control Area*

No Violations Noted

*Cells*

105 CMR 451.350\*  
105 CMR 451.350\*  
105 CMR 451.353\*  
105 CMR 451.353

Structural Maintenance: Floor damaged in cell # 2 & 58  
Structural Maintenance: Ceiling damaged in cell # 42  
Interior Maintenance: Wall paint peeling in cell # 3, 31, 38, 39, 41, 53, 54, 56, & 57  
Interior Maintenance: Wall paint peeling in cell # 43, 52, & 58

*Janitor's Closet (up)*

105 CMR 451.353\*  
105 CMR 451.353\*  
105 CMR 451.353

Interior Maintenance: Wall paint peeling  
Interior Maintenance: Ceiling vent dusty  
Interior Maintenance: Mop stored in bucket

*Showers Lower Level*

105 CMR 451.123\*  
105 CMR 451.123\*

Maintenance: Paint peeling on walls in shower F & G  
Maintenance: Wall damaged in shower F & G

*Showers Upper Level*

105 CMR 451.123\*  
105 CMR 451.123\*  
105 CMR 451.123\*  
105 CMR 451.123\*  
105 CMR 451.130

Maintenance: Paint peeling on walls in shower H, I, & J  
Maintenance: Wall damaged in shower H  
Maintenance: Ceiling damaged in shower H  
Maintenance: Light shield damaged in shower H  
Plumbing: Plumbing not maintained in good repair, faucet missing in shower I

*Staff Bathroom*

No Violations Noted

*Staff Office*

No Violations Noted

*Bubbler*

No Violations Noted

*Janitor's Closet (down)*

105 CMR 451.353

Interior Maintenance: Mop stored in bucket

**B-1 HOUSING**

105 CMR 451.320\*  
105 CMR 451.350\*

Cell Size: Inadequate floor space in all cells  
Structural Maintenance: Exterior of building damaged cell # 34

*Control Area*

105 CMR 451.353\*  
105 CMR 451.353

Interior Maintenance: Ceiling vent dusty  
Interior Maintenance: Electric outlet cover missing by bubbler

*Cells*

105 CMR 451.350\*  
105 CMR 451.350

Structural Maintenance: Floor damaged in cell # 11  
Structural Maintenance: Wall damaged in cell # 37

*Janitor's Closet (up)*

No Violations Noted

*Showers Upper Level*

105 CMR 451.123\*  
105 CMR 451.123\*

Maintenance: Paint peeling on walls in A, B, & C  
Maintenance: Paint peeling on walls in D & E

*Showers Lower Level*  
105 CMR 451.123\*

Maintenance: Paint peeling on walls in F, G, H, I, & J

*Staff Bathroom*

No Violations Noted

*Staff Office*

No Violations Noted

*Janitor's Closet (down)*

No Violations Noted

**B-2 HOUSING**

105 CMR 451.320\*  
105 CMR 451.350  
105 CMR 451.353

Cell Size: Inadequate floor space in all cells  
Structural Maintenance: Exterior of building damaged  
Interior Maintenance: Ceiling tiles water stained in block

*Control Area*

105 CMR 451.353

Interior Maintenance: Chair damaged

*Common Area*

105 CMR 451.353\*

Interior Maintenance: Floor seams not sealed

*Cells*

105 CMR 451.350\*  
105 CMR 451.350\*

Structural Maintenance: Wall damaged in cell # 27  
Structural Maintenance: Emergency exit door in stairway area not rodent and weathertight

*Showers Upper Level*

105 CMR 451.123\*

Maintenance: Paint peeling walls in shower A, B, C, & E

*Showers Lower Level*

105 CMR 451.123\*

Maintenance: Paint peeling walls in shower F, G, H, I, & J

*Staff Bathroom*

No Violations Noted

*Staff Office*

FC 4-501.11(A)

Maintenance and Operation, Equipment: Equipment not maintained in a state of good repair, refrigerator not maintained, needs defrosting

*Janitor's Closet (down)*

105 CMR 451.353

Interior Maintenance: Ceiling paint peeling

**C-1 HOUSING**

105 CMR 451.320\*  
105 CMR 451.353\*  
105 CMR 451.350\*

Cell Size: Inadequate floor space in all cells  
Interior Maintenance: Ceiling tiles water stained in block  
Structural Maintenance: Exterior of building damaged

*Common Area*

No Violations Noted

*Control Area*

No Violations Noted

*Cells*

105 CMR 451.350\*

105 CMR 451.353

Structural Maintenance: Floor damaged in cell # 24

Interior Maintenance: Wall paint peeling in cell # 1, 2, 6, 9, 10, 11, 12, 15, 22, 25, 30, & 60

*Janitor's Closet (up)*

No Violations Noted

*Showers Upper Level*

105 CMR 451.123\*

105 CMR 451.123\*

105 CMR 451.123\*

Maintenance: Paint peeling walls in shower A, B, C, & D

Maintenance: Soap scum on walls in shower A, B, C, & D

Maintenance: Wall damaged in shower A, D, & E

*Showers Lower Level*

105 CMR 451.123\*

105 CMR 451.123

105 CMR 451.123

Maintenance: Wall damaged in shower F, G, H, & I

Maintenance: Wall damaged in shower E

Maintenance: Paint peeling walls in shower E, F, G, H, & I

*Staff Bathroom*

105 CMR 451.123

Maintenance: Toilet seat damaged

*Staff Office*

No Violations Noted

*Janitor's Closet (down)*

105 CMR 451.353

Interior Maintenance: Mop stored in bucket

**C-2 HOUSING**

105 CMR 451.320\*

105 CMR 451.353\*

105 CMR 451.350\*

105 CMR 451.350\*

Cell Size: Inadequate floor space in all cells

Interior Maintenance: Ceiling tiles water stained

Structural Maintenance: Exterior of building damaged near cell # 36

Structural Maintenance: Floor damaged in entry area

*Control Area*

No Violations Noted

*Cells*

No Violations Noted

*Janitor's Closet (up)*

No Violations Noted

*Showers Upper Level*

105 CMR 451.123\*

Maintenance: Paint peeling on walls and floors of shower A, B, C, & D

*Showers Lower Level*

105 CMR 451.123\*

105 CMR 451.123\*

Maintenance: Paint peeling walls in shower H, I, & J

Maintenance: Soap scum on walls in shower G

*Staff Bathroom*

No Violations Noted

*Staff Office*

No Violations Noted

*Janitor's Closet (down)*

105 CMR 451.353\* Interior Maintenance: Ceiling paint peeling

**D-1 HOUSING (1 inmate per cell)**

105 CMR 451.350\* Structural Maintenance: Rear side of D exterior wall peeling

105 CMR 451.350\* Structural Maintenance: Rear side of D exterior wall, not weathertight

*Control Area*

No Violations Noted

*Cells*

105 CMR 451.353 Interior Maintenance: Wall paint peeling in cell # 49

*Janitor's Closet (lower)*

105 CMR 451.353\* Interior Maintenance: Wall paint peeling

105 CMR 451.350\* Structural Maintenance: Ceiling concrete block loose

105 CMR 451.350\* Structural Maintenance: Holes in floor around electrical piping

*Showers Lower Level*

105 CMR 451.123\* Maintenance: Soap scum on walls in shower A, B, & C

105 CMR 451.123\* Maintenance: Paint peeling on walls in shower D

105 CMR 451.123\* Maintenance: Paint peeling on walls in shower A, B, & C

105 CMR 451.123\* Maintenance: Wall damaged in shower C

*Showers Upper Level*

105 CMR 451.123\* Maintenance: Wall damaged in shower F & H

105 CMR 451.123\* Maintenance: Paint peeling walls in shower F & H

*Staff Bathroom*

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

*Staff Office*

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

*Janitor's Closet (down)*

No Violations Noted

**D-2 HOUSING**

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

105 CMR 451.350\* Structural Maintenance: Roof leaks

105 CMR 451.350\* Structural Maintenance: Floor damaged in entry area

*Control Area*

No Violations Noted

*Cells*

105 CMR 451.350\* Structural Maintenance: Floor damaged in cell # 4, 22, 23, & 36

105 CMR 451.350 Structural Maintenance: Floor damaged in cell # 5, 9, & 17

*Storage (up)*

105 CMR 451.353\* Interior Maintenance: Ceiling paint peeling

105 CMR 451.331\* Radiators and Heating Pipes: Pipes not properly insulated

*Showers Lower Level*

105 CMR 451.123\* Maintenance: Floor not sealed in shower B

*Showers Upper Level*

105 CMR 451.123\*

105 CMR 451.123

Maintenance: Floor not sealed in shower H, I, & J

Maintenance: Floor not sealed in shower F & G

*Staff Bathroom*

No Violations Noted

*Staff Office*

No Violations Noted

*Janitor's Closet (down)*

105 CMR 451.353

Interior Maintenance: Mop stored in bucket

**E-1 HOUSING**

105 CMR 451.320\*

105 CMR 451.353\*

105 CMR 451.353

Cell Size: Inadequate floor space in all cells

Interior Maintenance: Window damaged in entry area

Interior Maintenance Paint peeling on exterior wall

*Cells*

105 CMR 451.350\*

105 CMR 451.350

Structural Maintenance: Floor damaged in cell # 22 & 23

Structural Maintenance: Floor damaged in cell # 29

*Janitor's Closet (up)*

105 CMR 451.353

Interior Maintenance: Mop stored in bucket

*Showers Upper Level*

105 CMR 451.123\*

Maintenance: Floor not sealed in shower A, B, C, & D

*Showers Lower Level*

105 CMR 451.123\*

105 CMR 451.123\*

Maintenance: Wall damaged in J, G, & I

Maintenance: Wall paint peeling in shower F, G, & H

*Staff Bathroom*

No Violations Noted

*Staff Office*

No Violations Noted

*Janitor's Closet (down)*

No Violations Noted

**E-2 HOUSING**

105 CMR 451.320\*

Cell Size: Inadequate floor space in all cells

*Control Area*

No Violations Noted

*Cells*

105 CMR 451.123

Maintenance: Wall paint peeling in cell # 1

*Janitor's Closet (up)*

105 CMR 451.353

Interior Maintenance: Mop stored in bucket

*Showers Upper Level*

105 CMR 451.123\*

Maintenance: Paint peeling walls in shower A

105 CMR 451.123 Maintenance: Paint peeling on walls in showers B, C, & E  
105 CMR 451.130 Plumbing: Plumbing not maintained in good repair, handicap shower spray handle damaged

*Showers Lower Level*

105 CMR 451.123\* Maintenance: Paint peeling walls in D, E, H, I, & J  
105 CMR 451.123\* Maintenance: Wall damaged in shower J

*Staff Bathroom*

No Violations Noted

*Staff Office*

No Violations Noted

*Janitor's Closet (down)*

No Violations Noted

**F-1 HOUSING**

105 CMR 451.320\* Cell Size: Inadequate floor space in all cells  
105 CMR 451.350\* Structural Maintenance: Floor damaged, in entry area  
105 CMR 451.353\* Interior Maintenance: Ceiling vent dusty

*Control Area*

105 CMR 451.353\* Interior Maintenance: Chair damaged

*Cells*

105 CMR 451.353\* Interior Maintenance: Wall paint peeling in cell # 1

*Janitor's Closet (up)*

105 CMR 451.353 Interior Maintenance: Mop stored in bucket

*Showers Upper Level*

105 CMR 451.123\* Maintenance: Paint peeling on walls in shower A, B, & C  
105 CMR 451.123\* Maintenance: Paint peeling on walls in shower D & E

*Showers Lower Level*

105 CMR 451.123\* Maintenance: Floor paint peeling in shower F, G, H, I, & J

*Staff Bathroom*

No Violations Noted

*Staff Office*

No Violations Noted

*Janitor's Closet (down)*

No Violations Noted

**F-2 HOUSING**

105 CMR 451.320\* Cell Size: Inadequate floor space in all cells  
105 CMR 451.353\* Interior Maintenance: Ceiling vent dusty in block

*Control Area*

No Violations Noted

<i>Cells</i>	No Violations Noted
<i>Janitor's Closet (up)</i>	No Violations Noted
<i>Showers Upper Level</i> 105 CMR 451.123*	Maintenance: Paint peeling on walls in shower F, G, H, I, & J
<i>Showers Lower Level</i> 105 CMR 451.123*	Maintenance: Paint peeling on walls in shower A, B, C, & D
<i>Staff Bathroom</i>	No Violations Noted
<i>Staff Office</i>	No Violations Noted
<i>Janitor's Closet (down)</i> 105 CMR 451.353*	Interior Maintenance: Ceiling paint peeling

**MODULAR A**

<i>Entry Area</i>	No Violations Noted
<i>Central Area</i>	No Violations Noted
<i>Toxic/Caustic Room</i>	No Violations Noted
<i>Common Day Room</i> 105 CMR 451.350	Structural Maintenance: Roof leaks
<i>Telephone Room</i>	No Violations Noted
<i>Staff Bathroom</i> 105 CMR 451.123*	Maintenance: Missing vent cover
<i>Offices A-E</i>	No Violations Noted
<i>Landry Area</i>	No Violations Noted
<i>Library</i>	No Violations Noted
<b>Rooms</b>	
<i>Room 1</i>	No Violations Noted

*Room 2 Weight Room*

No Violations Noted

*Room 3*

No Violations Noted

*Room 4*

105 CMR 451.350

Structural Maintenance: Roof leaks

*Room 5*

No Violations Noted

*Room 6*

No Violations Noted

*Room 7*

105 CMR 451.350

Structural Maintenance: Roof leaks

*Room 8*

105 CMR 451.350

Structural Maintenance: Roof leaks

*Room 9*

No Violations Noted

*Room 10*

No Violations Noted

**MODULAR B**

*C.O.'s Office*

No Violations Noted

*Common/Day Room*

105 CMR 451.350\*

Structural Maintenance: Eight floor tiles damaged

*Bathroom Area*

No Violations Noted

*Shower Area*

No Violations Noted

*Shower Chase*

No Violations Noted

*Telephone Room*

No Violations Noted

*Library*

105 CMR 451.383(B)\*

Fire Safety System: Facility not in compliance with State Building Code provisions on, boxes stored within 18 inches of ceiling

*Room 2 Barber*

105 CMR 451.353

105 CMR 451.346

Interior Maintenance: Damaged chair

Safe Wiring: Use of extension cord as temporary wiring for damaged radio

<i>Room 3</i>	No Violations Noted
<i>Room 4 Parole Hearing</i>	No Violations Noted
<i>Room 5</i>	No Violations Noted
<i>Room 6</i>	No Violations Noted
<i>Room 7 Chapel</i>	No Violations Noted
<i>Room 8 Storage</i>	No Violations Noted
<b><u>COTTAGE 6</u></b> 105 CMR 451.320*	Cell Size: Inadequate floor space in all cells
<b>2<sup>nd</sup> Floor</b>	
<i>Bathroom</i>	No Violations Noted
<i>Storage &amp; Tool Crib</i>	Unable to Inspect - Locked
<i>Room 9</i>	No Violations Noted
<i>Room 10</i>	No Violations Noted
<i>Room 11</i>	No Violations Noted
<b>1<sup>st</sup> Floor</b>	
<i>Room 8</i>	No Violations Noted
<i>Room 7</i>	No Violations Noted
<i>Room 5</i>	No Violations Noted
<i>Room 6</i>	No Violations Noted
<i>Bathroom</i>	No Violations Noted

<i>Room 3</i>	No Violations Noted
<i>Room 4</i>	No Violations Noted
<i>Room 1</i>	No Violations Noted
<i>Room 2</i>	No Violations Noted
<i>Recreation Room</i>	No Violations Noted
<i>Bathroom</i>	No Violations Noted
<i>Tool Crib</i>	No Violations Noted
<i>Kitchen Area</i>	No Violations Noted
<i>C.O./C.P.O. Office</i>	No Violations Noted
<i>Toxic/Caustic Closet</i>	No Violations Noted
<b>Basement</b> 105 CMR 451.353	Interior Maintenance: Emergency light damaged in stairway
<i>Laundry</i>	No Violations Noted
<i>Recreation Area</i>	No Violations Noted
<i>Gym</i>	No Violations Noted
<i>Showers</i> 105 CMR 451.123*	Maintenance: Common shower floor paint peeling
<i>Supply</i>	No Violations Noted
<i>Bathroom</i>	No Violations Noted
<i>Hallway</i>	No Violations Noted

**Property**

Unable to Inspect - Locked

**COTTAGE 7**

105 CMR 451.320\*

Cell Size: Inadequate floor space in all cells

**3<sup>rd</sup> Floor**

*Storage*

No Violations Noted

*Room 12*

No Violations Noted

*Bathroom*

No Violations Noted

**2<sup>nd</sup> Floor**

*Room 4*

No Violations Noted

*Room 5*

No Violations Noted

*Room 6*

No Violations Noted

*Room 7*

No Violations Noted

*Room 8*

No Violations Noted

*Room 9*

No Violations Noted

*Room 10*

No Violations Noted

*Bathroom (near room 10)*

Unable to Inspect – Occupied

**1st Floor**

*Room 11*

No Violations Noted

*Tool Crib*

No Violations Noted

*Telephone Area*

No Violations Noted

<i>Bathroom (near Room 4)</i>	No Violations Noted
<i>Entry</i>	No Violations Noted
<i>Recreation Room</i>	No Violations Noted
<i>Office</i>	No Violations Noted
<i>Room 1</i>	No Violations Noted
<i>Room 2</i>	No Violations Noted
<i>Room 3</i>	No Violations Noted
<b>Basement</b>	No Violations Noted
<i>Laundry</i>	No Violations Noted
<i>Storage Room</i>	No Violations Noted
<i>Recreation Area</i>	No Violations Noted
<i>Toxic/Caustic Room</i>	No Violations Noted
<i>Bathroom</i>	No Violations Noted
<i>Rear Foyer Exit</i>	No Violations Noted
<b><u>COTTAGE 8</u></b>	
105 CMR 451.320*	Cell Size: Inadequate floor space in all cells
<b>3<sup>rd</sup> Floor</b>	
<i>Room 14</i>	No Violations Noted
<i>Room 13</i>	No Violations Noted
<i>Bathroom</i>	No Violations Noted

**2<sup>nd</sup> Floor**

*Bathroom (near room 12)*

No Violations Noted

*Tool Crib*

No Violations Noted

*Toxic/Caustic Room*

No Violations Noted

*Hall Closet*

105 CMR 451.353\*

Interior Maintenance Door knob pushed through door

*Room 10*

105 CMR 451.350\*

Structural Maintenance: Ceiling damaged, no support holding the ceiling tiles in place

*Room 11*

105 CMR 451.350\*

Structural Maintenance: Ceiling damaged, no support holding the ceiling tiles in place

*Room 12*

105 CMR 451.350\*

Structural Maintenance: Ceiling damaged, no support holding the ceiling tiles in place

*Hallway*

No Violations Noted

*Room 8*

No Violations Noted

*Bathroom (near Room 6)*

Unable to Inspect – Occupied

*Room 9*

No Violations Noted

*Room 7*

No Violations Noted

*Room 6*

No Violations Noted

**1<sup>st</sup> Floor**

*Dining Room*

No Violations Noted

*Room 5*

No Violations Noted

*Room 3*

No Violations Noted

*Room 4*

No Violations Noted

<i>Hallway</i>	No Violations Noted
<i>Officer's Bathroom</i>	No Violations Noted
<i>Basement</i>	No Violations Noted
<i>Gym</i>	No Violations Noted
<i>Storage</i>	No Violations Noted
<i>Laundry</i>	No Violations Noted
<i>Bathroom</i>	No Violations Noted
<i>Rear Foyer Exit</i>	No Violations Noted
<b><u>COTTAGE 9</u></b>	
105 CMR 451.350*	Structural Maintenance: Front steps were cracked
105 CMR 451.320*	Cell Size: Inadequate floor space in all cells
<b>3<sup>rd</sup> Floor</b>	
<i>Room 13</i>	No Violations Noted
<i>Room 12</i>	No Violations Noted
<i>Bathroom</i>	No Violations Noted
<b>2<sup>nd</sup> Floor</b>	
<i>Room 7</i>	No Violations Noted
<i>Room 4</i>	No Violations Noted
<i>Hallway (near Room 5 &amp; 6)</i>	No Violations Noted
<i>Room 6</i>	No Violations Noted
<i>Bathroom (near Room 6)</i>	
105 CMR 451.123*	Maintenance: Wall damaged by toilet

<i>Room 5</i>	No Violations Noted
<i>Room 8</i>	No Violations Noted
<i>Bathroom (near Room 8)</i> 105 CMR 451.353	Interior Maintenance: Uncovered electrical box
<i>Room 9</i>	No Violations Noted
<i>Room 10</i>	No Violations Noted
<i>Room 11</i>	No Violations Noted
<b>1<sup>st</sup> Floor</b>	
<i>Staff Bathroom</i>	No Violations Noted
<i>C. O.'s Office</i>	No Violations Noted
<i>Counselor's Office</i>	No Violations Noted
<i>Day Room</i>	No Violations Noted
<i>Toxic/Caustic Room</i>	No Violations Noted
<i>Kitchen Area</i>	No Violations Noted
<i>Room 1</i>	No Violations Noted
<i>Room 2</i>	No Violations Noted
<b>Basement</b>	
<i>Bathroom Area</i>	No Violations Noted
<i>Laundry Area</i>	No Violations Noted
<i>Pool Room</i>	No Violations Noted

*Supply/Janitor's Room*

No Violations Noted

*Weight Room*

No Violations Noted

**COTTAGE 10**

105 CMR 451.320\*  
105 CMR 451.350

Cell Size: Inadequate floor space in all cells  
Structural Maintenance: Side walk damaged

**3<sup>rd</sup> Floor**

*Hallway*

No Violations Noted

*Room 15*

No Violations Noted

*Room 16*

No Violations Noted

*Bathroom (Room 16)*

No Violations Noted

**2<sup>nd</sup> Floor**

*Room 9*

No Violations Noted

*Bathroom (Room 9)*

No Violations Noted

*Room 10*

No Violations Noted

*Bathroom (Room 10)*

No Violations Noted

*Room 11*

No Violations Noted

*Room 12*

No Violations Noted

*Bathroom (Room 12)*

No Violations Noted

*Room 14*

No Violations Noted

*Bathroom (Room 14)*

No Violations Noted

*Room 13*

No Violations Noted

*Bathroom (Room 13)*

No Violations Noted

**1<sup>st</sup> Floor**

*Staff Bathroom*

No Violations Noted

*Slop Sink Room*

105 CMR 451.353\*

Interior Maintenance: Light damaged

*Toxic/Caustic Room*

No Violations Noted

*Storage*

No Violations Noted

*Day Room*

No Violations Noted

*Visitor's Bathroom*

No Violations Noted

*Kitchen*

No Violations Noted

**Health Services**

*Room 2*

No Violations Noted

*Room 3*

No Violations Noted

*Room 4*

No Violations Noted

*Room 5*

No Violations Noted

*Room 6*

No Violations Noted

*Room 7*

No Violations Noted

*Room 8*

No Violations Noted

*C. O.'s Office*

No Violations Noted

**Basement**

*Rear Foyer Exit*

Unable to Inspect – Locked

<i>Weight Room</i>	No Violations Noted
<i>Utility Room</i>	No Violations Noted
<i>Laundry Area</i>	No Violations Noted
<i>Storage Room</i>	No Violations Noted
<i>Utility Room (next to shower)</i>	No Violations Noted
<i>Hallway (next to shower)</i>	No Violations Noted
<i>Bathroom</i>	No Violations Noted
<b><u>COTTAGE 11</u></b>	
105 CMR 451.350*	Structural Maintenance: Entry way damaged
105 CMR 451.320*	Cell Size: Inadequate floor space in all cells
105 CMR 451.350*	Structural Maintenance: Door area not rodent and weathertight
<i>2<sup>nd</sup> Floor Stairway</i>	No Violations Noted
<i>Staff Office</i> FC 4-501.11(A)	Maintenance and Operation, Equipment: Equipment not maintained in a state of good repair, refrigerator not maintained, needs defrosting
<i>Staff Bathroom</i>	No Violations Noted
<i>Laundry</i>	No Violations Noted
<i>Rooms 1 &amp; 2</i>	No Violations Noted
<i>Bathroom 1 &amp; 2</i> 105 CMR 451.123	Maintenance: Ceiling paint peeling
<i>Rooms 3 &amp; 4</i>	No Violations Noted
<i>Bathroom 3 &amp; 4</i>	No Violations Noted
<i>Rooms 5 &amp; 6</i>	No Violations Noted

<i>Bathroom 5 &amp; 6</i>	No Violations Noted
<i>Rooms 7 &amp; 8</i>	No Violations Noted
<i>Bathroom 7 &amp; 8</i>	No Violations Noted
<i>Room 9 &amp; 10</i> 105 CMR 451.353	Interior Maintenance: Ceiling paint peeling
<i>Bathroom 9 &amp; 10</i>	No Violations Noted
<i>Rooms 11 &amp; 12</i>	No Violations Noted
<i>Bathroom 11 &amp; 12</i>	No Violations Noted
<i>Room 13 &amp; 14</i>	No Violations Noted
<i>Bathroom 13 &amp; 14</i>	No Violations Noted
<i>Janitor's Closet</i> 105 CMR 451.353	Interior Maintenance: Mop stored in bucket
<i>Day Room</i>	No Violations Noted
<b><u>KITCHEN/DINING AREA</u></b> 105 CMR 451.350	Structural Maintenance: Area not rodent and weathertight, exterior door damaged at bottom
<i>Dishwasher Area</i>	No Violations Noted
<i>Main Kitchen</i>	No Violations Noted
<i>Kettles</i>	No Violations Noted
<i>Cooler 1</i>	No Violations Noted
<i>1199 Walk-In – Cooler 2</i>	No Violations Noted
<i>1194 Walk-In – Cooler 3</i>	No Violations Noted

<i>Slop Sink/Electrical Room</i>	No Violations Noted
<i>Dry Storage</i>	No Violations Noted
<i>Tool Crib</i>	No Violations Noted
<i>Toxic Storage</i>	No Violations Noted
<i>Storage</i>	No Violations Noted
<i>Staff Bathroom</i>	No Violations Noted
<i>Inmate Bathroom</i>	No Violations Noted
<i>Diet Area</i>	No Violations Noted
<i>Old Bakery</i>	No Violations Noted
<i>Dining Area</i>	No Violations Noted
<i>Janitor's Closet</i> 105 CMR 451.353*	Interior Maintenance: Mop stored in bucket
<i>Inmate Bathroom</i>	No Violations Noted
<i>Staff Bathroom</i> 105 CMR 451.350	Structural Maintenance: Roof leaks
<i>Storage Area</i> 105 CMR 451.350* FC 4-903.11(A)(2)*	Structural Maintenance: Ceiling damaged Protection of Clean Items, Storing: Single-service items not protected from contamination, spoons and forks left uncovered
<i>Strip Room</i>	No Violations Noted
<b>Basement</b> 105 CMR 451.350*	Structural Maintenance: Area not rodent and weathertight, exterior door damaged at bottom
105 CMR 451.350	Structural Maintenance: No hand rail in stairway
<i>Freezer 1</i>	No Violations Noted

<i>Freezer 2</i>	Unable to Inspect – Locked
<i>Freezer 3</i>	Unable to Inspect – Locked
<i>Garbage Cooler 5</i>	No Violations Noted
<i>Dry Storage</i>	No Violations Noted
<i>Bathroom</i>	Unable to Inspect – Locked
<b><u>MEAT PLANT</u></b>	
105 CMR 451.126*	Water Supply: No hot water supplied to building
105 CMR 451.350*	Structural Maintenance: Floor damaged in entry
<i>Basement</i>	
105 CMR 451.350*	Structural Maintenance: Wall damaged
105 CMR 451.350*	Structural Maintenance: Area not rodent and weathertight
105 CMR 451.350*	Structural Maintenance: Floor damaged
<i>Bathroom</i>	No Violations Noted
<i>Office 2</i>	
105 CMR 451.353	Interior Maintenance Door knob missing
<i>Staff Bathroom</i>	No Violations Noted
<i>Office 3 EHSO</i>	No Violations Noted
<i>Office 1</i>	No Violations Noted
<i>Office 4</i>	No Violations Noted
<i>Passage Area</i>	No Violations Noted
<i>Outside Cooler North</i>	
FC 4-501.11(A)	Maintenance and Operation, Equipment: Equipment not maintained in a state of good repair, lights working in cooler
<i>Outside Cooler South</i>	No Violations Noted

## Observations and Recommendations

1. The inmate population was 1441 at the time of inspection.
2. The Department recommends that all rooms have a number painted on the door frame for location purposes.
3. The Department recommends that the two structures, buildings # 2 & 4 be closed and secured from entry of rodents. Their roofs are collapsing into the structures and as such are a public nuisance to the general public and a harborage for rodents and insects.

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".

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

Sincerely,



Charles J. Kaniecki  
District Health Officer, CSP, BEH

cc: Suzanne K. Condon, Associate Commissioner, Director, BEH  
Steven Hughes, Director, CSP, BEH  
John W. Polanowicz, Secretary, Executive Office of Health and Human Services  
Carol Higgins O'Brien, Commissioner, DOC  
Officer Corey Hopkins, EHSO  
James Garreffo RS, CHO, Director, Nashoba Associated Boards of Health  
Clerk, Massachusetts House of Representatives  
Clerk, Massachusetts Senate  
Andrea Cabral, Secretary EOPS