
**Thomas P. DiNapoli
COMPTROLLER**



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**OFFICE OF THE
NEW YORK STATE COMPTROLLER**

**DIVISION OF STATE
GOVERNMENT ACCOUNTABILITY**

**DEPARTMENT OF
CORRECTIONAL SERVICES**

**COMPLIANCE WITH
EXECUTIVE ORDER 134 -
ENVIRONMENTAL IMPACT
OF CLEANING FACILITIES**

Report 2008-S-16

AUDIT OBJECTIVE

The objective of our audit was to determine whether the Department of Correctional Services is in compliance with Executive Order 134 requirements, including purchasing and using green cleaning products.

AUDIT RESULTS - SUMMARY

Executive Order 134 (Order) was issued on January 5, 2005, to reduce the environmental impact of cleaning State facilities. The Order requires all State agencies to procure and use cleaning products with properties that minimize their impact on human health and the environment. When first issued, the Order also stated that cleaning products can present environmental concerns because they may contain chemicals associated with eye, skin, or respiratory irritation, and other health issues. The Order requires State agencies to conduct an assessment and provides the agencies six months from the date of the Order to transition to conforming products.

We found that the Department of Correctional Services (Department) did not transition to conforming products within the six months; nor did it conduct the required assessment in a timely manner. In addition, the Department does not purchase or use environmentally-preferred cleaning products at any of its offices and correctional facilities; and has not required its correctional facilities, offices, or landlords of leased space to use environmentally-preferred cleaning products. However, it has made progress in conforming to the Order by testing cleaning products at one of its correctional facilities. These products were approved and, according to Department officials, will be available for use during the 2008-09 State fiscal year.

The Department was required to conduct an assessment and issue a report within one year

of the effective date of the Order. However, it was prepared six months after the due date. The report concluded that none of the products used by the Department complied with the Order and only covered the Department's main office in Albany. Department officials advised us that they are in the process of preparing the biennial update, which will include all of their facilities.

To identify the cleaning products purchased by the Department, we visited 5 of the Department's 69 correctional facilities and reviewed the list of cleaning products purchased from September 1, 2007, through December 31, 2007. We also visited four other locations cleaned by inmates (the Department's Training Academy, a New York City office, and two office locations in Albany). We found that just one correctional facility used environmentally-preferred cleaning products. The Training Academy, New York City office, and one Albany office did not purchase any environmentally-preferred cleaning products, while the other Albany office purchased one cleaning product that met the environmental standard.

We also determined that Department officials had completed the testing of three "Green Seal" certified products at one correctional facility. (Green Seal is an independent testing organization qualified to verify that products meet environmental standards.) Department officials have ordered packaging equipment that will enable them to package these products for use at all facilities, by June 2008. At that time the Department will issue directives requiring the exclusive use of approved products.

In addition, we met with representatives from the landlords at the three office locations leased by the Department. These facilities are not cleaned by inmates; rather, the lease

requires the landlord to clean the office space. We found that one of these locations did not use any environmentally-preferred products, one used some of those products, and the third used many products that qualify as environmentally-preferred.

Our report contains seven recommendations for complying with the Order. Department officials agreed with most of our recommendations and indicated they plan to take corrective action.

This report, dated September 30, 2008, is available on our website at: <http://www.osc.state.ny.us>. Add or update your mailing list address by contacting us at: (518) 474-3271 or Office of the State Comptroller
Division of State Government Accountability
110 State Street, 11th Floor
Albany, NY 12236

BACKGROUND

Executive Order 134 (Order) was issued on January 5, 2005, to reduce the environmental impact of cleaning State facilities. The Order requires all State agencies to procure and use cleaning products with properties that minimize their impact on human health and the environment. The Order also required all State agencies to conduct an assessment and issue a report within one year of the effective date of the Order, describing the efforts undertaken to comply with this Order. The assessment report must be retained and made available to agency employees and the general public. The report also must be reviewed and updated biennially by the agencies.

The Department of Correctional Services (Department) is responsible for the confinement and habilitation of approximately 63,500 inmates held at 69 State

correctional facilities and the 902-bed Willard Drug Treatment Campus. Under the supervision of Correction Officers, inmates are responsible for cleaning correctional facilities as well as the Department's Training Academy in Albany, office space in New York City, and two office locations in Albany. Inmates are not responsible for cleaning three of the facilities, office locations that are leased by the Department from landlords who provide their own cleaning services and products.

The Department's facilities procure most of their cleaning products from preferred source vendors, either the Department's Division of Industries (Corcraft) or the New York State Industries for the Disabled. Most remaining cleaning products are purchased through a State contract from Sysco Food Services.

During the State fiscal year ending March 31, 2007, the Department spent about \$5.8 million on housekeeping supplies and materials, including cleaning products and supplies (e.g., soap used by inmates for personal care, mops, scouring pads, etc.). For cleaning products used to clean the facilities, the Department purchased supplies totaling \$477,469 from Corcraft and \$695,166 from Industries for the Disabled. Purchase data for Sysco included non-cleaning products; therefore, a dollar value for cleaning products purchased from Sysco is not available.

AUDIT FINDINGS AND RECOMMENDATIONS

Compliance with Order

The Order requires State agencies to:

- procure products and use practices that reduce or minimize the risks of harmful effects on employees, custodial workers,

visitors, and other building occupants, as well as the environment;

- encourage contractors supplying goods and services to select and procure such products; and
- encourage lessors and building managers to select and procure such products.

The Order also required State agencies to conduct an assessment, and allowed them six months from the date of the Order to transition to conforming products. This enabled agencies to conform in a manner that avoided waste of existing inventories, accommodated the establishment of supply chains for new products, enabled the training of personnel in appropriate work practices, and allowed the phase-out of products and practices that did not conform to the Order. We found that the Department did not transition to conforming products within the six months; nor did it conduct the required assessment in a timely manner. In addition, the Department has not required its correctional facilities, offices, or landlords of leased space to use environmentally-preferred cleaning products. However, it has made progress in conforming to the Order by testing cleaning products at one of its facilities. Once approved, these products will be used at all facilities.

Assessment

The Order requires each State agency to assign an individual who will be responsible to:

- assess current facility management practices and use of cleaning products;
- evaluate whether these products conform to the Order;

- identify and procure conforming cleaning products; and
- document the reasons for selecting products that do not conform to the Order and include these reasons in the report required by the Order.

The Department designated the Director of Support Operations to assume these responsibilities. We determined the Director did conduct an initial assessment and the Department issued an assessment report in July 2006, six months later than expected. The report concluded that none of the products used by the Department complied with the Order. However, the report included only products used to clean the Department's main office in Albany and it did not include the reasons for selecting products that do not conform to the requirements of the Order. Department officials stated they have received correspondence from the Office of General Services regarding a new format for the assessment report, and are currently working on updating the assessment and preparing the report.

Department officials also stated that it was their understanding that the assessment had to be conducted only for State-owned buildings. However, they could not find any documentation that explained why the Department's initial assessment was not conducted for all the facilities the Department owns. Department officials indicated that they are in the process of collecting the required data from their facilities and will include it in the updated assessment report. They said they will also investigate the possibility of making the report available on their website.

Without the required assessments being conducted, employees and the general public do not have the necessary information regarding efforts that have been undertaken

by the Department to comply with the Order; and they are not aware of the reasons products are being purchased that do not comply with the requirements of the Order.

Recommendations

1. Conduct assessments for all buildings used whether owned or leased, and review and update this assessment biennially, as required by the Order.
2. Establish a procedure for making the biennial assessments available to employees and the general public. Consider using the Department's website to allow the assessment to be viewed by employees and the general public.

Procurement of Environmentally-Preferred Products

The Order requires the Department to procure and use cleaning products having properties which minimize potential impacts to human health and the environment. The Department's Division of Support Operations (Support Operations) is responsible for planning, directing, and coordinating activities such as housekeeping and laundry services. The Department's policy is to maintain and enforce high standards of cleanliness in all areas of each facility.

Support Operations developed housekeeping manual (manual) that provides procedures for cleaning different types of areas in facilities and outlines the products to use. The manual, dated May 2005, also lists the approved cleaning supplies to be used by each correctional facility. However, we found the manual does not conform to the Order. Rather, it includes products that the Department has used for several years, not environmentally-preferred products. Products

in the manual include germicidal detergent, heavy duty cleaner, glass cleaner, floor wax remover, floor sealer, floor finish, floor maintainer, and powdered cleanser with bleach.

We note that Support Operations issued a Housekeeping: Health Care Areas Directive dated July 12, 2007, requiring facilities to use the Corcraft Germicidal Cleaner 128 cleaning agent to clean health care areas, particularly isolation rooms, Regional Medical Units, infirmary rooms, and procedure/surgical/exam room areas. This product replaced the germicidal detergent and bleach formerly used to clean these areas. While it is not environmentally-preferred, it is considered better than the one used previously.

To identify the cleaning products purchased by the Department, we visited 5 of the Department's 69 correctional facilities and reviewed the list of cleaning products purchased from September 1, 2007, through December 31, 2007. We also visited four locations cleaned by inmates (the Department's Training Academy, a New York City office, and two office locations in Albany). We found the following:

- Four of the correctional facilities (Oneida, Green Haven, Lincoln, and Wyoming) did not purchase any environmentally-preferred cleaning products. Instead, they were procuring the approved cleaning products that had been in use for several years. One correctional facility (Coxsackie) did use environmentally-preferred cleaning products as part of the Department's pilot.
- The Training Academy, New York City office, and one Albany office did not obtain any environmentally-preferred cleaning products. Instead, they were

obtaining the approved cleaning products that had been in use for several years.

- One Albany office purchased one cleaning product that was environmentally-preferred. However, the rest of the products it purchased were the approved cleaning products that had been in use for several years.

While the Department has not complied with the Order, it has researched and tested environmentally-preferred products. Support Operations and Corcraft identified three products that conform to the Order: heavy duty all-purpose cleaner, glass cleaner, and neutral floor cleaner, all of which are available from PortionPac Chemical Corporation (PortionPac). These products are Green Seal-certified. In February 2006, the Department began a feasibility study to test the use of PortionPac products, as well as one product from Corcraft, the Germicidal 128 cleaning agent, in one block of the Coxsackie facility. The Department completed its controlled test in November 2006.

The PortionPac products received favorable ratings, and uniformed staff said the products were easy to use and they could see results over the present cleaning agents. Staff also stated that significant improvements in cleanliness were noted. The Supervisor of Housekeeping and Laundry Services recommended that these products begin to be used for the entire Coxsackie facility. To comply with the Order, the Department's Product Evaluation Committee approved the use of the PortionPac products and the Corcraft germicidal 128 cleaning agent in December 2006, saying that test results noted a significant improvement in cleanliness and a reduction in material costs.

Since January 23, 2007, the entire Coxsackie facility has been cleaned using the PortionPac

products and Corcraft germicidal 128 cleaning agent. The facility has eliminated the use of other previously-used cleaning products. Corcraft is currently working to identify a floor finish and stripper that will comply with the Order.

Further, for security purposes, cleaning material must be distributed in small quantities to inmates that clean the facilities. To use the PortionPac products, Corcraft buys 55-gallon drums from PortionPac and then packages it into small plastic bags that are easily distributed and controlled within the areas of the correctional facilities. For two of the products (the heavy duty-all purpose cleaner and glass cleaner), each small plastic bag is mixed with five gallons of water and then dispensed into reusable one-quart spray bottles. Small plastic bags of the neutral floor cleaner are distributed throughout the facility to the location where they will be used for cleaning. The contents of each plastic bag are mixed with three gallons of water. This method of distribution to the facilities allows the Department to control the amount of product in circulation, and reduces the number of empty containers that would normally go into the landfills.

However, according to Department officials, this packaging process cannot accommodate the high volume of product required to clean all of their facilities. Therefore, Corcraft sought bids for a Form/Fill/Seal machine that would form plastic bags, fill them with bulk or liquid cleaning products, and seal the bag. The bid opening was held in September 2007 and the purchase order for the form/fill/seal machine was approved in January 2008. Approval of the purchase was delayed partly because just one bid was received. The contractor has been given a guaranteed delivery time of 75 to 90 days for set-up and installation of the equipment.

Department officials told us that, once the equipment is installed, they will be capable of packaging sufficient cleaning products to serve the needs of all the Department's correctional facilities. At that time, they said they will issue directives requiring every facility to use these products and preclude them from purchasing others. In addition, they said they will provide facility employees and inmates who do the cleaning with the required training.

In addition, after implementing the use of three PortionPac products at the entire Cossackie facility, Corcraft realized that the cost to the Department of the neutral floor cleaner would become prohibitive. As a result, Corcraft sought an alternate to using this PortionPac product. Corcraft put out a request for bids to obtain a bulk product that they could package that would still be an environmentally-preferred product. The bid opening was held in January 2008. With the new equipment in place and a new contract for materials, Corcraft hopes it will be able to supply environmentally-preferred products to the Department during the 2008-09 State fiscal year.

We note that, while environmentally-preferred cleaning products are available on State contracts and from other preferred vendors, the Department chose to pursue the purchase of environmentally-preferred products from Corcraft. Department officials could provide no documentation of the decision to pursue environmentally-preferred products exclusively through Corcraft, and not to use readily available products from other preferred sources in the interim until Corcraft was able to supply the Department with these products.

Department officials state compliance with the Order was delayed because the Office of General Services did not clarify how Corcraft

could produce and package cleaning products that would meet Green Seal-equivalent requirements; identify products and methods of packaging the products to comply with the Department's directives related to the storage, safe use, and security of hazardous materials that include cleaning products; obtain products at a reasonable cost; or work with Industries for the Disabled on a plan to share in the packaging of the cleaning products. (The Industries for the Disabled currently packages two of the commonly-used cleaning products that the Department uses to clean its facilities, but they are not environmentally-preferred products.)

Department officials anticipate that the environmentally-preferred products will be available from Corcraft for use at its facilities on, or before, June 1, 2008. The facilities will be required to order and use these products as soon as the staff and inmates have received appropriate training in their use.

Nonetheless, it has been more than three years since the Order became effective. Meanwhile, the Department has continued to use products that may cause conditions the Order was designed to minimize.

Recommendations

3. Implement the use of environmentally-preferred products; then update the manual to conform with the Order and distribute it to all facilities.
4. Issue directives requiring all facilities to begin purchasing and using Corcraft's environmentally-preferred products as soon as they are available.

Use of Environmentally-Preferred Products

At the locations we visited, we reviewed the cleaning products that had been purchased and were actually in use. We also obtained an understanding of the inventory system and inventory. We learned how the products were distributed from central receiving locations to the site of their use by inmate cleaners.

We visited five correctional facilities along with the four other locations cleaned by inmates. Of these, just one correctional facility (Coxsackie) and an Albany office had procured environmentally-preferred cleaning products. We found that these facilities used the products that were purchased. The other eight continued to use the approved cleaning products that have been in use for several years.

In addition to these sites, we met with representatives from the landlords for the three office locations leased by the Department where the landlord is required to clean the office space. Each lease contains a provision that requires the landlord to comply with all laws, rules, orders, ordinances, and regulations applicable to the Department. The representatives for each of these landlords stated that the Department has never requested that they use environmentally-preferred products to clean the space they occupy. However, while we found that one of these locations did not use any environmentally-preferred products, one did use some, and the third used many (officials said they have not identified an acceptable floor stripper and polish).

Department officials told us they have not required landlords to comply with the Order because the landlord has the lease with the Office of General Services and the

Department believes that the Office of General Services is responsible for requiring the landlord to comply with the Order. We believe Department officials should require compliance at all facilities it leases to provide their employees with the benefits associated with using environmentally-preferred products.

Recommendations

5. Advise all landlords about the requirements of the Order.
6. Remind landlords to comply with lease provisions that require them to comply with all laws, rules, orders, ordinances, and regulations applicable to the Department.

Other Correctional Systems

We contacted other correctional systems to determine alternate ways of using cleaning products in the unique situation presented at such facilities. We received information from the New York City Department of Correction, Washington State Department of Corrections, and the California Department of Corrections and Rehabilitation.

The New York City Department of Correction is currently participating in a green pilot program and is testing products at one of its facilities. It uses the same pre-packaged products from PortionPac and Corcraft that were tested and are being purchased by the Department. Washington State Department of Corrections does not yet have a green cleaning program but also uses PortionPac products in its facilities.

The California Department of Corrections and Rehabilitation also is working on implementing a green cleaning program but is not using green cleaning products at this time.

Currently, it utilizes the Prison Industry Authority - the equivalent of Corcraft - to produce the cleaning products used throughout the state. It does not use any special packaging, but controls the amount of product used via locked stainless steel canisters that hold a one-gallon bottle. The canister has a built-in dispenser that releases the exact amount of cleaning product to be mixed with water. Keys to the canisters are maintained by the correctional staff that supervises the inmates cleaning the facility.

We believe the Department can benefit from contacting other correctional systems to learn about their practices. For example, California does not use special packaging equipment. Department officials stated that it would not have been practical or cost-effective to introduce any other cleaning products in the interim while Corcraft was developing new products for use in the facilities, but they did not have any documentation to support this decision.

Recommendation

7. Keep abreast of practices at other correctional systems that could be followed by the Department.

AUDIT SCOPE AND METHODOLOGY

We conducted our audit in accordance with generally accepted government auditing standards. We audited the Department's procurement and use of environmentally-preferred cleaning products, as required by the Order. Our audit covered the period January 5, 2005, through February 15, 2008.

To accomplish our objective, we interviewed officials from the Department's Support Operations, Corcraft, and officials at selected facilities. We obtained an understanding of the procurement and receiving process and

reviewed the provisions of the Order and related guidance available on the Office of General Service's Internet site. We also reviewed Department directives related to housekeeping and hazardous materials.

We selected a judgmental sample of five correctional facilities that were located throughout the State. At each correctional facility, we reviewed purchases of cleaning products and cleaning product inventories to determine the types of cleaning products purchased and in use. We also reviewed procurement and cleaning practices at four other locations where inmates clean the facilities: the Department's Training Academy, the New York City office, and two locations in Albany, as well as three leased office locations at which the landlords are responsible for cleaning.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds and other payments. In addition, the Comptroller appoints members to certain boards, commissions, and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our ability to conduct independent audits of program performance.

AUTHORITY

We performed this audit pursuant to the State Comptroller's authority as set forth in Article V, Section 1, of the State Constitution and

Article II, Section 8, of the State Finance Law.

REPORTING REQUIREMENTS

A copy of this report was provided to Department officials for their review and comment. Their comments were considered in preparing this final report, and are included as Appendix A.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the Department of Correctional Services shall

report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

CONTRIBUTORS TO THE REPORT

Major contributors to this report include Carmen Maldonado, Robert Mehrhoff, Erica Zawrotniak, Wayne Bolton, Jeffrey Dormond, Marianne Boyer, Bruce Brimmer, Gayle Clas, Dana Bitterman, and Sue Gold.

APPENDIX A - AUDITEE RESPONSE



BRIAN FISCHER
COMMISSIONER

STATE OF NEW YORK
DEPARTMENT OF CORRECTIONAL SERVICES
THE HARRIMAN STATE CAMPUS – BUILDING 2
1220 WASHINGTON AVENUE
ALBANY, N.Y. 12226-2050

May 12, 2008

Ms. Carmen Maldonado
Audit Director
Office of the State Comptroller
Division of State Government Accountability
123 William Street, 21st Floor
New York, NY 10028

RE: Draft Audit of DOCS Compliance
with Executive Order 134 –
Environmental Impact of Cleaning
Facilities (2008-S-16)

Dear Ms. Maldonado:

In accordance with Section 170 of the Executive Law and in response to your correspondence of April 11, 2008, attached is the Department's reply to the Draft Audit of DOCS Compliance with Executive Order 134 – Environmental Impact of Cleaning Facilities, Report 2008-S-16.

We have complied with the provisions of the Budget Policy and Reporting Manual, item B-410, by forwarding two copies of this response to the Division of the Budget.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Fischer'.

Brian Fischer
Commissioner

Attachment



BRIAN FISCHER
COMMISSIONER

STATE OF NEW YORK
DEPARTMENT OF CORRECTIONAL SERVICES
THE HARRIMAN STATE CAMPUS – BUILDING #2
1220 WASHINGTON AVENUE
ALBANY, N.Y. 12226-2050

GAYLE HAPONIK
DEPUTY COMMISSIONER
ADMINISTRATIVE SERVICES

May 8, 2008

Mr. Wayne A. Bolton
Office of the State Comptroller
Division of State Government Accountability
110 State Street, 11th Floor
Albany, NY 12236-0001

Re: Audit Report 2008 – S – 16

Dear Mr. Bolton:

In response to the findings resulting from your audit of the Department of Correctional Services' compliance with Executive Order No. 134, we generally agree with your observations and conclusions.

Internal Control Weakness: The Department has not required its correctional facilities, offices, or landlords of leased space to use environmentally preferred cleaning products. The Department did designate the Director of Support Operations with the responsibility to assess current practices and use of products, evaluate whether products used conform to the Order, identify and procure conforming cleaning products, and document the reason for selecting products that do not conform to the Order. The Department has assessed its current practices and the products used and determined that none of the products complied with the Order.

Recommendation #1: Conduct assessments for all buildings used whether owned or leased and review and update this assessment biennially, as required by the order.

Response: We agree with the recommendation. Assessment forms have been completed for all DOCS' sites.

Recommendation #2: Establish a procedure for making the biennial assessments available to employees and the general public. Consider using the Department's website to allow the assessment to be viewed by employees and the general public.

Response: We agree. Facilities are being directed to post a copy of the product listing at a conspicuous location in their facility. Staff are directed to review all material safety data sheets for products used in their facility. Material Data Safety Sheets are available in each facility. DOCS will attempt to have this information available on the Department's website.

Internal Control Weakness: Without the required assessments being prepared, employees and the general public do not have the necessary information on what efforts

have been undertaken by the Department to comply with the Order and is not aware of the reason why products are being purchased that do not comply with the requirements of the Order.

Recommendation #3: Implement the use of environmentally preferred products; then update the manual to conform with the Order and distribute it to all facilities.

Response: We agree with the recommendation. The Department of Correctional Services, Division of Support Operation in conjunction with Division of Industries (Corcraft) has been developing and testing green cleaning products for use in all DOCS' facilities. The development and testing of the products and the process for packaging the products for final use in the facilities has been a lengthy process.

Corcraft is developing five conforming products:

- Heavy duty all purpose cleaner
- Glass cleaner
- Neutral floor cleaner
- Floor finish
- Floor stripper

Corcraft's latest schedule indicated that all of these products, with the exception of the neutral floor cleaner, will be available to our facilities on, or before, July 1, 2008. Neutral floor cleaner will be available mid summer. The new products will be introduced into the facilities on a HUB by HUB basis. Completion for all facilities is expected to take 8-10 months.

Recommendation #4: Issue Directives requiring all facilities to begin purchasing and using Corcraft's environmentally preferred products as soon as they are available.

Response: We will issue draft directives during the phase-in, requiring all facilities to begin ordering and using the environmentally preferred products as soon as their staff and inmates have received appropriate training in the use of the new products.

This program will include all DOCS' facilities, State Office Campus Building 2, and the DOCS' Training Academy.

Internal Control Weakness: Department officials state that they have not required landlords to comply with the Order because the landlord has the lease with the State Office of General Services and the Department believes that the Office of General Services is responsible for requiring the landlord to comply with the Order. We believe Department officials should have required compliance at this facility to provide their employees with the benefits associated with using environmentally preferred products.

Recommendation #5: Advise all landlords about the requirements of the Order.

Response: We agree. OGS has informed us that all new lease agreements will contain language specifying the use of green cleaning products. They are also conducting a mailing to all current lease holders urging them to use green products. DOCS has notified all landlords in writing that they must comply with the requirements of Executive Order 134.

Recommendation #6: Remind landlords to comply with lease provisions that require them to comply with all laws, rules, orders, ordinances, and regulations applicable to the Department.

Response: We agree. As cited above, OGS and DOCS have advised landlords to comply with the requirements of Executive Order 134.

Internal Control Weakness: While the Department has taken steps to comply with the Order, its progress has been slowed since they have made an effort to keep the current packaging method used and have it supplied by Corcraft.

Recommendation #7: Keep abreast of practices at other correctional systems that could be followed by the Department.

Response: We agree in part with the recommendation. Due to the magnitude of changing standard cleaning products and procedures in seventy DOCS' facilities, it was not practical or cost effective to introduce interim cleaning products into the facilities prior to the introduction of new Corcraft products.

Through DOCS involvement in the American Correctional Association (ACA) and the Department's Product Evaluation Committee, DOCS does consult with other correctional agencies on a regular basis to exchange ideas.

The audit report's references California, Washington and NYCDOC about their special packaging and control procedures via locked canisters. The Department has excellent control and accountability procedures in place for cleaning products. The Department's facilities, Training Academy, Industries, and Central Office are accredited by ACA. The ACA standard for the control and accountability of flammable, toxic, and caustic materials is a mandatory standard in which 100% compliance must be maintained and verified during an ACA audit in order to achieve accreditation status.

Sincerely,



Stewart R. Kidder
Director of Support Operations

SRK/slg

cc: Gayle Haponik, Deputy Commissioner
David Williams, Assistant Commissioner
Mark Shepard, Deputy Director of Support Operations
Deborah Coons, Director of Internal Controls
Peter Berezny, Internal Auditor III
Charles Hunt, Housekeeping & Laundry Supervisor