

Department of Public Works

Response

Case # 25-0004-I



CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

MEMORANDUM

March 4, 2025

Ms. Isabel Mercedes Cumming, Inspector General
Office of the Inspector General
100 North Holliday Street, Suite 640
Baltimore, MD 21202

RE: DPW Response to OIG Case #25-0004-I, Investigation
Report Date: February 13, 2025

Inspector General Cumming,

I would like to extend my gratitude to you and your team for your continued support of the Department of Public Works (DPW), specifically the Bureau of Solid Waste (BSW). Your thorough investigation identified several challenges, which we are actively addressing. Some of these areas include:

- Employee Training,
- Improvement to facilities and fleet, and
- Formalizing Safety and Compliance Standard Operating Procedures.

In particular, I would like to recognize you and your team for your invaluable assistance in helping us enroll over 100 additional solid waste employees in healthcare plans this past fall. The following pages contain detailed responses to the findings and recommendations in your report.

Overview and Background

As you have noted in this report and in previous reports, solid waste work, whether collecting trash and recycling, cleaning alleys and streets, or operating heavy equipment at the landfill or Northwest Transfer Station, are some of the most difficult jobs in the city. Comprised of over 700 employees working in six different divisions, BSW is responsible for collecting and disposing of residential trash and recycling, City-wide mechanical street sweeping, cleaning and boarding vacant properties, running the Rat Rubout Program, and offering specialized recycling collections of scrap metal, electronics, Styrofoam and household hazardous waste

Over the past 10-15 years, BSW underwent several significant changes as the City's economic conditions changed and the solid waste industry changed. In FY 2012, BSW had a total of 725 budgeted positions. Since then, it faced a steady reduction in staffing until it reached a low of 671 budgeted positions in FY 2021. These changes were necessary as the city recovered from the Great Recession and as the economics of the recycling industry essentially inverted. In the early 2010s, the City was making a profit off of recycling, selling recyclables to producers and manufacturers who were willing to pay for such materials. However, that has since changed given the ongoing high costs of collecting, processing, and sorting of recyclables. As with most other jurisdictions in the United States, the City now pays for private entities to take and process our recycling.

However, perhaps the greatest challenge facing BSW since FY 2012 was the COVID-19 pandemic. Essentially, overnight, municipal trash and recycling volumes increased 10%-15% as people began working from home. Waste and recycling that had been generated during workdays in commercial buildings, where private contractors collect trash and recycling, were now entering the municipal waste stream. This increased volume provided significant strain on BSW such that recycling collections and mechanical street sweeping were suspended so crews could assist with trash collections. Consequently, BSW started seeing many experienced workers retire or leave because of this additional strain. In addition, supply chain disruptions and persistently high inflation in purchasing supplies and equipment made it increasingly difficult to ensure mission-critical services were delivered quickly and efficiently.

Over the past four years under the Scott Administration, DPW has been working to reverse these trends and make meaningful improvements to BSW operations. Over the past two fiscal years, BSW staffing has increased, surpassing pre-FY 2012 levels. Additionally, critical funding has been provided to replace the entire fleet of load packers for routine services as well as the entire fleet of street sweepers.

Further, over \$60 million in capital funding has been programmed to improve BSW facilities. We expect improvements to begin at the Eastern Sanitation Yard at Bowley's Lane this Spring and construction to begin for a new Western Sanitation Yard at Reedbird Avenue this Summer. Construction of a new Southeastern Facility at Kane Street is expected in 2026 as is the construction of a new composting facility.

I am acutely aware of the ongoing challenges of BSW and assure you that there is nothing more important to me than the safety and health of our workers. The challenges faced by BSW have been ongoing and growing for years, but the Scott Administration has sought to address and solve the challenges in BSW and the root causes to improve the health and safety of workers while improving service delivery for the residents of the City of Baltimore.

As detailed in the attached response we are making significant progress with major investments in not only capital improvements but in our greatest asset: **our workers.**

Sincerely,

Khalil Zaied

Khalil Zaied
Director, Department of Public Works



March 4, 2025

Ms. Isabel Mercedes Cumming, Inspector General
Office of the Inspector General
100 North Holliday Street, Suite 640
Baltimore, MD 21202

RE: DPW Response to OIG Case #25-0004-I, Investigation
Report Date: February 13, 2025

Inspector General Cumming,

This correspondence will serve as the Department of Public Works' (DPW) official management response to the Office of Inspector General (OIG) Report of Investigation #25-0004-I, dated February 13, 2025 (Report). The Report contains information that covers the overall work environment and experience of Bureau of Solid Waste (BSW) Routine Services employees at the Eastern Sanitation Yard (Bowley's Lane) and Western Sanitation Yard (Cherry Hill). More specifically, the investigation outlined issues and provided recommendations in four different areas, including the following:

1. Operational issues and concerns
2. Injuries, discipline, and frontline supervision
3. Safety and training
4. Work resources, workplace culture, salaries, and hazards

Set forth below is a summary of DPW's response to the OIG's report, including measures that are already in place to address the issues identified in the report. DPW looks forward to continuing to work with the OIG.

I. OPERATIONAL ISSUES AND CONCERNS

The OIG provided the following findings and recommendations related to operational issues:

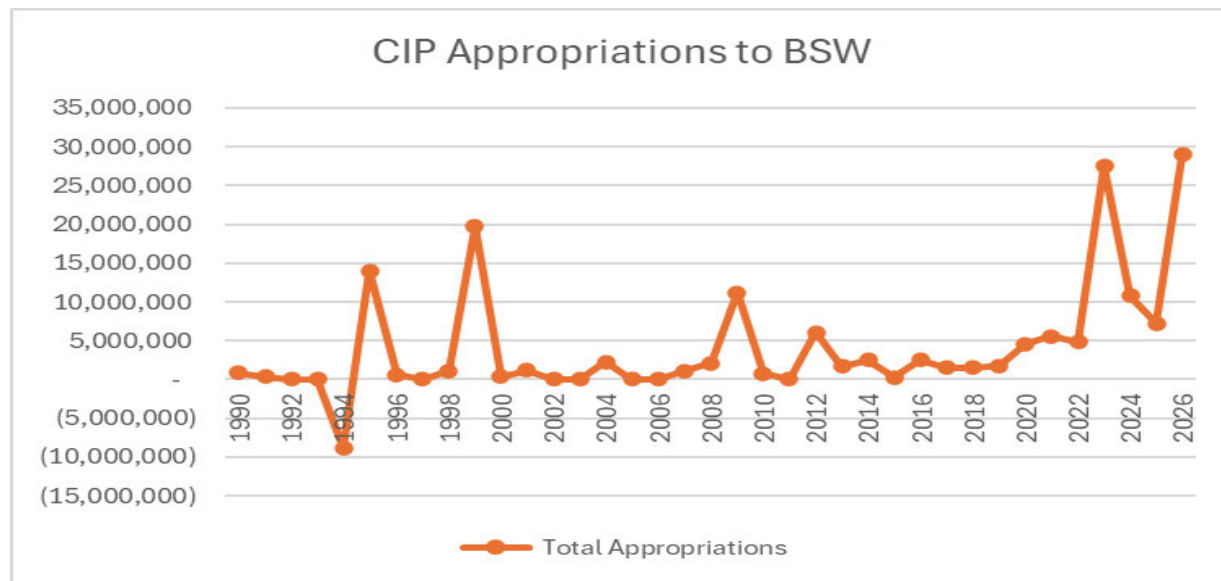
Finding 1: DPW and City leadership continue to work to ensure the facilities receive the funding and renovations that are sorely needed at BSW facilities. Due to a higher engineer estimate, the funding for the Bowley's Lane transfer station has not been solidified. Funding the Bowley's Lane transfer station construction could increase operational efficiency and provide better service to citizens as City trucks could dump their collections there rather than travel further to the landfill or the incinerator.

DPW has been working closely with the Department of General Services (DGS) and other support agencies to prioritize and complete work orders for minor repairs at the Bowley’s and Cherry Hill yards. The facilities that house and support the City’s mixed refuse and recycling collection crews (Western Sanitation Yard and Eastern Sanitation Yard) are the top priorities. As stated in the OIG report, in partnership with DGS, DPW has completed several short-term repairs, including but not limited to the following:

- Placement of a mobile trailer to be used as a cooling station
- Minor upgrades to bathroom amenities
- Cleaning of air vents
- Repair of locker room lockers
- Provision of portable AC’s
- Provided mobile coolers and tents as cooling stations
- Upgrading of kitchenettes in the administration area
- Painting of the interior doors
- Deep cleaning of trailers

(See Exhibit 1 for pictures and short-term repairs.)

Also, long-term plans to address infrastructure improvements at our BSW facilities are underway and integral to the City’s Capital Improvement Plan (CIP). As shown in the chart below, under the Scott Administration, the BSW has received the largest investment in CIP funding in decades:



The CIP includes over \$20 million in facility renovations/improvements and over \$42 million for facility reconstruction. More specifically, as part of our ongoing commitment to enhancing the facilities at the Eastside Sanitation Yard, the upcoming renovation of the men’s and women’s bathrooms and locker rooms is tentatively scheduled to start in Spring 2025. These improvements will provide modern amenities designed to better serve BSW staff. The renovations will include updated toilet and shower

fixtures with enhanced water pressure and temperature controls, modernized lockers, a dedicated lactation room for nursing mothers, a gender-neutral bathroom, and an upgraded HVAC system. These enhancements aim to create a more comfortable and welcoming environment for all staff members. This project is expected to be completed by Summer 2025.

As it relates to the construction of the East Side Transfer Station, DPW is taking a phased approach:

1. Phase I addresses employee building conditions - \$24M, fully funded
 - Renovate the existing Administrative and Worker facilities
 - Develop a Tier I Compost facility
 - Restructure and update the RDOC
 - Install one scale to service both composting and RDOC
 - Update employee parking and truck parking areas
 - Update and install new stormwater management systems
2. Phase II, Citizen needs - \$5M, fully funded
 - Composting facility
3. Phase III - \$42M, funding pending
 - Full-scale transfer station development

Design for all three phases is expected to be completed by Winter 2026. (See Exhibit 2).

Finding 2: OIG recommends that DPW implement changes to the trash routes and consider re-reviewing recycling routes due to areas of the city recycling at disproportionate rates.

In 2021, to improve Baltimore's trash and recycling collection services, DPW hired Rubicon (purchased by Routeware in 2024) to work with its Routine Services Division to conduct an audit of both trash and recycling routes. More specifically, DPW sought an integrated solid waste routing software to improve its services, digitize trash and recycling collection routes to make routes available to drivers in an electronic form and not dependent on each driver. Further, creating more efficient and balanced routes that are accurate and consistent will enable a flexible and responsive operation. Such optimization provides DPW with the ability to capture and analyze operational data for decisions, performance measurement, and other activities that are foundational to a sustainable operation. The goal remains to bring Baltimore's Routine Services in line with industry standards in terms of route sizing and performance standards while focusing on its mission. This study concluded in 2022 and DPW began implementing the recommendations, resulting in recycling routes being optimized. Additionally, Rubicon's audit of the trash routes produced the following findings:

- More than 60% of Baltimore residents receive trash collection in a rear alley, thus increasing service times due to slow speeds at which vehicles are forced to maneuver in tight alleys or crews collecting trash on foot and bringing it to the vehicle.
- Current operations demonstrate 20% larger routes than the recommended industry standards.
- 40% of routes are even larger than Baltimore's average route size of 1,173 stops.
- 17% of Baltimore's routes are below the industry standard of 950 stops per route.

Current State – Trash Routes (Rubicon Report)

Trash Collection Days	# of Routes	# of Stops	Average #of Stops/Route
Tuesday	45	50,097	1,113
Wednesday	45	56,375	1,253
Thursday	45	50,230	1,116
Friday	44	51,945	1,181
Weekly	179	208,647	1,166

Upon review of Rubicon’s findings, DPW is working to implement the following proposed recommendations to optimize trash routes:

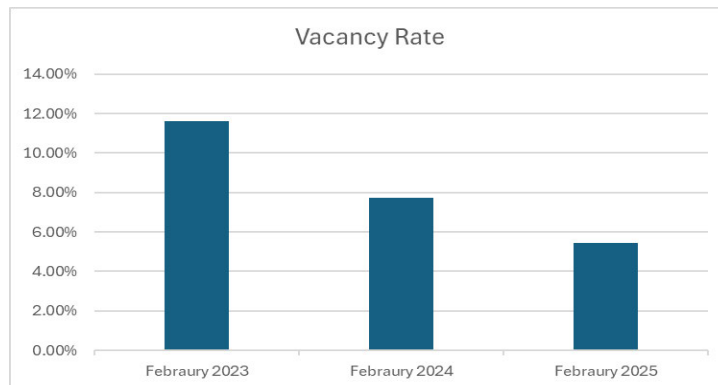
Summary of Route Structure Change Recommendations for Routine Services

	Status as of 2022	Future (OPTIMAL State - 2026)
Route Count	Trash: 45 Daily Routes Recycling: 10 Daily Routes (Bi-Weekly Collection)	Trash: 55 Daily Routes Recycling: 40 Daily Routes (Weekly Collection)
Fleet Size	101 Rear load packers	149 Rear load packers
Personnel	Solid Waste Drivers: 66 Solid Waste Workers: 132	Solid Waste Drivers: 114 Solid Waste Workers: 228

The agency plans to conduct route audits every 5 years.

Finding 3: The lack of proper staffing levels has negatively impacted solid waste operations. In DPW’s emergency request for the recent Spindler contract to provide personnel, DPW noted difficulty filling positions due to competitive wages from non-City and private employers

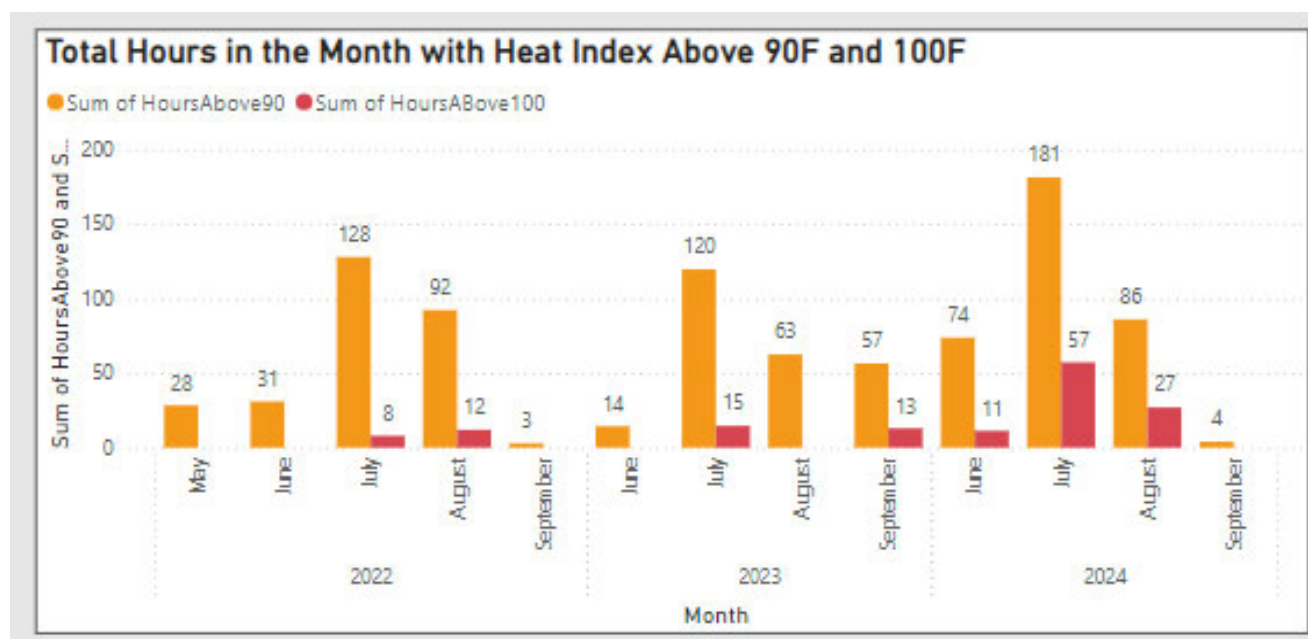
The FY 2025 budget has 729 positions for BSW, which is up from 671 in FY 2021. The BSW vacancy rate of approximately 5.45% is the lowest in the last three years, even with positions being added for weekly recycling. See chart below:



However, as highlighted in the OIG report, there is a challenge in maintaining staffing levels when employees are absent or injured. In response, DPW is collaborating with the City Administration to optimize staffing levels for routine services. Additionally, DPW is working on hiring Seasonal Maintenance Aides to help build a pool of employees who can support operations during the busy summer months of June to September. The agency is also actively engaging with the City Administration and the Department of Human Resources to review pay structures and ensure that BSW workers are compensated with competitive wages. Implementation of that study and adjustment to the employees' salaries is subject to collective bargaining and the City is currently negotiating with unions that provide labor to the City, including those employees referenced in the report.

Recommendation 4: The addition of new vehicles to DPW's fleet is noteworthy, but the OIG suggests that DPW work closely with DGS to maintain vehicle maintenance and ensure drivers complete pre-trip inspections without fear of retaliation for identifying an issue. All vehicles, including those of DPW chiefs, superintendents, and supervisors, should have active GPS installed for accountability and safety purposes.

As it relates to the BSW fleet, in the summer of 2024, the total number of hours with a heat index between 90F and 100F was unprecedented, particularly in July 2024. (See Exhibit 3).



Therefore, in the summer 2024, DPW directed that all drivers must check their trucks to ensure air conditioners and/or heat was working before routes begin. Working air conditioners and/or heat became a condition to operating the vehicles. Resultingly, all trucks that did not have working air conditioning were placed out of service and forwarded to DGS for repair and maintenance. To further enhance its fleet maintenance operations, DPW has implemented key operational improvements. As part of daily task, DPW now requires drivers to conduct daily checklist inspections of all trucks before routes begin. These inspections focus on ensuring that critical components, such as air conditioning system and heating, are functioning properly to protect staff from extreme weather. Upon being reported by the driver, trucks that do not have functioning heat and/or AC will be sent for immediate maintenance to avoid service disruptions and protect the health and safety of personnel. Additionally,

DGS has agreed to keep a pool of some of the older fleet (with operating AC) as a backup when the new trucks need repair.

Moreover, the Director of DPW instructed BSW to equip each truck with portable battery chargers to ensure that employees' communication devices used in conjunction with Rubicon remain charged throughout the day, which is critical for tracking and optimizing collection routes (**See Exhibit 4**). This initiative will enhance operational efficiency by preventing data disruptions and ensuring that supervisors have real-time access to route performance and fleet status. DPW concurs with the OIG's recommendation that all vehicles, especially those that belong to the DPW chiefs, superintendents, and supervisors, should have active GPS installed for accountability and safety purposes and is actively working with DGS to ensure that vehicles have GPS trackers installed and actively working.

DGS Fleet has also developed a Navman (AVL) training course. DPW is currently partnering with DGS to train their authorized personnel on the operation of the Navman system.

DPW is partnering with DGS on training BSW employees on Pre/Post trip inspections (**See Exhibit 5**). DGS is currently working with BSW to tailor the class to specific assets, ensuring it is comprehensive. DGS continues to provide manufacturer training for all new assets. Whenever a new asset or batch of assets is received, DGS arranges on-site training for agency personnel, including DPW personnel. This training serves as both a refresher for experienced operators and an introduction for new hires. DPW is working with DGS Fleet to ensure that HVAC is included in DPW's moving vehicles. From dump trucks to packers to skid-steers, we ensure that HVAC is included as an option in all specifications when ordering new equipment.

BSW Fleet Replacement

Since March 2022, DGS has been working closely with DPW's BSW to replace the aging Packer Fleet, including 16 cubic-yard vehicles, front-end loaders, 8 cubic-yard vehicles, and 25 cubic-yard vehicles. Funding for this initiative was secured through a combination of financing through the City's master lease and funding from the American Rescue Plan Act. The first purchase order (PO) was issued in July 2022. To date, DGS Fleet has secured orders for: a) 95 – 16 cubic-yard vehicles (Everyday Units for trash/recycling collections), b) 15 – 8 cubic-yard vehicles (Mini-Pack Units for Special Ops), and c) 3 – front-end loaders (EX Pack Units for Bulk Containers). Out of these orders, the DGS has placed in service: a) 65 – 16 cubic-yard vehicles, b) 9 – 8 cubic-yard vehicles, and c) 3 – front-end loaders.

- **Camera Systems**

DGS Fleet now includes Brigade 360 camera systems on all assets where available. All incoming Packers, Sweepers, Vactors, Dump Trucks, Light Equipment, and more are equipped with exterior cameras that record and store data.

- **Standard Replacement Program**

DGS Fleet is partnering with DPW's BSW to establish a standard order for replacement assets across all major service groups. This includes Packers, Container Trucks (Hook Lifts), Heavy Equipment (Landfill and Transfer Station), and Street Sweepers. This collaboration will ensure BSW's fleet maintains a continuous replacement program, replacing units before they deteriorate.

- **Flat-Rate Services in Workorder System**

DGS Fleet has introduced two mandatory flat-rate services in our Work order system for all Preventive Maintenance (PM):

- A/C Function Check: To be performed at the beginning of Spring through Summer and Fall months.
- Heater Check: To be performed at the beginning of Fall through Winter and Spring months.

- **Cooler Racks for 16-Yard Packers**

DGS Fleet has collaborated with vendors to custom build cooler racks, with supplied coolers, for all 16-Yard Packers (Everyday Units). All new units come with this upgrade, and we are working on a campaign to upgrade all current older units, which will be completed by Summer 2025.

- **POs for Supervisor Fleet Upgrades**

On 12/06/2024, DGS Fleet generated purchase orders for the acquisition of 18 F150 Hybrids and 8 Ford Escape Hybrids. These vehicles will replace the current fleet for BSW supervisory staff. The first batch of units is expected to arrive in April 2025, and all incoming and current units will have AVLs installed.

Recommendation 5: Regarding supplies and equipment, the OIG recommends that DPW continually seek feedback from the frontline workers, especially when uniform changes are considered. Further, worker test programs could help facilitate this feedback before buying items in large quantities. The OIG also requests that DPW review the creation of a root-cause problem-solving group or the development of a process improvement team to address frequently arising issues and improve operations.

DPW is committed to actively seeking feedback from front-line workers. As of January 2025, the BSW Acting Bureau Head has implemented monthly Employee and Management Committee meetings, which are designed to foster open communication and collaboration between management and front-line employees. Each meeting is composed of a management representative, a front-line employee, and an alternate representative from each BSW location. **(See Exhibit 6)**. These sessions provide an important platform for BSW Leadership to share crucial updates with the staff. These meetings also allow front-line employees to collaborate with management on innovative ideas to improve their work environment, voice feedback, raise concerns, and seek resolutions to any issues they may encounter in their day-to-day operations.

DPW remains committed to identifying and resolving systemic issues that may impact efficiency, effectiveness, and employee satisfaction. To that end, DPW has created a Leadership Safety Steering Committee that focuses on analyzing underlying causes of operational problems, facilitating collaborative solutions, and implementing corrective actions. This group consists of cross-functional stakeholders, including management and subject-matter experts, to ensure that a variety of perspectives and expertise are brought to the table **(See Exhibit 7)**.

Additionally, effective February 25, 2025, DPW started its inaugural Frontline Safety Steering Committee. This frontline committee aims to involve the frontline workers, who will meet monthly to discuss enhanced safety practices and protocols. This frontline expanded safety steering committee will aid and advise on matters of safety and health pertaining to DPW operations. Its primary role will be

to promote a safety culture by identifying potential hazards within the workplace and improving overall workplace safety.

DPW has also reestablished its Accident Review Board, which will consist of a chairperson, safety officer, team leader, and technical subject expert. The primary goal will be to thoroughly review all aspects of an accident, including witness statements, incidents reports and vehicle data to determine root causes, ultimately aiming to improve overall safety within an organization. The committee will share findings and recommendations with relevant personnel including management, employees, and drivers to promote safety awareness and accountability.

To gather feedback from its workforce, DPW proactively conducted Engagement and Pulse Surveys in 2023 and 2024. To ensure broad participation and foster trust, DPW distributed the surveys in paper format, assured employees of confidentiality, and held numerous in-person sessions. This comprehensive approach led to a participation rate of over 50% for both surveys (**See Exhibit 8**).

Furthermore, DPW organized action plan sessions to reinforce its commitment to listening to employees' confidential input. These sessions provided supervisors with the opportunity to see sample action plans from their peers and encouraged them to conduct similar sessions with their staff and take meaningful actions based on the feedback received.

Additionally, DPW participated in the Citywide Employee Voice Survey, which was administered through Workday. In collaboration with the Department of Human Resources, DPW successfully organized a series of 28 outreach events, with 50% of these specifically tailored for the BSW (**See Exhibit 9**). These events were strategically designed to encourage employees to participate in the survey, while also providing essential support and guidance in navigating the Workday platform to complete the survey efficiently. Through these efforts, DPW successfully gathered input from 34.8% of its employees.

DPW is also in the process of surveying our BSW workers regarding their PPE needs and overall safety concerns. Employees were encouraged to scan the attached QR code and complete the survey. One hundred and sixty-nine (169) BSW employees completed the survey and stated that:

- They liked heated jackets provided (**52.1%**)
- Did not have any issues with the PPE provided (**76.9%**)
- Felt adequately trained on how to use their PPE (**72.8%**)
- Have not encountered any safety concerns or hazards recently (**78.8%**)

(See Exhibit 10 for details on the survey as posted at the BSW facilities)

Further, DPW also provides its employees several channels to provide anonymous feedback or raise concerns on any workplace conditions, questions or concerns. DPW employees can now report their concerns anonymously through the following methods:

- Email: speakupdpw@baltimorecity.gov
- Phone: **410-396-1124**
- Online: Microsoft Form accessible via QR code

This tipline is part of DPW’s broader effort to create a transparent and supportive environment where employees feel empowered to voice their concerns without fear of retaliation (**See Exhibit 11**).

By adopting a structured approach to problem-solving and process optimization, DPW aims to proactively address issues before they escalate, improve overall operations, and foster a culture of continuous improvement within the organization. DPW will continue to assess and refine this approach, ensuring that the team is equipped with the necessary resources, support, and authority to implement meaningful changes that benefit both employees and the community we serve.

Recommendation 6: The OIG learned that DPW utilized a priority list to address citizen complaints received, and some addresses would stay on the list for months even if the issues appeared to be resolved. The OIG encourages DPW to review how long addresses stay on follow-up after complaints are received.

The agency has updated its procedures to address citizen complaints. Addresses stay on the list until resolved.

II. Injuries, Discipline, & DPW Management

Recommendation 7: The investigation uncovered that in 2024, 154 of the 293 BSW injuries that occurred were Bowley’s Lane or Cherry Hill employees. The OIG recommends that DPW formalize a standard operating process and conduct comprehensive training for injuries, especially in the solid waste division, where the work is ranked the fourth deadliest job in the United States. The standard operating process should also include a light duty program to alleviate confusion regarding assignments and return-to-work processes.

DPW has created a formalized standard operating procedure (SOP) specifically addressing accidents and incidents notification procedures, which includes procedures on how to address injuries. Additionally, DPW adheres to the City’s Administrative Manual 204-10, which outlines protocols for job-related injuries. Further, DPW has a practice of accommodating light-duty assignments when recommended by ██████ Clinic—the city’s occupational health clinic service provider. DPW works diligently to accommodate reasonable accommodations. DPW has proactively scheduled training sessions for BSW employees on Accident and Incident Reporting, set to take place in May 2025. During DPW’s new employee welcome experience all new employees receive comprehensive training on the City’s Job-Related Injury and Illness policy. (**See Exhibit 12**)

BSW employees have already received comprehensive trainings on Slips, Trips and Falls, Cold Weather, Heat Illness (**See Exhibit 13 for training dates**), and additional refresher sessions on Heat Illness scheduled for April 2025. In collaboration with the City’s Bureau of Risk Management, DPW is finalizing the following proposed extreme weather plans and standard operating procedures (SOP): a) Heat Illness Prevention Plan b) Cold Stress and Illness Prevention Plan, c) Extreme Heat Weather Safe Operating Procedure SOP d) Extreme Cold Stress Weather SOP and e) Accident/Incident Notification SOP (**See Exhibit 14**).

DPW remains deeply committed to the health, safety, and well-being of its employees. As part of this ongoing commitment, DPW will also be incorporating a Light Duty Program SOP into its suite of employee safety protocols.

Recommendation 8: The OIG recommends that DPW report any concerns with the ██████ contract to the Worker's Compensation Division in the Law Department and Risk Management. The OIG also learned that ██████ Clinic is inconvenient for many solid waste employees to travel to and are reportedly not conducting physical evaluations.

DPW continues to collaborate with Law Department and Risk Management on any reported concerns that DPW has with ██████ Clinic performance. Since 2002, ██████ has served as the city's occupational health clinic service provider. More specifically, the clinic provides such services as preventative health and wellness initiatives, immunizations, work-related medical tests and addresses workplace injuries.

Recommendation 9: The OIG encourages performance evaluations to be completed for frontline employees and supervisors. Disciplining employees without documenting or providing feedback on job performance lowers morale. Further, it creates the appearance that there is a lack of accountability for frontline supervisors. DPW should also work to ensure that new solid waste employees receive one-on-one explanations of the discipline process, especially regarding occasions.

DPW acknowledges that while performance evaluations were encouraged previously, DPW is now collaborating with the Department of Human Resources (DHR) to ensure participation and compliance with the evaluation process moving forward. Additionally, the agency has partnered with DHR to provide digital literacy training to bridge the digital and literacy divide as the performance review process begins with self-reviews. Understanding the challenge with completing performance reviews/evaluations, DPW is actively working on implementing easier ways for supervisors and employees to complete performance evaluations.

More specifically, DPW is currently developing a comprehensive, hands-on Performance Management training program designed specifically for Routine Services Supervisors. This program will provide Supervisors with the necessary tools and knowledge to effectively create annual goals for their employees while receiving direct training. The primary objective of this initiative is to ensure that each Routine Services employee is aligned with clear, measurable objectives that support both individual and organizational success.

As part of the training, Supervisors will be guided to establish two SMART (Specific, Measurable, Achievable, Relevant, Time-bound) goals for each employee—one focused on performance and the other on safety. These goals will not only be communicated to employees but will also be actively tracked throughout the Performance Cycle, ensuring continuous feedback and progress monitoring.

Lastly, during DPW's new employee welcome experience all new employees receive comprehensive training on the City's Attendance Standards Policy and various City policies (See Exhibit 15).

Recommendation 9: At the time of their interviews, workers believed their supervisors did not support them, did not care for their safety, did not handle injuries properly, and were unwilling to assist. The frontline supervisors require comprehensive training, especially in conflict management and de-escalation. Once trained, these supervisors should be held accountable to the standards outlined in the training. Additionally, the OIG encourages DPW to review the process of promoting based on seniority.

DPW has provided comprehensive management training to supervisory staff through the "Accountability in the Workplace" courses. These courses cover essential topics, including accountability, agency expectations, and critical policies such as the Substance Abuse Control Policy, Attendance Standards, Equal Employment Opportunity (EEO) Policy, Workplace Violence Policy, Sexual Harassment Policy, and the Arrest, Charges, and Convictions Policy. Additionally, the training addresses employee management, corrective action, disciplinary processes, and the handling of grievances.

These sessions were designed to ensure that supervisors are well-equipped to manage their teams effectively, address workplace safety concerns, and maintain a safe and compliant work environment. In addition to Accountability in the Workplace, BSW leadership has also received training on Absence Management and Grievance Procedures (**See Exhibit 16 for training details**). DPW's Human Resources Team is revamping its HR University training to ensure that its managers in Solid Waste and throughout the agency are trained in the entire employee life cycle.

Accountability in the Workplace

- April 12, 2023
- April 20, 2023

Family Medical Leave Training

- December 4, 2024

Grievance and Workplace Violence Training

- September 30, 2024
- November 21, 2024

The agency collaborated with the City's Department of Human Resources to provide mandatory Workplace Connection and Having Crucial Conversation training on October 21, 2024, and October 28, 2024, to all the supervisors in the Solid Waste Bureau to empower them with the tools and resources to hold their employees accountable and not be fearful of them. (**See Exhibit 17**). Additionally, some Routine Service Supervisors are scheduled to participate in the first cohort of The Leadership Pathway training program provided by DHR beginning March 2025. The goal is to have all BSW supervisors eventually participate in this cohort. This mandatory DHR leadership cohort will provide comprehensive training to leaders on:

- Enhancing or learning leadership, management, and supervisor behaviors and principles.
- Understanding the critical role of leading, managing, and supervising.
- Recognizing and being able to apply appropriate strategies and methods when working with employees.
- Constructing a personal leadership narrative with fair and consistent practices.
- Understanding Baltimore City policy and the role a supervisor has in each of the policies.
- Developing critical thinking skills, and practice decision making.
- Obtaining a comprehensive set of actionable skills and tools to rely on through leadership, management, and supervision tasks.

Starting in August 2024, BSW Assistant Superintendents, Superintendents, Chiefs, and Acting Bureau Head in collaboration with DHR, participated in a six-month Executive Coaching Program for Leadership Alignment. They participated in six monthly coaching sessions where they engaged in structured activities, completed assignments, and reviewed relevant videos. These sessions focused on aligning their leadership approaches, fostering a unified strategy towards goals, and improving overall accountability. The details of the program are as follows:

- 8/15/24 – Simple Symbol Assessment
- 9/12/24 – Workplace Connection
- 10/10/24 – Delegation
- 11/21/24 – Having a difficult Conversation
- 2/13/25 – Customer Service
- 3/20/25 – Public Speaking

(See Exhibit 18)

DPW is also actively interviewing to hire its own Industrial Hygienist to address workplace occupational safety and health concerns. The position will ensure constant awareness of health and safety conditions and compliance with Maryland Occupational Safety & Health (MOSH) regulations and other applicable rules. DPW leadership is committed to maintaining an accessible, positive, and safe work environment. Leadership will be held accountable if work standards are disregarded. If any employee feels unsafe on the job or facing challenges in the workplace, we encourage them to contact our internal employee tip line via phone or email. Our employees are the backbone of DPW's operations, and we remain steadfast in our commitment to supporting their safety, well-being, and professional development.

III. Training and Safety

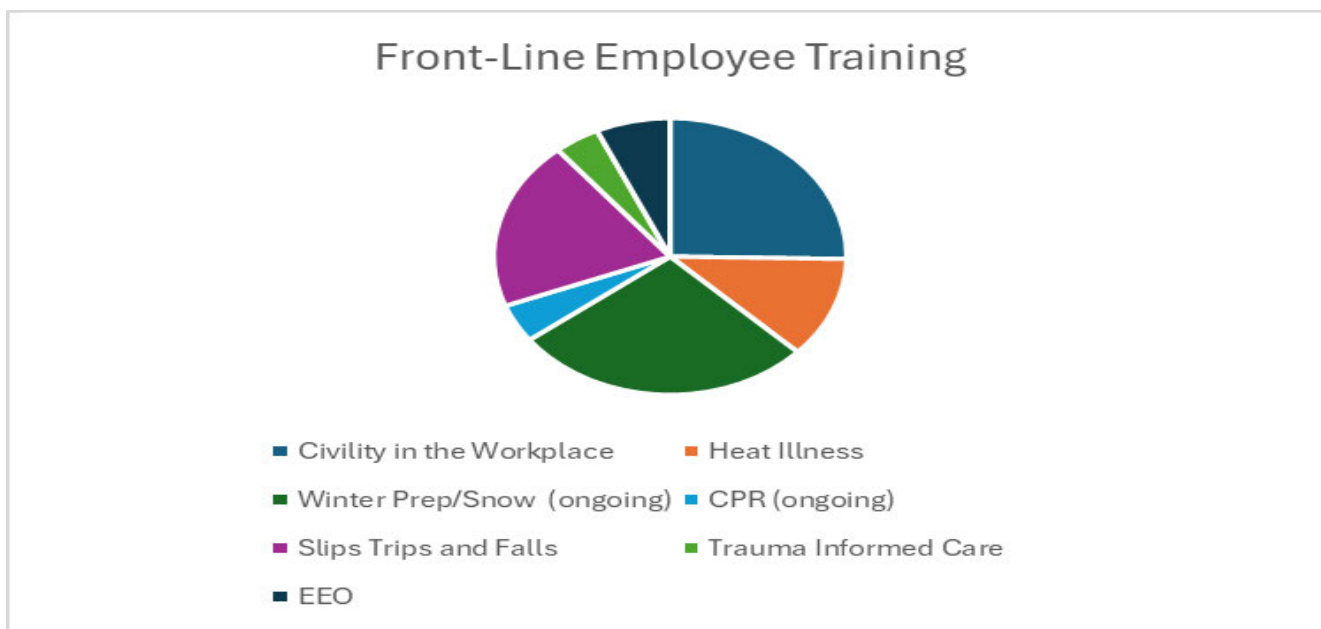
Recommendation 10: The investigation revealed that DPW lacks a comprehensive job training program for new solid waste workers and drivers. The current on-the-job training that is provided contributes to an unsafe work environment and increases the chances of injury. The OIG suggests DPW solicit input from workers and create a standard operating procedure and training class for new workers before they work a route. While DPW drivers attend a driving class, they should also be shown how to navigate the City's tight alleyways before their first day driving on a route. DPW should consider developing a mentorship program and work to identify individuals with leadership qualities who may be able to fulfill the trainer role.

DPW has made significant investments in a range of comprehensive training initiatives aimed at empowering Solid Waste staff and enhancing their overall workplace experience. These efforts are designed to not only improve skill sets but also foster a culture of safety, collaboration, and employee morale.

To date, DPW has successfully conducted a variety of in-person training sessions that address essential topics such as the following:

- **Civility in the Workplace:** Promoting a respectful and professional work environment.
- **Winter Preparedness Training:** Equipping staff with knowledge and strategies for handling winter-specific challenges.
- **CPR/First Aid/Emergency Response Training:** Starting in October 2024, with ongoing weekly sessions to ensure all staff are equipped with lifesaving skills.
- **Digital Skills Training:** Starting in November 2024, with ongoing sessions designed to strengthen technological proficiency.
- **Slips, Trips, and Falls:** Educating staff on how to prevent common workplace accidents.
- **Trauma-Informed Care:** In partnership with the City’s Health Department, focused on supporting employees in understanding and responding to trauma.
- **Equal Employment Opportunity (EEO)/Anti-Retaliation Training:** starting in October 2024, DPW’s Equal Employment Opportunity (EEO) office began conducting training sessions with DPW supervisors on various EEO subjects including but not limited to: EEO rights and responsibilities to employees and supervisors, top EEO red flags, key EEO laws, City EEO policies, leadership’s role in promoting EEO. DPW’s EEO office’s primary goal is to ensure a fair and respectful work environment.
- **OSHA 300 LOG Training-** Educates staff on how to correctly record workplace related injuries, and illnesses, etc. on the required OSHA forms ensuring compliance with OSHA standards/regulations.
- **Heat Illness Prevention Training** – Ensure that employees recognize heat stress hazards and act appropriately to address those hazards.

See the chart below for approximate training data:



(See Exhibit 19 for detailed training information)

In addition to these efforts, the following training sessions are currently being scheduled to further enhance staff preparedness and safety:

- **Employee Incident/Accident Procedure**

- **Bloodborne Pathogens**
- **Heat Illness Refresher**
- **Pre/Post Trip Inspections**
- **Workplace Violence**

DPW is proactively exploring strategies to ensure that employees who may have missed these trainings are provided with an opportunity to attend them. Further, effective March 5, 2025, an additional half-day orientation will be implemented specifically for front line employees. This training module will involve a comprehensive onboarding process designed to address key safety protocols and job-specific skills, to ensure that all new employees are fully equipped and prepared for their first day on the job.

During the driver training segment of the new employee orientation, Solid Waste Drivers receive specialized training on navigating the City's tight alleys, a vital skill for ensuring safe and efficient operations. DPW plans to conduct supplemental hands-on training for new routine services drivers before assigning them a route. This supplemental hands-on training will primarily focus on navigating tight alleys. In addition, DPW plans to conduct hands on refresher training for all routine services drivers and employees on navigating the tight alleys in the city.

DPW acknowledges the value of a mentorship program and will explore the feasibility of implementing this initiative. DPW will continue to obtain input regarding enhancing its training opportunities via the employee/management committee meetings. Through these ongoing and upcoming initiatives, DPW is committed to the continuous professional development of its Solid Waste staff, ensuring that they are supported, trained, and empowered to perform their roles safely and effectively.

Recommendation 11: DPW, along with other agencies, should strive to have comprehensive safety programs that prioritize employee safety. Heat training must be completed at all levels of BSW and tied to employees' work experience. These trainings should be followed by refresher courses and classes. Supervisors must understand the importance of employee safety and be mindful of mandatory breaks. DPW will need to develop processes to ensure that workers are taking proper precautions due to the task work environment. DPW's safety steering committee should include solid waste workers and drivers to maximize its effectiveness and impact. When conducting training, DPW must explain how the topic applies to their jobs. Further, the OIG recommends that DPW work with Risk Management to conduct a safety analysis of solid waste positions and review ways to decrease the number of injuries.

DPW is fully committed to ensuring the health and safety of its employees, particularly when it comes to the critical issue of Heat Illness prevention. In Summer 2024, DPW conducted comprehensive Heat Illness training for its employees, equipping them with the knowledge and strategies necessary to protect themselves in extreme heat conditions. To reinforce this commitment, the agency is in the process of scheduling a refresher training session on Heat Illness for May 2025. This session will be mandatory for all employees across the BSW, ensuring that staff at all levels are well-prepared to manage heat-related risks. Additionally, as part of the new employee orientation process, all incoming staff will also undergo this vital training to ensure they are informed from the onset of their employment.

DPW is currently finalizing its Heat Illness Protection Plan in collaboration with the City's Bureau of Risk Management. This comprehensive plan, which will be shared with the labor partners for input,

outlines the agency's detailed processes for ensuring that all workers take the necessary precautions to safeguard their health while performing their daily duties. This plan is in alignment with the new MOSH guidelines.

In addition to these efforts, DPW has established a Safety Steering Committee, which plays a crucial role in identifying and addressing the underlying causes of operational challenges. This committee facilitates collaboration across departments, bringing together a diverse group of stakeholders, including management and subject-matter experts, to develop and implement effective solutions and corrective actions. The committee's focus is on addressing the root causes of various safety-related issues and working to improve overall operational efficiency and employee well-being.

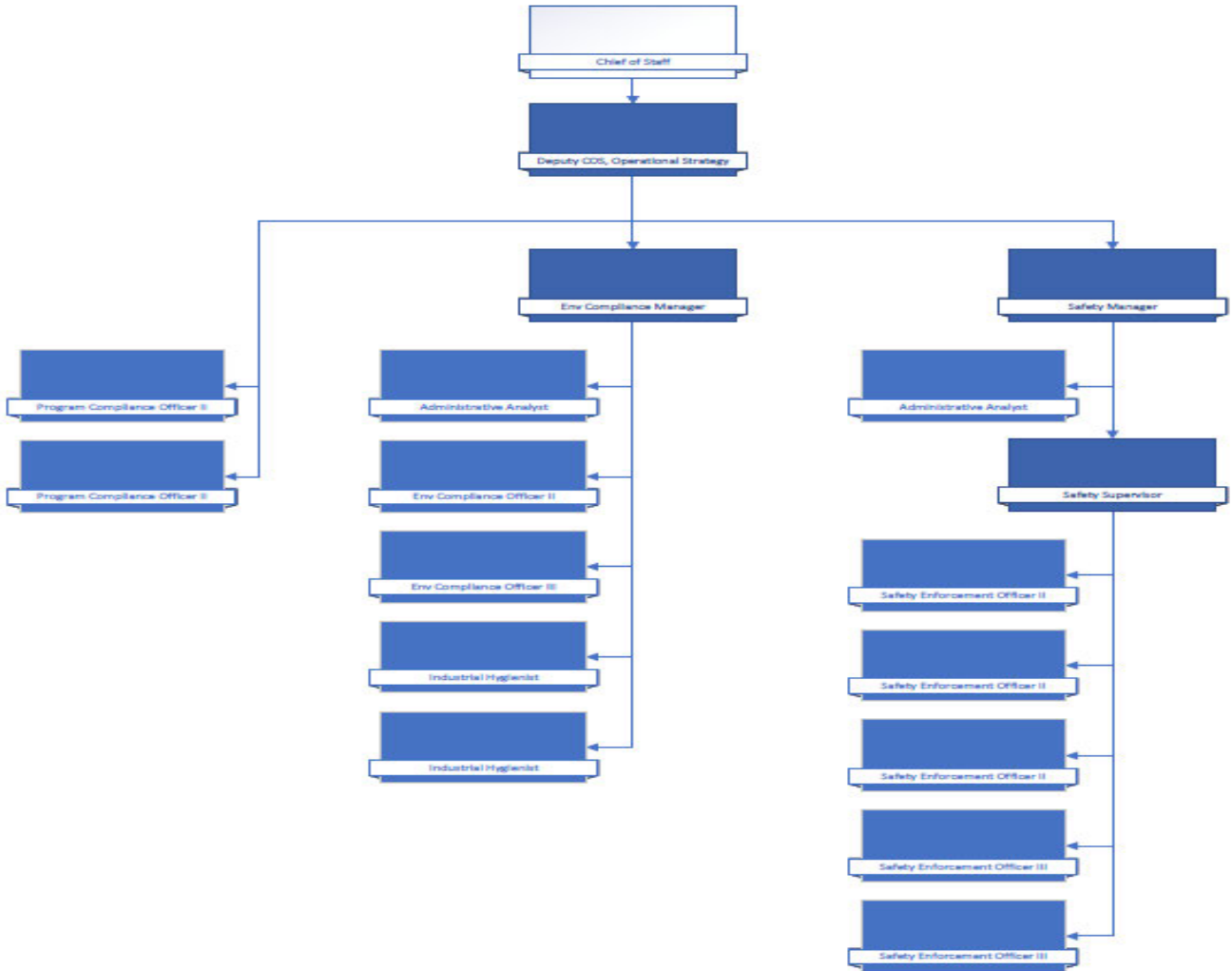
As discussed above, DPW has revitalized its Accident Review Board to further strengthen its approach to safety management. This committee focuses on systematically reviewing accidents, identifying key contributing factors, and implementing necessary measures to prevent future incidents.

DPW is committed to creating a safer and more supportive workplace for all employees and prioritizing proactive measures that not only address immediate concerns but also foster a long-term culture of safety and continuous improvement.

Finding 12: Regarding the two safety divisions within DPW, ERCS and OSTPD, the investigation revealed that the confusion surrounding roles and responsibilities has impacted trainings and responses to incidents. Streamlining and formalizing processes with a focus on incident response is critical when crises occur. Additionally, workers cited radios as an effective resource during emergencies.

DPW conducted an internal reorganization to consolidate all Safety personnel under a single Division. This restructuring aims to streamline all safety communication, improve coordination, and enhance collaboration across the department. By centralizing safety functions, DPW will ensure a more efficient and unified approach to emergency preparedness and response, particularly in addressing HIPP. See the detailed organizational chart below:

Safety and Environmental Compliance Organizational Chart



Further, DPW has drafted a proposed Heat Illness Prevention Plan (HIPP) and supplementary proposed policies and procedures, including but not limited to the following: a) Cold Stress and Illness Prevention Plan, b) Extreme Heat Standard Operating Procedure, c) Accident Incident Notification Standard Operating Procedure, and d) Extreme Cold Stress Weather Standard Operating Procedure.

DPW identified the need for the radios and has been working on acquiring used radios for SW staff with assistance from another agency. Radios have to be configured to ensure compatibility with BSW’s system. We anticipate having radios implemented by Summer 2025. Per the Accident/Incident Notification Standard Operating Procedure and training, employees are instructed:

- To Dial 911 in case of a medical emergency and request an ambulance. Provide location, nature of injury or illness, hazards involved, and the nearest emergency access point.
- In case of emergency first call 911. If there is a radio available in the vehicle, then via the radio notify Control One immediately. If a radio is not available in the call your supervisor to notify Control One and Safety Office.

IV. Worker's Resources, Salaries, and Job Hazards

Recommendation 13: The OIG recommends that DPW leadership work to provide additional resources for employees, including:

- *Bi-weekly onsite visits by a designated counselor/social worker or EAP representative.*
- *Comprehensive explanations of the City's health insurance options and waiver credit upon hire and during the benefit enrollment periods.*
- *Form equity affinity groups that are tailored to the solid waste workers.*

DPW is taking the following steps to address the well-being and needs of our workforce:

Proposed Bi-weekly Onsite Visits by a Designated Counselor/Social Worker or EAP Representative: DPW acknowledges the need for ongoing mental health and emotional support for our employees, especially in high-stress roles such as Solid Waste workers. We will work with our partners at DHR, Employee Assistance Program team and discuss potential bi-weekly visits to provide employees with easy access to confidential support, counseling, and resources, promoting mental well-being and overall resilience within the workforce. To encourage employees to contact EAP on their own, DPW has posted EAP flyers all over the BSW. In collaboration with our partners at DHR, DPW is also exploring additional resources for counseling and mental health resources for BSW employees. In addition, DPW introduced employees to Roberta's House, a Family Grief Support Center, which provides therapeutic counseling and support. As discussed above, DPW partners with City's Health Department to provide trauma informed care training, focused on supporting employees in understanding and responding to trauma.

DPW Chaplaincy Program- DPW is currently conducting its due diligence regarding creating a chaplain advocacy group. Starting in January 2025, DPW began coordinating with the Baltimore City Fire Department's Chaplaincy Program to collaborate with BCFD on creating policies, procedures and training for the proposed DPW employees who have expressed interest in serving on DPW's Chaplaincy board, if and when implemented. The objective of DPW's proposed Chaplaincy Program is to provide care, comfort, and compassion to our personnel who experience trauma, through the use of qualified individuals through a comprehensive non-denominational Chaplaincy Program. The proposed program will be composed of volunteer DPW employees who have been trained in chaplaincy and crisis response to assist DPW employees when requested.

Comprehensive Explanations of the City's Health Insurance Options and Waiver Credit: DPW- Human Resource provides comprehensive explanations of health insurance plans, waiver credits, and other benefits are provided to newly hired employees. Due to the insightful report from the Office of the Inspector General (OIG), which brought much-needed attention to the number of BSW employees without health insurance, a collaborative effort was launched with the Department of Human Resources' (DHR) Benefits Division. This partnership resulted in a series of informational sessions specifically designed to equip BSW employees with the essential tools to effectively navigate their health insurance options.

The OIG's assistance was pivotal, as the OIG personally reached out via text to the 134 employees who were without insurance, ensuring that they were informed and encouraged to take action. Thanks to this outreach and the combined efforts of all parties, during last year's Benefits Enrollment period, DPW was able to successfully enroll 100 out of the 134 previously (approximately 74%) uninsured BSW employees in the City's Health Insurance program. This accomplishment stands as a testament to the impact of proactive collaboration and the OIG's dedicated engagement to improving lives of BSW employees.

Formation of Equity Affinity Groups Tailored to Solid Waste Workers: DPW recognizes the importance of fostering a sense of community and belonging within our workforce. We fully support the idea of creating equity affinity groups/employee resource groups and have already started the process of creating them by sending out an agency-wide survey to obtain input from all DPW employees. These groups will offer employees a space to share experiences, promote inclusivity, and work together to address issues that may impact their well-being and workplace satisfaction. These affinity groups will serve as an additional avenue for support, empowerment, and open dialogue.

Recommendation 14: Employees described working in extreme weather conditions, facing hazardous situations, and experiencing injuries. The repetitive actions required for the physical work can have long-term injury effects for workers. Nearly all employees interviewed, including members of DPW leadership, expressed that the employees deserve to be paid more than their starting pay of \$40,669. Currently, despite the job dangers, their hazard compensation is only 15¢ per hour, totaling \$6 for a 40-hour work week. The OIG encourages DPW to work with DHR to review these salaries, especially due to the personnel crisis DPW has faced for several years.

The Administration completed a salary study in 2024 that included an assessment of solid waste worker wages. The new salary scales provided as part of the most recent salary study is subject to collective bargaining with labor unions. As such, the City is currently negotiating with the unions with the hopes of implementing new salary scales for certain unions in FY26.

V. CONCLUSION

DPW remains committed to providing a safe and healthy workplace environment, not only for BSW, but all of its employees. In understanding that BSW employees are at the forefront of providing critical services that touches every resident and visitor to our Charm City, DPW will continue to refine its processes, procedures, and practices in order to meet this mission. This includes enhanced training, enhanced facilities, enhanced culture, resulting in a high-performing workforce.

EXHIBIT LIST:

1. List of completed Short-term repairs at the Bowley's and Cherry Hill yards
2. Detailed Capital Improvement Project information
3. Heat Index details
4. Picture of Portable chargers in vehicles and Routing Software Memo
5. Pre-trip and post-trip procedures Memo to BSW supervisors
6. Employee/Management meetings information
7. Leadership Safety Steering Committee information
8. DPW's 2023 and 2024 Engagement and Pulse Survey information
9. 2025 City Employee Voice Survey Outreach information
10. BSW PPE survey
11. Speak Up DPW information
12. DPW's New Employee Orientation Key Operating Policies
13. BSW Training Schedules
14. DPW's Draft Extreme Heat and Cold Illness Prevention Plans and Standard Operating Procedures
15. DPW's New Employee Orientation- Attendance Policy Information
16. BSW leadership training Sign-in information
17. DHR training collaboration information
18. Six-Month Executive Coaching by DHR for BSW leadership information
19. BSW training sign-in information