



Status Report on Implementation of District of Columbia Auditor Recommendations

September 26, 2014

Report Team:

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A Report by the Office of the District of Columbia Auditor
Lawrence Perry, Acting District of Columbia Auditor

 Office of the District of Columbia Auditor

The Honorable Phil Mendelson, Chairman
Council of the District of Columbia
1350 Pennsylvania Avenue, NW, Suite 504
Washington, D.C. 20004

Dear Chairman Mendelson:

Attached is the Status Report on Implementation of District of Columbia Auditor Recommendations, which provides the status of all recommendations issued between the start of Fiscal Year 2012 and January 2014.

The intent of this report is to keep the Council of the District of Columbia informed about the implementation status of recommendations made by the Office of the District of Columbia Auditor. We welcome any suggestions or recommendations for improving upon this report to enhance your ability to monitor the effective implementation of District Auditor recommendations.

Sincerely,



Lawrence Perry
Acting District of Columbia Auditor

Background

The Office of the District of Columbia Auditor (ODCA) conducts audits and issues recommendations to improve the economy, efficiency, and effectiveness of District government operations. However, the benefit from our audit work is not in the recommendations made, but in their effective implementation. When an audit recommendation is made, agency management is responsible for implementing it. Auditors can take steps to improve the likelihood that a recommendation will be appropriately implemented by first providing sound and reasonable recommendations and following-up with agency management to determine the status of recommendations made in past audit reports.

Objective, Scope and Methodology

The purpose of this report is to make public the implementation status of the recommendations we have made to District of Columbia government agencies in our audit reports.



Through July 1, 2014, we tracked 134 recommendations contained in 20 audit reports issued from October 2011 through January 2014.¹

We begin our follow-up process by entering all recommendations contained in completed audit reports into our tracking database. We then follow up every six months with the agency director and agency management to determine the implementation status of those recommendations. All recommendations reported as implemented usually require documentary evidence showing what actions were taken. Follow up continues every six months until all recommendations have been confirmed as either implemented, no longer applicable, or will not be implemented.

We did not conduct the examination as an audit as defined by the Government Accountability Office's Government Auditing Standards.

Results

This report describes the status of the 134 recommendations issued from October 2011 through January 2014. The status of each audit recommendation is identified using the following classifications:

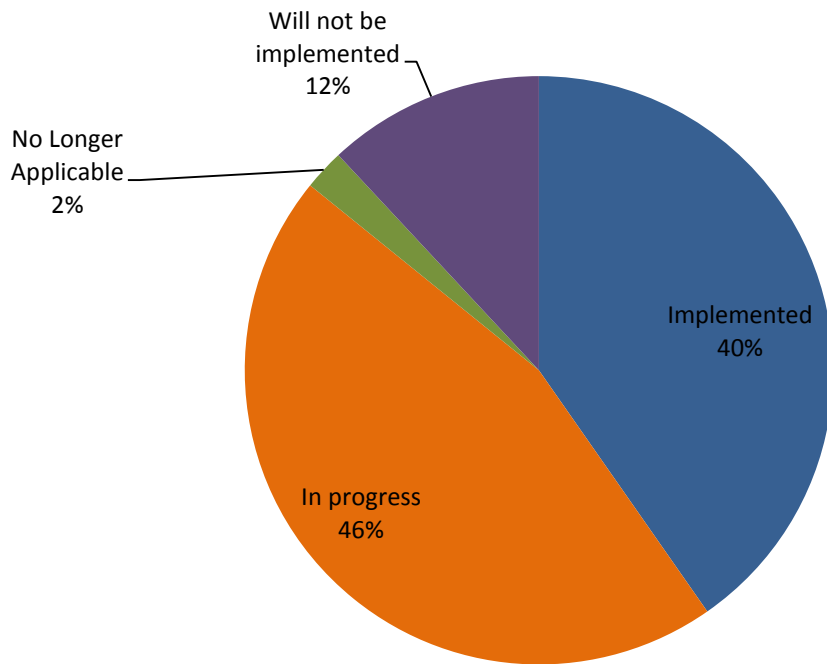
	Implemented	We reviewed status information provided by the audited agency's management and agreed that the recommendation was effectively implemented.
	In progress	This status is assigned in three instances: <ul style="list-style-type: none">• Recommendations that management

¹ For the purposes of this report, we only reviewed recommendations made in audit reports conducted under Generally Accepted Government Auditing Standards (GAGAS) rules. ODCA issues numerous reports each year that are not considered GAGAS audits. As we enhance our recommendation follow-up system, in the future we may consider including recommendations made in non-audit reports.

		<ul style="list-style-type: none"> • reported as underway but not yet fully implemented; • Recommendations that management reported as implemented but lacked documentary evidence supporting their claim; or • Recommendations that require more time for management to implement.
	No longer applicable	Circumstances have changed since the audit report was issued that render the recommendation no longer relevant.
	Will not be implemented	Management does not agree with the recommendation and does not intend to implement it.

For purposes of future tracking, all recommendations confirmed as “implemented” will be considered “closed” and no additional follow-up will be conducted. All other recommendations are considered “open” and regular follow-up will continue until they are considered “closed” – either as a result of being implemented or if more than 3 years has passed since the recommendation was issued. As shown in the chart below, as of August 1, 2014, 40 percent of recommendations were implemented, 46 percent were in progress, 2 percent were no longer applicable, and 12 percent will not be implemented.

Recommendations Status Summary



Recommendation Status by Audit Report

Report	Date Published	Implemented	In Progress	No Longer Applicable	Will not be Implemented
Audit of the District of Columbia Lottery and Charitable Games Control Board from Fiscal Year 2007 to 2009	Dec 13, 2011	7	5	2	4
Review of the Permanent Supportive Housing Program Department of Human Services	Apr 23, 2012		6		1
Audit of the Closure and Consolidation of 23 DC Public Schools	Sep 6, 2012	2			2
Audit of the Accounts and Operations of ANC 2D for Fiscal Years 2009 Through 2011	Sep 26, 2012	6	1		5
Review of the District of Columbia's Performance Management System	Sep 26, 2012				1
Audit of the Department of Small and Local Business Development's Fiscal Year 2011 Performance Accountability Report	Feb 21, 2013	2	1		
Audit of the District's Workforce Development Programs	Feb 22, 2013	15	3		
Audit of the Affordable Housing Mandates for Development Projects Formerly Managed by the Dissolved National Capital Revitalization Corporation and Anacostia Waterfront Corporation	Mar 21, 2013		9		

Report	Date Published	Implemented	In Progress	No Longer Applicable	Will not be Implemented
Audit of the Accrued Sick and Safe Leave Act of 2008	Jun 19, 2013		4		
Audit of the District of Columbia Boxing and Wrestling Commission	Jun 25, 2013	8	6		2
Audit of the Department of Motor Vehicles' Driver Education Program Fund for Fiscal Years 2008-2010	Sep 4, 2013		1		
Audit of the Department of Employment Services Workforce Development Monitoring and Quality Assurance Procedures	Sep 11, 2013	3	1		1
Audit of the Department of Small and Local Business Development Certified Business Enterprise Program	Sep 27, 2013	1	8		
Audit of the Department of General Services Fiscal Year 2012 Procurement of Snow and Ice Removal and Pretreatment Services	Sep 27, 2013		5 ²		
Audit of the DC Department of Parks and Recreation Facility Use and Permit Process	Sep 30, 2013		2		
Audit of Non-District Resident Students Enrolled in Public Schools	Sep 30, 2013	3	2		

² As of August 1, 2014, we had not received any information from the Department of General Services in response to our request for the implementation status of the five recommendations contained in this report.

Report	Date Published	Implemented	In Progress	No Longer Applicable	Will not be Implemented
Audit of the Department of Employment Services Adult Career and Technical Education Programs	Sep 30, 2013	3		1	
Audit of the Public Service Commission Agency Fund for Fiscal Year 2009-2012	Sep 30, 2013	4			
Audit of the District Department of Transportation's H Street Shuttle Service Grant Awards Issued in Fiscal Years 2008 and 2010	Dec 6, 2013		3 ³		
Audit of the Office of the People's Counsel Agency Fund for Fiscal Years 2009-2012	Jan 15, 2014		4		
Totals		54 (40%)	61 (46%)	3 (2%)	16 (12%)

³ As of August 1, 2014, we had not received any information from the District Department of Transportation in response to our request for the implementation status of the three recommendations included in this report.

Open Recommendations by Agency

Entity	Number of Open Recommendations
Department of Small and Local Business Development	9
Department of Housing and Community Development	9
Boxing and Wrestling Commission	8
Department of General Services	7
D.C. Lottery and Charitable Games Control Board	7
Department of Human Services	7
ANC 2D	6
Department of Employment Services	6
Office of the People's Counsel	4
District Department of Transportation	3
Department of Human Resources	2
Department of Parks and Recreation	2
Office of the State Superintendent for Education	2
Office of the City Administrator	1
Office of the Chief Financial Officer	1

Implementation Status by Age of Recommendation

Timeframe	Implemented	In Progress	No Longer Applicable	Will not be Implemented	Total
0-6 Months	Not tracked				
7-12 Months	14	26	1	1	42
1 to 2 Years	33	24	0	10	67
Over 2 Years	7	11	2	5	25
Total	54	61	3	16	134

Status of Audit Recommendations as of July 31, 2014

Report Title (publication date)	Recommendation	Status as of July 31, 2014	Comments
<p>Audit of the District of Columbia Lottery and Charitable Games Control Board from Fiscal Year 2007 – 2009 (December 13, 2011)</p>	<p>The Executive Director of the Lottery should immediately amend the Lottery’s rules and regulations at District of Columbia Municipal Regulations, Title 30, Chapter 1 to reflect the Lottery’s current organizational structure.</p>	<p>In progress</p>	<p>No estimate was provided as to when this recommendation may be implemented.</p>
	<p>The Executive Director of the Lottery should establish an MOU for any future fingerprinting services MPD provides to the Lottery.</p>	<p>In progress</p>	<p>The Lottery indicated that this recommendation has been implemented but did not provide any documentary evidence.</p>
	<p>The Agency Fiscal Officer for the Lottery must take steps to ensure that vendors who satisfactorily provide goods and services and submit a proper invoice for payment are paid within 30 calendar days in accordance with the District’s Quick Payment Act.</p>	<p>In progress</p>	<p>The Lottery indicated that this recommendation has been implemented but did not provide any documentary evidence.</p>
	<p>The Lottery’s Agency Fiscal Officer should take steps to ensure that the Lottery’s employees comply with the Lottery’s policies and procedures by properly logging in the date invoices were received.</p>	<p>Implemented</p>	
	<p>The Lottery’s Agency Fiscal Officer should take steps to ensure that all invoices are properly approved for payment by appropriate officials of the Lottery before invoices are processed for payment.</p>	<p>In progress</p>	<p>The Lottery indicated that this recommendation has been implemented but did not provide any documentary evidence.</p>
	<p>The Chief of Security of the Lottery should take steps to ensure that the results of pre-employment background and fingerprint checks are received and reviewed prior to an individual’s employment.</p>	<p>In progress</p>	<p>The Lottery reported this recommendation as being implemented. However, we recently conducted a compliance audit of the Lottery and determined through testing of the Lottery’s personnel files that, in fact, background and</p>

			fingerprint checks are still not being consistently received and reviewed prior to a new employee being hired.
	The Lottery's Executive Director should request OCFO's Office of Integrity and Oversight to conduct periodic background and fingerprint checks for the Lottery's employees.	Will not be implemented	The Lottery explained that they will not ask another agency to change its policies and procedures.
	The Lottery's Executive Director should take steps to ensure that all appropriate documents including credit checks, hiring memorandum, authority to release information, copy of the employee's driver's license and employee personal history questionnaire are properly completed and maintained in each employee's file.	Will not be implemented	The Lottery expressed the opinion that this authority does not lie with the Lottery's Executive Director, but instead these actions can only properly be taken by OCFO's Director of Human Resources.
	The Chief Financial Officer and the Agency Fiscal Officer should ensure that the Lottery collects all fees for services provided by the Lottery including fees for fingerprinting and background checks.	Implemented	
	The Chief Financial Officer should bill LTE in the amount of \$705 for the background and fingerprint checks that were conducted.	No longer applicable	According to the Lottery, LTE has gone out of business.
	The Lottery must take steps to ensure that appropriate documents required to license sales agents are completed and properly maintained.	Implemented	
	The Lottery's Director of Sales should take steps to consistently enforce rules and regulations pertaining to the minimum sales requirement for agents.	No longer applicable	In January 2013, the Lottery rescinded the minimum sales requirement for agents.

	<p>The Agency Fiscal Officer (AFO) must deactivate a sales agent's terminal after receiving the first notification that the sales agent's bank account had insufficient funds on the day the Lottery attempted to collect the agent's sales revenue. Additionally, the AFO must request that the Chief of Security investigate to collect payment.</p>	<p>Implemented</p>	
	<p>The Agency Fiscal Officer for the Lottery must take steps to establish an effective collection policy for unpaid account receivables due from sales agents.</p>	<p>Implemented</p>	
	<p>The Lottery's General Counsel must ensure that agents comply with the repayment agreements and pursue collection of amounts owed in Superior Court, the U.S. Attorney for the District or the Attorney General of the District of Columbia.</p>	<p>Implemented</p>	
	<p>The Agency Fiscal Officer should pursue collection of the \$228,041 and \$141,864 owed by sales agents as of FYs 2008 and 2009 respectively.</p>	<p>Will not be implemented</p>	<p>The Lottery explained that their bad debt was only .1% of total sales and was written off.</p>
	<p>The Lottery's cardholder for the Lottery's P-Card program should not attend the Lottery's ART meetings.</p>	<p>Will not be implemented</p>	<p>In comments provided by the Lottery on our 2011 draft report, the agency indicated they agreed with this recommendation and would implement it. However, in their responses to our recommendation follow-up request, the Lottery now says they disagree with the recommendation. They now assert that any recommendations for changes to their p-card program administration should come from the Office of Contracts and Procurement.</p>

	The Lottery's Executive Director should also designate an employee other than the Lottery's cardholder to serve as the Lottery's Agency Program Coordinator.	Implemented	
Review of the Permanent Supportive Housing Program (April 23, 2012)	Implement policies and procedures to ensure that all payments are properly documented, accurate and comply with the requirements of the Office of the Chief Financial Officer's Financial Policies and Procedures Manual.	In progress	DHS reports this recommendation will be implemented by September 2014.
	The Director of DHS should review DHS staff assignments to ensure adequate staffing so DHS can properly review invoices prior to payment.	In progress	DHS reports this recommendation will be implemented by September 2014.
	Comply with HUD's FMR standards to provide housing services under the Permanent Supportive Housing Program.	In progress	DHS reported that this recommendation would be implemented by June 2014. We attempted to follow-up with the agency to get an update on this, but did not get a reply to our inquiry.
	Provide training on correct legal standards to use when providing housing services under the Permanent Supportive Housing Program.	Will not be implemented	DHS claims they are already using the correct legal standards and so no action is necessary.
	Take appropriate action to revise HUD FMR regulations to use the DCHA HCVP rates to determine fair rents for the Permanent Supportive Housing Program.	In progress	DHS reported that this recommendation would be implemented by June 2014. We attempted to follow-up with the agency to get an update on this, but did not get a reply to our inquiry.

	Relocate all single individuals currently residing in two bedroom apartments to one bedroom apartments.	In progress	DHS' response to our inquiry was to indicate that the recommendation was no longer applicable and explained as follows: "Due to a limited housing inventory, one (1) bedroom units were difficult to find. As a result, several landlords allowed their two (2) bedroom units to be leased up (sic) at the cost of a one bedroom unit. To date, single individuals reside in one-bedroom units, and it continues to be our current housing practice to lease single individuals in one bedroom units." We have requested documentary evidence to support their explanation but have not yet received it.
	Lease units to PSH Program participants that meet the minimum housing space requirements.	In progress	DHS has reported this recommendation as implemented but has not provided any documentary evidence.
Audit of the Closure and Consolidation of 23 D.C. Public Schools (September 6, 2012)	Develop and implement a training program for contract administrators, contracting officer technical representatives and contract administrators / monitors that provides instructions on the (1) monitoring / documenting of contract deliverables, (2) monitoring / documenting of contractor performance, and (3) certification and authorization of contractor invoices.	Implemented	
	Contact the District of Columbia Attorney General regarding repayment by MAI of \$112,691 that the District improperly reimbursed MAI for the cost of project managers and move supervisors.	Will not be implemented	DGS disputes our underlying finding that OPEFM incorrectly reimbursed \$112,691 to MAI for project managers and move supervisors costs.

	<p>Develop a training program to instruct contracting officers, contracting officer technical representatives and contract administrators / monitors on the proper execution of contract awards and contract processes and requirements.</p>	<p>Implemented</p>	
	<p>Contact the District of Columbia Attorney General regarding the repayment by MAI of the \$32,307 bonus that the District improperly paid MAI.</p>	<p>Will not be implemented</p>	<p>Our finding (from the 2012 report) was that "OPEFM improperly awarded MAI a \$32,307 bonus." DGS admits that no written contract modification was ever made providing for the revised timeline needed to justify the bonus. However, they maintain that the revised timeline and deliverables were "communicated" to MAI and thus the bonus was thus deemed appropriate.</p>
<p>Audit of the Accounts and Operations of ANC 2D for Fiscal Years 2009 Through 2011 (September 26, 2012)</p>	<p>ANC 2D's Commissioners/officers must continue to take steps to ensure that ANC 2D holds nine public meetings each year.</p>	<p>Will not be implemented</p>	<p>ANC 2D's response: "The current commissioners have been in compliance throughout. The audit covered a period before we took office." We attempted to point out that this explanation would seem to match a response of "implemented," but the ANC chose not to change their answer.</p>
	<p>ANC 2D's Commissioners/officers must continue to take steps to ensure that a written record is prepared and maintained in ANC 2D's files of all public meetings.</p>	<p>Will not be implemented</p>	<p>ANC 2D's response: "The current commissioners have been in compliance throughout. The audit covered a period before we took office." We attempted to point out that this explanation would seem to match a response of "implemented," but the ANC chose not to change their answer.</p>

	ANC 2D's Commissioners/officers must continue to comply with D.C. Code § 1-309.10(n) (2012 ed.) by developing an annual fiscal year spending plan budget for each upcoming fiscal year and present the Plan at an ANC 2D public hearing prior to the adoption of ANC 2D's budget.	Will not be implemented	ANC 2D's response: "The current commissioners have been in compliance throughout. The audit covered a period before we took office." We attempted to point out that this explanation would seem to match a response of "implemented," but the ANC chose not to change their answer.
	ANC 2D's Treasurer and Chairperson must continue to file a cash or surety bond each year or participate in the ANC Security Fund.	Will not be implemented	ANC 2D's response: "The current commissioners have been in compliance throughout. The audit covered a period before we took office." We attempted to point out that this explanation would seem to match a response of "implemented," but the ANC chose not to change their answer.
	ANC 2D's Treasurer should take steps to ensure that ANC 2D's quarterly financial reports are accurate and are filed by required due dates.	Implemented	
	The ANC 2D Treasurer should reconcile bank statements to the checkbook within 15 days of the receipt of the bank statement and ensure that the bank statement and the reconciliation are reviewed and initialed by the Chairperson or Vice-Chairperson.	Implemented	
	ANC 2D Commissioners/officers must take steps to follow grant requirements contained in D.C. Code § 1-309.13 (m) (2012 ed.) when awarding grants.	Implemented	
	ANC 2D's Commissioners/officers must continue to comply with D.C. Code § 1-309.13 (f) (2012 ed.) by ensuring that all ANC checks contain two authorized signatures.	In progress	ANC 2D reported this recommendation as implemented but did not provide any documentary evidence.

	Pursuant to D.C. Code § 1-309.13 (f) (1) (2012 ed.), ANC 2D Commissioners must continue to formally document the Commission's approval of all disbursements prior to making disbursements.	Implemented	
	ANC 2D Commissioners must refrain from voting on grant requests where any conflict of interest can or does exist.	Implemented	
	ANC 2D Commissioners / officers should ensure that grantees submit copies of canceled checks or signed receipts to document that grant funds were actually disbursed for the purpose for which they were awarded.	Implemented	
	ANC 2D's Commissioners/officers must continue to ensure that any personal service expenditures are properly documented in the ANC minutes and that position descriptions for employees, or contracts for consultants are established and maintained in the ANC 2D files.	Will not be implemented	ANC 2D's response: "The current commissioners have been in compliance throughout. The audit covered a period before we took office." We attempted to point out that this explanation would seem to match a response of "implemented," but the ANC chose not to change their answer.
Review of the District of Columbia's Performance Measurement System (September 26, 2012)	OCA management should develop formal written policies and procedures to implement findings and recommendations made in audit reports and formally designate an Agency Risk Manager who has overall responsibility for resolving findings and recommendations made in audit reports.	Will not be implemented	The Office of City Administrator maintains that because their office is small and because very few audit recommendations are directed to them there is no reason to implement this recommendation.
Audit of the Department of Small and Local Business Development's Fiscal Year 2011 Performance Accountability Report	DSLBD should develop written policies and procedures for collecting and reporting the number of trash bags collected. The policies and procedures should include internal controls that will help to ensure the reporting of accurate information.	Implemented	

	<p>DSLBD management should design policies and procedures that will ensure that the agency is properly collecting and maintaining adequate documentary evidence regarding the number of participants at DSLBD training and education activities.</p>	<p>Implemented</p>	
	<p>DSLBD management should identify additional storage space for agency records. In addition, management should adhere to the District's recordkeeping policy.</p>	<p>In progress</p>	<p>DSLBD reports that it is now working with an outside vendor to digitize its records, which will effectively free up space in its storage room and make it easier to locate records as needed. They anticipate this process will be complete by September 30, 2014.</p>
<p>Audit of the District's Workforce Development Programs (February 22, 2013)</p>	<p>Develop a corrective action plan to ensure that DOES achieves the annual cluster performance scores.</p>	<p>In progress</p>	<p>DOES reported that this recommendation would be implemented by July 2014. We have not been able to confirm that it has been implemented.</p>
	<p>Ensure that the WIC develop formal policies and procedures that detail monitoring and reporting functions. At a minimum, these policies and procedures should include provisions that:</p> <ul style="list-style-type: none"> a) Define the WIC's role, duties, and functions in providing oversight of the District's Workforce Development Programs; b) Provide for regular board meetings; c) Provide for the development and implementation of workforce performance expectations, standards, and measures; and d) Require that the WIC provide the Mayor an annual report on the accomplishments of training and employment related activities within the District. 	<p>Implemented</p>	

	Require the WIC to develop and annual fiscal budget that provides for the anticipated fiscal year expenditures.	Implemented	
	Modify the MOU between DOES and DMPED to include a detailed WIC scope of work and budget, and performance expectations, standards, and measures for the WIC.	Implemented	
	Require the WIC to appoint a Youth Council, as required by § 117 (h) (1) of the WIA.	Implemented	
	Require the WIC to develop formal policies and procedures detailing how the WIC will monitor and report on Youth Council functions and activities.	Implemented	
	As required by the WIA, require that the Youth Council develop formal policies and procedures that detail their role, duties, and functions in providing oversight of the District's youth activities.	Implemented	
	Take steps to ensure that One-Stop Career Centers are properly certified. Additionally, policies and procedures should be established and implemented to monitor compliance with One-Stop Center certification requirements.	Implemented	
	Identify performance measures for Workforce Development Programs, sources of data and data requirements that will allow DOES to report on locally and federally funded Workforce Development Program performance measures.	Implemented	
	Implement a quality control system to monitor and ensure that data entry personnel enter Workforce Development performance data in the DOES MIS.	Implemented	

	<p>Develop a workforce development reporting system that will allow DOES to generate reports that detail Workforce Development Program performance. At a minimum, the reporting system should be capable of producing reports that provide:</p> <ul style="list-style-type: none"> • The total number of participants enrolled within each individual training and employment program; • The total number of participants that dropped out of each individual training and employment program; • Etc. (Recommendation abbreviated here to save space) 	Implemented	
	<p>Develop a formal system to review and update One-Stop Career Operations policies and procedures periodically. This would ensure the policies and procedures are current, complete, and accurately comply with federal and District laws and regulations. This system should include formal verification that all DOES staff received updated copies of the policies and procedures.</p>	Implemented	
	<p>Develop a formal assessment process which adequately documents and identified One-Stop Center participants' current circumstances, skills, and service needs.</p>	In progress	DOES reported this recommendation as implemented but has not provided any documentary support.
	<p>Perform periodic reconciliation and verification between VOS and the hard copy files to ensure the information recorded within VOS is consistent, accurate, and complete. This would also ensure errors are detected and corrected in a timely manner and that DOES staff are held accountable for their daily work performance.</p>	Implemented	

	Ensure that DOES staff enter into VOS the employment status of Workforce Development Program participants upon completion of any employment training.	Implemented	
	Develop a formal job description for the Program Analyst position that details the operational duties, responsibilities, and functions of the position.	Implemented	
	Develop and customize a training manual for DOES program staff, by position.	In progress	DOES reported this recommendation will be implemented by September 30, 2014.
	Develop and implement a VOS standard operating procedures manual.	Implemented	
Audit of the Affordable Housing Mandates for Development Projects Formerly Managed by the Dissolved National Capital Revitalization Corporation and Anacostia Waterfront Corporation (March 21, 2013)	Develop and implement appropriate policies and procedures to ensure that DHCD can accomplish its mandate to oversee and monitor NCRC and AWC development projects.	In progress	DHCD reported this recommendation as implemented, but as of this writing, had not yet provided documentary evidence to support this assertion.
	Develop an action plan for periodically reviewing all NCRC projects to determine compliance with the developer's Land Development Agreements, Affordable Dwelling Unit requirements, covenants, and relevant laws.	In progress	DHCD reported this recommendation as implemented, but as of this writing, had not yet provided documentary evidence to support this assertion.
	Develop policies and procedures for performing: <ul style="list-style-type: none"> a) Income verification; b) Area Median Income classification; c) Income documentation retention; and d) Audit, communication, and reporting requirements for developers of land formerly owned by NCRC and AWC. 	In progress	DHCD reported this recommendation as implemented, but as of this writing, had not yet provided documentary evidence to support this assertion.

	<p>Provide routine and periodic training to DHCD staff and developers on:</p> <ul style="list-style-type: none"> a) Income verification; b) AMI classification; c) Income documentation retention; and d) Audit and reporting requirements. 	<p>In progress</p>	<p>DHCD reported this recommendation as implemented, but as of this writing, had not yet provided documentary evidence to support this assertion.</p>
	<p>Provide follow-up reviews on all NCRC properties to determine whether developers complied with income eligibility requirements, AMI category placement requirements, and income documentation requirements as outlined in each development agreement and promptly take all feasible actions to resolve incidences of non-compliance.</p>	<p>In progress</p>	<p>DHCD reported this recommendation as implemented, but as of this writing, had not yet provided documentary evidence to support this assertion.</p>
	<p>Perform a review of ADUs at Highland Park Apartments, the Kenyon Square Condominiums, and other NCRC projects to determine whether developers used the appropriate methodology to determine income eligibility and AMI category placements. The DHCD Director should take appropriate action to resolve and prevent future occurrences of non-compliance with the District's Income Limit Standards.</p>	<p>In progress</p>	<p>DHCD reported this recommendation as implemented, but as of this writing, had not yet provided documentary evidence to support this assertion.</p>
	<p>Develop and implement policies and procedures that require DHCD to review ADU restrictive covenants for appropriateness, completeness, and legal sufficiency and approve all ADU restrictive covenants prior to the covenants being filed with the Recorder of Deeds.</p>	<p>In progress</p>	<p>DHCD reported this recommendation as implemented, but as of this writing, had not yet provided documentary evidence to support this assertion.</p>

	In consultation with DHCD's legal advisor, develop and file restrictive covenants for the five ADUs identified in this finding whose restrictive covenants were not filed or filed without provisions for AMI category as provided in the corresponding LDAs.	In progress	DHCD has reported that this recommendation is no longer applicable. However, they have not provided any documentary evidence that this is so.
	In consultation with DHCD's legal advisor and with the Deputy Mayor for Planning and Economic Development, develop and file with the Recorder of Deeds documentation necessary to ensure the Tivoli ADUs survive for the remaining ADU affordability period.	In progress	DHCD reports that they expect to complete implementation of this recommendation by December 2014.
Audit of the Accrued Sick and Safe Leave Act of 2008 (June 19, 2013)	Establish an accrual system to track eligibility for paid sick leave for intermittent District government employees.	In progress	DCHR reports this recommendation will be implemented by September 2014.
	Provide retroactive accrued sick leave to current District employees that were eligible to accrue paid sick leave under the Accrued Sick and Safe Leave Act but did not receive paid sick leave due to the failure of the Department of Human Resources to track paid sick leave.	In progress	DCHR reports this recommendation will be implemented by September 2014.
	Publish the final Accrued Sick and Safe Leave Act hardship exemption rules in the District of Columbia Register.		
	Establish a process to review employer compliance with the provisions of the Accrued Sick and Safe Leave Act of 2008.		
Audit of the District of Columbia Boxing and Wrestling Commission (June 25, 2013)	The Commission should establish policies and procedures to authorize payment to Pearson VUE only upon the Commission's review and approval of an invoice.	In progress	BWC reported that this recommendation has been implemented but has not provided any documentary evidence to support this assertion.

	<p>Commission officials must implement policies and procedures to ensure that persons holding or conducting an event within the jurisdiction of the Commission file with the Commission, within 24 hours after the event is over, a report concerning fees, prices, revenues, and gross receipts from the event.</p>	<p>Will not be implemented.</p>	<p>BWC has reported their intention to instead seek a change in the statute that contains this requirement. They contend that the requirement is unrealistic, owing to the fact that many events conclude late at night on a Friday or Saturday, thus making completion of the required report within 24 hours impractical.</p>
	<p>Commission officials must establish and implement a procedure to record the date of receipt for all gate reports.</p>	<p>In progress</p>	<p>BWC reported that this recommendation has been implemented but has not provided any documentary evidence to support this assertion.</p>
	<p>Consistent with D.C. Code § 3-608 (c) (2011), the Commission should assess fines for reports that are not filed and fees not paid within 24 hours after the event.</p>	<p>Implemented</p>	
	<p>The Commission should develop and implement a written policy regarding tickets provided to sponsors and the military. Such policy must adhere to the regulatory cap regarding complimentary tickets.</p>	<p>In progress</p>	<p>BWC reports that a draft of the proposed regulation will be voted on in September 2014.</p>
	<p>The Commission should collect the additional fees from promoters who incorrectly paid five percent on net receipts rather than gross receipts.</p>	<p>Implemented</p>	
	<p>The Commission should establish and implement policies and procedures to comply with 19 DCMR §§ 2123.13-2123.14 (LexisNexis 2012) which requires the Commission to ensure that the box in which tickets are deposited has two padlocks.</p>	<p>Implemented</p>	

	The Commission should coordinate with the Office of the Chief Financial Officer's Office of Tax and Revenue to develop and implement policies and procedures to ensure that promoters consistently pay the sales tax and the sales tax is applied to the correct taxpayer's account.	Implemented	
	The Commission should develop and implement policies and procedures to ensure that promoters provide the necessary documentation to support claims of exemption from sales tax.	Implemented	
	The Commission should coordinate with the Office of the Chief Financial Officer to establish and implement policies and procedures to ensure that the correct sales tax rate is used to calculate sales taxes for general sales and events held at the Verizon Center.	Will not be implemented	BWC asserts that it has no authority to collect taxes or to set tax rates.
	The Commission should take steps to have travel expense totaling \$1,191.44 reimbursed from the D.C. Board of Barber and Cosmetology to the Boxing and Wrestling Commission.	Implemented	
	The Commission should develop and implement policies and procedures to ensure that Commission files comply with the requirements of 19 DCMR § 2026.4 and files are complete and accurate.	In progress	BWC reported that this recommendation has been implemented. However, they have not provided any documentary evidence to support this assertion.
	The Commission should establish and implement a written records retention policy that is consistent with the District's records retention policy.	In progress	BWC has provided a draft records retention policy but has not given any indication when it will go into effect.

	Commission officials must take steps to ensure that all applicants for a permit submit a certification form in compliance with D.C. Code §§ 47-2862 (2012) and 47-2863.	Implemented	
	The Commission should establish the appropriate policies and procedures to ensure that the correct fees are charged for license and permits.	In progress	BWC reported that adjustments to the fees have been developed and are undergoing internal review.
	The Commission must ensure that individuals that officiate at events are properly licensed in accordance with D.C. laws and regulations and Commission rules and procedures.	Implemented	
Audit of the Department of Motor Vehicles Driver Education Program Fund for Fiscal Years 2008-2010 (September 4, 2013)	The Chief Financial Officer should establish internal controls that include written policies and procedures to ensure periodic and timely reconciliation of specific fee charges with the dollar amount recorded in SOAR to ensure that DC DMV revenue is accurately recorded.	In progress	After reviewing our draft report in August 2013, OCFO sent written comments explaining that they intended on implementing our recommendation. However, when we attempted to follow up with OCFO in April 2014 to find out the implementation status of the recommendation, OCFO responded by explaining that the recommendation was no longer applicable. Their written explanation was not satisfactory and included no documentary evidence supporting it. We are still waiting for a further explanation of their position.
Audit of the Department of Employment Services Workforce Development Monitoring and Quality Assurance Procedures (September 11, 2013)	Develop and implement a complete and accurate central filing system that complies with applicable record keeping provisions of the Chief Procurement Officer.	In progress	DOES reported this recommendation as implemented. However, they have not provided any documentary evidence to support this assertion.
	Develop and implement a contract quality control function and periodically review contract files to ensure compliance with applicable sections of the DCMR.	Implemented	

	Implement the appropriate internal controls over the payment process by requiring that DOES staff review charges and verify that services were rendered prior to making payment. Additionally, DOES staff must ensure that a Program Activity Summary Sheet is completed properly and maintained for every Workforce Development Contract or Blanket Purchase Agreement.	Will not be implemented	DOES provided written comments to us on the draft report. In those comments, DOES indicated they agreed with this recommendation and would implement it. However, when we followed up in April 2014, DOES reported that they did not intend to implement the recommendation. Their explanation appears to indicate that they believe no action is necessary.
	Develop and implement appropriate internal controls that require proper segregation of duties to ensure that a single employee does not receive and approve receipt of goods or services.	Implemented	
	Develop and implement internal controls that ensure that DOES conducts required annual site visits to each service provider.	Implemented	
Audit of the Department of Small and Local Business Development's Certified Business Enterprise Program (September 27, 2013)	DSLBD should ensure adequate proof of District residency by including stronger requirements in D.C. Municipal Regulations.	In progress	DSLBD reports this recommendation will be implemented by October 2014.
	DSLBD should enforce the requirement that CBE applicants submit tax returns.	In progress	DSLBD reports that this recommendation has been implemented but has not provided sufficient documentary evidence to support this assertion.
	DSLBD should consistently enforce the requirement that JV applicants submit bonding and competence documentation and the non-CBE partner's audited financial statements.	In progress	DSLBD reports that this recommendation has been implemented but has not provided sufficient documentary evidence to support this assertion.
	DSLBD should implement a compliance and monitoring strategy which includes unannounced site visits.	Implemented	
	DSLBD should establish controls which ensure that the CBE review process is	In progress	DSLBD has reported that this recommendation will be

	protected from political influence.		implemented by September 2014.
	DSLBD should add supervisory review to the JV certification process.	In progress	DSLBD reports that this recommendation has been implemented but has not provided sufficient documentary evidence to support this assertion.
	DSLBD's Certification Manager should ensure that performance evaluations are conducted and staff professional development is improved.	In progress	DSLBD has begun this process but as of the time of writing has not yet completed a full performance review cycle. The agency anticipates completing annual reviews and developing new performance plans early in FY 2015.
	DSLBD should immediately formalize a set of CBE & JV certification policies and procedures.	In progress	DSLBD reports that this recommendation will be implemented by December 2014.
	DSLBD should review and update the portion of the regulation that addresses fixed assets of CBEs.	In progress	DSLBD reports that this recommendation will be implemented by December 2014.
Audit of the Department of General Services' Fiscal Year 2012 Procurement of Snow and Ice Removal and Pretreatment Services (September 27, 2013)	Take action to ensure that all agency personnel assigned to technical evaluation panels adhere to prescribed technical evaluation procedures.	In progress	DGS has not responded to our request for information about the implementation status of the recommendations made in this report.
	Develop and implement procedures to ensure that all required documentation is maintained in agency contract files.	In progress	DGS has not responded to our request for information about the implementation status of the recommendations made in this report.
	When contracting out procurement activity, include contractual language requiring contractors to submit all relevant procurement documentation to DGS for inclusion in the contract files.	In progress	DGS has not responded to our request for information about the implementation status of the recommendations made in this report.

	Direct the DGS contracting officer to establish procedures to ensure that DGS obtains at least three written quotations from DCSS contractors for procurements greater than \$25,000.	In progress	DGS has not responded to our request for information about the implementation status of the recommendations made in this report.
	Develop and implement a system of internal controls designed to ensure compliance with District government procurement laws, regulations, policies, and procedures.	In progress	DGS has not responded to our request for information about the implementation status of the recommendations made in this report.
Audit of the Department of Employment Services Adult Career and Technical Education Programs (September 30, 2013)	Establish sufficient internal controls to effectively manage and oversee future CTE programs including, but not limited to, ensuring that program criteria and objectives are written and established, sufficient monitoring is conducted and documented, and effective enforcement of reporting requirements is maintained.	No longer applicable	The Career and Technical Education programs are no longer the responsibility of the Department of Employment Services. They have been transferred to the Office of the State Superintendent for Education.
	Review the invoices of two contractors and take the necessary steps to have UDC and/or the contractor refund any monies paid in excess of allowable and supportable charges.	Implemented	
	For future agreements with UDC, establish necessary internal controls to ensure that payments to contractors are in accordance with contract terms and agreements and invoices are reviewed and approved in accordance with OCFO policies and procedures prior to payment.	Implemented	
	Take the necessary actions to recover the \$26,125 in payments made by UDC for goods and services that were not related to programs cited in their MOU with DME.	Implemented	
Audit of the DC Department of Parks and Recreation Facility Use and Permit Process (September 30, 2013)	DPR should establish a system that will assist in ensuring that residency status is accurately submitted for on-line applications and that the appropriate fees are collected by	In progress	DPR reports this recommendation will be implemented by January 2015.

	requiring on-line applicants to attest to the truthfulness and accuracy of information provided.		
	DPR should consider establishing a system to review and verify adult team rosters submitted for athletic fields and other organized sports and amending Section 1.4 of their policy and procedure manual to establish fees based on composition of teams where applicable.	In progress	DPR reports this recommendation will be implemented by Fall 2014.
Audit of Non-District Resident Students Enrolled in Public Schools (September 30, 2013)	OSSE should work with schools to ensure all eligible resident students are enrolled before non-resident students in accordance with legal requirements.	Implemented	
	OSSE should ensure tuition is calculated and deposited in accordance with statutory requirements.	Implemented	
	OSSE should work with the schools to ensure that: <ol style="list-style-type: none"> 1) there is only one District residency fraud hotline; 2) it is promoted in accordance with the law; and 3) investigations are addressed as required by law. 	Implemented	
Audit of the Public Service Commission's Agency Fund for Fiscal Years 2009-2012 (September 30, 2013)	Take steps to ensure that all assessment checks are deposited in a timely manner in compliance with OCFO's financial policies and procedures.	Implemented	
	Take the necessary steps to comply with the District of Columbia's Quick Pay Act and make all payments no later than the required due date.	Implemented	
	Establish procedures to ensure the timely payment of invoices.	Implemented	

	Take steps to ensure that all invoices are stamped with the date the invoice was received.	Implemented	
Audit of the District Department of Transportation's H Street Shuttle Service Grant Awards Issued in Fiscal Years 2008 and 2010 (December 6, 2013)	DDOT should strengthen its internal control environment to ensure grant-related policies and procedures address appropriate District laws and the City-Wide Sourcebook Grants Manual and Sourcebook.	In progress	DDOT has not yet responded to our request for information about the implementation status of the recommendations made in this report.
	DDOT should ensure that grant-related policies and procedures are clearly known and implemented.	In progress	DDOT has not yet responded to our request for information about the implementation status of the recommendations made in this report.
	DDOT should ensure adherence with grant agreement terms prior to disbursing grant payments.	In progress	DDOT has not yet responded to our request for information about the implementation status of the recommendations made in this report.
Audit of the Office of the People's Counsel Agency Fund for Fiscal Years 2009-2012 (January 15, 2014)	Review invoice number 210186888A dated May 13, 2009 and make necessary adjustments to ensure that the vendor is correctly paid.	In progress	As of the time of this writing, we had not yet received responses from the Office of the People's Counsel.
	Take steps to ensure that all assessment checks are deposited in a timely manner in compliance with the District OCFO's financial policy and procedures.	In progress	As of the time of this writing, we had not yet received responses from the Office of the People's Counsel.
	Take the necessary steps to comply with the District of Columbia's Quick Pay Act and make all payments no later than the required due date.	In progress	As of the time of this writing, we had not yet received responses from the Office of the People's Counsel.
	Take steps to ensure that all invoices are stamped with the date the invoice was received in order to accurately calculate when invoices are due.	In progress	As of the time of this writing, we had not yet received responses from the Office of the People's Counsel.