



**Implementation of
District of Columbia
Auditor Recommendations**

January 13, 2017

A Report by the Office of the District of Columbia Auditor
Kathleen Patterson, District of Columbia Auditor

007:17:JS:cp:LP:KP

January 13, 2017

The Hon. Phil Mendelson, Chairman
Council of the District of Columbia
The John A. Wilson Building
1350 Pennsylvania Ave., N.W.
Washington DC 20004

Dear Chairman Mendelson:

What follows is a letter report providing the status of recommendations made by this office over the last three years. We hope this is particularly useful to the Council in conducting its FY 2017 performance oversight hearings.

Background

The Office of the District of Columbia Auditor (ODCA) conducts audits and program reviews and issues recommendations to improve the economy, efficiency, and effectiveness of District government operations. The benefit from our work is not in the recommendations made, however, but in their effective implementation. When a 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 providing sound and reasonable recommendations and following-up with agency management to determine the status of recommendations made in past 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 reports.

Through October 31, 2016, we tracked 161 recommendations contained in 26 reports issued from December 2013 through April 2016. For 2013 through 2015 we include recommendations made in “Yellow Book” audits, that is, those following Generally Accepted Government Auditing Standards and for 2016 we included all other recommendations in non-GAGAS audits and program evaluations.

We begin our follow-up process by entering all recommendations contained in completed reports into our tracking database. Our practice has been to follow up every six months with agency management to determine the implementation status of those recommendations. Starting in fiscal year 2016, our first follow up with the agency occurs three months after the report is issued. 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 Follow up continues every six months until all recommendations have been confirmed as either implemented, no longer applicable, or the agency confirms that the recommendation will not be implemented.

This year’s report includes all recommendations deemed “open” in last year’s report, except for those issued more than three years ago. “Open” recommendations are any that we have not been able to confirm as implemented or no longer applicable, or that the agency has reported that they will not be implementing. We also included new recommendations issued in reports dating from May 1, 2015 through April 30, 2016.

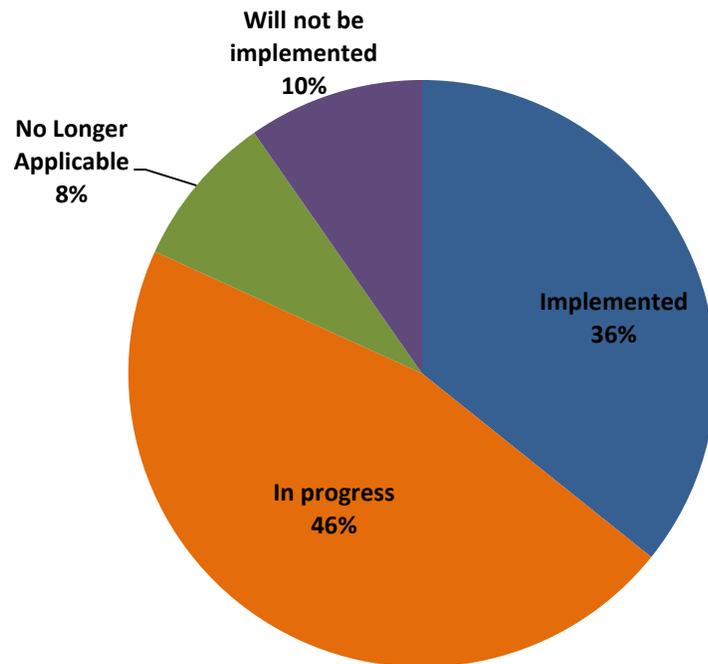
Results

This report describes the status of the 161 recommendations issued from December 2013 through April 2016. 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	<p>This status is assigned in three instances:</p> <ul style="list-style-type: none"> • Recommendations that management 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 accepts risk	Management does not agree with the recommendation and does not intend to implement it. In making this choice, agency management is accepting the risk that accompanies the associated finding.

For purposes of future tracking, all recommendations confirmed as “implemented” or “no longer applicable” 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 three years has passed since the recommendation was issued. As shown in the chart below, as of October 31, 2016, 36 percent of recommendations were implemented, 46 percent were in progress, 8 percent were no longer applicable, and 10 percent will not be implemented.

Recommendations Status Summary



What follows are a summary of the status of recommendations and a comprehensive list of recommendations with their status explained.

Sincerely,

Kathleen Patterson
District of Columbia Auditor

cc: D.C. Councilmembers

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The following table summarizes the status of the 161 recommendations by audit report in chronological order.

Page	Report	Date Published	Implemented	In Progress	No Longer Applicable	Will not be implemented
8	#1 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			
8	#2 Audit of the Administration of District Funds to the D.C. Children and Youth Investment Trust Corporation	Feb 12, 2014			3	
8	#3 Audit of the District's Eastern Market Program and Fund	Jul 29, 2014	2	2		
9	#4 Contractor Selection and Quality Assurance for Select DDOT Road Projects	Aug 6, 2014		2		
9	#5 District of Columbia Public Schools' Budget Development and Execution Processes Were Not Sufficient to Avoid Divisional Over- and Under-Spending	Sep 10, 2014	3			
9	#6 Improved Oversight of the UDC Land Grant Endowment Fund is Required	Sep 19, 2014	1			
9	#7 Nursing Facility Quality of Care Fund is Improving the Lives of District Residents but Additional Oversight is Necessary	Sep 22, 2014	1	1		
10	#8 The D.C. Lottery and Charitable Games Control Board was Substantially in Compliance with the D.C. Official Code for Fiscal Year 2013 but Action is Required for Full Compliance	Sep 29, 2014	3	1		1
10	#9 ANC 8B Financial Operations Were Not Fully Compliant with Law	Sep 30, 2014	6	1		
11	#10 Audit of the Anacostia River Clean Up and Protection Fund	Oct 30, 2014	4		1	
12	#11 Audit of ANC 5B for Fiscal Years 2009 through 2013 1 st Quarter	Nov 6, 2014	8			
13	#12 ANC 1A Did Not Fully Comply with All Legal Requirements	Nov 20, 2014	4	1		

Page	Report	Date Published	Implemented	In Progress	No Longer Applicable	Will not be implemented
13	#13 ANC 8E Did Not Properly Support All Reported Expenditures	Feb 10, 2015	1	1		
14	#14 Oversight Improvements Must Continue to Ensure Accountability in Use of Public Funds by D.C. Public Charter Schools	Mar 17, 2015	2	2		1
14	#15 ANC 5C Did Not Comply Fully with the ANC Act	Apr 9, 2015	1	3		
15	#16 ANC 6E Largely Compliant with Law	Apr 28, 2015	1	2		
15	#17 ANC 7F Did Not Fully Comply with the ANC Act	May 18, 2015		8		
16	#18 Effects of the District's Sick and Safe Leave Act	May 28, 2015	1	2		
16	#19 ANC 8D Financial Operations Were Not Fully Compliant with the Law	June 16, 2015		4		
16	#20 The District's School Modernization Program has Failed to Comply with D.C. Code and Lacks Accountability, Transparency, and Basic Financial Management	July 1, 2015	2	13	2	6
20	#21 Events DC Performance Evaluation	Oct 30, 2015	2			
20	#22 Potentially Wasteful Pool Maintenance Contracts Need Review, Oversight	Feb 3, 2016		4		
20	#23 RPTAC Has Improved the Appeal Assessment Process	Mar 4, 2016		3		
21	#24 Prevention of Homelessness Was Not Properly Managed in Fiscal Year 2014 to Ensure Performance Consistent with Contract Terms	Mar 9, 2016	5	18	6	6
25	#25 DYRS Can Strengthen the Management of DC YouthLink, Community-Based Residential Facilities, and Performance Reporting	Mar 17, 2016	8		2	
27	#26 Review of Summer Youth Employment Programs in Eight Major Cities and the District of Columbia	April 21, 2016		9		1
	TOTALS		59 (36%)	76 (46%)	14 (8%)	16 (10%)

As of October 31, 2015, the distribution of open recommendations is as follows:

Entity	Number of Open Recommendations
Department of Human Services	23
Department of General Services	15
Department of Employment Services	10
Office of the Mayor	8
ANC 7F	8
ANC 8D	4
ANC 5C	3
Real Property Tax Appeals Commission	3
Council of the District of Columbia	3
District Department of Transportation	2
D.C. Lottery and Charitable Games Control Board	2
Department of Parks and Recreation	2
Office of the State Superintendent for Education	2
ANC 6E	2
Public Charter Schools Board	1
ANC 1A	1
ANC 8B	1
ANC 8E	1
Department of Health Care Finance	1
Department of Human Resources	1

The following table shows the status of recommendations included in this report organized by how long it has been since the report was issued.

Timeframe	Implemented	In progress	No longer applicable	Will not be implemented	Total
0-6 Months	Not tracked				
7-12 Months	14	33	8	8	63
1 to 2 Years	22	36	2	7	67
Over 2 Years	23	7	4	1	35
TOTAL	59	76	14	16	163

Status of Audit Recommendations, as of October 31, 2016, Listed Chronologically, by Date of Report Publication

Ref #	Report Title (publication date)	Rec #	Recommendation	Status	Comments
1	Audit of the District Department of Transportation's H Street Shuttle Service Grant Awards Issued in Fiscal Years 2008 and 2010 (December 6, 2013)	1	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.	Implemented	
		2	DDOT should ensure that grant-related policies and procedures are clearly known and implemented.	Implemented	
		3	DDOT should ensure adherence with grant agreement terms prior to disbursing grant payments.	Implemented	
2	Audit of the Administration of District Funds to the D.C. Children and Youth Investment Trust Corporation (February 12, 2014)	1	CYTIC should ensure that documentation standards and controls are consistently applied within the grant-making process	No longer applicable	The Children's Youth Investment Trust Corporation voted to dissolve the organization in 2016. It no longer exists.
		2	CYTIC should consistently monitor all grantees and ensure that grant monitoring documentation is maintained in grant files.	No longer applicable	The Children's Youth Investment Trust Corporation voted to dissolve the organization in 2016. It no longer exists.
		3	CYTIC should ensure that all District funds are properly accounted for and readily identifiable.	No longer applicable	The Children's Youth Investment Trust Corporation voted to dissolve the organization in 2016. It no longer exists.
3	Audit of the District's Eastern Market Program and Fund (July 29, 2014)	1	DGS should execute new lease agreements with all South Hall merchants that accurately reflect market rates. Until new lease agreements are signed, DGS should enforce the holdover provisions of the current lease agreements.	In progress	DGS initially reported that they expected to implement this recommendation by July 2015. This implementation date has since been pushed back to November 2016.
		2	DGS should enforce and collect the \$3,500 in late payment penalties for South Hall merchants in accordance with the lease agreements.	Implemented	
		3	DGS should create a standard contract for North Hall rentals that documents all relevant information and that are approved and signed by the CPMO.	Implemented	
		4	DGS and OFRM should conduct monthly deposit reconciliations.	In progress	DGS reported that this recommendation has been implemented. However, they have not provided

Ref #	Report Title (publication date)	Rec #	Recommendation	Status	Comments
					documentary evidence to support this assertion. We did not follow up with OFRM on this recommendation.
4	Contractor Selection and Quality Assurance for Select DDOT Road Projects (August 6, 2014)	1	DDOT should develop clear and complete guidance for required responsibility reviews so that they will be consistently conducted and documented.	In progress	DDOT has not yet responded to our request for a status update on these recommendations.
		2	DDOT management should further clarify their policies and procedures to indicate which deadline is to be used when calculating possible liquidated damages. In addition, the date which contract work is determined to be complete must be clearly communicated to all parties and documented.	In progress	DDOT has not yet responded to our request for a status update on these recommendations.
5	District of Columbia Public Schools' Budget Development and Execution Processes Were Not Sufficient to Avoid Divisional Over- and Under-Spending (September 10, 2014)	1	DCPS should work with the Office of the Chief Financial Officer to assess shortcomings in budget formulation and monitoring to prevent divisions from overspending their budgets.	Implemented	
		2	DCPS should maintain evidence of monthly monitoring of divisional spending relative to the adopted budget.	Implemented	
		3	DCPS should maintain transparency for stakeholders by continuing to align its budgetary divisions with its operational divisions.	Implemented	
6	Improved Oversight of the UDC Land Grant Endowment Fund is Required (September 19, 2014)	1	OCFO and the IAC should identify UDC's Land-Grant Endowment Fund, identify and reimburse any non-allowable management fees and expenditures paid from the Fund, and execute written procedures to consistently manage and oversee the Fund to ensure compliance with the appropriate requirements and stipulations regarding: 1) management fees, 2) allowable expenditures, and 3) target allocation ranges.	Implemented	
7	Nursing Facility Quality of Care Fund is Improving the Lives of District Residents but Additional Oversight is Necessary (September 22, 2014)	1	DHCF should assess its nursing facility provider tax and establish an allowance for uncollectible amounts, if necessary.	Implemented	DHCF concluded that such an allowance was unnecessary.
		2	The Mayor or a designated representative should comply with the requirements of D.C. Code §47-1262 (d) and perform an annual audit of the Fund, reporting on the results of the audit to the District of Columbia Council.	In progress	DHCF reports that they will task their external auditors with auditing the Nursing Home Quality of Care Fund. They had previously reported that it would be complete by January 2016, but now estimate it will be done by October 2016.

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8	The D.C. Lottery and Charitable Games Control Board was Substantially in Compliance with the D.C. Official Code for Fiscal Year 2013 but Action is Required for Full Compliance (September 29, 2014)	1	The Lottery's Chief of Security should initiate written measures to ensure that the Lottery complies with District law requirements that results of pre-employment background and fingerprint checks are received prior to an individual's employment with the Lottery.	Implemented	
		2	The Lottery's Executive Director should request the OCFO's Office of Integrity and Oversight to conduct periodic background and fingerprint checks for all Lottery employees, contractors, and vendors identified in "sensitive" positions.	Implemented	
		3	The Lottery's AFO and the Director of Licensing and Sales should take immediate action to document and establish procedures that comply with District law and ensure that all sales agents hold all money resulting from lottery and daily number games sales in trust for the benefit of the Lottery.	No action intended; management accepts risk	DCLB has reported that they disagree with the finding. They claim that their existing methods for collecting funds from Lottery sales agents are sufficient.
		4	The Lottery's AFO should institute measures to ensure that unclaimed prize money is utilized for additional lottery games and promotions, as specified.	In progress	DCLB reported that they have implemented this recommendation; however, they have not provided adequate documentary evidence to support this claim.
		5	The Lottery's AFO should establish written procedures and practices to ensure vendors who satisfactorily provide goods and services to the Lottery and submit a proper invoice for payment are paid within 30 calendar days as required by the District's Quick Payment Act.	Implemented	
9	ANC 8B Financial Operations Were Not Fully Compliant with Law (September 30, 2014)	1	ANC 8B's commissioners, at their first meeting of each calendar year, should adopt and publish a schedule of regular commission meetings for the remainder of the calendar year.	Implemented	
		2	ANC 8B's commissioners should maintain an approved written record of each public meeting in a secure location.	Implemented	
		3	ANC 8B's Treasurer should ensure that ANC 8B's quarterly financial reports are complete, accurate, and filed with the Auditor by required due dates.	Implemented	
		4	ANC 8B's Treasurer should reconcile bank statements to the checkbook within 15 days of the	In progress	ANC 8B reported that they have implemented this recommendation. However, based on limited testing,

Ref #	Report Title (publication date)	Rec #	Recommendation	Status	Comments
			receipt of the bank statement and that the bank statement and the reconciliation should be reviewed and approved by the Chairperson or Vice Chairperson.		we have determined that this is not so.
		5	ANC 8B should establish written policies and procedures detailing the requirements for hiring and approving expenditures for consultants providing personal services and incorporate these procedures into their by-laws.	Implemented	
		6	ANC 8B should review the current grant policy, improve its internal controls for their grant program and comply with the D.C. Code and the Auditor's Guidelines.	Implemented	
		7	ANC 8B should establish a written records transition policy for Commissioners that are not re-elected or whom are no longer serving as officers.	Implemented	
10	Audit of the Anacostia River Clean Up and Protection Fund (October 30, 2014)	1	DOEE should strengthen its system to monitor and document that the Fund's expenditures are meeting the Anacostia River Act's priorities in order, on an annual basis.	No longer applicable	The Council of the District of Columbia, in the "Fiscal Year 2016 Budget Support Act of 2015," effective 10/22/15, modified the Anacostia River Act to remove the requirement that funds are spent in any specific order. The law now only requires that funds are spent on specified projects, but does not specify in what order or that any are given greater priority than others.
		2	DOEE should establish written Standard Operating Procedures for the Program's revenue and expenditure processes and grant management processes.	Implemented	
		3	DOEE should establish complete MOUs or signed agreements with its partner agencies.	Implemented	
		4	The DMV should immediately comply with legal requirements to transfer Anacostia River license plate renewal fees into the Fund and clarify the requirement to ensure consistent, timely transfers.	Implemented	
		5	DOEE should strengthen its strategic planning process to detail the Program's interagency collaborations, goals and objectives, strategies and resources, and program evaluation.	Implemented	

Ref #	Report Title (publication date)	Rec #	Recommendation	Status	Comments
11	Audit of ANC 5B for Fiscal Years 2009 through 2013 1 st Quarter (November 6, 2014)	1	ANC 5B's commissioners / officers, at their first meeting of each calendar year, should adopt a schedule of regular commission meetings for the remainder of the calendar year.	Implemented	
		2	ANC 5B's commissioners / officers should maintain a written record of each public meeting and maintain an approved copy of the record in a secure location.	Implemented	
		3	ANC 5B's commissioners / officers, at their first meeting of each fiscal year, should develop a budget for the upcoming fiscal year.	Implemented	
		4	ANC 5B's Treasurer and Chairperson, at their first meeting of the calendar year, should adopt a resolution to participate in the ANC Security Fund or obtain a cash or surety bond.	Implemented	
		5	ANC 5B's Treasurer should ensure that ANC 5B's quarterly financial reports are complete, accurate, and filed with the Auditor by the required due dates.	Implemented	
		6	ANC 5B's Treasurer should provide the date the report was filed with the Auditor at each public meeting.	Implemented	

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		7	ANC 5B's Treasurer should reconcile bank statements to the checkbook within 15 days of the receipt of the bank statement.	Implemented	
		8	ANC 5B's bank statements and reconciliations should be reviewed and then initialed by an officer other than the Treasurer.	Implemented	
12	ANC 1A Did Not Fully Comply with All Legal Requirements (November 20, 2014)	1	ANC 1A's Treasurer should ensure that ANC 1A's quarterly financial reports are complete, accurate, and filed with the Auditor by the required due date.	Implemented	
		2	ANC 1A's Treasurer should provide the date the quarterly report was filed with the Auditor at each public meeting.	In progress	Based on our review of their meeting minutes, it does not appear that they have complied with this recommendation.
		3	ANC 1A should review the current grant policy and improve its internal controls for their grant program and comply with the D.C. Code and the Auditor's Guidelines.	Implemented	
		4	ANC 1A should provide proof of approval of these new policies at a public meeting within 90 days of this report.	Implemented	
		5	ANC 1A's commissioners / officers, at their first meeting of each fiscal year, should develop a spending plan for the upcoming fiscal year.	Implemented	
13	ANC 8E Did Not Properly Support all Reported Expenditures (February 10, 2015)	1	With regard to filing complete and accurate quarterly reports, ANC 8E should follow the requirements of the ANC Act as well as the ANC Financial Management Guidelines issued by the Office of the District of Columbia Auditor.	In progress	ANC 8E continues to file their quarterly reports late.
		2	The Council of the District of Columbia should consider legislative action to strengthen controls over spending by Advisory Neighborhood Commissions.	Implemented	The Committee on Housing and Community Development, which has oversight of the ANCs, has passed legislation to update the ANC law, which includes language to increase accountability and minimize waste in ANC spending.

Ref #	Report Title (publication date)	Rec #	Recommendation	Status	Comments
14	Oversight Improvements Must Continue to Ensure Accountability in Use of Public Funds by D.C. Public Charter Schools (March 17, 2015)	1	The PCSB should continue to strengthen its annual financial and compliance reviews to ensure all financial and contracting requirements are met, and met timely.	Implemented	
		2	Through their oversight of D.C. public charter schools, the Mayor and the Council of the District of Columbia should ensure that the PCSB has the necessary personnel and other tools to provide adequate monitoring of charter schools, including considering legislation to require for-profit management firms to provide the same level of financial information as now provided by not-for-profit firms.	Implemented	
		3	OSSE should work with D.C. policymakers to develop policies and procedures so that funding can more efficiently follow students, including adjusting payments to charter schools for student movement that occurs after the enrollment audit.	In progress	OSSE reports that they expect to implement this recommendation by September 2018.
		4	OSSE should appropriately deploy personnel to verify that payments to charter schools for at-risk students and residential programs are accurate.	In progress	OSSE reported that this recommendation has been implemented; however, they did not provide adequate documentation to support this assertion.
		5	The PCSB should publish current fiscal policies and procedures for charter schools.	No action intended; management accepts risk	PCSB's response: "Historically PCSB has published a fiscal policy handbook but we discontinued this practice in 2011 because the handbook was unable to capture every unique circumstance for all LEAs. However we have made additional resources available to our schools that provide guidance on financial and operational best practices (e.g. DC Public Charter Schools Operations Manual, http://focusdc.org/docs/opsmanual.pdf)."
15	ANC 5C Did Not Comply Fully with the ANC Act (April 9, 2015)	1	ANC 5C's Treasurer should ensure that ANC 5C's quarterly financial reports are complete, accurate, properly signed, and filed with the Auditor by the required due dates.	In progress	ANC 5C continues to submit their quarterly reports late.
		2	ANC 5C should follow the ANC Act when filling vacancies.	In progress	ANC 5C did not fill any vacancies in FY2015 or FY2016.
		3	ANC 5C should review their current grant policy and internal controls in order to be in compliance with the D.C. Code and the Auditor's grant guidelines.	In progress	ANC 5C has not yet implemented this recommendation.

Ref #	Report Title (publication date)	Rec #	Recommendation	Status	Comments
		4	ANC 5C's Commissioner should adhere to the requirements of the Act with regard to submitting complete documentary support for every expenditure they make.	Implemented	
16	ANC 6E Largely Compliant with Law (April 28, 2015)	1	ANC 6E should update its bylaws to reflect ANC 6E's current geographic boundaries	In progress	ANC 6E has not yet responded to our request for information about their implementation of this recommendation.
		2	Tighter management control should be applied to ensure the integrity of the grant award and monitoring processes.	In progress	ANC 6E has not yet responded to our request for information about their implementation of this recommendation.
		3	ANC 6E's Commissioners, at their first meeting of each fiscal year, should develop a spending plan for the upcoming fiscal year.	Implemented	
17	ANC 7F Did Not Fully Comply with the ANC Act (May 18, 2015)	1	ANC 7F should establish a voucher package for each disbursement to include supporting documents.	In progress	ANC 7F has not yet responded to our request for information about their implementation of this recommendation.
		2	ANC 7F's Commissioners/officers, at their first meeting of each fiscal year, should develop and present a spending plan budget for the upcoming fiscal year.	In progress	ANC 7F has not yet responded to our request for information about their implementation of this recommendation.
		3	ANC 7F's Commissioners, at their first meeting of each calendar year, should adopt and publish a schedule of regular Commission meetings for the remainder of the calendar year.	In progress	ANC 7F has not yet responded to our request for information about their implementation of this recommendation.
		4	ANC 7F's Commissioners should maintain, in a secure location, an approved written record of each public meeting.	In progress	ANC 7F has not yet responded to our request for information about their implementation of this recommendation.
		5	ANC 7F should ensure that its quarterly financial reports are filed with the Auditor by required due dates.	In progress	ANC 7F has not yet responded to our request for information about their implementation of this recommendation.
		6	ANC 7F's Treasurer and Chairperson should, at their first meeting of the calendar year, adopt a resolution to participate in the ANC Security Fund, or obtain a cash or surety bond.	In progress	ANC 7F has not yet responded to our request for information about their implementation of this recommendation.
		7	The ANC 7F Treasurer should reconcile bank statements to the checkbook within 15 days of receipt of the bank statement.	In progress	ANC 7F has not yet responded to our request for information about their implementation of this recommendation.
		8	The bank statement and reconciliation should be reviewed and approved by the Chairperson or Vice	In progress	ANC 7F has not yet responded to our request for information about their implementation of this

Ref #	Report Title (publication date)	Rec #	Recommendation	Status	Comments
			Chairperson.		recommendation.
18	Effects of the District's Sick and Safe Leave Act (May 28, 2015)	1	DOES should resubmit the hardship exemption rules and the District Council should review these rules and either affirmatively approve or disapprove them. If the Council disapproves the rules, we urge them to work with DOES to develop rules that satisfy the requirements of the law or to amend the law as they see fit.	In progress	DOES reports that this recommendation will be implemented by March 2017.
		2	DCHR should notify all current District employees who are or were WAE employees that they are entitled to sick leave as of the date the Act became effective and explain how and when they will be credited with this leave.	In progress	DCHR has not responded to our request for information about their implementation of this recommendation.
		3	DOES should develop a comprehensive program to ensure that all District businesses are aware of the requirements under the Act. The agency should also consider devoting additional resources to inspections and enforcement of the Act.	Implemented	
19	ANC 8D Financial Operations Were Not Fully Compliant with the Law (June 16, 2015)	1	ANC 8D Commissioners should ensure that adequate documentation supporting all disbursements is maintained by creating a voucher package for each expenditure.	In progress	ANC 8D has not yet replied to our request for information about the implementation status of this recommendation.
		2	ANC 8D Commissioners should ensure that all checks are signed by two officers, as required.	In progress	ANC 8D has not yet replied to our request for information about the implementation status of this recommendation.
		3	ANC 8D Commissioners should maintain an approved written record of each public meeting in a secure location.	In progress	ANC 8D has not yet replied to our request for information about the implementation status of this recommendation.
		4	ANC 8D's Commissioners / officers, at their first meeting of each fiscal year, should develop and present a spending plan for the upcoming fiscal year.	In progress	ANC 8D has not yet replied to our request for information about the implementation status of this recommendation.
20	The District's School Modernization Program Has Failed to Comply with D.C. Code and Lacks Accountability, Transparency, and Basic Financial Management (July 1, 2015)	1	The Council should require the development of a clear and consistent selection process.	In progress	The Council reports that this recommendation will be implemented by the end of 2017.
		2	Once policymakers have defined a selection process by which DGS (in consultation with other agencies) will select schools for modernization, the Deputy Mayor for Education should ensure that this information is efficiently disseminated to the public.	In progress	The Deputy Mayor for Education reported that this recommendation has been implemented; however, they have not provided documentary support.

Ref #	Report Title (publication date)	Rec #	Recommendation	Status	Comments
		3	The Deputy Mayor for Education should revise the Master Facilities Plan to include a schedule and process for school modernizations in the District.	In progress	The Deputy Mayor for Education reports this recommendation will be implemented by December 2017.
		4	The Mayor [should] ensure that all of the elements outlined in D.C. Code § 38-2803 (d) are included in the annual budget submission.	In progress	The Deputy Mayor for Education reports this recommendation will be implemented by Spring 2017.
		5	The Mayor and Council should reappoint the Advisory Committee as required by the law, or the Mayor and Council should amend the law and seek alternative means to meet the intent of the provision: accountability, transparency, and oversight.	No longer applicable	The law has been changed and no longer requires an Advisory Committee.
		6	The Mayor and Council should assess the impact of funding the District's school modernization program with debt.	Implemented	
		7	<p>For the five high school modernizations covered in this audit (Eastern, Woodson, Cardozo, Anacostia, and Wilson) [...], we recommend that DGS perform an assessment of each contract to determine if any savings should have accrued to the District. This analysis should include:</p> <ul style="list-style-type: none"> An item-by-item reconstruction of how the GMP contingency was used [...and] [A] report on "buy-outs" including variances between subcontracts for base scope versus their respective Guaranteed Maximum Price schedule of values line item. <p>Should this analysis identify any project savings that should have accrued to the District, DGS should secure the appropriate payment to the District.</p>	In progress	DGS reports that they have completed the analysis for 3 of 5 high schools and explains that the other 2 high schools will be audited "as time permits."
		8	<p>DGS [should] enforce the terms of each of the contracts it signs for the District's school modernization projects. Specifically, DGS should:</p> <ul style="list-style-type: none"> Require that contractors provide Buy Out variances in their monthly reports, [...]; (See report for additional language.) 	In progress	DGS reported that they have implemented this recommendation, but has not provided documentary evidence to support this.
		9	For each project over a specific threshold, the Council should require DGS to present an analysis of	Implemented	The Committee on Transportation and the Environment states that the Council continues to ask

Ref #	Report Title (publication date)	Rec #	Recommendation	Status	Comments
			job costs and savings to the Council before the final contractor payment application is approved and paid.		DGS for this information at oversight hearings.
		10	DGS [should] enforce existing cost control mechanisms for its projects and [] devise a method for managing and assessing those mechanisms, including contract provisions in their existing contracts which establish how contractors may spend funds set aside for contingencies.	In progress	DGS reported that they have implemented this recommendation but has not provided documentary evidence to support this.
		11	The Mayor and Council should require that each iteration of the MFP include cost standards for school modernizations in the District as a check on spiraling costs and to enable the ODCA to comply with the requirements set forth in D.C. Code § 38-2973.05.	In progress	The Deputy Mayor for Education responded “No longer applicable” but referred to pending legislation. In addition, it is not clear to us what provision of law, either existing or pending, renders this recommendation no longer applicable. The Council reported “not started” and noted that “there is still an opportunity for the Executive to incorporate cost standards in the next MFP.”
		12	The Mayor and Council should require an analysis of the costs and benefits of LEED-qualified construction and clarify the standards that should be sought.	No action intended, management accepts risk	The Deputy Mayor for Education and Council both pointed out that the Healthy Schools Act requires all school facilities to be built at LEED Gold certification or higher.
		13	DGS should continue to gather the necessary information for Anacostia’s LEED submission. Should Anacostia be deficient in the quality of its design as compared to other District schools, any deficiencies preventing LEED certification should be remedied immediately.	In progress	DGS reported this recommendation as no longer applicable, but did not provide any documentary support. In addition, it appears from their response that it may be more accurate to say that the recommendation is implemented. We will follow up with them and update this recommendation in the future.
		14	The Mayor should direct DGS to improve its internal controls environment, by designing, documenting, and implementing effective internal controls.	No action intended, management accepts risk	
		15	DGS should familiarize itself with the statutory references to the District’s school modernization program, and in particular, the audit requirements outlined by District law so as to create controls and processes designed to meet those expectations set by policymakers.	No action intended, management accepts risk	DGS responded by saying that they were already familiar with statutory references to the District’s school modernization program.
		16	[...], DGS should ensure that the Capital	No action	

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			Improvement Plan (CIP) includes school specific project listings [...]. Should DGS still require some transfers throughout the fiscal year, it should ensure that it retains the necessary documentation to support why transfers were made and who approved them.	intended, management accepts risk	
		17	DGS [...] should develop and document a process for properly reviewing and approving all invoices before they are paid [and t]hese procedures must provide detailed instructions [...] on the exact nature of the documentation that should be included with each pay application. They should also describe how to retain documentation so that auditors can review invoice approval and payment processes in the future.	In progress	DGS reported that this recommendation has been implemented. However, they did not provide documentation to support this, and our FY16 audit in progress indicates it has not been implemented.
		18	DGS should occasionally conduct random mini-audits of DC PEP to ensure that the District's contractors are submitting all the documentation required by their contracts and to ensure that DC PEP is properly managing those contracts.	In progress	DGS explains that they have started a process of regular compliance review and that they expect to officially close out the DCPEP contract by December 31, 2016.
		19	DGS should develop a process for allocating costs from individual invoices to multiple schools, as necessary. Additionally, project management fees should be charged directly to the schools where project managers worked.	No action intended; management accepts risk	
		20	DGS [...] should] revise their process for reviewing and approving invoices for payment [to] ensure that funds allocated by the Council are in fact spent as intended.	In progress	DGS reported that this recommendation has been implemented but did not provide documentation to support this. In addition, our FY16 audit in progress indicates this has not been implemented.
		21	DGS should design policies and procedures to ensure that IT equipment is properly monitored and uniquely identified from the time that it is purchased until custody of this equipment is transferred over to each school's IT department.	In progress	DGS's response was unclear. They reported the recommendation as implemented, however, in their explanation it appeared that it was still in progress. We followed up to ask for clarification but have not yet received a reply.
		22	The Mayor should perform an analysis of the relationship with DC PEP in accordance with D.C. Code § 2-352.05.	No longer applicable	The contract with DC PEP expired September 30, 2016.

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21	Events DC Performance Evaluation (October 30, 2015)	1	Events DC should investigate the metrics included here to determine if there are any areas where they can improve their financial or operational performance. Additionally, Events DC should continue to perform this type of analysis in the future, using either the International Association of Venue Managers' report or another comparable source of data.	Implemented	
		2	Destination DC (DDC) should investigate the differences ODCA has identified in Appendix 1 to determine if there are any areas where they can improve their marketing and sales strategy. Additionally, DDC should continue to provide this type of analysis in the future, using either the Destination Marketing Association International's marketing and sales study or another source of compiled data for the destination marketing industry.	Implemented	
22	Potentially Wasteful Pool Maintenance Contracts Need Review, Oversight (February 3, 2016)	1	DGS and DPR should perform a cost / benefit analysis of their existing pool maintenance contracts and consider modifying or cancelling their existing maintenance contracts if no clear benefit can be shown.	In progress	Neither DGS nor DPR have responded to our request for information about the status of this recommendation.
		2	DPR and DGS should consider contracting directly with distributors for the purchase of pool chemicals.	In progress	Neither DGS nor DPR have responded to our request for information about the status of this recommendation.
23	RPTAC Has Improved the Appeal Assessment Process (March 4, 2016)	1	Part-time Commissioners should be hired as part-time District government employees rather than as independent contractors.	In progress	RPTAC reported this recommendation is in progress but provided no estimate of when it will be implemented.
		2	RPTAC should work with the Board of Ethics and Government Accountability (BEGA) to ensure that all of those who are required to file Public Financial Disclosure Statements do so and to properly report to BEGA the names of those who are required to file Confidential Financial Disclosure Statements and ensure that they do so and that those Confidential Financial Disclosure Statements are reviewed in a timely manner, as required.	In progress	RPTAC reported that this recommendation has been implemented, but did not provide any documentary support.
		3	RPTAC should put in place a recusal process that	In progress	RPTAC reported that this recommendation has been

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			includes a determination of whether a conflict of interest or potential conflict of interest exists and whether recusal is the appropriate remedy. (See report for additional language.)		implemented, but did not provide any documentary support.
24	The District's Management Contract with The Community Partnership for the Prevention of Homelessness was not Properly Managed in Fiscal Year 2014 to Ensure Performance Consistent with Contract Terms (March 9, 2016)	1	To the extent that DHS continues to contract for the management of homeless services, the agency should carefully review the required deliverables for future contracts, design a contract oversight plan that includes regular performance assessment metrics of the contractor, and assign sufficient personnel to perform contract administration.	In progress	DHS reported this recommendation would be implemented by September 30, 2016. We followed up with the agency in November 2016 to see if the recommendation had been implemented but had not heard back from them at the time of this writing.
		2	DHS should ensure that TCP submits the required monthly and annual performance reports, based on subcontract services to be provided, for each Contract Line Item Number (CLIN) and subcontract, as well as monthly invoices that detail the quantity of services provided for each CLIN and subcontract.	In progress	DHS reported this recommendation would be implemented by September 30, 2016. We followed up with the agency in November 2016 to see if the recommendation had been implemented but had not heard back from them at the time of this writing.
		3	DHS should invest in staffing for homeless services contract administration, including expanding the team, outlining specific responsibilities and providing for creation of data reports in HMIS.	In progress	DHS reported this recommendation would be implemented by September 30, 2016. We followed up with the agency in November 2016 to see if the recommendation had been implemented but had not heard back from them at the time of this writing.
		4	DHS should review and revise the performance expectations of homeless services contract administrators and incorporate these detailed responsibilities into the contract administrators' annual performance assessments.	Implemented	
		5	Policymakers, including the Mayor and Council, with the assistance of the Chief Financial Officer, should devise a more suitable annual funding cycle for ongoing critical services that does not rely on a series of budget and contract modifications, including working with federal counterparts as necessary.	In progress	
		6	DHS should develop a solicitation plan including justification for which services should be competitively bid and a timeline for solicitations going forward.	In progress	DHS reported this recommendation would be implemented by September 30, 2016. We followed up with the agency in November 2016 to see if the recommendation had been implemented but had not heard back from them at the time of this writing.

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		7	DHS should review the number of staff in OPRMI to determine if additional employees are necessary or other staff can assume additional responsibilities to ensure reports are sent to the providers in a timely manner.	In progress	DHS reports that they have detailed a staff member to assist the monitoring work. In addition, they say they will continue to review the number of staff in OPRMI's Homeless Services Monitoring Unit (HSMU) to ensure the Department continues to send reports to staff out within 45 days of the completion of a site visit. They anticipate this review will be complete by June 30, 2017.
		8	DHS should hold TCP accountable for the implementation of its program rules strategy in its annual performance review.	In progress	DHS reported this recommendation as implemented but did not provide sufficient documentary evidence to support this.
		9	With feedback from TCP and providers, DHS should assess which training TCP is to provide and how often, and this information should be included in the contract and annual performance reviews.	No action intended, management accepts risk	
		10	With feedback from TCP and providers, DHS should determine the programs / facilities for which TCP shall be responsible for providing security services, including the number of security personnel needed and hours of coverage.	In progress	DHS reported this recommendation as implemented but did not provide sufficient documentary evidence to support this.
		11	DHS should require that TCP submit, for agency approval, revised subcontract templates by program type [...] based on conversations with the subcontractor and including details on terms such as "comprehensive case management" and "spending plan."	In progress	DHS reported this recommendation as implemented but did not provide sufficient documentary evidence to support this.
		12	DHS should require TCP to include monitoring of specific contract elements in the Performance Monitoring plan [...]; that the plan be circulated to all of the subcontractors and include, when necessary, training to ensure subcontractors are familiar with the terms and requirements; and assess TCP's compliance on an annual basis.	In progress	DHS reported this recommendation as implemented but did not provide sufficient documentary evidence to support this.
		13	DHS should be consistent in enforcing guidance including communicating with the UPO and Catholic Charities that they must comply with TCP's Policies and Procedures as Continuum of Care Subcontractors.	In progress	DHS reported this recommendation as implemented but did not provide sufficient documentary evidence to support this.
		14	DHS should work with the Office of Contracting and	No action	DHS explains that "The CoC contracts are issued as

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			Procurement and TCP to bring CLIN amounts closer to actual costs.	intended, management accepts risk	fixed price and firm fixed unit price vehicles. Rates are revisited on an annual basis to ensure they confirm with prior year actual costs.”
		15	DHS should require TCP to reprogram budget authority or submit budget modifications if necessary.	No action intended, management accepts risk	DHS explains: “DHS intends to minimize, or eliminate the need for these actions in future procurements with the modified performance period [...]. This will also apply to the FY 2017 CoC contracts.”
		16	DHS should ensure that TCP only provides repair and maintenance of designated District-owned facilities and should include all relevant attachments in the contract to clarify which facilities TCP can provide repair and maintenance to.	No action intended, management accepts risk	DHS’s response was somewhat unclear. It appears that they may actually have implemented this recommendation. We will follow up with the agency to clarify.
		17	DHS should develop policies and procedures for the PSHP, which includes detailed processes for communicating timely changes in client amounts, rental amounts and housing changes, as well as information sharing between case managers, TCP, and DHS.	In progress	DHS reported this recommendation would be implemented by September 30, 2016. We followed up with the agency in November 2016 to see if the recommendation had been implemented but had not heard back from them at the time of this writing.
		18	DHS should ensure it has full, complete, and accurate data as it relates to its clients [...] so that it can conduct periodic reconciliations of TCP’s rental payments and conduct periodic desk audits to ensure that clients are charged to the correct programs.	Implemented	
		19	DHS should advise TCP to pay security deposits and monthly rental payments that are stipulated in the lease.	No longer applicable	Since Fiscal Year 2016, the District of Columbia Housing Authority (DCHA) has assumed the responsibilities for making payments. DCHA is required to make security deposits and rental payments on behalf of the Permanent Supportive Housing program.
		20	DHS should advise TCP to comply with the contract’s record retention requirement by strengthening its storage and organization of PSHP leases and supporting documentation.	No longer applicable	The Department of Human Services is now responsible for maintaining these documents.
		21	DHS should enter into written agreements with TCP on the Families and Singles CLINs and include clear guidance on how to bill specific costs, as well as detailed performance metrics (i.e., timely and	Implemented	

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			accurate rent payments).		
		22	DHS should determine how TCP should allocate the Sweat Equity costs.	Implemented	
		23	DHS should enter into a written agreement with TCP on the management of D.C. General, including the review and approval of a detailed budget annually.	In progress	DHS reported this recommendation as “no longer applicable;” however, they have not provided documentation to support this.
		24	DHS should consult with the D.C. Council about the use of ERAP funds to cover RRH costs.	No action intended, management accepts risk	DHS responded: “DHS understands that families who have become homeless and enter the FRSP program have been subject to a housing crisis, and that ERAP is a legitimate tool for these clients when they receive permanent housing through FRSP.”
		25	DHS should work with TCP to develop and approve detailed RRH Policies and Procedures that includes procedures to prevent late rental payments and policies on pro-rated rent and rent assurance.	No longer applicable	RRH payments are now handled by DCHA as of September 1, 2016.
		26	DHS should verify that providers are complying with program requirements related to recertification and regularly review transactions for compliance.	In progress	DHS reported that this recommendation would be implemented by September 30, 2016. We followed up with them in November 2016, but have not heard back.
		27	DHS should advise TCP to resolve data issues so that data analysis can be conducted to track all clients’ rental subsidy amounts over time and analyze the cases of long-term RRH clients to come up with a plan for their transition from the program, if the program is going to continue to be a short-term program.	In progress	DHS reported that this recommendation would be implemented by December 31, 2016.
		28	DHS should promptly finalize rule-making for the RRH program.	Implemented	
		29	DHS should advise TCP to comply with the contract’s record retention requirement by strengthening its storage and organization of RRH leases and supporting documentation.	No longer applicable	DHS reported: “The new CoC contracts for FY 2017 will only include RRH case management services. RRH rental payments are now managed by DCHA and DHS, with DHS maintaining the records.”
		30	DHS should create sub-CLINs for One-Time Costs and Rent for tracking and planning, as TCP and DHS had done for PSHP.	No longer applicable	DHS explained: “The new Continuum of Care contracts for FY 2017 will only include RRH case management services.”
		31	DHS should enter into written agreements with TCP for RRH, with detailed performance metrics, i.e., timely rent payment, and consistent recertification	No longer applicable	DHS reported: “The new CoC contracts for FY 2017 will only include RRH case management services; no RRH rental payments. RRH rental payments are now

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			requirements.		managed by DCHA and DHS. Please see attached MOA between DHS and DCHA which includes standards such as compliance with DCHA's Administrative Plan for HCVP and DCHA regulations regarding the application process, eligibility requirements, inspections, terminations, etc.; and staff qualifications."
		32	DHS should enter into a written agreement with TCP for LRSP that includes detail on allowable costs and detailed performance metrics, i.e., timely payments of one-time costs.	In progress	DHS reported this recommendation was no longer applicable. We have followed up with the agency, asking for documentation to support their answer. DHS has not yet provided sufficient documentation to support their response.
		33	DHS should regularly review LRSP transactions for compliance.	In progress	DHS reported this recommendation was no longer applicable. We have followed up with the agency, asking for documentation to support their answer. DHS has not yet provided sufficient documentation to support their response.
		34	DHS should determine whether it is appropriate for TCP to receive an administrative fee for managing itself.	No action intended, management accepts risk	DHS's response: "DHS understands that the cost of doing business (sic); and hence a fee is appropriate for any level of oversight. DHS does agree that enhanced monitoring should be occurring in an instance where the prime contractor on the Continuum of Care is directly providing services to ensure separation of duties."
		35	DHS should require TCP to competitively bid the 10 services that TCP self-managed.	No action intended, management accepts risk	DHS's response: "There was never a contractual obligation or expectation that TCP subcontract continuum of care services. As stated in DHS' response, it is unclear if many of the self-managed services could be reasonably outsourced. In the case of DC General, an attempt to competitively bid the service resulted in no responses."
25	DYRS Can Strengthen the Management of DC Youthlink, Community-Based Residential Facilities, and Performance Reporting (March 17, 2016)	1	To the extent possible, DYRS should direct the DC Children's Youth Investment Trust Corporation (Trust) to obtain corroborating documentation from an independent third party before it reimburses Lead Agency expenses. (See report for additional language.)	No longer applicable	DYRS reported this as implemented. However, we feel it is more accurate to say "no longer applicable" as CYITC was dissolved earlier this year.
		2	DYRS should require the Trust to document its expense review and approval process and ensure	No longer applicable	DYRS reported this as implemented. However, we feel it is more accurate to say "no longer applicable" as

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			that it retains this organizational knowledge for future use.		CYITC was dissolved earlier this year.
		3	DYRS should design policies and procedures to restrict access to FAMCare. These policies and procedures need to be created, implemented, and periodically updated to ensure that DYRS only disburses funds for valid and approved services and placements. They should limit or restrict access to FAMCare based on the assigned responsibilities of each user, and ensure that this access is promptly updated or terminated when employees change job functions or leave DYRS.	Implemented	
		4	DYRS should review its Human Care Agreement and, if necessary, revise it to reflect only those requirements deemed essential. Furthermore, DYRS should establish procedures to review, verify, and analyze data collected from CBRFs.	Implemented	
		5	If DYRS intends to continue using site visits to evaluate its CBRFs, it must design, document, and implement a set of procedures to guide DYRS employees as they perform their work. These procedures should ensure that DYRS collects and retains documentation resulting from the site visit.	Implemented	
		6	DYRS can improve its ability to track and report on its public safety performance metrics by ensuring that results can be recalculated by an objective third party. This means that the source data used to make the calculation must be retained, and that DYRS should document the specific steps necessary to calculate the metric.	Implemented	
		7	DYRS should consistently define its public safety metrics so that the definition of each metric is consistent, no matter where it is reported (e.g. the DYRS website, internal or external reports).	Implemented	
		8	DYRS should require its CBRFs to comply with the policies and procedures included in their Human Care Agreements and include consequences for noncompliance in the Agreements.	Implemented	
		9	DYRS public safety measures should include	Implemented	

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			historical data that allow for an analysis of trends in the measure over time and DYRS should provide timely updates to each measure.		
		10	DYRS should design procedures to facilitate an analysis of its cost structure for the DC YouthLink program and perform this type of analysis on an ongoing basis to ensure that the DC YouthLink program delivers services in the most efficient and effective manner possible. (See report for additional language.)	Implemented	
26	Review of Summer Youth Employment Programs in Eight Major Cities and the District of Columbia (April 21, 2016)	1	The District should expand private fund-raising efforts, [...], and consider establishing a 501 (c) (3) organization under the auspices of its Workforce Investment Board to solicit private donations.	In progress	DOES reported this recommendation as implemented, but has not provided any documentation.
		2	DOES should consider using federal Workforce Innovation and Opportunity Act funds to support the summer youth employment program, because WIOA [...] requires grantees to spend 20 percent of their youth funds on work experience for in-school or out-of-school youth. [...]	In progress	DOES reported this recommendation as implemented, but has not provided any documentation.
		3	The District should consider giving enrollment priority to youth who are low-income or otherwise disadvantaged, as defined by the Workforce Innovation and Opportunity Act.	In progress	DOES reported this recommendation as implemented, but has not provided any documentation.
		4	District of Columbia policymakers should consider program and policy changes [...] that provide specialized services or reserve slots for youth at risk of involvement in violence, youth in foster care, runaway and homeless youth, and youth with disabilities.	In progress	DOES reported this recommendation as implemented, but has not provided any documentation.
		5	D.C. policymakers should consider establishing a competitive, private-sector component of MBSYEP that is intended to place students who are 16 years of age or older in summer jobs that may lead to full-time employment.	In progress	DOES reported this recommendation as in progress, but did not provide an expected date that it would be complete.
		6	DOES officials should seek to re-introduce unsubsidized summer placements to MBSYEP and to increase gradually the number and percentage of positions that are unsubsidized or partly subsidized.	No action intended; management accepts risk	DOES responded: "Unsubsidized placements are managed by businesses and other private funding institutions throughout the District."

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		7	DOES should evaluate whether drawing on private-sector expertise to administer various aspects of MBSYEP would increase efficiency and effectiveness. [...]	In progress	DOES reported that this recommendation will be implemented by August 1, 2017.
		8	The Mayor should consider issuing an executive order outlining agency responsibilities in developing and administering MBSYEP, including the roles of agencies besides the Department of Employment Services in creating and monitoring summer positions for youth.	In progress	We have not yet heard back from the Mayor's office as to the status of this recommendation.
		9	DOES should expand the range of performance measures for MBSYEP by reporting annual data on program attrition, the number and percentage of placements in high-growth industry sectors, and the number and percentage of youth in unsubsidized or partly subsidized jobs. [...]	In progress	DOES reported that this recommendation will be implemented by February 1, 2017.
		10	DOES should follow the requirements of the law by (1) hiring an independent contractor to conduct the evaluation of MBSYEP, (2) ensuring that the evaluation covers all of the requirements set forth in D.C. Code § 32-244, and (3) presenting the evaluation to the Council and posting [it] on the DOES web site by December 30 th of each year.	In progress	DOES reported this recommendation as implemented, but has not provided any documentation.