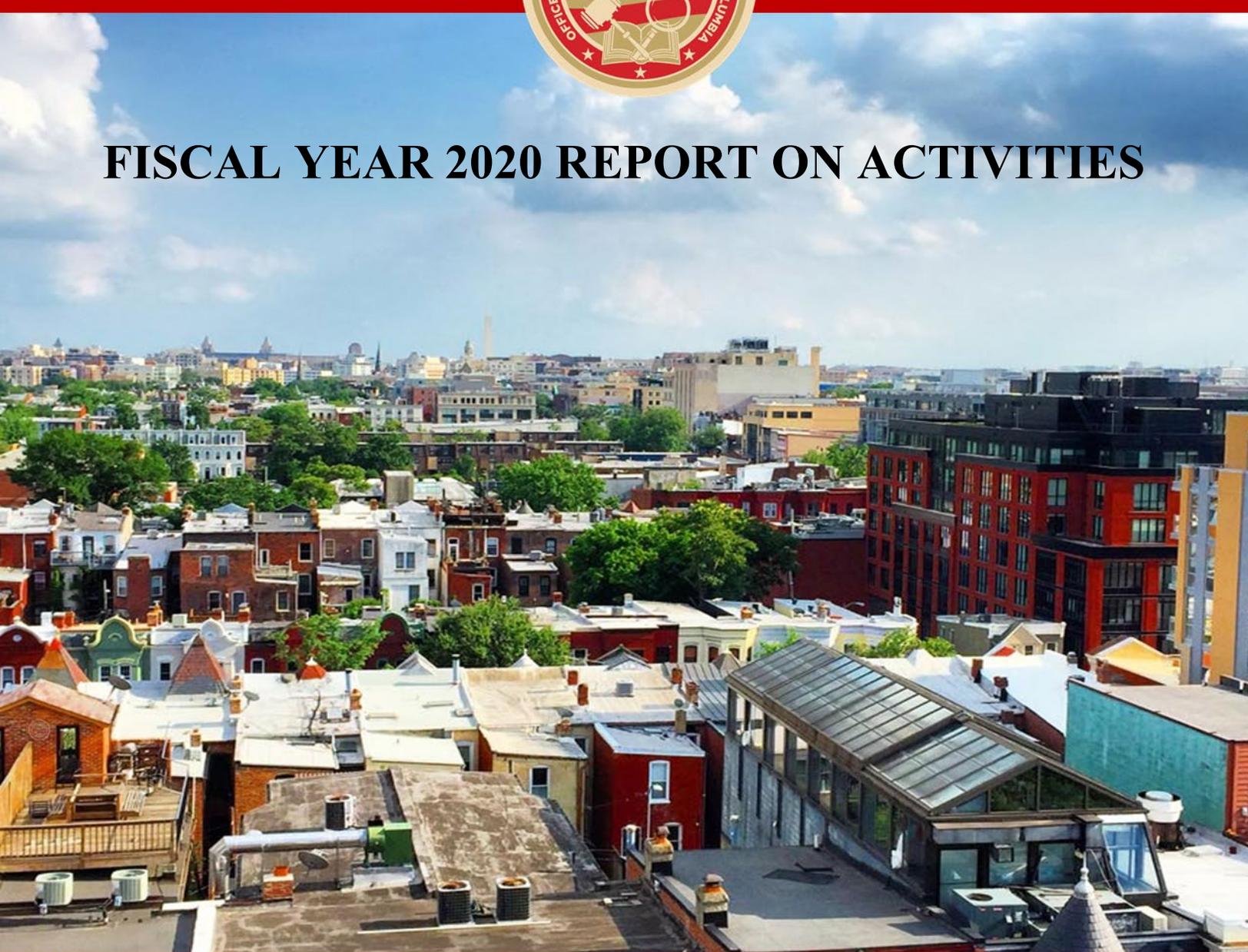


# DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL



November 2020

## FISCAL YEAR 2020 REPORT ON ACTIVITIES



### *Guiding Principles*

*Workforce Engagement \* Stakeholders Engagement \* Process-oriented \* Innovation  
\* Accountability \* Professionalism \* Objectivity and Independence \* Communication \* Collaboration  
\* Diversity \* Measurement \* Continuous Improvement*

## **Mission**

Our mission is to independently audit, inspect, and investigate matters pertaining to the District of Columbia government in order to:

- prevent and detect corruption, mismanagement, waste, fraud, and abuse;
- promote economy, efficiency, effectiveness, and accountability;
- inform stakeholders about issues relating to District programs and operations; and
- recommend and track the implementation of corrective actions.

## **Vision**

Our vision is to be a world-class Office of the Inspector General that is customer-focused, and sets the standard for oversight excellence!

## **Core Values**

Excellence \* Integrity \* Respect \* Creativity \* Ownership  
\* Transparency \* Empowerment \* Courage \* Passion  
\* Leadership





## DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

### A MESSAGE FROM THE INSPECTOR GENERAL



I am pleased to present this *Annual Report* summarizing the oversight activities of the District of Columbia Office of the Inspector General (OIG) for the reporting period from October 1, 2019, to September 30, 2020.

The OIG's legislative mandate is to promote economy, efficiency, and effectiveness and prevent and detect corruption, mismanagement, waste, fraud, and abuse in District operations and programs. The OIG fulfills its mandate through independent audits, inspections, evaluations, and investigations. Each year the OIG operationalizes this mandate by publishing its *Audit and Inspection Plan*. With a professional staff of seasoned auditors, investigators, attorneys, and analysts, the OIG focused on five core areas in FY 2020: (1) Proactive Internal Controls; (2) Economic Development; (3) Health; (4) Welfare; and (5) Public Safety.

The OIG's two key accomplishments during the reporting period strengthened the adage "prevention is better than cure" as a general value proposition and as a means of reducing financial irregularities in the District government. First, the OIG developed and has accessible a District-wide Internal Control Assessment Program (ICAP), which enables agencies to proactively identify and address risks of corruption, mismanagement, fraud, waste, and abuse. Second, the OIG issued five Management Alert Reports (MARs), which held that natural and man-made emergencies could not reasonably justify District agencies circumventing anti-fraud internal controls.

In addition, the OIG had significant accomplishments overseeing the District's \$15.5 billion budget. The OIG issued 13 audit and inspection reports with 123 recommendations for improving the economy, efficiency, and effectiveness of District programs and operations. These reports resulted in \$71.8 million in monetary benefits consisting of \$5.2 million in recoupable funds, \$58.8 million in questioned costs, and \$7.8 million in funds put to better use. The OIG also evaluated 3,151 Hotline contacts and referrals, opened 210 investigations, closed 230 investigations, and had a total of \$8.3 million in criminal and civil recoveries.

These and other noteworthy accomplishments detailed in this report were due, in part, to: (1) the OIG's ability to work collaboratively with District agencies and leadership to identify and reduce vulnerabilities throughout District; (2) District agencies' responsiveness to the OIG's oversight work; and (3) effective coordination among OIG divisions and units to maximize synergy and increase productivity to the benefit of the District.

The OIG's FY 2020 accomplishments reflect continued commitment to its mission, despite these unprecedented times. I commend the OIG's hardworking and talented staff for their steadfast dedication to the agency's mission. This commitment is particularly important as the OIG continues to increase its focus on District programs and operations that are susceptible to corruption, mismanagement, waste, fraud, and abuse, and work collaboratively with its internal and external stakeholders to deliver timely, relevant, and impactful oversight of District operations and programs.

Due to the continued impact of the COVID-19 Public Health Emergency and the budgetary shortfall the District is experiencing, it is imperative that oversight of the District is vigorous to ensure that fraud, waste, abuse, and mismanagement in District operations and programs are identified and addressed in an effective and efficient manner. In short, the District should expect the OIG to continue to aggressively seek out instances where tax payer dollars are not used as intended.



Daniel W. Lucas  
Inspector General

# TABLE OF CONTENTS

	Page
<b>EXECUTIVE SUMMARY OF ACTIVITIES .....</b>	<b>1</b>
<b>Significant Accomplishments – Operations Division.....</b>	<b>1</b>
<b>FY 2020 Oversight Themes.....</b>	<b>2</b>
<b>District Oversight Symposium.....</b>	<b>3</b>
<b>FY 2020 Performance Measures.....</b>	<b>4</b>
<b>AGENCY OVERVIEW.....</b>	<b>7</b>
<b>Organizational System.....</b>	<b>7</b>
<b>Risk Assessment and Future Planning Division.....</b>	<b>7</b>
<b>Operations Division .....</b>	<b>7</b>
<b>Quality Management Division .....</b>	<b>8</b>
<b>Business Management Division .....</b>	<b>8</b>
<b>Office of the General Counsel.....</b>	<b>8</b>
<b>CORE MISSION AREAS.....</b>	<b>9</b>
<b>Audit Unit .....</b>	<b>9</b>
Comprehensive Annual Financial Report.....	9
Progress and Performance.....	10
Significant Projects.....	10
<b>Inspections and Evaluations Unit.....</b>	<b>11</b>
Progress and Performance.....	12
Significant Projects.....	12
<b>Investigations Unit .....</b>	<b>15</b>
Progress and Performance.....	15
Significant Projects.....	16
<b>Medicaid Fraud Control Unit.....</b>	<b>19</b>
Progress and Performance.....	19
Significant Projects .....	20
<b>ENABLING MISSION AREAS .....</b>	<b>22</b>
<b>Risk Assessment and Future Planning Division.....</b>	<b>22</b>
Hotline Program.....	23
Data Analysis Unit (DAU).....	23
<b>Quality Management Division .....</b>	<b>24</b>
<b>Business Management Division .....</b>	<b>25</b>
The COVID-19 Pandemic Response .....	25
Strategic Public Relations and Communication .....	26
Facility Relocation .....	26
Assets Management .....	26

# TABLE OF CONTENTS

Significant Hearings and Testimonies.....	27
Significant Meetings with Oversight Bodies.....	27
<b>APPENDICES.....</b>	<b>28</b>
Appendix A. Selected OIG Statutory Requirements.....	28
Appendix B. OIG Organizational Chart and Structure.....	30
Appendix C. Audit Unit’s Organizational Chart and Structure.....	31
Appendix D. Inspections & Evaluations Unit’s Organizational Chart and Structure .....	32
Appendix E. Investigations Unit’s Organizational Chart and Structure .....	33
Appendix F. Medicaid Fraud Control Unit’s Organizational Chart and Structure .....	34
Appendix G. Audit Unit Reports and Recommendations (In-House) .....	35
Appendix H. Audit Unit Reports and Recommendations (Contract).....	36
Appendix I. Inspections & Evaluations Unit Reports and Recommendations .....	39
Appendix J. OIG Management Alert Reports .....	40
Appendix K. Selected Investigative Outcomes .....	41
Appendix L. Selected Medicaid Fraud Control Unit’s Outcomes.....	42
<b>DISTRIBUTION LIST.....</b>	<b>43</b>

## EXECUTIVE SUMMARY

### EXECUTIVE SUMMARY OF ACTIVITIES

The OIG is an executive branch agency of the District of Columbia government that conducts independent audits, inspections, and investigations of government programs and operations. The OIG's mission is to promote economy, efficiency, and effectiveness, and to prevent and detect corruption, mismanagement, waste, fraud, and abuse throughout the District government.

D.C. Code § 1-301.115a(f-2) requires the OIG to prepare an annual report summarizing its activities for the preceding fiscal year (FY). The annual report keeps the Council of the District of Columbia, Mayor, and District residents informed of the OIG's significant oversight activities. Please see [Appendix A](#) for a selected list of the OIG's statutory requirements.

#### Significant Accomplishments – Operations Division

The **Audit Unit (AU)** published 9 audit reports with 82 recommendations to improve the economy, efficiency, and effectiveness of District agencies' operations and programs. The agencies accepted 94 percent of the audit recommendations. These reports identified \$71.8 million in monetary benefits, including \$5.2 million in recoupable funds, \$58.8 million in questioned costs, and \$7.8 million in funds put to better use. AU also administered the District of Columbia *Comprehensive Annual Financial Report (CAFR)* contract, which resulted in the publication of 22 contractor-authored reports. In addition, AU published:

- A report with 17 recommendations to help the Department of Consumer and Regulatory Affairs (DCRA) develop and document its internal control system in order to achieve its organizational objectives (see [Appendix H](#)).
- A report with seven best practices recommendations to help the District government determine the likelihood that Bill 23-0091<sup>1</sup> would achieve its intended objectives (see [Appendix H](#)).

The **Inspections and Evaluations Unit (I&E)** published 4 reports containing 41 recommendations for improving the efficiency and effectiveness of municipal services vital to District residents and stakeholders. Agencies agreed with 76 percent of the recommendations.

The **Investigations Unit (IU)** opened 76 investigations (20 criminal, 1 administrative, and 55 preliminary), and closed 113 investigations (54 criminal, 14 administrative, and 45 preliminary). IU also completed 10 administrative referrals related to the cases closed.<sup>2</sup> IU's investigative receivables and recoveries totaled \$789,218.

<sup>1</sup> The Department of Buildings Establishment Act of 2019 (Bill 23-0091) is designed to establish the District Department of Buildings and reassign responsibilities from the DCRA.

<sup>2</sup> These referrals were made to the Board of Ethics and Government Accountability (BEGA), Office of the Attorney General for the District of Columbia (OAG), and District agencies for action deemed appropriate on completed investigations.

## EXECUTIVE SUMMARY

The **Medicaid Fraud Control Unit (MFCU)** processed 2,457 referrals<sup>3</sup> and accounted for \$4.8 million in total criminal and civil recoveries.<sup>4</sup> The Unit made two presentations, one at a national public integrity conference and the other to a local entity, both designed to increase awareness of the MFCU.

### FY 2020 Oversight Themes

During FY 2020, the OIG identified instances where internal controls were inadequately designed and not operating effectively. Internal control is a process or system for assuring reliable financial reporting, compliance with laws, regulations and policies, and achievement of an organization's objectives related to operational efficiency and effectiveness. Effective internal controls mitigate risks to organizations. Internal controls may also help an organization prevent fraud, or at least detect fraudulent activity sooner, limiting loss to the District.

Responsibility for developing and maintaining internal control ultimately falls to District managers. The OIG is responsible for making recommendations to District managers to implement or strengthen controls. Unaddressed internal control deficiencies identified by the OIG put the District at risk for fraud, waste, abuse, corruption, and mismanagement.

The OIG's FY 2020 findings and recommendations identified the following common themes of internal control deficiencies:

#### **Inadequate Project Planning, Execution and Monitoring**

The OIG looked at several District agencies that were responsible for planning, executing, and monitoring large-dollar programs and construction projects. During these engagements, the OIG found that the District agencies had opportunities to better plan for and monitor the progress of these initiatives. A well-developed plan, coupled with project-related metrics, could help District agencies identify potential problems and take corrective actions to ensure the project is completed within the established scope, budget, and deadlines.

#### **Creating and Capturing Documentation in a Virtual Environment**

As District agencies pivoted to a new work environment during the COVID-19 Public Emergency, the OIG found some agencies have not adapted their practices in this virtual environment. During FY 2020, the OIG noticed varied availability of documentation in electronic format amongst District agencies. Electronic documentation was particularly

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<sup>3</sup> For the purposes of external reporting requirements to the U.S. Department of Health and Human Services, Office of Inspector General (HHS-OIG), the MFCU considers a referral to be any contact where a lead is provided to MFCU staff, and then MFCU staff undertakes some investigative effort, legal review, or analysis. "Referrals" are not synonymous with "open investigations" or "open cases".

<sup>4</sup> The Medicaid program is jointly funded by the District and the Federal government. This amount reflects actual recoveries by the District, including the District's share of global recoveries to the Medicaid program, and does not include the Federal share of Medicaid program recoveries.

## EXECUTIVE SUMMARY

sparse in the areas relating to procurement, assessment and collection of fines, tax records, and revenue collection. Inconsistent availability of documentation in a virtual environment not only has a negative impact on management’s ability to monitor and control its operations, it also creates inefficiencies in the delivery of services to District residents. Regardless of their operating statuses, the OIG’s findings during the reporting period held that District agencies should strive to capture and store relevant documents, decisions made, and actions taken in electronic format to more effectively manage and monitor their programs.

### Expediency and Overriding Internal Controls

During FY 2020, the COVID-19 Public Health Emergency created immediate and increased demands for services and supplies. In an effort to accelerate the procurement process, specific procedures were revised and/or bypassed. Notwithstanding the need to quickly procure in these circumstances, certain risks to the procurement process are exacerbated when speed has a greater value over accuracy and due diligence. These heightened risks include inaccurate and unvalidated needs analysis, poor vendor selection, errors and delays in delivery of goods and services, and the potential the District paid for goods and services that were never delivered by the vendor. An effective internal control system can help mitigate these risks – even in high pressure and uncertain environment like that resulting from the COVID-19 Public Health Emergency.

### Matters Requiring Management’s Immediate Attention

During FY 2020, the OIG issued several Management Alert Reports (MARs) to District agency leaders. The OIG issues MARs to inform leaders of matters that surfaced during the OIG’s work (audit, inspection, evaluation, or investigation) and require immediate attention. A complete list of MARs issued during FY 2020 is included in [Appendix J](#).

## District Oversight Symposium



On October 8, 2019, the Inspector General held the District’s first *Annual Oversight Symposium*. The symposium was designed to facilitate a shared understanding of oversight responsibilities within the District; create a synergetic oversight environment such that leadership, internal oversight, and external oversight bodies can work as a collective system for District residents; and build oversight capacity within the District. Over 75 District leaders and employees joined the OIG on that day to discuss oversight responsibilities within the District.

The Inspector General, joined by OIG oversight partners from the BEGA and the D.C. Auditor, in addition to the Mayor, D.C. Council Chairman, Attorney General for the District of Columbia, and Chief Financial Officer, imparted upon attendees the importance of collaborative oversight to ensure efficient use of District resources to deliver maximum value to District residents.

## EXECUTIVE SUMMARY

### FY 2020 Performance Measures

**Table 1. Risk Assessment and Future Planning Division’s Performance Measures**

<b>OIG Hotline Program Activities</b>	
Contacts <sup>5</sup> Analyzed	694
Percentage of Contacts Evaluated within 10 Days of Receipt	95%
Number of Actionable Complaints to the RAFP Hotline <sup>6</sup>	202
Percentage of Complaints Received that are Actionable by the OIG	29%
Referrals to the Board of Ethics and Government Accountability <sup>7</sup>	16
Referrals to Other District and Federal Agencies	90
<b>OIG Data Analysis Unit Activities</b>	
Number of Products Completed in Support of Active Oversight Work	33
Number of Proactive Products Completed	8

**Table 2. Operations Division’s Performance Measures**

<b>Audit Unit Activities</b>	
Reports Published – OIG Staff	9
Reports Published – Contractors <sup>8</sup>	24
Recommendations Made – OIG Staff	82
Recommendations Accepted by Agencies	77
Percentage of Recommendations Accepted by Agencies	94%
Percentage of Audit Projects Completed Within 210 Business Days	50%
Total Monetary Benefits	\$71,751,801
Funds Recovered/Recouped	\$5,232,480
Questioned Costs	\$58,771,985
Funds Put to Better Use	\$7,747,336

<sup>5</sup> The OIG Hotline Program follows Council of the Inspectors General on Integrity and Efficiency (CIGIE) standards by noting all “complaints” as “contacts.” CIGIE is an independent entity established within the federal executive branch to address integrity, economy, and effectiveness issues that transcend individual government agencies and to aid in the establishment of a professional, well-trained and highly-skilled workforce in over 70 federal Offices of Inspector General.

<sup>6</sup> Actionable complaints are defined as those that allege corruption, fraud, waste, abuse, or mismanagement within the District of Columbia government. These numbers do not include separate referrals made to the MFCU captured in Table 2 below.

<sup>7</sup> This figure includes referrals sent directly from RAFP, as well as referrals made to BEGA as the result of IU work. RAFP is the conduit for all OIG referrals to BEGA.

<sup>8</sup> These reports were deliverables of an OIG contract. See [Appendix H](#) for a complete list of all contractor-authored reports issued in FY 2020.

## EXECUTIVE SUMMARY

### Inspections and Evaluations Unit Activities

Reports Published	4
Recommendations Made	41
Recommendations Accepted by Agencies	31
Percentage of Recommendations Accepted by Agencies	76%
Percentage of I&E Projects Completed Within 210 Business Days	25%

### Investigations Unit Activities

Total Investigative Receivables and Recoveries	\$789,118
Restitutions, Orders, and Fines	\$671,186
Referrals for Civil Recoupment	\$117,932
Investigative Activities	
Investigations Opened	76
Investigations Closed	113
Cases Presented to the USAO <sup>9</sup> for Prosecution	8
Cases Accepted by the USAO for Prosecution	4
Convictions	4
Subpoenas Served	45
Significant Activity Reports Issued	0
Civil Referrals to the D.C. Office of the Attorney General	3
Referrals to the Board of Ethics and Government Accountability	6
Referrals to District Agencies (Management Authority)	1
Search Warrants	0
Percentage of Investigations Closed that Resulted in a Criminal, Civil, Administrative Action or Monetary Outcome	15%

### Medicaid Fraud Control Unit Activities

Total Criminal and Civil Recoveries	\$4,847,366
Criminal Recoveries	\$2,213,445
Global Civil Case Monetary Recoveries <sup>10</sup>	\$2,633,921
Referrals to MFCU (Hotline Contacts)	2,457
Investigative Activities	
Criminal Fraud Cases Opened	71
Abuse, Neglect, or Financial Exploitation Cases Opened	63
Criminal Fraud Cases Closed	82
Abuse, Neglect, or Financial Exploitation Cases Closed	35
Cases Presented to the USAO for Prosecution	14

<sup>9</sup> United States Attorney's Office.

<sup>10</sup> This category involves any civil case in which the District and other states are party to the litigation. The OIG's Medicaid Fraud Control Unit works global cases jointly with other state Medicaid Fraud Control Units.

## EXECUTIVE SUMMARY

<b>Medicaid Fraud Control Unit Activities (continued)</b>	
Cases Accepted by the USAO for Prosecution	14
Criminal Convictions/Indicted/Charged	15
Subpoenas Served	86
Civil Referrals to the D.C. Office of the Attorney General	2
Civil Referrals Accepted by the D.C. Office of the Attorney General	2
Resolutions by the D.C. Office of the Attorney General	1
Global and Non-Global Civil Dispositions	7
Referrals to District Agencies	21
Search Warrants	1
Percentage of Investigations Closed that Resulted in a Criminal, Civil, Administrative Action or Monetary Outcome	21%

**Table 3. Quality Management Division's Performance Measures**

<b>Quality Assurance Review Activities</b>	
Number of Quality Assurance Review (QAR) Reports Issued	7
Number of QAR Projects Planned for Fiscal Year	15
Number of QAR Projects Completed	7
Percentage of Planned QAR Projects Completed	47%
Number of QAR Projects Completed Within 10 Business Days	100%
Recommendations Made to OIG Units	33
Recommendations Accepted by OIG Units	32
Percentage of Recommendations Accepted by Units	97%

**Table 4. Business Management Division's Performance Measures**

<b>Business Management Activities</b>	
Number of Meetings Attended to Market the OIG to ANCs <sup>11</sup>	6
Percentage of Meetings Attended to Market the OIG to ANCs	100%
Number of Contract Payments in Compliance with the Quick Payment Act	73
Percentage of Contract Payments in Compliance with the Quick Payment Act	100%
Percentage of FTEs with Completed Annual Performance Evaluations	100%

**Table 5. Office of the General Counsel's Performance Measures**

<b>Freedom of Information Act Activities</b>	
Number of Freedom of Information Act (FOIA) Requests	22
Number of FOIA Requests Processed Within 15 Business Days	21
Percentage of FOIA Requests Processed Within 15 Business Days	95%

<sup>11</sup> Advisory Neighborhood Commissions

# ORGANIZATIONAL OVERVIEW

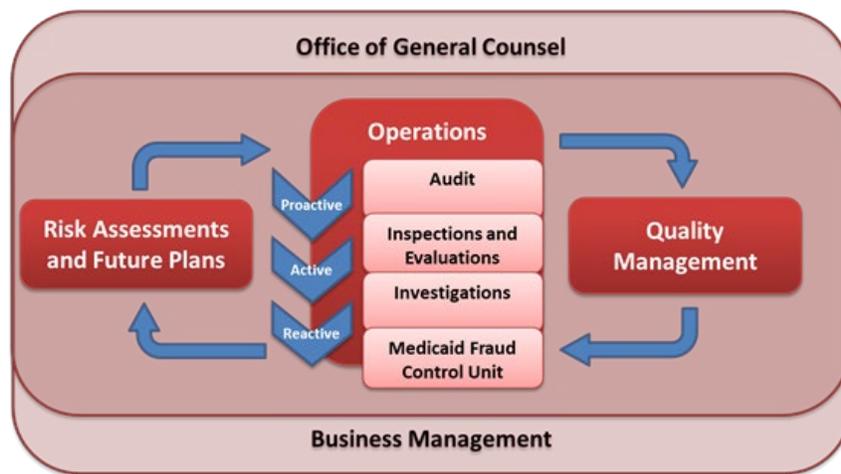
## AGENCY OVERVIEW

This section presents an overview of the OIG’s organizational system and the FY 2020 accomplishments of each division within the agency.

### Organizational System

The OIG is organized as a system to ensure full operational capacity while uniquely linking all divisions and units within the agency (see Figure 1 below and [Appendix B](#) for more detail on the OIG’s overall organization and structure).

**Figure 1. D.C. OIG Organizational Model**



### Risk Assessment and Future Planning Division

The Risk Assessment and Future Planning Division (RAFP) evaluates risk related to corruption, mismanagement, waste, fraud, and abuse within the District. RAFP also assists the OIG in building the right capabilities to mine data for insights that will allow the agency to make proactive, knowledge-driven decisions. RAFP leads the development of the OIG’s annual audit and inspection plan and provides analytical outputs to the Operations Division for action deemed appropriate.

### Operations Division

The Operations Division consists of four externally-focused units within the OIG.

The **Audit Unit** (AU) conducts audits of District agencies, programs, functions, and activities. In addition, AU monitors and oversees the audit process for the District of Columbia *Comprehensive Annual Financial Report* (CAFR).

## ORGANIZATIONAL OVERVIEW

The **Inspections and Evaluations Unit (I&E)** conducts inspections and special evaluations that provide decision makers with objective, thorough, and timely evaluations of District government agencies and programs.

The **Investigations Unit (IU)** investigates allegations of misconduct involving violations of District or federal criminal law, civil statutes, regulations, and employee standards of conduct.

The **Medicaid Fraud Control Unit (MFCU)**, certified by the U.S. Department of Health and Human Services on March 1, 2000, investigates and prosecutes Medicaid provider fraud as well as fraud in the administration of the Medicaid program. The Unit also investigates allegations of abuse, neglect, and financial exploitation involving persons who reside in Medicaid-funded facilities or who receive Medicaid-covered services.

### Quality Management Division

Quality Management Division (QM) ensures all outputs from the Operations Division comply with OIG policies, professional standards, and best practices. QM oversees all OIG activities to maintain a desired level of excellence while ensuring the OIG's long-term success through customer satisfaction, innovation, and continuous quality improvement. QM also manages the agency-wide performance measurement, analysis, and reporting processes to support data-based decision making and ensure the timely completion of statutorily-mandated performance reports.

### Business Management Division

The Business Management Division (BM) supports the OIG's mission by establishing policies and controls and delivering services to support the goals and objectives of other divisions. BM, the OIG's internal operating division, includes these units and programs: (1) Facilities; (2) Contracts and Procurement; (3) Information Technology; (4) Human Resources; (5) Administrative Services; (6) Records Management; and (7) Communications and Public Relations. BM ensures all OIG Divisions and Units have tools needed to prevent and detect corruption, mismanagement, waste, fraud, and abuse while ensuring that best practices are followed under regulations, and holds the agency to the same standards of accountability as the OIG expects of other District agencies.

### Office of the General Counsel

The Office of the General Counsel (OGC) ensures all activities undertaken by the OIG comport with laws, rules, regulations, and policies. Further, OGC provides in-house legal services by ensuring OIG operations, activities, and communications conform to applicable legal requirements, rendering forthright and objective legal advice to protect the OIG against legal liability, and advocating the OIG's legal position in disputes.

## ORGANIZATIONAL HIGHLIGHTS

### CORE MISSION AREAS

#### Audit Unit

The Audit Unit (AU) focuses its resources on programs and initiatives that pose serious challenges and risks for the District. The OIG designs audits to mitigate those risks and assesses the results of budgeted programs to ensure they are achieving expected results. AU conducts performance audits and also monitors, assesses, and reports on the status of an agency's implementation of recommended (and agreed to) corrective actions from prior audits to determine whether actions taken addressed the noted deficiencies. Much of the benefit from audit work is the effective resolution of findings and recommendations. See [Appendix C](#) for AU's organizational chart and structure.

#### Comprehensive Annual Financial Report

The OIG is required by law to enter into a 5-year contract with an independent auditor to audit the District's financial statements annually. In FY 2020, the independent auditor, SB & Company, LLC, conducted the audit under the 4<sup>th</sup> and final option year of its 5-year contract. On March 17, 2020, the OIG awarded McConnell & Jones, LLP, the District of Columbia *Comprehensive Annual Financial Report* (CAFR) contract, effective April 1, 2020, under which McConnell & Jones is to audit the District's financial statements and produce a comprehensive report. The term of the contract is for 1 year with four, 1-year option periods.

The CAFR contains the District's financial statements and an independent, certified accounting firm's opinion about whether the financial statements were presented fairly and in compliance with generally accepted accounting principles. The report also assesses whether there were instances of noncompliance and/or weaknesses in internal controls that materially affected the District's financial position and operations as of the end of the fiscal year. As part of the CAFR audit process, the independent auditors produce various reports that cover specific District components, funds, and programs. See [Appendix H](#) for a complete list of reports produced as a result of the CAFR contract.

The OIG established the CAFR Committee (Committee) to monitor and oversee the audit process. The Committee monitors and oversees the reliability and integrity of the Office of the Chief Financial Officer (OCFO) financial reporting process and systems of internal controls for finance, accounting, and legal compliance. It also monitors the performance of the District's independent auditors and facilitates communication among the independent auditors, the Executive Office of the Mayor, the D.C. Council, OCFO, and other District management officials. AU leadership chairs the Committee.

On January 31, 2020, the OIG published the District's FY 2019 CAFR, marking the 23<sup>rd</sup> consecutive unqualified opinion of the District's financial statements. The independent auditors identified no material weaknesses or significant deficiencies related to the District's financial statements.

**ORGANIZATIONAL HIGHLIGHTS**

**Progress and Performance**

The OIG audited District agencies and published nine audit reports that identified improper payments, best practices, process flaws, and internal control weaknesses. The audit reports offered 82 recommendations to improve operations, address deficiencies, and ensure District agencies operate efficiently and effectively. District agencies accepted 77 (94 percent) of the recommendations offered. These audit reports had considerable impact in terms of funds to be recouped and improvements in District agencies. Table 6 summarizes AU’s FY 2020 performance data.

**Table 6. Summary of AU FY 2020 Performance Data**

<b>Audit Unit Activities</b>	<b>FY 2020</b>
Reports Published – OIG Staff	9
Reports Published – Contractors	24
Recommendations Made – OIG Staff	82
Recommendations Accepted by Agencies	77
Percentage of Recommendations Accepted by Agencies	94%
Total Monetary Benefits	\$71,751,801
Recoupable Funds	\$5,232,480
Questioned Costs	\$58,771,985
Funds Put to Better Use	\$7,747,336

**Significant Projects**

OIG audit reports published in FY 2020 focused on issues related to management of the Streetcar Program, restoration of the Anacostia River, procurement, fund accounting, and contract modification practices. See [Appendix G](#) for a complete list of the OIG’s FY 2020 audit reports and the number of recommendations in each report.

Highlights from selected FY 2020 audit projects include:

***Prime Contractor for the Streetcar Program Billed and Received \$5.2 Million in Improper Payments from the District, September 23, 2020***

The OIG found that the prime contractor for the Streetcar Program charged the District for expenses that were duplicative, unauthorized, excessive, unallowable, or unreasonable. District Department of Transportation (DDOT) officials bore oversight responsibility regarding the contract for program management services of the Streetcar Program to ensure the quality of the work performed met applicable contract specifications. In total, the OIG made 10 recommendations for DDOT to recoup amounts paid to the prime contractor above the rates or adjustments stipulated in the contract and those in District and federal regulations. DDOT agreed to recoup from the prime contractor \$5,232,349 in improper payments.

## ORGANIZATIONAL HIGHLIGHTS

### *Department of Energy and Environment and DC Water and Sewer Authority, The District has Made Progress Restoring the Anacostia River, September 18, 2020*

The District is making progress with its goal to restore the Anacostia River to a fishable and swimmable state by preventing, reducing, and remediating pollution. However, it is unlikely the District will achieve the goal of a fully-fishable and swimmable Anacostia River by 2032, as planned. The OIG made eight recommendations to DOEE to help improve its project management practices as the District strives to meet its goal by 2032.

### *Oversight of Contracts for District Facilities Modernization and New Construction Projects Needs Improvement, May 13, 2020*

The OIG found that the Department of General Services (DGS) did not effectively procure architectural, engineering, and management services when authorizing facilities modernization and new construction projects. Effective procurement and contract management are important to achieving good contracting outcomes, including controlling cost increases resulting from contract modifications. The OIG made 13 recommendations focused on ensuring that: project plans, designs, and construction management services are effectively procured; contract modification requests are not the result of poor performance and errors that the contractor is responsible for addressing at its own cost; and all contract award decisions, including a justification for sole source awards and the underlying reasons for contract modifications are documented.

### *Office of the Chief Technology Officer: Internal Controls for Pipeline Contract Management Need to be Improved, January 9, 2020*

The Office of the Chief Technology Officer (OCTO) did not design effective internal controls to assure accurate and complete resource screening. OCTO is responsible for ensuring the prime contractor provides qualified supplemental IT staff and the District only pays contracted staff based on contract terms. The OIG found that OCTO relied on the Prime Contractor to administer its own performance. OCTO also relied on standard operating procedures that were not designed to address key procedures, including invoice approval and pay rate selection procedures. The OIG made 14 recommendations for OCTO to improve internal controls related to candidate screening and verification procedures and to ensure the accuracy of hours and rates billed under the contract.

## Inspections and Evaluations Unit

The OIG's Inspections and Evaluations Unit (I&E) focuses its resources on conducting inspections and evaluations to highlight needs for corrective measures that improve operations, address deficiencies, and ensure compliance with District and federal laws, regulations, and policies. I&E engagements provide senior District government managers with an independent source of facts and analysis about agency performance, program efficiency, and the effectiveness of quality assurance procedures.

**ORGANIZATIONAL HIGHLIGHTS**

I&E also conducts contract and grant reviews to: (1) determine whether there are any terms or conditions unfavorable to the District or in conflict with best practices or applicable criteria; (2) assess whether parties to the contract/grant have effectively operationalized administration of key terms; and (3) assess whether the District maintains proper oversight of deliverables required by the contract/grant. These reviews also look for vulnerabilities to fraud, waste, abuse, mismanagement, and inefficiency.

I&E conducts its projects in accordance with quality standards promulgated by CIGIE.

Performance indicators of the overall effectiveness of I&E’s work include the number of projects completed, findings identified, recommendations made and recommendations agreed to by an inspected entity, and, ultimately, the subsequent improvements in agency or program operations. The findings developed during inspections may also lead to referrals to the OIG’s Investigations Unit or Audit Unit. See [Appendix D](#) for I&E’s organization chart and structure.

**Progress and Performance**

The OIG published 4 reports containing 45 recommendations<sup>12</sup> for improving the efficiency and effectiveness of municipal services vital to District residents and stakeholders. District agencies accepted 76 percent of the recommendations offered. Table 7 summarizes I&E’s FY 2020 performance data.

**Table 7. Summary of I&E FY 2020 Performance Data**

Inspections & Evaluations Unit Activities	FY 2020
Reports Published – OIG Staff	4
Recommendations Made	41
Recommendations Accepted by Agencies	31
Percentage of Recommendations Accepted by Agencies	76%

**Significant Projects**

I&E completed projects in the following agencies: the Office of the Chief Financial Officer (Central Collection Unit); the D.C. Retirement Board; the Department of Employment Services (Office of Paid Family Leave); and the Department of Human Services (Economic Security Administration).

See [Appendix I](#) for a complete list of the OIG’s FY 2020 reports and the number of recommendations in each report.

<sup>12</sup> Four of these recommendations pertained to suggested areas of improvement; therefore, I&E did not ask the inspected entity to indicate whether it agreed or disagreed with each.

## ORGANIZATIONAL HIGHLIGHTS

Summaries of FY 2020 Published Reports:

### *Evaluation of the Office of the Chief Financial Officer’s Central Collection Unit, March 17, 2020*

The Central Collection Unit (CCU) was established by the Delinquent Debt Recovery Act of 2012 and is responsible for collecting all non-tax debts owed to District government agencies, except for debts pertaining to child support cases and those owed to the D.C. Water and Sewer Authority. The Act also imposes this requirement: “Each District agency that transfers and refers a delinquent debt of more than \$100 to the [CCU] for collection shall, within 5 days of the transfer and referral, suspend the granting or issuance of any District license or permit to the delinquent debtor.”<sup>13</sup>

The objectives of this review were to evaluate: (1) the processes through which District agencies identify, document, and transfer aged receivables (i.e., debts owed to the District) to the CCU; and (2) CCU’s oversight and management of the collections processes, and to recommend improvements in areas to include debt collections and the effectiveness of CCU’s contract administration.

Foremost among several primary issues identified, the OIG learned that D.C. Fire and Emergency Medical Services continued to hold a considerable amount of delinquent debt in the form of unpaid bills for ambulance service.<sup>14</sup> In response to the OIG’s work, the OCFO conducted an analysis that valued the accounts receivable balance at \$117.9 million, which was then transferred to CCU for further action.

During fieldwork for this evaluation, the OIG also published a Management Alert Report (20-I-001): *Multi-Agency Enforcement and Adjudication Activities*, that analyzed District agencies’ enforcement and adjudication activities related to two, four-unit apartment buildings owned by the same individual for nearly 15 years. The MAR illustrated how there are opportunities for the CCU to collaborate with other District agencies to implement processes that reduce the likelihood a delinquent debtor receives a license or permit from a District government agency for which he/she is ineligible.

### *District of Columbia Retirement Board – Evaluation of Procurement Processes and Selected Contracts, June 10, 2020*

This evaluation was a continuance of an ongoing OIG initiative to review District procurement processes and contracts for vulnerabilities to fraud, mismanagement, waste,

<sup>13</sup> 1 Fiscal Year 2013 Budget Support Act of 2012, subtit. E, D.C. Law 19-0168, effective from Sept. 20, 2012 (codified as amended at D.C. Code §§ 1-350.01 – .12 (Lexis current through Mar. 4, 2020)). 2 BILL 19-9, “THE DELINQUENT DEBT RECOVERY ACT OF 2011”: NOTICE OF PUBLIC HEARING BEFORE THE D.C. COUNCIL COMM. ON GOV’T OPERATIONS AND THE ENVIRONMENT (undated).

<sup>14</sup> In March 2009, the OIG published the *Audit of the Department of Fire and Emergency Medical Services’ Administration of Ambulance Billing Contracts* (OIG No. 07-2-31FB), which found outstanding receivables valued at over \$64 million.

## ORGANIZATIONAL HIGHLIGHTS

and abuse. DCRB procurements carry heightened risk because it is an independent agency that is not subject to District procurement laws or the Office of Contracting and Procurement's (OCP) authority.

The OIG found that DCRB had not established effective internal controls over its procurement processes. Deficiencies in the organizational structure (including unfilled positions), procurement policies and procedures, and information technology were preventing DCRB from sufficiently guarding against fraud, waste, and abuse; fully complying with procurement regulations; and achieving agency goals. Although the agency had previously taken steps (e.g., hired consultants) to identify deficiencies requiring corrective actions, it had not implemented necessary improvements. DCRB agreed with 14 of the report's 18 recommendations, and during FY 2021 the OIG will check on DCRB's progress toward implementing them and addressing the other conditions cited in the report.

### *Department of Employment Services – Assessment of the District's Implementation of the Paid Family Leave Benefits Administration System, June 26, 2020*

When the OIG announced this assessment on March 4, 2020, the Department of Employment Services (DOES) was working through an aggressive, truncated timeline for developing and launching the Paid Family Leave Benefits Administration System (PFLBAS) so that it could start administering benefits on July 1, 2020, as required by the Universal Paid Leave Amendment Act of 2016 (Act). The primary objective for this project was to identify which PFLBAS implementation milestones had been met and the status and anticipated completion dates of those milestones that remained.

To conduct this assessment, the OIG reviewed, among other things, the Act; D.C. Municipal Regulations regarding Paid Family Leave (PFL) benefits; the District's contract with the vendor responsible for developing, implementing, and supporting the PFLBAS; the District's contract with the vendor responsible for verifying and validating the system developer's work; and these vendors' status reports.

The OIG identified four opportunities for improvement pertaining to operational and contractual aspects of the PFL program that the OIG believes warrant continued close monitoring and, in some instances, actions to enhance oversight capabilities to improve the likelihood of successful implementation and ongoing functioning of the PFLBAS. The final assessment presented DOES with four recommendations, and in FY 2021, the OIG will request an update on the status of the PFLBAS and some of the issues we identified.

### *Department of Human Services (DHS) – Inadequate Internal Controls Within the Economic Security Administration May Have Contributed to the Loss of \$1.8 Million, August 3, 2020*

As a result of an OIG criminal investigation in 2019, two former District Department of Human Services (DHS) Social Service Representatives within the Economic Security

## ORGANIZATIONAL HIGHLIGHTS

Administration were convicted of collectively defrauding \$1.8 million from DHS' Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) benefits programs. To minimize the potential recurrence of fraud, the OIG, in collaboration with DHS, initiated this project to assess DHS' internal control system against the U.S. Government Accountability Office's (GAO) Standards for Internal Control in the Federal Government (Green Book).<sup>15</sup>

Specifically, the OIG found DHS could better clarify employee roles and responsibilities, improve its performance expectations related to both transaction speed and accuracy of eligibility determinations, improve its fraud reporting requirements, and improve its planning for onboarding staff. Additionally, the OIG found that DHS leadership could improve its risk assessment program to develop appropriate fraud risk responses. By enhancing its risk assessment program, DHS leadership can improve its control activities, to include physical controls over vulnerable assets, refinement of information technology systems, and oversight of contracted support. The report presented DHS with 23 recommendations for strengthening its administration and oversight of the SNAP and TANF programs.

### Investigations Unit

The OIG's Investigations Unit (IU) investigates allegations of misconduct involving employee standards of conduct and violations of District or federal criminal law, civil statutes, and regulations. IU reports may include findings and recommendations regarding program weaknesses, contracting irregularities, and other institutional problems discovered as a result of OIG-initiated complaints or investigations. See [Appendix E](#) for IU's organizational chart and structure.

### Progress and Performance

In FY 2020, IU opened 76 investigations (20 criminal, 1 administrative, and 55 preliminary) and closed 113 investigations (54 criminal, 14 administrative, and 45 preliminary). IU also completed 10 administrative referrals (BEGA (6); OAG-Civil (3), and 1 Management Alert Report to the Department of Motor Vehicles). Also, four of the eight criminal cases presented to the United States Attorney's Office (USAO) for the District of Columbia were accepted for prosecution. These investigations may result in criminal convictions for fraud, bribery, conspiracy to commit bribery, bank fraud, and money laundering. Cases resolved in FY 2020 primarily addressed allegations of public corruption, procurement fraud, and financial and general crimes. Investigative recoveries and civil recoupments totaled \$789,118.

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<sup>15</sup> The Green Book identifies five internal control components – control environment, risk assessment, control activities, information and communication, and monitoring – which “must be effectively designed, implemented, and operating together in an integrated manner for an internal control system to be effective.” U.S. GOV'T ACCOUNTABILITY OFFICE, GAO-14-704G, STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, § OV2.14 at 12 (Sept. 2014), <https://www.gao.gov/products/GAO-14-704G>.

## ORGANIZATIONAL HIGHLIGHTS

Due to the COVID-19 pandemic, the Mayor of the District of Columbia declared a state of emergency, and the President of the United States declared a national emergency on March 11, 2020, and March 13, 2020, respectively. As a result, judicial proceedings in both the United States Court for the District of Columbia and the Superior Court of the District of Columbia were postponed with exceptions for certain criminal and juvenile delinquency proceedings.<sup>16</sup> The majority of IU's investigations assigned to the United States Attorney's Office for the District of Columbia that had scheduled judicial proceedings did not meet these exceptions. IU anticipates that judicial proceedings that were postponed due to the pandemic will occur during FY 2021.

Table 8 summarizes IU's FY 2020 performance data.

**Table 8. Summary of IU FY 2020 Performance Data**

<b>Investigations Unit Activities</b>	<b>FY 2020</b>
Total Investigative Receivables and Recoveries	\$789,118
Restitutions, Orders, and Fines	\$671,186
Referrals for Civil Recoupment	\$117,932
Investigative Activities	
Investigations Opened	76
Investigations Closed	113
Cases Presented to the USAO for Prosecution	8
Cases Accepted by the USAO for Prosecution	4
Convictions	4
Subpoenas Served	45
Significant Activity Reports Issued	0
Civil Referrals to the D.C. Office of the Attorney General	3
Referrals to the Board of Ethics and Government Accountability	6
Referrals to District Agencies (Management Authority)	1
Search Warrants	0

### Significant Projects

In FY 2020, IU and its federal and local law enforcement partners engaged in the following types:

- Criminal Investigations
- Administrative Investigations
- Civil Referrals

Summaries of selected IU FY 2020 investigative activity are detailed on the following pages.

<sup>16</sup> These proceedings occurred by teleconferencing or video teleconferencing.

**ORGANIZATIONAL HIGHLIGHTS****Criminal Investigations**

When investigative findings indicate criminal conduct, the OIG is required by law to present them to the USAO or the appropriate local prosecuting agency for action. When a case is referred for prosecutorial consideration, the investigation proceeds under the guidance and direction of an Assistant U.S. Attorney or local prosecutor, often in conjunction with other law enforcement partners, such as the Federal Bureau of Investigation (FBI) and federal OIGs. The investigative findings also are used to determine whether civil action is appropriate in addition to or in lieu of criminal prosecution.

***Former District Government Employee Sentenced for Bribery***

From July 1, 2014, through August 10, 2017, Latasha Moore, former Resource Allocation Analyst for the District of Columbia Department of Consumer and Regulatory Affairs, accepted \$140,537.02 in bribe payments from a member of the public. In furtherance of the scheme, Ms. Moore recommended that her supervisor approve invoices the individual submitted for payment to which he was not entitled because another vendor completed the work.

On October 11, 2018, Ms. Moore pled guilty to one count of bribery. On January 21, 2020, Ms. Moore was sentenced to 30 months of incarceration, 24 months of supervised release, and was ordered to pay restitution in the amount of \$140,537.02.

***A Member of the Public Sentenced for Role in Embezzlement Scheme***

Between 2015 and 2017, Belinda McKenzie, a former Family Support Worker, Catholic Charities for the Archdiocese of Washington (CC ADW), along with others, engaged in a scheme to recruit family members, neighbors, and friends and use their information on fraudulent Emergency Rental Assistance Program (ERAP) applications. The ERAP funds were administered by CC ADW and financed by the District of Columbia Department of Human Services.

On May 15, 2019, Ms. McKenzie pled guilty to one count of mail fraud. On January 16, 2020, Ms. McKenzie was sentenced to 24 months in prison and (2 years of supervised release. Ms. McKenzie was also ordered to pay \$234,249 in restitution and a received a forfeiture money judgment of \$234,249.

***A Member of the Public Sentenced for Fraud***

From 2014 to 2016, Cleopha Tanis, a member of the public, engaged in a scheme to defraud the Department on Disability Services by falsifying vocational rehabilitation (VR) tuition applications to obtain VR benefits to which recipients were not entitled.

## ORGANIZATIONAL HIGHLIGHTS

On December 16, 2020, Mr. Tanis pled guilty to one count of mail fraud. On March 13, 2020, Mr. Tanis was sentenced to 1-month incarceration, 12 months supervised release, and was fined \$10,000. Mr. Tanis was also ordered to pay \$47,895.00 in restitution.

### **Civil Referrals**

When the USAO declines prosecution in a criminal investigation, IU can request the OAG pursue civil recoupment of improperly received funds.

#### ***Former District Government Employee Improperly Received Tuition Benefits***

In FY 2020, the OIG referred to the OAG Public Safety Division an investigation regarding a former District government employee who allegedly circumvented the school lottery process and enrolled her children in D.C. Public Schools (DCPS) during school years 2015 – 2016 and 2017-2018 while residing in Maryland. The investigation revealed that from November 2015 through June 2018, the District government employee lived in Maryland, enrolled her children in DCPS while a MD resident, and, as a result of her actions, improperly received tuition benefits totaling \$67,103.00 to which she was not entitled. After the Public Safety Division declined criminal prosecution, the investigation was referred to OAG's Civil Enforcement Section for civil recoupment.

#### ***Former District Government Employee Improperly Received Tuition Assistance Funds***

In FY 2020, the OIG referred an investigation to the OAG Civil Enforcement Section for civil recoupment against a former District government employee who received educational tuition assistance payments, although she failed to maintain eligibility to receive the funds. The OIG investigation revealed that the District government employee took undergraduate degree courses that the District Department of Transportation (DDOT) paid for with DDOT tuition assistance funds between 2009 and 2015. However, the District government employee did not meet specific academic performance standards for nine of the courses she took, and failed to notify DDOT that she was no longer eligible for tuition assistance because she did not meet minimum academic performance standards for all of the courses. As a result of her actions, the District government employee improperly received tuition assistance funds totaling \$14,155.00. DDOT terminated the employee, and the D.C. Office of Pay and Retirement Services recouped \$11,538.48 of the \$14,155.00 owed through wage garnishment of the employee's severance pay.

#### ***Members of the Public Improperly Received District Government Benefits***

In FY 2020, the OIG referred two investigations to the OAG Civil Enforcement Section for civil recoupment against two members of the public who improperly received unemployment insurance (UI) compensation benefits from the Department of Employment Services (DOES). The OIG investigations revealed that the individuals applied for and received UI benefits to which they were not entitled. The individuals submitted false unemployment claims to DOES indicating they were unemployed while

## ORGANIZATIONAL HIGHLIGHTS

simultaneously employed, and, as a result of their actions, improperly received UI benefits totaling \$23,488.00, and \$24,724.00.

### Medicaid Fraud Control Unit

The OIG's Medicaid Fraud Control Unit (MFCU) is the single identifiable entity within the District of Columbia responsible for investigating and prosecuting (i.e., referring for prosecution) healthcare providers that defraud the Medicaid program. In addition to provider fraud, MFCU also investigates misuse of patient funds and criminal abuse and neglect of persons who reside in Medicaid-funded healthcare facilities (such as hospitals, nursing homes, and residences for adults with cognitive disabilities or mental illness). The U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG) annually recertifies MFCU and exercises oversight over its performance and compliance with federal requirements. See [Appendix F](#) for MFCU's organizational chart and structure.

### Progress and Performance

MFCU received 2,457 referrals ranging from reports of changes in the condition of nursing home residents to allegations of serious assaults and provider fraud. The overwhelming majority (2,376) pertained to patient abuse, neglect, or financial exploitation; 63 referrals were sufficient to open an investigation. Meanwhile, 81 referrals alleged Medicaid fraud, leading MFCU to open 71 investigations. MFCU received \$2,633,921 in recoveries from six global civil settlements for the District.

MFCU's current open cases include criminal fraud and civil investigations. MFCU also monitors hundreds of *qui tam* cases<sup>17</sup> and makes determinations along with the OAG as to whether to intervene. As of September 2020, MFCU was monitoring approximately 306 *qui tam* cases. Table 9 summarizes MFCU's FY 2020 performance data.

**Table 9. Summary of MFCU FY 2020 Performance Data**

Medicaid Fraud Control Unit Activities	FY 2020
Total Financial Recoveries	\$4,847,366
Criminal Recoveries	\$2,213,445
Global Civil Case Monetary Recoveries	\$2,633,921
Referrals to MFCU	2,457
Investigative Activities	
Fraud Investigations Opened	71
Abuse, Neglect, or Exploitation Investigations Opened	63
Fraud Investigations Closed	82
Abuse, Neglect, or Exploitation Investigations Closed	35
Cases Presented to the USAO for Prosecution	14

<sup>17</sup> *Qui tam* cases are lawsuits filed by private entities under the federal, state, and local False Claims Acts on behalf of governments including the District.

## ORGANIZATIONAL HIGHLIGHTS

Medicaid Fraud Control Unit Activities	FY 2020
Cases Accepted by the USAO for Prosecution	14
Criminal Convictions/Indicted/Charged	15
Subpoenas Served	86
Civil Referrals to the D.C. Office of the Attorney General	2
Referrals Accepted by D.C. Office of the Attorney General	2
Resolutions by D.C. Office of the Attorney General	1
Global and Non-Global Civil Dispositions	7
Referrals to District Agencies	21
Search Warrants	1

In FY 2020, MFCU staff participated in two presentations, one at a national program integrity conference and one to a local entity, to heighten public awareness of the OIG and MFCU. MFCU participated in monthly meetings with the Department of Health Care Finance (DHCF) and several other external partners who have an organizational interest in preventing and deterring healthcare fraud. These include the FBI, USAO, other Offices of Inspectors General, Managed Care Organizations, the Department on Disability Services, and the District of Columbia Department of Aging and Community Living.

In addition, MFCU participated in weekly meetings with the District's Long-Term Care Ombudsman and the Health Regulation and Licensing Administration of the District's Department of Health to share information and referrals regarding the abuse, neglect, and financial exploitation of District residents living in long-term care facilities such as nursing homes, assisted living and community residents.

### Significant Projects

MFCU conducted the following types of investigations in FY 2020:

- Criminal Health Care Investigations
- Civil Health Care Investigations
- Criminal Abuse, Neglect, and Financial Exploitation Investigations

Summaries of selected FY 2020 investigative activities in MFCU are detailed below. See [Appendix L](#) for a list of MFCU's FY 2020 outcomes available on the OIG website.

### Criminal Health Care Investigations

#### *Hope Omone Falowo*

On November 22, 2019, Hope Omone Falowo, a home health aide, pled guilty to one count of Health Care Fraud (18 U.S.C. § 1347). According to admissions made as part of her plea agreement, Ms. Falowo submitted timesheets to the District Medicaid program for services not rendered to Medicaid beneficiaries, including timesheets for dates when Ms. Falowo was traveling outside the country, and timesheets that alleged that she

## ORGANIZATIONAL HIGHLIGHTS

worked in excess of 24 hours in a single day. On September 3, 2020, Ms. Falowo was sentenced to 13 months in prison and 24 months of supervised probation with a restitution amount of \$316,897.00, a forfeiture amount of \$316,897.00, and a fine of \$100.00. The OIG has requested that Ms. Falowo be excluded from all federal health care programs for 5 years.

### *Temitope Olaiya*

On February 28, 2020, Temitope Olaiya, a home health aide, plead guilty to one count of Health Care Fraud (18 U.S.C. § 1347) and one count of Bank Fraud (18 U.S.C. § 1344) and was sentenced on the same day to 120 months in prison and 36 months of supervised probation with a restitution amount of \$377,307.88 and a fine of \$200. According to admissions made as part of her plea agreement, Ms. Olaiya admitted that she submitted timesheets to the District Medicaid program for services that she never provided to Medicaid beneficiaries. On February 28, 2020, Ms. Olaiya also pled guilty to one count of Conspiracy to Import Five Kilograms or More of Cocaine (21 U.S.C. §§ 952(a), 960(a), and 963) and was sentenced to 120 months in prison, to run concurrently with her other sentence, and 60 months of supervised probation and a fine of \$100. The OIG has requested that Ms. Olaiya be excluded from all federal health care programs for 10 years based on the federal exclusion authority.

### *Temitope Oluwa-Bakare Ogunbiyi*

On September 16, 2019, Temitope Oluwa-Bakare Ogunbiyi, a home health aide, pled guilty to one count of Health Care Fraud (18 U.S.C. § 1347). According to admissions made as part of her plea agreement, Ms. Ogunbiyi admitted that she submitted timesheets to the District Medicaid program for services that she never provided to Medicaid beneficiaries. On February 14, 2020, Ms. Ogunbiyi was sentenced to 15 months in prison and 36 months of supervised probation with a restitution amount of \$1,071,247.12, a forfeiture amount of \$575,462.03, and a fine of \$100. The OIG has requested that Ms. Ogunbiyi be excluded from all federal health care programs for 5 years.

### *Rose Gana*

On October 23, 2019, Rose Asang Gana, a home health aide, pled guilty to one count of Health Care Fraud (18 U.S.C. § 1347). According to admissions made as part of her plea agreement, Ms. Gana admitted that she submitted false timesheets to the District Medicaid program for services that she never provided to Medicaid beneficiaries, including time sheets that alleged that she worked more than 20 hours in a single day. On February 13, 2020, Ms. Gana was sentenced to 13 months in prison and 36 months of supervised probation with a restitution amount of \$441,234.64, forfeiture in the amount of \$257,503.31, and a fine of \$100. The OIG has requested that Ms. Gana be excluded from all federal health care programs for 5 years.

## ORGANIZATIONAL HIGHLIGHTS

### *Bilal Ahmed*

On September 6, 2019, Bilal Ahmed, a dentist, pled guilty to one count of Health Care Fraud (18 U.S.C. § 1347). According to admissions made as part of his plea agreement, Dr. Ahmed admitted that he submitted or caused to be submitted false timesheets to the District Medicaid program for services that he never provided to Medicaid beneficiaries. On February 10, 2020, Dr. Ahmed was sentenced to 71 months in prison, to run concurrently with a prior prison sentence and 36 months of supervised probation, with a restitution amount of \$5,421,227.00, forfeiture in the amount of \$3,978,879.93, and a fine of \$100. On December 15, 2017, Dr. Ahmed was convicted of First Degree Sexual Abuse of a Patient and multiple counts of Second Degree Sexual Abuse of a Patient and sentenced to 180 months and 540 days in prison, 36 months of supervised probation, and fined \$650. In August 2017, the District's Department of Health, Board of Dentistry, revoked Dr. Bilal's dental license. The OIG has requested that Dr. Ahmed be excluded from all federal health care programs for 10 years based on federal exclusion authority.

### Civil Health Care Investigations

#### *India Rogers*

On September 24, 2020, India Rogers, a dentist, entered into a settlement agreement with the District to resolve allegations that she had violated the District's False Claims Act by submitting false claims to the District's Medicaid program for services not rendered to patients residing in District nursing homes. As part of the settlement agreement, Dr. Rogers waived her rights to funds held in suspension by the District's Medicaid program.

#### *Reckitt Benckiser*

On October 23, 2019, the District and other states reached a \$700 million settlement agreement with Reckitt Benckiser over allegations that the drug distributor improperly marketed Suboxone, a drug to treat opioid addiction. The civil settlement with the Medicaid programs was part of a \$1.4 billion settlement for federal, state, and local governments. The District's Medicaid program received \$2,513,102.99 of the settlement.

## ENABLING MISSION AREAS

This section presents the roles, responsibilities, and FY 2020 accomplishments of the OIG's organizational components supporting its core mission areas. The section also presents significant hearings, testimonies, external awards, and meetings with oversight bodies that occurred during the reporting period.

### Risk Assessment and Future Planning Division

The Risk Assessment and Future Planning Division (RAFP) consists of the Hotline Program and the Data Analysis Unit (DAU). RAFP is the focal point of the OIG's Strategic Goal to

## ORGANIZATIONAL HIGHLIGHTS

*proactively identify and reduce vulnerabilities that could lead to corruption, fraud, waste, abuse, and mismanagement that impacts the District of Columbia.* RAFP works across OIG operational units to provide a unified view of District operations; identify and prioritize risks; assist in identifying audits, inspections, and investigations; and to eliminate duplicative efforts and provide focus for the OIG's limited resources.

### Hotline Program

The OIG Hotline Program serves as the single point for intake and initial analysis of allegations of corruption, fraud, waste, abuse, and mismanagement within District government operations and programs. The Hotline Program receives allegations from multiple sources, to include phone calls, email, fax, postal mail, and walk-in complaints. The Hotline Program also reviews and analyzes all allegations to determine the appropriate actions to take for resolution.

During FY 2020, the Hotline Program received 694 complaints,<sup>18</sup> referred 100 complaints to other District or federal agencies, assisted 334 complainants with the proper avenue of redress to remedy their issues, and recommended 79 complaints for investigation or inclusion in the OIG's *FY 2021 Audit and Inspection Plan*. During this period, the Hotline Program determined a course of action within 10 days of receipt of a complaint 95 percent of the time, improving on the previous year's metrics and meeting RAFP's FY 2020 performance goal.

### Data Analysis Unit (DAU)

The DAU is the primary data analytics operation for the OIG, with a mission to provide analytical case support to ongoing investigations, audits, and inspections and to proactively identify risk and instances of corruption, fraud, waste, abuse, and mismanagement throughout the District government.

During FY 2020, the DAU provided analytical case support for 33 OIG investigations, identified risk areas throughout the District government in support of the OIG Risk Committee,<sup>19</sup> and completed 8 proactive projects with 38 percent leading to the initiation of an investigation, audit, or inspection. Additionally, RAFP released two Management Alert Reports to District agencies to bring attention to increased fraud risks in emergency procurement and benefit programs associated with the COVID-19 Public Health Emergency.

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<sup>18</sup> RAFP previously counted misdirected phone calls and hangups as complaints. These have been removed from the number of complaints listed for FY 2020.

<sup>19</sup> The OIG Risk Committee, consisting of RAFP and Operations Units, prepares the OIG's Annual Audit and Inspection Plan and conducts a systemic review and evaluates risks to the District. These risks are identified through an iterative process that includes: feedback received from elected officials; survey responses from District agency leaders and Council staff; a comprehensive review of District agency budget and performance information; analysis of OIG hotline contacts; and coordination with other District oversight practitioners.

## ORGANIZATIONAL HIGHLIGHTS

### Quality Management Division

The Quality Management Division (QM) ensures that agency operations are:

- Adhering to internal control policies, procedures, and standards.
- Complying with professional and quality standards of performance.
- Carried out economically, efficiently, and effectively.

In supporting the OIG's mission, QM employs a systematic process of: (1) involving all OIG employees in innovation, customer satisfaction, and continual improvement of work processes, products, and services to ensure the OIG's long-term success; (2) maximizing the efficiency, effectiveness, transparency, and accountability of OIG operations to maintain the desired level of excellence; (3) ensuring OIG work processes provide timely, high-quality products that promote improvement in District government programs and operations; (4) collaborating with all divisions to define, track, and report performance measures for each strategic objective; (5) implementing an effective visual performance metrics dashboard to facilitate data-driven, fact-based decision-making; (6) coordinating peer reviews for the Audit, Inspections and Evaluations, and Investigations Units to provide a formal, objective assessment of their operations; and (7) conducting benchmarking studies to determine how the Audit, Inspections and Evaluations, and Investigations Units compare to those of other OIGs.

QM develops and utilizes best practices for government oversight to ensure:

- The OIG budget is linked to the agency's strategic goals and objectives.
- OIG resources are targeted to address high-risk areas identified by RAFFP.
- High-quality products and services are delivered to OIG stakeholders.
- Stakeholder feedback on the quality of OIG products is obtained and used for continual improvement.
- The best employees are recruited, trained, retained, and motivated.

QM accomplished the following in FY 2020:

- Issued 7 quality assurance reports with 33 recommendations for improvement to the Operations Division's units and a 97 percent acceptance rate.
- Reviewed 16 reports and documents for compliance with quality standards prior to distribution to external parties.
- Collaborated with OIG divisions units to identify, define, and document 77 new key performance indicators (KPIs) and 100 workload measures (WLMs) to help measure the efficiency and effectiveness of the OIG's core work processes.
- Collected, analyzed, and disseminated a monthly KPIs and WLMs tracker to OIG divisions and units for internal and external reporting purposes.
- Updated, analyzed, and reported monthly metrics from the OIG recommendations tracking database maintained by QM.
- Developed an agency-wide risk matrix to aid the OIG leadership in responding to the COVID-19 pandemic.

## ORGANIZATIONAL HIGHLIGHTS

- Drafted an enterprise risk management (ERM) framework with a maturity model based on scientific approaches for identifying, assessing, prioritizing, and mitigating internal and external risks facing the OIG.
- Developed a District-wide Internal Control Assessment Program (ICAP) and related tools using technology for deployment. This enables District agencies to proactively assess and address issues in their internal control systems to ensure that internal controls are adequately designed and operating effectively to prevent and detect corruption, fraud, waste, abuse, and mismanagement in District operations and programs.

### Business Management Division

BM ensures all OIG operational divisions and units have the tools needed to prevent and detect corruption, mismanagement, waste, fraud, and abuse, while ensuring that District rules and regulations are followed. BM helps facilitate agency-wide initiatives in these ways:

- Providing safe and secure working environments.
- Providing necessary tools for staff to accomplish OIG goals.
- Recruiting highly qualified and motivated staff.
- Providing high-quality administrative support services to all OIG components.
- Ensuring the OIG engages in contact with the media, community, and other external stakeholders.
- Ensuring the OIG budget is linked to strategic goals and objectives, and followed per District rules and regulations.
- Ensuring all OIG staff members have the technology needed to complete their mission and goals in the most effective and efficient manner.
- Ensuring all records for the OIG are maintained, archived, and destroyed in accordance with its approved records retention schedule.

BM facilitated these initiatives in FY 2020:

#### The COVID-19 Pandemic Response

BM played a major role in preparing the OIG to effectively respond to the unexpected occurrence of the COVID-19 pandemic in a systematic manner. BM also worked with staff to ensure their safety and effectiveness while working to support the OIG in accomplishing its oversight mission during the pandemic. Specifically, BM accomplished the following:

- Hosted a pandemic table-top COOP exercise for the leadership team.
- Ensured technological capabilities were in place to begin and sustain situational telework.
- Worked with the District's Homeland Security and Emergency Management Agency (HSEMA) to secure necessary personal protective equipment (PPE) for all OIG staff at various risk levels.
- Completed the EOM return to work readiness preparations and safety checks.

## ORGANIZATIONAL HIGHLIGHTS

- Hosted Live Chats weekly to ensure OIG staff can ask and have questions answered in real time, regarding the OIG's response and work during the pandemic.
- Prepared and distributed weekly newsletters focused on COVID-19-related data and issues to OIG staff.

### Strategic Public Relations and Communication

The OIG's Strategic Public Relations and Marketing Plan has two goals:

1. Increase customers using OIG services.
2. Enhance OIG's reputation through strategic public relations campaigns to shape the way customers think of our work.

During FY 2020, the OIG began the following initiatives in furtherance of these goals:

- Delivered training about the OIG's mission to District government employees.
- Developed training videos on the OIG's mission and purpose for the following customer groups: residents/ taxpayers, media, vendors, and District Focus Groups.
- Worked on completing a new, more user friendly and informative OIG website.
- Began a thoughtful and informative social media campaign.
- Finalized a training video for District employees and residents highlighting the 40 years of work the OIG has done for the District.
- Hosted the first annual Oversight Symposium for the District.

Additionally, prior to the COVID-19 pandemic, the OIG continued its outreach initiatives from previous years. This included attending public meetings, participating in training for District agencies, and presenting to vulnerable populations in the District's communities.

### Facility Relocation

The OIG collaborated with the Department of General Services (DGS) in FY 2018 to move the OIG to a more appropriate facility in support of its law enforcement mission. This initiative continued successfully into FY 2020. DGS is currently working on the approval of a lease, while the OIG is also working with the Office of the Chief Technology Officer on infrastructure for the new office space, DGS' construction team on layout and architecture, and readying the current space for a move.

### Assets Management

During FY 2020, the OIG completed the integration of a full asset management system. This was a multi-unit effort among the OIG's Records Management Unit, Information Technology Unit, Facilities Management Unit, and Investigations Unit. Overall, this system allows the OIG to monitor and manage its assets using a systems approach. The benefits to the OIG, in increased productivity and efficiency, place it in a better position to increase the return on investment.

## ORGANIZATIONAL HIGHLIGHTS

### Significant Hearings and Testimonies

The Inspector General (IG) testified at the following hearings in FY 2020:

January 9, 2020: [Testimony before the Committee on Facilities and Procurement - Public Oversight Roundtable on 'District-Wide Participation in the Surplus Property Program Could Be Improved'](#)

January 16, 2020: [Testimony on the OIG's FY 2019 Performance Hearing Testimony Before the Committee on Government Operations](#)

February 5, 2020: [Testimony of Daniel W. Lucas, Inspector General before the Council of the District of Columbia, Committee of the Whole Public Oversight Hearing on the 'Fiscal Year 2019 Comprehensive Annual Financial Report \(CAFR\)'](#)

June 12, 2020: [Testimony on the OIG's FY 2021 Budget Review before the Committee on Government Operations](#)

### Significant Meetings with Oversight Bodies

- The IG met quarterly with the Mayor, Council Chairman, City Administrator, and the Attorney General. During those meetings, the IG provided District leaders with an overview of ongoing projects, solicited feedback on future projects, and discussed any other matters of interest.
- Throughout FY 2020, the IG met with other Inspectors General during monthly CIGIE meetings. By statute, the OIG is required to adhere to CIGIE quality standards.<sup>20</sup>
- The OIG and BEGA leaders met to discuss matters of mutual interest and resolve any oversight overlap. District employees are required to “immediately and directly report credible violations of the District Code of Conduct and violations of [Chapter 18 of the District Personnel Manual (DPM)]” to BEGA, the OIG, or both.<sup>21</sup>

<sup>20</sup> D.C. Code § 1-301.115a(b)(1).

<sup>21</sup> DIST. OF COLUMBIA DEP'T OF HUMAN RESOURCES, ELECTRONIC DISTRICT PERSONNEL MANUAL (DPM) § 1801.1, <https://edpm.dc.gov/> (last visited Oct. 20, 2020).

## APPENDICES

## APPENDICES

### Appendix A. Selected OIG Statutory Requirements

D.C. Code § 1-301.115a(f-2) requires the OIG to prepare an annual report, by December 1<sup>st</sup> each year, summarizing its activities during the preceding fiscal year. This legislation also outlines the OIG’s purpose and specific responsibilities.

#### PURPOSE

- Section (a-1)(1) “Conduct and supervise audits, inspections[,] and investigations relating to the programs and operations of District government departments and agencies, including independent agencies;”
- Section (a-1)(2) “Provide leadership and coordinate and recommend policies for activities designed to promote economy, efficiency, and effectiveness and to prevent and detect corruption, mismanagement, waste, fraud, and abuse in District government programs and operations . . .”
- Section (a-1)(3) “Provide a means for keeping the Mayor, Council, and District government department and agency heads fully and currently informed about problems and deficiencies relating to the administration of these programs and operations and the necessity for and progress of corrective actions.”

#### RESPONSIBILITIES

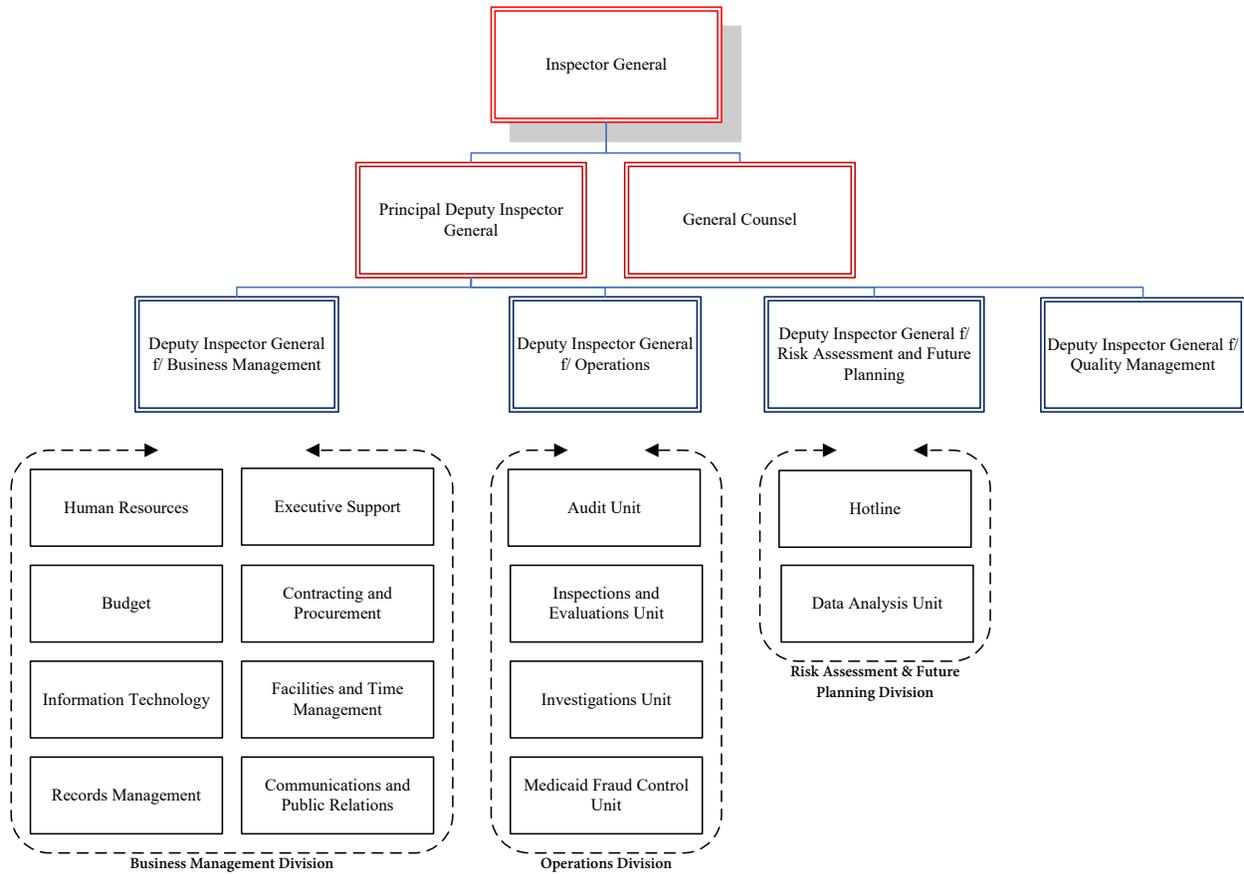
- Section (a)(3)(A) “Conduct independent fiscal and management audits of District government operations; ”
- Section (a)(3)(C) “Serve as principal liaison between the District government and the U.S. [Government Accountability] Office; ”
- Section (a)(3)(D) “Independently conduct audits, inspections, assignments, and investigations [requested by the Mayor] . . . and any other audits, inspections[,] and investigations [deemed] necessary or desirable in the Inspector General’s judgment;”
- Section (a)(3)(E) “Annually conduct an operational audit of all procurement activities carried out pursuant to this chapter . . .;”
- Section (a)(3)(F)(i) “Forward to the appropriate authority any report, as a result of any audit, inspection[,] or investigation conducted by the office, identifying misconduct or unethical behavior . . .”

## APPENDICES

- Section (a)(3)(F)(ii) “Forward to the Mayor, within a reasonable time of reporting evidence of criminal wrongdoing to the Office of the U.S. Attorney or other law enforcement office, any report regarding the evidence, if appropriate;”
- Section (a)(3)(H) “Pursuant to a contract described in [Section (a)(4) below], audit the complete financial statement and report on the activities of the District government for [the] fiscal year . . .”
- Section (a)(3)(I) “Not later than 30 days before the beginning of each fiscal year . . . and in consultation with the Mayor, the Council, and the Authority, establish an annual plan for audits to be conducted . . . during the fiscal year . . .”
- Section (a)(3)(J) “[C]onduct investigations to determine the accuracy of certifications made to the Chief Financial Officer . . . of attorneys in special education cases brought under the Individuals with Disabilities Education Act in the District of Columbia.”
- Section (a)(4)(A) “[E]nter into a contract with an auditor who is not an officer or employee of the [OIG] to . . . [a]udit the financial statement and report described in paragraph (3)(H) . . . for [the] fiscal year . . .”
- Sections (d)(1) & (2) “[C]ompile for submission to the . . . Mayor and the Council . . . at least once every fiscal year, a report setting forth the scope of the Inspector General’s operational audit, and a summary of all findings and determinations made as a result of the findings. [The report shall include] any comments and information necessary to keep . . . the Mayor and the Council informed of the adequacy and effectiveness of procurement operations, the integrity of the procurement process, and adherence to provisions of this chapter.”
- Section (f) “[R]eport expeditiously to the Attorney General whenever the Inspector General has reasonable grounds to believe there has been a violation of Federal or District criminal law.”
- Section (f-5) “A peer review of the [OIG’s] audit, inspection[,] and investigation sections’ standards, policies, procedures, operations, and quality controls shall be performed no less than once every 3 years by an entity not affiliated with the [OIG]. Any final report shall be distributed to the Mayor [and] the Council . . . .”

**APPENDICES**

**Appendix B. OIG Organizational Chart and Structure**

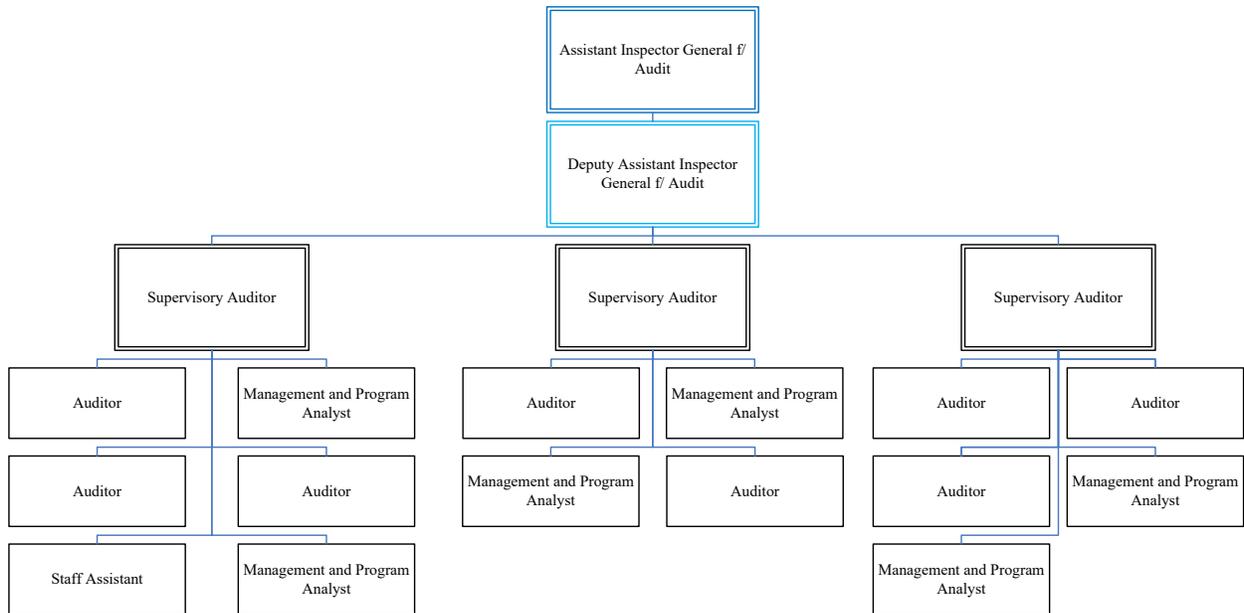


**Organizational Structure**

The OIG is led by the Inspector General, who is immediately supported by the Principal Deputy Inspector General and the General Counsel. The Principal Deputy Inspector General oversees the day-to-day operations of the OIG and provides leadership and direction to the OIG’s four Deputy Inspectors General. The Deputy Inspectors General each lead a specific division, which comprise the system by which the OIG has been arranged to execute its mission. The General Counsel oversees the Office of the General Counsel and provides leadership and direction to the OIG’s Deputy and Associate General Counsel.

**APPENDICES**

**Appendix C. Audit Unit’s Organizational Chart and Structure**

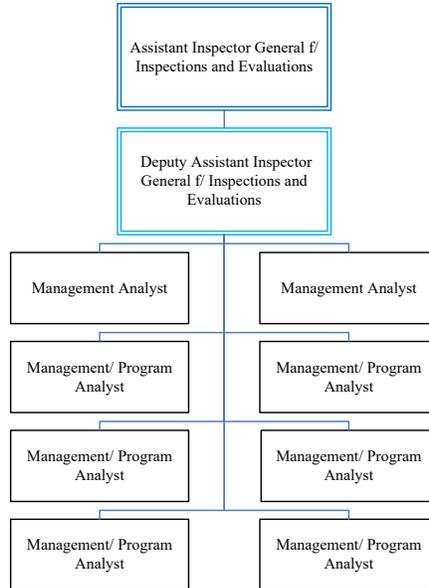


**Organizational Structure**

The Assistant Inspector General for Audits (AIGA), the Deputy Assistant Inspector General for Audits (DAIGA), and three Supervisory Auditors manage the AU. The AIGA sets policy; the DAIGA provides leadership and direction for AU; and Supervisory Auditors supervise the day-to-day projects and activities of audit staff. Organization for branch staffing is according to tactical operational needs, which gives AU the flexibility to respond to unexpected requests while matching staff and projects based on need.

**APPENDICES**

**Appendix D. Inspections & Evaluations Unit’s Organizational Chart and Structure**

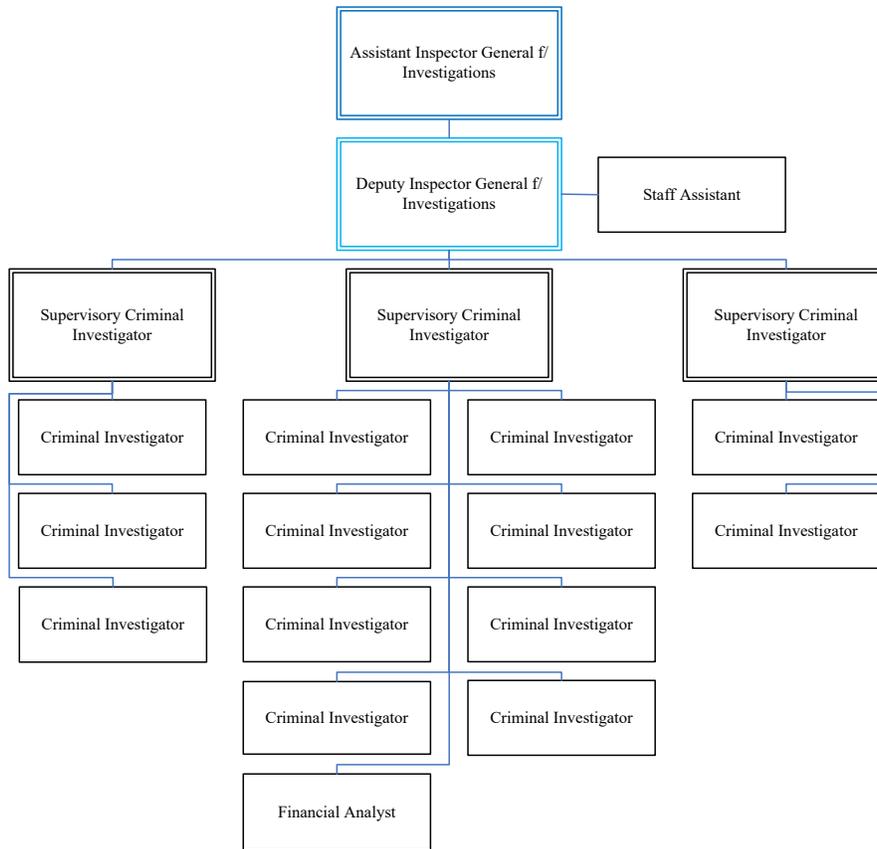


**Organizational Structure**

I&E is managed by the Assistant Inspector General for Inspections and Evaluations (AIGIE), and the Deputy Assistant Inspector General for Inspections and Evaluations (DAIGIE). The AIGIE sets policy and project priorities and provides leadership and direction to the unit. The DAIGIE manages the unit’s day-to-day operations and administrative activities, coordinates management analysts’ project activities, identifies and delivers professional development opportunities, and monitors and evaluates each analyst’s performance.

**APPENDICES**

**Appendix E. Investigations Unit’s Organizational Chart and Structure**

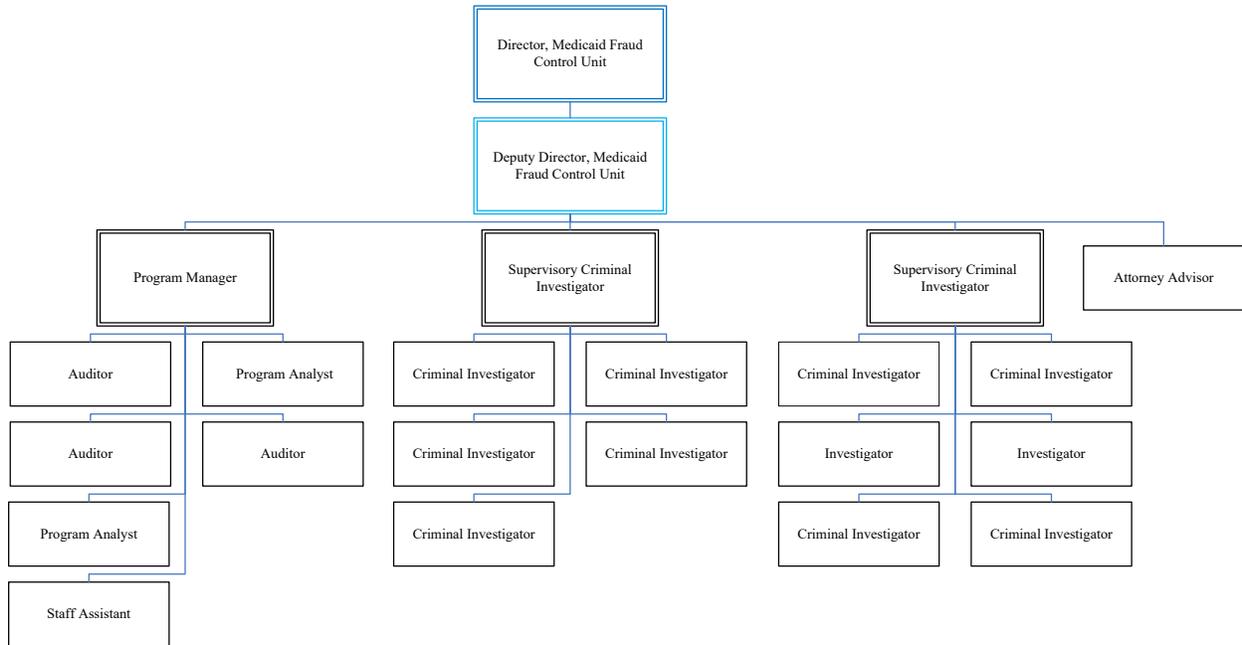


**Organizational Structure**

The Assistant Inspector General for Investigations (AIGI), the Deputy Assistant Inspector General for Investigations (DAIGI), and three Supervisory Special Agents manage IU. The AIGI sets policy and provides leadership for the unit. The DAIGI supervises the Supervisory Special Agents, estimates workloads, and outlines anticipated problems to be resolved and investigative objectives. Supervisory Special Agents supervise criminal investigators’ day-to-day activities.

**APPENDICES**

**Appendix F. Medicaid Fraud Control Unit’s Organizational Chart and Structure**



**Organizational Structure**

The Director, Deputy Director, two Supervisory Special Agents (SSAs), and a Supervisor Program Manager manage MFCU. The Director provides leadership and direction for the Unit, including establishing the Unit’s goals and operational policies under the OIG’s strategic framework. The Deputy Director supervises the unit’s two SSAs, Program Manager, and an attorney-advisor. The SSAs oversee the day-to-day activities of two investigative teams, and the Program Manager supervises the team composed of auditors, program analysts, and a staff assistant.

## APPENDICES

### Appendix G. Audit Unit Reports and Recommendations (In-House)

Agency	Title	Report Date	Recommendations Made	Recommendations Accepted	Potential Monetary Benefits
DDOT	DDOT Struggled to Manage Street Car Construction Program Because it Could not Adapt and Respond to Changes in the Project Schedule, Scope, and Budget	November 27, 2019	15	14	\$57,201,985
DCPS, OCFO	Access to Attorney Records is Needed to Determine the Accuracy of Attorney Certifications	November 14, 2019	5	3	\$0
OCTO	Office of the Chief Technology Officer: Internal Controls for Pipeline Contract Management Need to be Improved	January 10, 2020	14	14	\$1,570,000
DGS	Oversight of Contracts for District Facilities Modernization and New Construction Projects Needs Improvement	May 5, 2020	13	10	\$7,700,000
DOES	DOES Can Improve Tracking and Reporting for Project Empowerment Program Performance Outcomes	July 23, 2020	14	11	\$0
Multiple	Audit of OIG Prior Year Recommendations	July 17, 2020	0	0	\$0
OAG, OCFO	Audit of the Attorney General Income and Expenditures Restitution Fund	August 26, 2020	3	3	\$47,466.50
DOEE	The District has Made Progress Restoring the Anacostia River	September 18, 2020	8	7	\$0
DDOT	Prime Contractor for the Streetcar Program Billed and Received \$5.2 Million in Improper Payments from the District	September 23, 2020	10	8	\$5,232,349

**APPENDICES****Appendix H. Audit Unit Reports and Recommendations (Contract)**

<b>Agency</b>	<b>Title</b>	<b>Report Date</b>	<b>Recommendations Made</b>	<b>Recommendations Accepted</b>
DCRA	Prospective Evaluation of Bill 23-0091	December 6, 2019	7	N/A
DCRA	Evaluation of the Internal Control Environment as of August 31, 2019	December 10, 2019	17	14
DCHA	District Of Columbia Housing Finance Agency Financial With Independent Auditor's Report for Fiscal Years Ended September 30, 2019 And 2018	January 31, 2020	0	0
HBX	Health Benefit Exchange Authority Financial Statements (With Reports of Independent Public Accountants) for Fiscal Years Ended September 30, 2019 And 2018	January 31, 2020	0	0
DDOT	District Department of Transportation Highway Trust Fund Financial Statements for Fiscal Years Ended September 30, 2019 and 2018	January 31, 2020	0	0
DHCD	Home Purchase Assistance Program Fund Financial (With Report of Independent Public Accountants) for Fiscal Years Ended September 30, 2019 and 2018	January 31, 2020	0	0
OUC	District of Columbia E911/E311 Fund Financial Statements With Reports of Independent Public Accountants for Fiscal Years Ended September 30, 2019 and 2018	January 31, 2020	0	0
DC Lottery	District of Columbia Lottery and Charitable Games Control Board Financial Statements and Management's Discussion and Analysis (With Report of Independent Public Accountants) for Fiscal Years Ended September 30, 2019	January 31, 2020	0	0
UMC	Not-For-Profit Hospital Corporation United Medical Center Financial Statements (With Reports of Independent Public Accountants) for Fiscal Years Ended September 30, 2019 and 2018	January 31, 2020	0	0

## APPENDICES

Agency	Title	Report Date	Recommendations Made	Recommendations Accepted
Events DC	Washington Convention and Sports Authority Financial Statements and Management's Discussion and Analysis (With Report of Independent Public Accountants) for Fiscal Years Ended September 30, 2019 and 2018	January 31, 2020	0	0
DCRB	District of Columbia Teachers' and Police Officers and Firefighters' Retirement Funds Financial Statements and Schedules (With Independent Auditors' Report) for Fiscal Years Ended September 30, 2019 and 2018	January 31, 2020	0	0
UDC	University of the District of Columbia Basic Financial Statements (With Report of Independent Public Accountants) for Fiscal Years Ended September 30, 2019 And 2018	January 31, 2020	0	0
OCFO	The District of Columbia's Comprehensive Annual Financial Report (CAFR) for Year Ended September 30, 2019	January 31, 2020	0	0
DOES	Unemployment Compensation Fund Financial Statements with Reports of Independent Public Accountants for Fiscal Years Ended September 30, 2019 and 2018	January 31, 2020	0	0
OCFO	Other Post-Employment Benefits Fund Financial Statements With Reports of Independent Public Accountants for Fiscal Years Ended September 30, 2019 and 2018	January 31, 2020	0	0
OCFO	District of Columbia 529 College Savings Program Trust Funds: Financial Statements and Management's Discussion and Analysis (with Report of Independent Public Accountants) for Fiscal Years Ended September 30, 2019 and 2018	January 31, 2020	0	0
OCFO	District of Columbia Tobacco Settlement Financing Corporation Financial Statements With Independent Auditors' Report for Fiscal Year Ended September 30, 2019	January 31, 2020	0	0

**APPENDICES**

Agency	Title	Report Date	Recommendations Made	Recommendations Accepted
Events DC	Washington Convention and Sports Authority Schedule of Excess Cash Calculation/or the Fiscal Year Ended September 30, 2019	February 13, 2020	0	0
Events DC	Washington Convention and Sports Authority Management Recommendations for Fiscal Year 2019	February 12, 2020	2	2
UMC	United Medical Center FY 2019 Management Recommendations	February 12, 2020	2	2
OCFO	Government of the District of Columbia: Best Practice Recommendations for Fiscal Year 2019	February 12, 2020	2	1
DCRB	District of Columbia Teachers' and Police Officers and Firefighters' Retirement Funds Compliance Report	February 12, 2020	1	1
OCFO	Government of the District of Columbia: Management Recommendations for Fiscal Year 2019	February 12, 2020	2	2
DDOT	Highway Trust Fund Forecast Statements for Fiscal Years 2020-2024	May 23, 2020	0	0

**APPENDICES**

**Appendix I. Inspections & Evaluations Unit Reports and Recommendations**

<b>Agency</b>	<b>Title</b>	<b>Report Date</b>	<b>Recommendations Made</b>	<b>Recommendations Accepted</b>	<b>Potential Monetary Benefits</b>
OCFO	Closeout Letter of the Evaluation of the OCFO Central Collections Unit	March 17, 2020	0	0	\$0
DOES	Closeout Letter: Evaluation of the District's Paid Family Leave Benefits Administration System	June 26, 2020	4	N/A	\$0
DCRB	Evaluation of the District of Columbia Retirement Board's Procurement Processes and Selected Contracts	June 10, 2020	18	14	\$0
DHS	Department of Human Services (DHS): Inadequate Internal Controls Within the Economic Security Administration May Have Contributed to the Loss of \$1.8 Million	August 8, 2020	23	17	\$0

**APPENDICES**

**Appendix J. OIG Management Alert Reports**

A management alert report (MAR) is issued to inform a specific agency’s management of a matter that surfaced during the OIG’s work (audit, inspection, evaluation, or investigation) that requires immediate attention. MARs are one of the ways in which the OIG keeps District leaders fully and currently informed about problems and deficiencies related to their programs and operations.<sup>22</sup> Due to the sensitive nature of the matters, MARs are not made public.

Agency	Subject	Matters Discussed	Date Issued
OCA	Management Alert Report -- 20-I-001 – Risks Related to Multi-Agency Enforcement and Adjudication Activities	The OIG brought to the attention of the City Administrator discrete instances where two properties received numerous infractions from various District agencies, yet their owner was still able apply for and receive rent subsidies from the D.C. Housing Authority and lead abatement grants from the Department of Housing and Community Development. The MAR identified resources expended by the government in the form of inspections and issuing violations ultimately lacked consequence.	December 13, 2019
OCP	Management Alert Report – 20-R-001 – COVID Procurement Risks	The OIG brought to the attention of the Chief Procurement Officer risk factors associated with COVID-19 procurement fraud.	May 18, 2020
DOES and DHS	Management Alert Report – 20-R-002 – COVID-19 Related Benefit Program Risks	The OIG brought to the attention of the Department of Employment Services and the Department of Human Services risk factors concerning benefit program fraud.	June 16, 2020
DMV	Management Alert Report – 20-IU-001 – Alert of Fraud Scheme in Connection with CDL Licenses	The OIG brought to the attention of the Department of Motor Vehicles a fraud scheme connected to the issuance of Commercial Drivers Licenses (CDL).	June 22, 2020
DFS	Management Alert Report – 20-OPS-005 – Use of MPD Detailees	The OIG brought to the attention of the Department of Forensic Sciences the risks associated with the continued use of Metropolitan Police Department (MPD) detailees to provide forensic analysis.	July 10, 2020

<sup>22</sup> D.C. Code § 1.301.115a(a-1)(3).

**APPENDICES**

**Appendix K. Selected Investigative Outcomes**

<b>Agency Involved</b>	<b>Press Release/Significant Activity Report Title</b>	<b>Date</b>
DCHR	Former Government Consultant Sentenced to 41 Months in Prison for Bribery and Fraud Schemes	December 23, 2019
DHS	District Woman Sentenced to 24 Months in Prison on Federal Mail Fraud Charge, Admits Her Role in Embezzlement Scheme	January 17, 2020
OCFO	Former D.C. Tax Official Pleads Guilty to Accepting Bribes to Erase Millions in Tax Liability	June 25, 2020

**APPENDICES****Appendix L. Selected Medicaid Fraud Control Unit's Outcomes**

<b>Press Release</b>	<b>Date</b>
Former Personal Care Aide Pleads Guilty to Health Care Fraud	October 25, 2019
Former Personal Care Aide Sentenced 13 Months in Prison for Health Care Fraud	October 25, 2019
Nigerian Woman Pleads Guilty to Drug Trafficking and Fraud Schemes	November 5, 2019
Former Personal Care Aide Pleads Guilty to Health Care Fraud	November 25, 2019
Former Personal Care Aide Pleads Guilty to Health Care Fraud	December 16, 2019
Woman Sentenced for Cocaine Conspiracy and Multiple Fraud Schemes	February 28, 2020
University of Maryland Law School Graduate and National Institutes of Health Employee Charged with Defrauding Medicaid	June 23, 2020
Howard University Hospital Employee and Upper Marlboro Woman Charged in Separate Criminal Complaints with Defrauding Medicaid	June 24, 2020
Washington, DC Dentist and Two Others Facing Federal Indictment in Maryland on Charges Related to a Scheme to Defraud Medicaid	July 22, 2020
Maryland Woman Pleads Guilty to Health Care Fraud	September 9, 2020

## DISTRIBUTION LIST

### DISTRIBUTION LIST

The Honorable Muriel Bowser, Mayor, District of Columbia, Attention: Betsy Cavendish (via email)

Mr. Kevin Donahue, Interim City Administrator, District of Columbia (via email)

Mr. Barry Kreiswirth, General Counsel, City Administrator, District of Columbia (via email)

The Honorable Phil Mendelson, Chairman, Council of the District of Columbia (via email)

The Honorable Kenyan McDuffie, Chair Pro Tempore and Ward 5 Councilmember, Council of the District of Columbia

The Honorable Anita Bonds, At-Large Councilmember, Council of the District of Columbia

The Honorable David Grosso, At-Large Councilmember, Council of the District of Columbia

The Honorable Elissa Silverman, At-Large Councilmember, Council of the District of Columbia

The Honorable Robert C. White, At-Large Councilmember, Council of the District of Columbia

The Honorable Brianne K. Nadeau, Ward 1 Councilmember, Council of the District of Columbia

The Honorable Brooke Pinto, Ward 2 Councilmember, Council of the District of Columbia

The Honorable Mary M. Cheh, Ward 3 Councilmember, Council of the District of Columbia

The Honorable Brandon T. Todd, Ward 4 Councilmember, Council of the District of Columbia

The Honorable Charles Allen, Ward 6 Councilmember, Council of the District of Columbia

The Honorable Vincent C. Gray, Ward 7 Councilmember, Council of the District of Columbia

The Honorable Trayon White, Sr., Ward 8 Councilmember, Council of the District of Columbia

Mr. John Falcicchio, Chief of Staff and Deputy Mayor for Planning and Economic Development, Executive Office of the Mayor (via email)

Ms. LaToya Foster, Director, Office of Communications, Executive Office of the Mayor (via email)

Ms. Nyasha Smith, Secretary to the Council (via email)