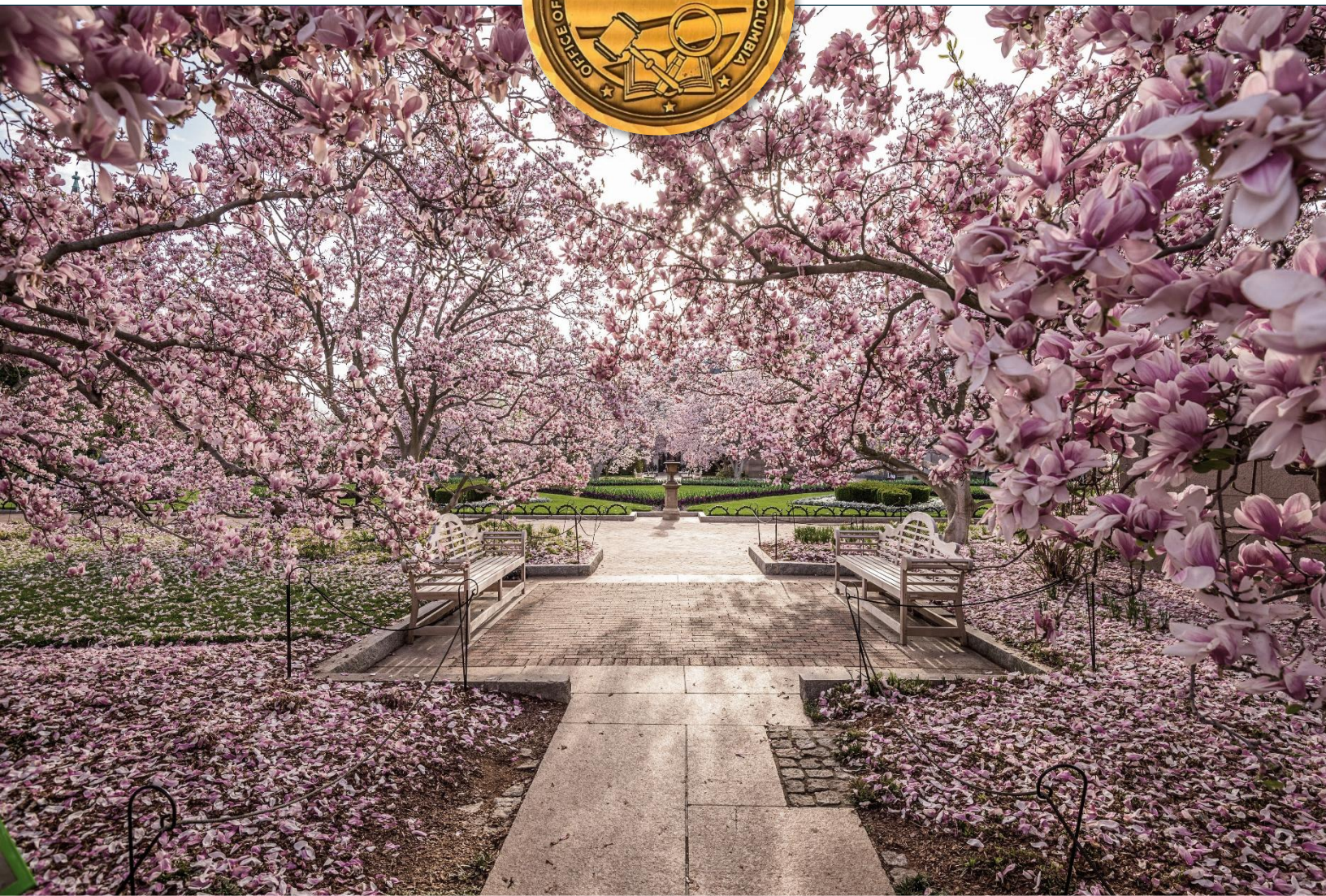


INSPECTION REPORT

OUC's Risk Mitigation Infrastructure
Office of Unified Communications

OIG No. 25-I-02-UC0

April 10, 2026



DANIEL W. LUCAS
INSPECTOR GENERAL



OUR MISSION

We 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.

OUR VISION

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

OUR VALUES

Accountability: We recognize that our duty extends beyond oversight; it encompasses responsibility. By holding ourselves accountable, we ensure that every action we take contributes to the greater good of the District.

Continuous Improvement: We view challenges not as obstacles, but as opportunities for growth. Our commitment to continuous improvement drives us to evolve, adapt, and enhance our practices.

Excellence: Mediocrity has no place in our lexicon. We strive for excellence in every facet of our work.

Integrity: Our integrity is non-negotiable. We act with honesty, transparency, and unwavering ethics. Upholding the public's trust demands nothing less.

Professionalism: As stewards of oversight, we maintain the utmost professionalism. Our interactions, decisions, and conduct exemplify the dignity of our role.


Transparency: Sunlight is our ally. Transparency illuminates our processes, decisions, and outcomes. By sharing information openly, we empower stakeholders, promote understanding, and reinforce our commitment to accountability.





MEMORANDUM

To: Heather McGaffin
Director, Office of Unified Communications

From: Daniel W. Lucas 
Inspector General

Date: April 10, 2026

Subject: **OUC's Risk Mitigation Infrastructure** | **OIG No. 25-I-02-UCO**

This memorandum transmits our final inspection report, *Office of Unified Communications' Risk Mitigation Infrastructure*. This inspection assessed the existence and effectiveness of OUC's risk mitigation strategies pertaining to 911 Call Center operations, focusing on operational, strategic, and compliance risks. We reviewed OUC's risk management practices, staffing policies, training programs, and emergency preparedness procedures for the period covering fiscal year 2020 through the third quarter of fiscal year 2025.

We conducted this inspection following the *Quality Standards for Inspection and Evaluation*¹ from the Council of the Inspectors General on Integrity and Efficiency (CIGIE) and the *Standards for Internal Control in the Federal Government* (GAO Green Book).²

Our report includes six recommendations to strengthen OUC's risk management and operational oversight, as well as three opportunities for improvement. OUC provided a written response agreeing with all six recommendations and describing corrective actions taken and planned. Complete agency responses are included in Appendix 3.

¹ Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Inspection and Evaluation*, (Washington DC: CIGIE, 2020), <https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf>.

² U.S. Gov't Accountability Office, *Standards for Internal Control in the Federal Gov't*, GAO-25-107721 (Wash. D.C.: GAO, 2025), <https://www.gao.gov/products/gao-25-107721>. Note: D.C. Code § 1-204.49(4) states that the Mayor shall "give due consideration to the effectiveness of accounting systems, *internal control*, and related administrative practices of the respective agencies." (Emphasis added.) The OIG uses the standards in the GAO Green Book as criteria to assess the design, implementation, and operation of District internal control systems.

April 10, 2026

We will notify the Council and the Mayor of our findings and post a public version of the final report, including OUC's full response, on our website. We will report annually on actions OUC has taken to implement the recommendations and on any recommendations that remain unimplemented.

We appreciate the cooperation and courtesy extended to our staff during this evaluation. If you have any questions about this report, please contact me or Yulanda Gaither, Assistant Inspector General for Inspections and Evaluations, at yulanda.gaither@dc.gov.



OUC's Risk Mitigation Infrastructure

Summary

The Office of the Inspector General conducted this inspection to assess the existence and effectiveness of the Office of Unified Communications' (OUC) risk mitigation strategies as they pertain to the 911 Call Center's operations. We reviewed OUC's risk management practices from fiscal year 2020 through the third quarter of fiscal year 2025.

OUC does not have an enterprise risk management framework to identify and address operational risks that could affect the continuum of call taking and dispatching for 911 emergency response services. The lack of such framework contributes to operational challenges: high levels of employee absences that strain operations, quality assurance processes that need improvement, and gaps in supervisory cross-training. OUC also can benefit from strengthening its communications about emergency preparedness—many employees are unaware of the agency's continuity of operations plan.

Despite these challenges, OUC has made progress in some areas. The agency has reduced critical vacancies, invested in employee wellness programs, and implemented comprehensive training program for call takers and dispatchers. These efforts demonstrate OUC's commitment to improving operations and supporting its workforce.

Objectives

Our objective was to assess how OUC identifies and manages risks that could affect 911 emergency services.

Findings and Observations

1. OUC lacks a risk management framework to identify and manage operational risks.
2. High levels of employee absences strain 911 Call Center operations.

3. Some supervisors lack cross-training to handle both police and fire emergency calls.
4. OUC does not systematically analyze quality assurance data to identify trends.
5. OUC's *Prohibited Items Policy* contains contradictions and is inconsistently enforced.
6. Many staff members are unaware of OUC's continuity of operations plan.
7. OUC has significantly increased investment in employee wellness programs.
8. OUC has implemented a comprehensive training program that meets industry and District standards.
9. OUC has reduced critical vacancies in its 911 Call Centers.
10. District-wide challenges in updating address data affect OUC's emergency response accuracy.

Recommendations

We made six recommendations to OUC management, including: developing an enterprise risk management framework; addressing staffing and supervisory capabilities; strengthening quality assurance and policy implementation; and enhancing emergency preparedness. We also identified three opportunities for improvement to support continued progress.

Management Response

OUC provided a written response agreeing with all six recommendations and describing corrective actions taken and planned. The complete agency response is included in Appendix 3.





Office of Unified Communications' Risk Mitigation Infrastructure

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INTRODUCTION

Objective

This inspection assessed how the Office of Unified Communications (OUC) identifies and manages risks in its 911 Call Center operations. We examined whether OUC has systems to prevent and address problems that could affect emergency response services. Our review focused on operations, strategic planning, and compliance with applicable standards.

For this inspection, we define risk management as the policies, procedures, systems, and practices that an organization uses to identify, assess, and manage risks that could affect its operations and mission. Risk management includes addressing operational risks such as staff shortages and equipment failures, strategic risks such as inadequate planning and resource allocation, and compliance risks such as failure to meet regulatory requirements or industry standards.

Methodology

Standards

We conducted this inspection following the *Quality Standards for Inspection and Evaluation* from the Council of Inspectors General on Integrity and Efficiency. In accordance with DC Code § 1-301.115a(b)(1), we also applied the *Standards for Internal Control in the Federal Government* (GAO Green Book) issued by the US Government Accountability Office.³ These standards require that we obtain sufficient evidence to support our findings and recommendations.

Documents Reviewed

We reviewed OUC's formal policies and procedures for 911 Call Center operations, including standard operating procedures, training materials, and performance data. Because OUC follows industry standards established by the National Emergency Number Association (NENA) and the Association of Public-Safety Communications Officials (APCO), we reviewed guidance from these organizations to assess OUC's compliance. We also reviewed OUC's collective bargaining agreement with the National Association of Government Employees/Service Employees International Union (NAGE) to understand contractual requirements affecting operations.

³ US Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-25-107721 (Washington DC: GAO, 2025), <https://www.gao.gov/products/gao-25-107721>, (hereafter, GAO Green Book).

Interviews

We interviewed OUC employees from all organizational levels: executive leadership (i.e., Director, Deputy Directors, and Chief of Staff), managers (i.e., a unit chief, a manager of 911 operations, and managers of support areas), supervisors (i.e., watch commanders and assistant watch commanders), and frontline staff (dispatchers and call takers). We also spoke with staff from OUC's support departments, including Information Technology, Human Resources, and Professional Standards and Development. Additionally, we interviewed DC Fire and Emergency Medical Services leadership to understand emergency response coordination between agencies.

Site Visit

We toured OUC's primary 911 Call Center to observe operations.

Scope

Our review covered fiscal years 2020 through the third quarter of fiscal year 2025.

Background

Why We Conducted This Inspection

OUC operates one of the busiest 911 call centers in the country, handling approximately 1.68 million calls for service in fiscal year 2024.⁴ In recent years, media reports and oversight hearings have documented dispatching errors and operational challenges within DC's 911 system. For example, in July 2025, news outlets reported that 911 dispatchers sent emergency crews to the wrong address after a fall on the National Mall.⁵ The Mayor, DC Council, and OUC Director have acknowledged the need to address these operational challenges. Public safety concerns emphasize the importance of assessing whether OUC has robust systems in place to prevent, identify, and address operational risks that could compromise emergency response services.

Office of Unified Communications

The DC Council established OUC in 2004 to provide centralized call handling and dispatch services for the District's 911, 311, and other emergency, non-emergency, and

⁴ Office of Unified Communications, 911 Performance Dashboard BETA, (accessed Aug. 5, 2025), <https://ouc.dc.gov/page/911-performance-dashboard-beta>.

⁵ Matt Pusatory, Nathan Lee, and Matt Gregory, "DC 911 dispatchers send crews to wrong address after National Mall fall," WUSA9, July 7, 2025, <https://www.wusa9.com/article/news/police/dc-911-dispatches-crews-to-wrong-address-after-national-mall-fall/65-ceabc981-408f-48fe-9be7-b1064bde1e59>.

resident service calls.⁶ Beyond call handling, OUC manages public safety voice radio technology and wireless communication systems to District government agencies.⁷

OUC's 911 Call Center handles 911 emergency calls for police, fire, and emergency medical services. It works primarily with the Metropolitan Police Department (MPD) and the Fire and Emergency Medical Services Department (FEMS) to coordinate lifesaving responses. OUC's 311 Call Center handles non-emergency calls for city services and coordinates public safety communications across the District.

During fiscal year 2024, OUC operated with a budget of approximately \$63.6 million and 426 full-time equivalent (FTE) positions. The 911 Call Center was staffed by approximately 220 FTEs assigned to 12-hour shifts Monday through Saturday and 8-hour shifts on Sunday.

Standards and Requirements

OUC adheres to industry standards set by NENA and APCO. These professional organizations focus on 911 operations, technology, education, policy, and public safety communications. The OUC Director stated that the agency primarily relies on NENA and APCO standards when developing policies, procedures, and processes for 911 operations.

In addition to industry standards, our office evaluates District agencies' internal controls against GAO's *Standards for Internal Control in the Federal Government* (GAO Green Book), which serves as the authoritative framework for designing, implementing, and evaluating internal control systems.⁸ Further, the GAO Green Book requires that management identify, analyze, and respond to risks to achieving objectives.⁹

To support this risk-focused assessment, we also align our work with good practices in enterprise risk management described in GAO's *Enterprise Risk Management: Selected Agencies' Experiences Illustrate Good Practices in Managing Risk* ([GAO-17-63](#)). GAO's enterprise risk management (ERM) guidance outlines a systematic, portfolio-level approach to identifying, analyzing, and responding to

⁶ [DC Code § 1-327.52\(a\)](#).

⁷ Office of Unified Communications, *We Answer the Call* (accessed Aug. 5, 2025), <https://ouc.dc.gov/page/WATC>.

⁸ See DC Code § 1-301.115a(b)(1) (Office of the Inspector General "shall ... comply with standards established by the US Comptroller General ..."), which directs the DC OIG to follow the administrative-control standards found in GAO's *Standards for Internal Control in the Federal Government* (the "Green Book"). Those standards are issued under the authority of the Federal Managers' Financial Integrity Act of 1982 (Pub. L. [97-255](#), Sept. 8, 1982).

⁹ GAO Green Book §§ 7.01 & 7.06.

risks, including defining objectives, establishing risk tolerances, and evaluating internal and external risks through data-informed analysis and strategic planning. Although ERM guidance is considered best practice for federal executive agencies, rather than a formal requirement for District agencies, it complements the Green Book by reinforcing principles of effective risk management.¹⁰

Together, the GAO Green Book and GAO's ERM framework establish the criteria that District agencies, including OUC, are expected to follow in managing risks, strengthening internal controls, and ensuring operational readiness. These standards form the basis for our assessment of OUC's internal control and risk-management practices.

911 Response Process

As outlined in the infographic to the right, When OUC handles a 911 call, the process involves multiple coordinated steps and personnel. Telecommunication equipment operators (call takers) answer incoming 911 calls, gather critical information from callers about the emergency, and determine the appropriate response needed. For calls requiring emergency services, call takers transfer the information to dispatchers who coordinate with either MPD or FEMS to deploy the appropriate resources and personnel to the scene. Throughout this process, supervisory staff—including watch commanders and assistant watch commanders—provide oversight, guidance, and intervention as needed to ensure proper emergency response coordination. See the accompanying figure for additional information about the process.

Computer-aided dispatch (CAD) technology and geographic information systems (GIS) support this multi-step process by helping pinpoint exact locations and track resource deployment. Given the District's proximity to Maryland and Virginia,



Source: OUC's [911 Performance Dashboard Beta](#)

¹⁰ US Office of Management and Budget, *Circular A-71: Preparation, Submission, and Execution of the Budget*, Aug. 29, 2025, § 230.6, Accessed March 4, 2026, <https://www.whitehouse.gov/wp-content/uploads/2025/08/all.pdf>.

OUC frequently coordinates with emergency services within neighboring jurisdictions to ensure comprehensive emergency coverage.

INSPECTION RESULTS

Our objective was to assess the existence and effectiveness of OUC's risk mitigation strategies as they pertain to 911 Call Center operations. We found opportunities for improvement in OUC's approach to risk management alongside areas where the agency made meaningful progress.

Enterprise Risk Management Framework

OUC does not have an ERM framework to systematically identify, assess, and manage operational, strategic, and compliance risks. Without this structured approach, OUC cannot effectively address the operational challenges we identified during our inspection.

Operational Challenges

GAO Green Book Principle § 7.04 states "Management considers all significant interactions within the entity and with external parties, changes within the entity's internal and external environments, and other internal and external factors to identify risks throughout the entity." During this inspection, we identified several operational challenges requiring OUC management's attention.

- Chronic absenteeism affected 911 Call Center staffing, with 30 percent of shifts falling below minimum requirements between December 2024 and April 2025.
- Some supervisors lack training for handling all emergency responses because not all supervisors are cross-trained for both MPD and FEMS operations.
- OUC's quality assurance activities do not include systematic analysis of 911 calls to identify trends and strategies for improvement.
- Policies are unclear and inconsistently enforced, including contradictory guidance on prohibited items.
- Communication of OUC's Continuity Operations Plan (COOP) preparedness activities is ineffective as many staff were unaware of or had limited knowledge of the COOP.
- Coordination challenges with other District agencies delay geospatial data updates needed for accurate emergency response.

Areas of Progress

OUC has reduced vacancies in its 911 Call Center, maintains a comprehensive training program for call-takers and dispatchers that meets industry and District standards, and has increased its investment in wellness initiatives for its 911 staff. The following findings detail OUC's operational challenges and progress areas, followed by recommendations for improvement and additional observations.

Finding 1: OUC does not have an enterprise risk management framework

OUC has not developed an enterprise risk management framework to systemically address operational, strategic, and compliance risks in its 911 Call Center. While OUC has COOP and Emergency Response Plans for catastrophic events such as facility fires, cyberattacks, floods, and natural disasters, the agency lacks a structured approach to identify, assess, and manage routine operational risks. An OUC manager stated that the agency follows guidance from the Office of Risk Management, which focuses on workplace safety and liability rather than operational risk management for mission-critical and administrative functions.

As outlined in the Standards and Requirements section, the GAO Green Book establishes that agencies should systematically identify, assess, and manage operational risks. Without an enterprise risk management framework, OUC cannot effectively identify patterns, prioritize interventions, or allocate resources to address the operational challenges articulated in this report. These challenges include chronic absenteeism, supervisory training gaps, fragmented quality assurance processes, inconsistent policy enforcement, knowledge of emergency preparedness activities and geospatial mapping of new addresses. An ERM framework would help OUC identify these challenges and associated risks earlier, assess their severity, develop mitigation strategies, and monitor progress systematically rather than addressing problems reactively as they arise.

During our exit conference, OUC leadership told us that the agency had discussed with ORM the possibility of conducting an operational assessment. However, OUC had not established a timeline or scope for this assessment. OUC had assessed its strategies to respond to large-scale, catastrophic events, although it had not focused on strategies for day-to-day operational aspects.

| Recommendation 1 |
|--|
| <p>We recommend that the Director, OUC:</p> <p>Develop and implement an enterprise risk management framework that includes processes for identifying operational risks, assessing their impact, prioritizing mitigation efforts, assigning responsibilities, and monitoring progress.</p> |
| <p>OUC Response:</p> <p><i>OUC has undertaken comprehensive efforts to identify, assess, and mitigate risks across all operational divisions. Targeted initiatives—including enhanced training, expanded public education, and deployment of Next Generation 911 technologies—are now embedded in agency operations to ensure risks are systematically addressed and monitored.</i></p> |

Finding 2: Chronic absenteeism among frontline staff impedes 911 Call Center operations

According to OUC's 911 Performance Dashboard, 30 percent of scheduled shifts fell below the minimum staffing requirement between December 2024 and April 2025. According to data obtained from OUC's Human Resources unit, during FY 2024 OUC recorded 2,785 unscheduled leave instances and 1,763 leave-without-pay instances. During this same period, 73 employees (33 percent of the 911 Call Center's 220-person workforce) were out on Family and Medical Leave Act (FMLA) time. Additionally, supervisors we interviewed reported frequently performing call-taking and dispatching duties themselves due to excessive unscheduled absences.

OUC policy requires the 911 Call Center to maintain a minimum of 40 employees per shift: 12 MPD dispatchers, 10 FEMS dispatchers, and 18 call takers.¹¹ However, the policy is silent on the minimum number of supervisors required per shift.

Staff we interviewed identified several factors contributing to absenteeism: fatigue and burnout from mandatory holdovers (requirements to work extra hours due to understaffing), stress from the demanding nature of 911 work, and lack of motivation to attend

¹¹ Office of Unified Communications, "Emergency Minimum Staffing Requirements," SOP 08-25, on file. This SOP erroneously reflected the total number of personnel required to be 30, but an OUC manager confirmed that it should be written as 40 members.

scheduled shifts. OUC implemented a volunteer system to reduce mandatory holdovers, but when there are not enough volunteers, employees with less seniority are required to remain on duty until the next shift arrives.

During interviews, supervisors cited multiple control weaknesses that they believed contributed to OUC staff absenteeism. These control weaknesses included poor internal communication and inconsistent management oversight of employee attendance. Supervisors also noted that employees often bypassed their direct supervisors when requesting leave; instead, they sought and received approval from managers with whom they had long-standing collegial relationships. Additionally, supervisors have a limited role in formally approving timesheets in Peoplesoft. It was stated that supervisors do not review and approve the timesheets of their direct subordinates; rather, OUC has designated an analyst to handle the approvals for all 911 members.

These control weaknesses and chronic absenteeism create operational risks. When supervisors must fill in for absent frontline staff, their ability to provide oversight, answer questions, and prevent errors timely is diminished. An understaffed 911 Call Center faces increased risk that the agency will be unable to respond to calls efficiently and dispatch resources in a timely manner, which poses a risk to the safety, security, and wellbeing of District residents and visitors.

Without a systematic risk management framework, OUC lacks the structured approach needed to monitor absenteeism patterns, identify early warning signs, and implement targeted interventions to address this operational challenge.

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| Recommendation 2 |
| <p>We recommend that the Director, OUC:</p> <p>Implement strategies to reduce absenteeism and enforce protocols for supervisory review and approval of time and attendance requests.</p> |
| <p>OUC Response:</p> <p><i>Following the October 2024 staffing study conducted with the Office of Budget and Performance Management (OBPM), OUC implemented corrective initiatives that resulted in an 82.59 percent reduction in top leave code usage, as documented in the August 2025 follow-up report. Attendance incentives have further improved workforce reliability. OUC continues to enforce supervisory accountability and maintain strict oversight of time and attendance practices.</i></p> |

Finding 3: Not all supervisors are cross-trained for both MPD and FEMS operations

Not all OUC supervisors are cross-trained in handling both MPD and FEMS emergency operations. During our interviews, supervisors stated that while each supervisor typically has in-depth knowledge of either MPD or FEMS response protocols based on their prior work experience, many lack training in both disciplines. On some shifts, all scheduled supervisors have expertise in one type of operation (either MPD or FEMS) but not both. Call takers and dispatchers we interviewed expressed concerns about some supervisors' limited knowledge in one of the two operational areas.

The position descriptions for OUC supervisors include filling in as needed to ensure uninterrupted phone and radio coverage. Additionally, the OUC-NAGE collective bargaining agreement requires supervisors to ensure uninterrupted phone and radio coverage.¹² During OUC's FY 2025 Performance Oversight Hearing, the OUC Director testified that all supervisors should be cross-trained to perform all emergency operation skills.¹³ Additionally, industry standards from the Association of Public-

¹² Collective Bargaining Agreement between Office of Unified Communications and National Association of Government Employees/Service Employees International Union Local R3-07, FY 2016-2017, <https://olrcb.dc.gov/sites/default/files/dc/sites/olrcb/publication/attachments/NAGE%20R3-07%20%28OUC%29%20-%20FY%202016-2017.pdf>. This agreement remained the operative version during the period covered by our review.

¹³ Council of the District of Columbia, Committee on the Judiciary and Public Safety, "Performance Oversight Hearing on Office of Unified Communications," February 5, 2025 (Washington, DC).

Safety Communications Officials specify that communication center supervisors should possess the knowledge, skills, and abilities to function as public safety telecommunicators, including operational proficiency in call handling and dispatching for law enforcement and FEMS operations.

OUC leadership has prioritized cross-training for frontline dispatchers rather than supervisors. The agency's Continuing Education policy (2023-300-304) does not specify training requirements for supervisors. According to staff we interviewed, supervisor training focuses primarily on administrative responsibilities such as performance management rather than operational skills for both MPD and FEMS emergency responses. Some managers expressed interest in expanding cross-training for supervisors.

When supervisors lack familiarity with response protocols for both MPD and FEMS operations, they cannot effectively guide or provide feedback to frontline staff handling all types of emergencies. In these situations, veteran staff members must assist supervisors when the supervisor lacks knowledge of required protocols. This gap in supervisory capability affects the quality of oversight and can slow emergency response coordination.

Without an enterprise risk management framework, OUC lacks a systematic process to continuously address supervisory training gaps that present operational risks to emergency response quality.

| Recommendation 3 |
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| <p>We recommend that the Director, OUC:</p> <p>Ensure all 911 Call Center supervisors are cross-trained to effectively handle emergency responses for both MPD and FEMS operations.</p> |
| <p>OUC Response:</p> <p><i>OUC established a structured twelve-week supervisory training curriculum through the Office of Professional Standards and Development. The initial cohort completes training on April 3, 2026. All supervisors must complete comprehensive call taking and dispatch on-the-job training supported by Daily Observation Reports. Additional mandatory training begins April 6, 2026, for supervisors lacking prior experience in these functions. This requirement is now institutionalized for all newly hired and promoted supervisors.</i></p> |

Finding 4: OUC does not systematically analyze performance data to identify operational improvements

Federal and industry standards require agencies to conduct systematic quality assurance that includes trend analysis. DC Code § 1-327.55(5)(D) requires OUC's Office of Professional Standards and Development (OPSD) to implement formalized quality assurance processes to identify areas where training would be beneficial. NENA standards specify that performance reporting should include trend analysis of timeliness, accuracy, and error volume.¹⁴ APCO standards define quality assurance as including random case review, feedback, remediation, and submission of compliance data.¹⁵ Additionally, the GAO Green Book requires management to effectively communicate quality information using established reporting lines to increase transparency and accountability.¹⁶

OUC conducts quality assurance activities for individual calls but does not systematically analyze this data to identify trends. OPSD staff conduct routine reviews of randomly selected calls, as well as calls of concern presented by the public, using checklists and industry standards to assess employee performance. When quality standards are not met, OUC provides remedial training tailored to individual employees. The agency also reviews calls identified as irregular or high priority and produces post-incident reviews for events that garner media attention. OUC's OPSD team works with the information technology department to provide data about distinct incidents via the agency's 911 Public Dashboard.

However, OUC does not systematically analyze the results from individual quality assurance reviews (e.g., reasons for 911 calls, resources dispatched; shift or employees handling the 911 calls) to identify trends that could inform strategic improvements. Supervisors do not receive information about performance trends to help them discuss deficiencies and improvement strategies with their teams. One supervisor noted they had not seen trend data on performance errors but believes most errors pertain to incorrect addresses and occur most frequently on weekends. Per an OUC manager, there is frequently a disconnect between senior management and middle managers; when errors are identified, middle managers are not kept in the loop and informed how

¹⁴ NENA, NENA Next Generation 9-1-1 Data Management Requirements, (2016), 10.

¹⁵ Cite to APCO

¹⁶ GAO Green Book Principle 14.

errors were resolved because the results from OPSD reviews are not currently shared with supervisors.

The agency lacks processes for aggregating quality assurance data, identifying trends, and using these trends to inform operational improvements. Without an enterprise risk management framework, OUC lacks the systematic approach needed to integrate trend analysis, performance monitoring, and continuous improvement into its quality assurance processes.

Without systematic trend analysis, OUC cannot identify patterns that could inform training priorities, operational improvements, or risk mitigation strategies. Supervisors and managers lack the information needed to engage strategically in quality assurance processes or to proactively address recurring problems before they escalate. Internal and external stakeholders remain unclear about the agency's performance trends and approach to addressing quality assurance issues. The lack of trend analysis limits OUC's ability to prevent errors rather than responding to them after they occur.

| Recommendation 4 |
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| <p>We recommend that Director, OUC:</p> <p>Enhance OUC's quality assurance process to include systematic trend analyses and share the results internally and externally to inform training and areas for operational improvements.</p> |
| <p>OUC Response:</p> <p><i>OUC implemented CommsCoach by GovWorx on December 5, 2025, establishing full operational quality assurance coverage of all 911 calls. Since January 2026, more than 65,000 calls have been evaluated through objective, automated review. The resulting dashboards and analytic tools have significantly strengthened training development and operational oversight.</i></p> |

Finding 5: OUC's prohibited items policy contains contradictory language and is inconsistently enforced

The GAO Green Book requires management to document internal control responsibilities through clear policies that personnel can

implement effectively.¹⁷ Policies must provide unambiguous guidance so that personnel understand expectations and supervisors can enforce standards consistently.

OUC's Prohibited Items policy contains contradictory language regarding personal electronic devices. Section 5.3.1.1, states that cellphones, cameras, or any other visual recording devices are prohibited on the operations floor. However, Section 5.3.1.1.1 of the same policy states, "staff may always keep personal electronic devices on their person as long as they are not visible or distracting."¹⁸ This contradiction leaves staff and supervisors unclear about whether personal devices are prohibited or permitted under certain conditions.

Interviews with OUC staff revealed that this policy is not consistently enforced. Multiple interviewees at all levels of the organization stated they have observed personal cellphone usage by call takers, dispatchers, and supervisors on the operations floor during both morning and evening shifts. Interviewees stated that some supervisors issue verbal warnings for policy violations multiple times before taking further disciplinary action, while others immediately resort to disciplinary action when cellphone use is observed. This inconsistent enforcement further undermines policy compliance and effectiveness.

Contradictory policy language and inconsistent enforcement create confusion about expectations, disparate treatment, and reduces the policy's effectiveness. Supervisors and managers reported that cellphone usage distracts staff from critical tasks and requires constant supervisory intervention to maintain focus on emergency operations. The unclear policy undermines operational discipline in an environment where staff attention and accuracy are essential for effective emergency response.

¹⁷ GAO Green Book Principle 12.

¹⁸ Office of Unified Communications, "Prohibited Items," Policy No. 2022-100-102 § 5.3.1.1 (July 27, 2022).

| Recommendation 5 |
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| <p>We recommend that the Director, OUC:</p> <p>Revise the Prohibited Items Policy to eliminate contradictory language and clearly specify whether personal electronic devices are prohibited or permitted in the 911 Call Center and under what circumstances. Additionally, establish and communicate clear enforcement procedures, including consequences for violations.</p> |
| <p>OUC Response:</p> <p><i>OUC is currently undergoing a comprehensive review of all agency policies to ensure alignment with national standards and accreditation requirements. The Prohibited Items Policy is included in this review, and revisions will explicitly clarify expectations for personal electronic devices and establish consistent enforcement procedures.</i></p> |

Finding 6: Some OUC personnel had limited awareness of OUC's COOP preparedness activities

District agencies are required to maintain Continuity of Operations Plan (COOP) preparedness. Specifically, DC Code § 7-2231.11(b) requires each District agency to work with the Homeland Security and Emergency Management Agency (HSEMA) to conduct annual exercises of its COOP and develop after-action reviews identifying any deficiencies.

Staff we interviewed were largely unaware of OUC's COOP and did not receive training in emergency procedures. Many of the employees interviewed stated they were unsure about the COOP's existence, location, or contents and did not know where to access the plan. An OUC employee stated that the agency had not conducted internal COOP exercises with staff, though OUC participated in quarterly exercises with HSEMA. The employee stated that OUC was planning to conduct an internal exercise within the next few months and conduct training annually thereafter. Supervisors we interviewed mentioned familiarity with the premise of COOP but stated that they had not received any formal training about the document.

COOP preparedness training was not incorporated into OUC's regular training curriculum. Risk management, continuity of operations, and emergency management are not explicitly mentioned in the FY 2025 training calendar. While the agency had developed some training resources for specific COOP activities, such as manual operation of 911 Call Center telephones during power outages, these resources were not

systematically delivered to staff. Without an enterprise risk management framework, OUC lacks a structured approach to ensure emergency preparedness training is prioritized and delivered consistently.

When staff are unfamiliar with COOP procedures, the agency's ability to maintain critical 911 communications during emergencies or system failures is compromised. Staff unfamiliarity with emergency procedures can cause delays and confusion during actual emergencies, disrupting essential services when they are most needed. Conversely, when staff are prepared and understand their roles during COOP activation, OUC's ability to maintain uninterrupted emergency communications is enhanced.

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| Recommendation 6 |
| We recommend that the Director, OUC: Implement activities to educate OUC 911 Call Center personnel about COOP goals and implementation. |
| OUC Response: <i>All OUC personnel have participated in agency-wide COOP exercises, including the most recent conducted in March 2026. Additional trainings and exercises are scheduled to reinforce preparedness and ensure continuity of operations under all contingencies.</i> |

ADDITIONAL OBSERVATIONS

The following observations represent noteworthy conditions that do not rise to the level of a formal finding. Unlike findings, which are based on specific criteria and standards, observations provide contextual information about factors that may affect OUC's operations. The improvements identified in these observations are opportunities for OUC to enhance its operational effectiveness and do not require a formal management response.

Observation 1: OUC has made progress filling vacant positions to address staffing challenges in its 911 Call Center

OUC has made substantial improvements in one critical area of workforce management: filling vacant positions. During the agency's Fiscal Year 2022 Performance Oversight Hearing, OUC reported 37 vacancies among its 911 Call Takers and 77 vacancies among its 911 Dispatchers. In comparison, according to data supplied by the

agency's human resources staff, as of April 30, 2025, the agency reported 22 vacancies among its 911 Call Takers and 19 vacancies among its 911 Dispatchers.

OUC utilizes a rolling recruitment model that onboards cohorts of call takers every 6-8 weeks. This approach helps the agency coordinate with the training department to streamline onboarding and maintain manageable cohort sizes. During interviews, operational and auxiliary staff stated that vacancies were being filled at a steady rate and the need for mandatory overtime is becoming less common as staffing needs are met.

According to an OUC manager, staffing shortages were a considerable risk to the agency's 911 operations, but substantial progress had been made since FY 2024. OUC has even hired an additional recruiter to help with its recruitment efforts. This manager also shared that its partnerships with FEMS and MPD to hire retired personnel have been beneficial.

An OUC manager noted that several MPD dispatcher positions were vacant due to retirement. In response, OUC's human resources staff are working closely with MPD and other public safety agencies to recruit, train, and retain individuals with specialized skills. An OUC interviewee indicated that there is a variation in the number of supervisors—watch commanders and assistant watch commanders—on each OUC shift ranging from two to four supervisors; additional assistant watch commanders would be beneficial across all shifts.

Observation 2: OUC's emergency response is impacted by District-wide challenges in updating geospatial information

OUC manages the District's Computer Aided Dispatch (CAD) system, which generates a digital view of the city's streets and structures similar to a global positioning system to identify and locate addresses during emergencies for accurate dispatch of responders and equipment. Effective emergency response depends on real-time access to current geospatial data that reflects the District's evolving built environment.

The rapid expansion of commercial and residential development within Washington, DC has created systemic challenges for OUC and other safety agencies, including FEMS and MPD. Developers have increasingly utilized previously unoccupied areas—for example, alleyways, street corners, and sub-level spaces—for new

construction projects. To maintain the city's addressing system sequencing, developers employ "half addresses" when applying for building permits. For example, a new condominium constructed between existing buildings may receive an address such as 1023 1/2 D Street, SE. These structures often feature entrances hidden from street view, making them difficult to locate for individuals unfamiliar with the area.

According to an OUC manager with IT expertise, timing delays exist in updating CAD with current geospatial information, though data transfer occurs between agencies. This manager stated that new construction utilizing half addresses is often not reflected in CAD immediately due to the multi-step coordination required between OUC's Information Technology department and the District's Department of Buildings—which oversees building, maintenance, and demolition processes and issues addresses for new structures. This coordination gap affects data sharing agreements and platform interfacing for new construction and street information.

These geospatial data delays create operational challenges during emergency situations. According to OUC and FEMS officials, when structures are not yet recorded in CAD, emergency callers must rely solely on their knowledge of surrounding addresses or landmarks rather than the building's assigned address. The delays in obtaining accurate geospatial information for input into CAD subsequently affects OUC's ability to provide precise location data to FEMS or MPD field responders.

The absence of timely access to building plans and prospective addresses as development occurs throughout the city limits OUC's emergency response effectiveness. As noted by OUC and FEMS officials, enhanced access to this information would improve CAD accuracy and reduce response delays associated with locating newly constructed properties during emergencies.

Opportunity for Improvement 1

We recommend that the Director, OUC:

Coordinate with the DC Department of Buildings to identify ways to improve OUC's access to timely geospatial data.

Observation 3: OUC has increased its investment in employee retention initiatives addressing stress, trauma, and burnout

According to DC Code § 1-541.01(d), *Workplace Wellness Policy*, “[e]ach agency shall designate one employee as the agency’s wellness coordinator who shall have the responsibility of implementing the wellness policy in the agency and promoting wellness programs.”¹⁹ Per NENA standards, emergency communication centers should “...build Comprehensive Stress Resilience Plans empowering their personnel for wellness by preventing, managing, and healing from these impacts...”²⁰

OUC has expanded its wellness infrastructure to address burnout, exhaustion, and stress from long shifts, mandatory holdovers, and frequent exposure to traumatic events. An OUC interviewee stated that the primary concern among workers is the emotional fatigue of the job. Many feel overwhelmed and exhausted from the long hours, high volume of calls, and the psychological toll it takes to listen to such traumatic events.

OUC’s wellness strategy has included provision of wellness rooms, on-campus gyms, counseling services, and wellness partnerships with DCHR and other agencies and commercial vendors who offer wellness events and webinars on topics like stress management, nutrition, and physical activity. However, some gaps limit program effectiveness. Wellness services are unavailable during evening and weekend shifts when substantial portions of OUC’s workforce operate. The agency relies heavily on DCHR programming offered during traditional business hours, with only occasional manager-hosted events for evening shift workers. For example, counseling services, which have been in high demand, are offered by an onsite Wellness Coordinator on weekdays between 10:00 AM and 6:30 PM.

OUC has established a volunteer task force to collect employee feedback but has not conducted formal surveys to assess program effectiveness or measure impact of the wellness initiatives. With

¹⁹ This section applies to all District agencies, including independent District agencies and the Council of the District of Columbia, but excluding boards and commissions, Advisory Neighborhood Commissions, and the Courts.

²⁰ “NENA Standard to Protect the Wellbeing of 9-1-1 Professionals,” NENA-STA-002.2-2022, accessed January 27, 2026, https://cdn.ymaws.com/www.nena.org/resource/resmgr/standards/nena-sta-002.2-2022_wellbein.pdf.

routine data collection and stakeholder communication, the agency could more effectively demonstrate program value and identify improvement opportunities.

While OUC's wellness investments align with national standards, gaps in after-hours service delivery, infrastructure limitations, and absence of impact assessment prevent the agency from fully realizing the potential benefits for employee wellness, performance, and retention.

| Opportunity for Improvement 2 |
|--|
| <p>We recommend that the Director, OUC:</p> <p>Collect employee feedback on the satisfaction and sufficiency of wellness initiatives and spaces to ensure programming and resources are meeting staff needs.</p> |

| Opportunity for Improvement 3 |
|--|
| <p>We recommend that the Director, OUC:</p> <p>Expand the wellness program to ensure health and well-being activities are accessible to employees across all shifts.</p> |

Observation 4: OUC has implemented a multi-faceted training program that meets industry and District standards

District law requires OUC's Division of Development and Standards to include the staff needed to implement a robust training program for all employees that establishes minimum annual training hours and certifications required for public safety telecommunicators and training officers, with standards aligned to national public safety associations.²¹

OUC's Continuing Education policy (No. 2023-300-304) § 5.1.1, requires "all OUC Employees [to] complete, at minimum, 40 hours of training every fiscal year unless the minimum requirement is changed, or operational needs of the agency require additional hours."

²¹ DC Code § 1-327.55(5).

OUC has successfully implemented a comprehensive training program for call takers and dispatchers, including refresher courses in specialty areas for FEMS and MPD operations. According to the OUC Director's recent testimony, in FY 2024, OUC facilitated training courses covering 88 topics. The Director added that all OUC staff completed the required 40 hours of continuing education for professional development and recertification purposes.²² According to OUC's human resource staff, members have obtained a total of 538 certifications from NENA and APCO, including Telecommunicator Certification, Communications Training Officer Certification, and Certified Public Executive Certification.

In FY 2024, OUC increased its investment in training by approximately \$1.1 million from the prior fiscal year, demonstrating significant organizational commitment. As outlined in the agency's Continuing Education policy (2023-300-304), OUC has developed and enforces a continuing education policy requiring minimum hours for all employees, applying to both core operational roles and auxiliary positions.

During interviews, OUC members provided varied feedback about the agency's training. Some spoke positively about its thoroughness and content, while others expressed that new employee training could be longer and include more simulations of real-life scenarios before staff begin taking calls. This feedback indicates opportunities for continued enhancement of the training program.

Providing comprehensive training on agency and industry best practices helps improve call takers' and dispatchers' accuracy in call-taking and dispatching functions while reducing operational errors and enhancing customer experience. OUC's alignment with industry standards and District mandates supports their commitment to continuous improvement.

²² Office of Unified Communications, submission to DC Council Performance Oversight Hearing, February 3, 2025.

CONCLUSION

This inspection assessed how the Office of Unified Communications manages risks in its 911 Call Center operations. Our review found that OUC faces several challenges that could affect emergency response services to District residents.

Areas of progress

OUC has made progress in addressing several potential risks. The agency has reduced vacancies in key positions, invested significantly in employee wellness programs, and expanded its training initiatives to improve staff development and retention.

Key challenges

OUC does not have an enterprise risk management framework to identify and manage operational risks that could affect emergency response services. The absence of this framework limits OUC's ability to prevent problems before they affect emergency services.

Staff attendance challenges and limited quality assurance activities create additional risks to the agency's ability to fully execute its mission. High levels of unscheduled leave strain call center operations by overburdening available employees and increase the risk that OUC is unable to respond to calls efficiently and dispatch resources timely. Some supervisors lack cross-training in both police and fire response protocols which limits their ability to effectively guide or provide feedback to frontline staff handling all types of emergencies. OUC's quality assurance processes need improvement to include systematic trend analysis to identify patterns that could inform training priorities, operational improvements, or risk mitigation strategies.

OUC's emergency planning also needs strengthening. Many staff members are unaware of the agency's continuity of operations plan, which could delay recovery during an emergency.

Path forward

OUC has expressed commitment to addressing the findings in this report. We make six recommendations to help OUC strengthen its risk management practices, improve operational oversight, and ensure reliable emergency response services. Implementing these recommendations will better protect District residents who depend on 911 services.



APPENDIX 1. FINDINGS

Table of Findings

| No. | Finding |
|-----|--|
| 1 | OUC does not have an enterprise risk management framework |
| 2 | Chronic absenteeism among frontline staff impedes 911 Call Center operations |
| 3 | : Not all supervisors are cross-trained for both MPD and FEMS operations |
| 4 | OUC does not systematically analyze performance data |
| 5 | OUC's prohibited items policy contains contradictory language and is inconsistently enforced |
| 6 | OUC personnel had limited awareness of OUC's COOP preparedness activities |



APPENDIX 2. RECOMMENDATIONS

Table of Recommendations

| Agency | No. | Recommendation | Status | Action Required | Finding |
|--------|-----|--|--------|-------------------------|---------|
| OUC | 1 | Develop and implement an enterprise risk management framework that includes processes for identifying operational risks, assessing their impact, prioritizing mitigation efforts, assigning responsibilities, and monitoring progress. | Open | Tracking implementation | 1 |
| OUC | 2 | Implement strategies to reduce absenteeism and enforce protocols for supervisory review and approval of time and attendance requests. | Open | Tracking implementation | 2 |
| OUC | 3 | Ensure all 911 Call Center supervisors are cross-trained to effectively handle emergency responses for both MPD and FEMS operations. | Open | Tracking implementation | 3 |
| OUC | 4 | Enhance OUC's quality assurance process to include systematic trend analyses and share the results internally and externally to inform training and areas for operational improvements. | Open | Tracking implementation | 4 |
| OUC | 5 | Revise the Prohibited Items Policy to eliminate contradictory language and clearly specify whether personal electronic devices are prohibited or permitted in the 911 Call Center and under what circumstances. Additionally, establish and communicate clear enforcement procedures, including consequences for violations. | Open | Tracking implementation | 5 |
| OUC | 6 | Implement activities to educate OUC 911 Call Center personnel about COOP goals and implementation. | Open | Tracking implementation | 6 |





APPENDIX 3. OUC MANAGEMENT RESPONSE

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of Unified Communications


Muriel Bowser
Mayor



Heather McGaffin
Director

MEMORANDUM

To: Daniel Lucas
Inspector General

From: Heather McGaffin 
Director, Office of Unified Communications

Date: April 1, 2026

Subject: Response to OUC's Risk Mitigation Infrastructure | OIC No. 25-I-02-UC0

This memorandum provides the Office of Unified Communications' (OUC) formal response to the six recommendations identified in the OIG's Risk Mitigation Infrastructure Report. Since February 2023, OUC has executed substantial reforms designed to strengthen operational readiness, modernize critical processes, and elevate performance standards across the agency. The Agency agrees with the recommendations and has already made progress towards achieving them, which is outlined below.

Recommendation 1

Develop and implement an enterprise risk management framework.

OUC has undertaken comprehensive efforts to identify, assess, and mitigate risks across all operational divisions. Targeted initiatives—including enhanced training, expanded public education, and deployment of Next Generation 911 technologies—are now embedded in agency operations to ensure risks are systematically addressed and monitored.

Recommendation 2

Implement strategies to reduce absenteeism and enforce supervisory oversight of time and attendance.

Following the October 2024 staffing study conducted with the Office of Budget and Performance Management (OBPM), OUC implemented corrective initiatives that resulted in an 82.59 percent reduction in top leave code usage, as documented in the August 2025 follow-up report. Attendance incentives have further improved workforce reliability. OUC continues to enforce supervisory accountability and maintain strict oversight of time and attendance practices.



Recommendation 3

Ensure all 911 Call Center supervisors receive cross-training in MPD and FEMS operations.

OUC established a structured twelve-week supervisory training curriculum through the Office of Professional Standards and Development. **Recommendation 3**

Ensure all 911 Call Center supervisors receive cross training in MPD and FEMS operations.

OUC established a structured twelve-week supervisory training curriculum through the Office of Professional Standards and Development. The initial cohort completes training on April 3, 2026. All supervisors must complete comprehensive call taking and dispatch on-the-job training supported by Daily Observation Reports. Additional mandatory training begins April 6, 2026, for supervisors lacking prior experience in these functions. This requirement is now institutionalized for all newly hired and promoted supervisors.

Recommendation 4

Enhance quality assurance processes with trend analysis and internal/external reporting.

OUC implemented CommsCoach by GovWorx on December 5, 2025, establishing full operational quality assurance coverage of all 911 calls. Since January 2026, more than 65,000 calls have been evaluated through objective, automated review. The resulting dashboards and analytic tools have significantly strengthened training development and operational oversight.

Recommendation 5

Revise the Prohibited Items Policy to eliminate contradictory language and clarify enforcement.

OUC is currently undergoing a comprehensive review of all agency policies to ensure alignment with national standards and accreditation requirements. The Prohibited Items Policy is included in this review, and revisions will explicitly clarify expectations for personal electronic devices and establish consistent enforcement procedures.

Recommendation 6

Educate personnel about COOP goals and implementation.

All OUC personnel have participated in agency-wide COOP exercises, including the most recent conducted in March 2026. Additional trainings and exercises are scheduled to reinforce preparedness and ensure continuity of operations under all contingencies.

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