

# DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

OIG Project No. 23-E-04-JZO

November 2023



## Evaluation of Community- Based Services



### **GUIDING PRINCIPLES**

**ACCOUNTABILITY \* INTEGRITY \* PROFESSIONALISM**

**TRANSPARENCY \* CONTINUOUS IMPROVEMENT \* EXCELLENCE**

## **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**

Accountability \* Integrity \* Professionalism  
Transparency \* Continuous Improvement \* Excellence





## Executive Summary

### **Evaluation of Community-Based Services**

---

#### **WHY WE DID THIS EVALUATION**

This evaluation was included in the Office of the Inspector General's (OIG) *Fiscal Year 2023 Audit and Inspection Plan*. We conducted the evaluation due to the critical role the Department of Youth Rehabilitation Services (DYRS) plays in ensuring the safety of court-involved youths and the public, as well as the Committee on Recreation, Libraries, and Youth Affairs' concern with underutilization of DYRS' community-based programs.

#### **OBJECTIVES**

The objectives of this evaluation were to identify the various types of community-based services that DYRS oversees and analyze the extent to which various community-based services have been utilized between fiscal years 2020 and 2022 (October 2019 through September 2022).

#### **WHAT WE FOUND**

The OIG found significant gaps in oversight of program spending, attendance, and document retention, putting the DYRS programs at higher risk of fraud, waste, abuse, and mismanagement of its resources. There has been a decrease in recent years in the population of committed youth, the number of service providers, and participation in skills-building and related programs at Achievement Centers. DYRS service providers repeatedly failed to meet the monthly minimum youth attendance requirements. However, DYRS continued to reimburse providers for invoices, regardless of whether their programs met minimum attendance requirements. Progressive Life Center (PLC), which receives Community Programming Initiative (CPI) grant funds from DYRS to oversee service coalition providers' day-to-day operations, reviewed provider invoices and verified expenses but did not monitor their gift card purchases or event sign-in sheets to verify attendance. Additionally, although DYRS is responsible for monitoring PLC and tracking CPI grant expenditures, it failed to retain all CPI grant administration documents. As a result, DYRS could not explain or account for discrepancies in final expenditure reports.

#### **WHAT WE RECOMMEND**

The OIG made 12 recommendations to DYRS to increase program participation and strengthen internal controls to deter program fraud, waste, abuse, and mismanagement.

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Office of the Inspector General



Inspector General

OIG

November 17, 2023

Sam Abed  
Acting Director  
Department of Youth Rehabilitation Services  
450 H Street, NW  
Washington, DC 20001

Dear Director Abed:

Enclosed is our final report, *Evaluation of the Department of Youth Rehabilitation Services – Community-Based Services* (OIG No. 23-E-04-JZ0). The evaluation was included in our *Fiscal Year 2023 Audit and Inspection Plan* and conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's (CIGIE) *Quality Standards for Inspection and Evaluation*.

The objectives of this evaluation were to: identify the various types of community-based services that DYRS oversees and analyze the extent to which various community-based services have been utilized between fiscal years 2020 and 2022 (October 2019 through September 2022). We provided our draft report to the agency on September 29, 2023, and received management's response on October 20, 2023.

Our draft report included five findings and 12 recommendations to the Department of Youth Rehabilitation Services (DYRS) for actions we deemed necessary to correct the identified deficiencies. DYRS agreed with Recommendations 2, 5, 6, and 8 through 12. DYRS' actions taken and/or planned are responsive and meet the intent of the recommendations. Therefore, we consider these recommendations resolved but open, pending evidence of stated actions.

DYRS agreed with stipulation to Recommendations 3, 4, and 7. Proposed actions meet the intent of the recommendations; therefore, we consider these recommendations resolved but open, pending evidence of stated actions.

DYRS agreed in part with Recommendation 1: DYRS should establish and mandate a set number of hours or programs for youth participation at Achievement Centers based on the length of their commitment. The agency disagreed with having a blanket mandate for Achievement Center participation, citing youth programs and activities extend beyond the Achievement Centers. Stated action to address the recommendation meets our intent to ensure committed youths' participation in available programs is maximized per their needs and that resources are not wasted due to program underutilization. We consider this recommendation resolved but open, pending evidence of stated actions.

We acknowledge that DYRS has already begun addressing some of the findings in our draft report. DYRS' response to the draft report is included at Appendix D.

We appreciate the cooperate and courtesies extended to our staff during this evaluation. If you have any questions concerning this report, please contact me or Yulanda Gaither, Assistant Inspector General for Inspections and Evaluations, at [yulanda.gaither@dc.gov](mailto:yulanda.gaither@dc.gov) or 202-727-9029.

Sincerely,

*Marie Hart*

For: Daniel W. Lucas  
Inspector General

DWL/yg

cc:

The Honorable Muriel Bowser, Mayor, District of Columbia  
Attention: Betsy Cavendish

Mr. Kevin Donahue, City Administrator, District of Columbia

Mr. Lindsey Appiah, Deputy Mayor for Public Safety and Justice

The Honorable Phil Mendelson, Chairman  
Council of the District of Columbia

The Honorable Trayon White, Sr., Chairperson,  
Committee on Recreation, Libraries, and Youth Affairs, Council of the District of Columbia

The Honorable Anita Bonds, At-Large Councilmember,  
Committee on Recreation, Libraries and Youth Affairs, Council of the District of Columbia

The Honorable Brianne K. Nadeau, Councilmember,  
Committee on Recreation, Libraries and Youth Affairs, Council of the District of Columbia

The Honorable Kenyan R. McDuffie, Councilmember At-Large,  
Committee on Recreation, Libraries and Youth Affairs, Council of the District of Columbia

The Honorable Robert C. White, Jr. Councilmember At-Large,  
Committee on Recreation, Libraries and Youth Affairs, Council of the District of Columbia

The Honorable Kathy Patterson, District of Columbia Auditor,  
Office of the D.C. Auditor

## TABLE OF CONTENTS

---

	Page
<b>BACKGROUND</b> .....	1
<b>FINDINGS</b> .....	3
Some Achievement Center service providers were compensated for services despite failing to meet minimum attendance requirements.....	3
Some Credible Messenger Initiative and Achievement Center service providers did not submit required documentation along with their invoices, leaving program resources vulnerable to fraud, waste, abuse, or mismanagement.....	9
DYRS and PLC’s CPI grant expenditure reports were inconsistent with the agency’s official financial record.....	11
PLC failed to monitor gift cards purchased and disseminated by providers.....	14
DYRS did not retain CPI grant administration documents .....	17
<b>CONCLUSION</b> .....	19
<b>APPENDICES</b> .....	20
Appendix A: Objectives, Scope, and Methodology.....	20
Appendix B: Acronyms and Abbreviations .....	21
Appendix C. DYRS Response to the Draft Report.....	22

## BACKGROUND

---

The Department of Youth Rehabilitation Services (DYRS) is responsible for the safety, well-being, and secure detention of court-involved youth and for rehabilitating those committed to its care.<sup>1</sup> Its mission is to provide court-involved youth the opportunity to become more productive citizens by building on the strengths of youths and their families in the least restrictive, most homelike environment consistent with public safety. DYRS also provides youth care coordination and case management services.<sup>2</sup>

The Superior Court of the District of Columbia Family Court (DC Family Court) determines whether a youth should be committed to DYRS custody.<sup>3</sup> Once a youth is committed to DYRS care, DYRS determines the best placement for the youth and develops an individualized plan for supervision and rehabilitation.

DYRS follows the Positive Youth Justice (PYJ) framework, which aims to provide youths with the tools they need to successfully transition into adulthood.<sup>4</sup> The PYJ framework focuses on a youth's developmental needs, such as work, education, relationships, health, creativity, and community.

DYRS' Community Programming Initiative (CPI) grant provides a comprehensive and coordinated system of services for court-involved youth and families to

- advance the rehabilitation of DYRS youth by connecting them to services, supports, and resources that help them reach their goals and developmental milestones;
- enhance public safety by engaging youth in positive, developmentally appropriate, and structured activities that complement and enhance DYRS' methodologies for the care and supervision of young people; and
- create safer and stronger communities that support youth and families by investing directly in local organizations and human resources that are accessible and dedicated to strengthening young people and their families.<sup>5</sup>

Under its CPI grant, DYRS is responsible for announcing requests for applications, monitoring grantees, and managing the solicitation for subgrantees. DYRS' Grants Management division is responsible for administering the grant. Through the CPI grant, DYRS sought one grantee to

---

<sup>1</sup> DC Code § 2-1515.01(12) defines youth as "a 'child' as that term is defined by [DC Code] § 16-2301(3) or other minor in the custody of the Department."

<sup>2</sup> DC DEP'T OF YOUTH REHAB. SERVS., Mission and Vision, <https://dyrs.dc.gov/page/mission-and-vision> (last visited Sept. 19, 2023).

<sup>3</sup> DC Code § 2-1515.01(2) defines "committed" as the "removal of a youth from his or her home because of an order of adjudication or an order of disposition and placement in the care and custody of the Department of Youth Rehabilitation Services."

<sup>4</sup> Jeffrey A. Butts, *Positive Youth Justice: Framing Justice Interventions Using the Concepts of Positive Youth Development*, [https://academicworks.cuny.edu/jj\\_pubs/380/](https://academicworks.cuny.edu/jj_pubs/380/). The PYJ model was published first by a team of researchers led by Dr. Jeffrey Butts at the John Jay College of Criminal Justice in New York City.

<sup>5</sup> DYRS website, <https://dyrs.dc.gov/page/community-programming-initiative> (last visited Sept. 8, 2023).

implement and manage the delivery of innovative and impactful community-based activities, Achievement Center<sup>6</sup>-based services, and youth mentorship opportunities.

Progressive Life Center (PLC), the grantee, oversees the day-to-day operations of consultants, contractors, and service coalition vendors that operate in the Achievement Centers. PLC is also responsible for drafting and signing subgrant agreements, monitoring subgrantee background checks, providing program support and technical assistance, receiving and reviewing invoices, and monitoring subgrantee performance.

DYRS offers services and programs to deliver vital community-based support services and provides individualized case and care planning management through youth engagement specialists and care coordinators at the Achievement Centers.

The Achievement Centers are intended to foster career development, life skills, and healthy living; they support youth and families through drop-in visits, scheduled programs, and various other events. Through subgrantees, Achievement Centers emulate the PYJ framework and offer numerous programs and services. Committed and post-committed<sup>7</sup> youth and families in the community are encouraged to access the Achievement Centers and their services.

Another component of DYRS' approach to care coordination is the Credible Messenger Initiative, which launched in 2016. Under this initiative, committed youth are connected with mentors who have relevant life experiences. The goal of the initiative is to transform youth attitudes and behaviors regarding violence. Credible Messengers serve committed youth in community venues and residential and secured facilities, as well as non-committed youth in District libraries and public schools.<sup>8</sup>

This evaluation's objectives, scope, and methodology are provided in Appendix A. We conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency's (CIGIE) *Quality Standards for Inspection and Evaluation*<sup>9</sup> and gained understanding of the agencies internal controls within the context of the evaluation objectives using the Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government*, GAO-14-704G (known as the Green Book). The Green Book sets the internal control standards for federal entities and may be adopted by state and local entities as a framework for an internal control system.<sup>10</sup>

---

<sup>6</sup> Achievement Centers are spaces that host a variety of life and vocational skills-building programs for committed youth.

<sup>7</sup> The Credible Messenger Initiative SOP defines post-commitment services as a "service provision provided to a youth and/or families that continues after a youth's commitment has expired with DYRS." DC DEP'T OF YOUTH REHABILITATION SERV. THE CREDIBLE MESSENGER INITIATIVE, STANDARD OPERATING PROCEDURES 91 (Fiscal Year 2022).

<sup>8</sup> During the scope of the evaluation, PLC oversaw the Credible Messenger Initiative program. In FY 2023, however, DYRS took over managing the program.

<sup>9</sup> CIGIE QUALITY STANDARDS FOR INSPECTION AND EVALUATION (Dec. 2020), <https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf> (last visited Aug. 7, 2023).

<sup>10</sup> U.S. GOV'T ACCOUNTABILITY OFFICE, STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOV'T, GAO-14-704G (Sept. 2014), <https://www.gao.gov/products/GAO-14-704G> (last visited Nov. 14, 2022).



## FINDINGS

---

### **Some Achievement Center service providers were compensated for services despite failing to meet minimum attendance requirements**

CPI provides services through Memorandums of Understanding (MOUs) between PLC and Achievement Center service providers.<sup>11</sup> The MOUs state that providers must serve an average minimum number of youths each month. In fiscal years (FY) 2020 and 2021, the grant required service providers to serve a minimum average of six youths per day each month.<sup>12</sup> In FY 2022, the grant required service providers to serve an average of at least three youths per day each month.<sup>13</sup> A service provider's failure to meet the attendance requirement in the first month could result in a written warning. Failure to meet the requirement for a second consecutive month could result in a performance improvement plan. Failure to meet the requirement for a third consecutive month could result in the alteration or termination of the MOU.

Review of attendance records indicated that providers failed to meet the minimum monthly attendance requirement for several consecutive months and, in some cases, recorded no attendance. Figure 1 illustrates that in FY 2020, service providers failed to meet the attendance requirement on 42 of 84 occasions, including six occasions on which some providers reported no youth attendance.<sup>14</sup> Additionally, three providers reported less than the minimum average attendance for at least three consecutive months, and one provider failed to meet the minimum attendance for 10 consecutive months.<sup>15</sup> The horizontal line in Figures 1 and 2 represents the minimum average attendance. Despite low attendance and failure to meet attendance requirements, PLC opted not to modify any of the service providers' MOUs.

---

<sup>11</sup> Achievement Center Standard Operating Procedures define service providers as the "network of local community-based organizations." DC DEP'T OF YOUTH REHABILITATION SERV. THE ACHIEVEMENT CENTERS PROGRAMS + COMMUNITY BASED, FY 22 SERVICE COALITION STANDARD OPERATING PROCEDURES, INTRODUCTION. Service coalition providers are selected for their "unique abilities and approaches to serving court-involved youth." *Id.* at 3.

<sup>12</sup> The MOUs further explain that "your organization must serve, on a monthly basis, a minimum, average of eighty percent (80%) of the number of youths listed in the 'True Daily Capacity Number,' section. As an example, if your organization is expected to serve eight (8) youth (which constitutes as DYRS youth and community members) each day for three days, the minimum average attendance for the week would be six (6) youth." *See, e.g.*, Memorandum of Understanding between Progressive Life Center Inc. and D.O.L.L.S. & Dreams Inc., § (D)(a)(i) (Contract Number 10-PLC/DD-20) (emphasis added in original).

<sup>13</sup> The MOUs further explain that "your organization must serve, on a monthly basis, a minimum, average of sixty percent (60%) of the number of youths listed in the 'True Daily Capacity Number' section. As an example, if your organization is expected to serve five (5) youth (which constitutes as DYRS youth and community members) each day for three days, the minimum average attendance for the week would be three (3) youth." *See* Memorandum of Understanding between Progressive Life Center Inc. and D.O.L.L.S. & Dreams Inc., § (D)(a)(ii) (Contract Number 10-PLC/DD-22) (emphasis added in original).

<sup>14</sup> DYRS provided attendance data for nine service providers but was unable to locate and provide data for October 2019; it was also unable to provide data for April 2020, because it paused services due to COVID-19. DYRS terminated a provider's MOU after February 2020.

<sup>15</sup> The providers' programs were focused on music academy, film production, physical fitness and nutrition, and behavioral health/restorative justice.

**Figure 1. FY 2020 service providers' average monthly attendance, by program<sup>16</sup>**

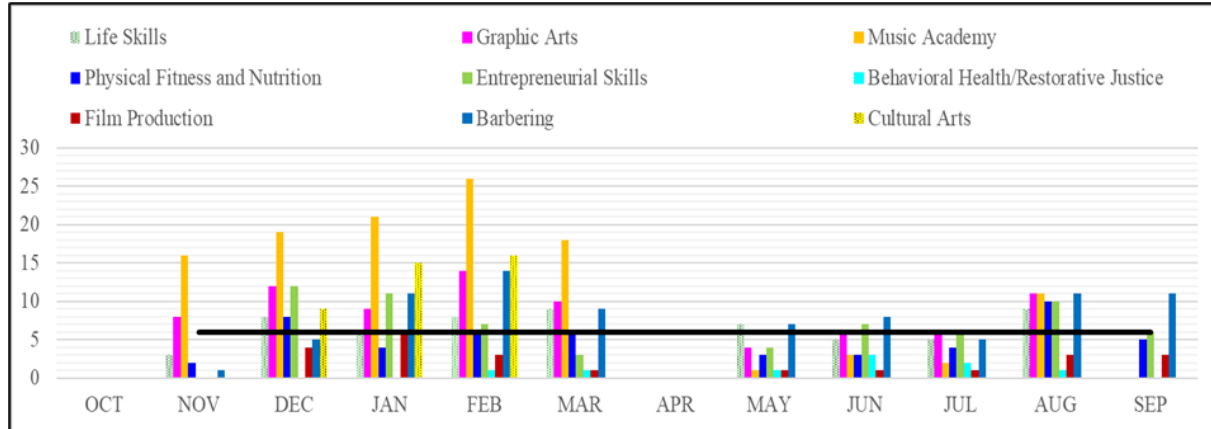
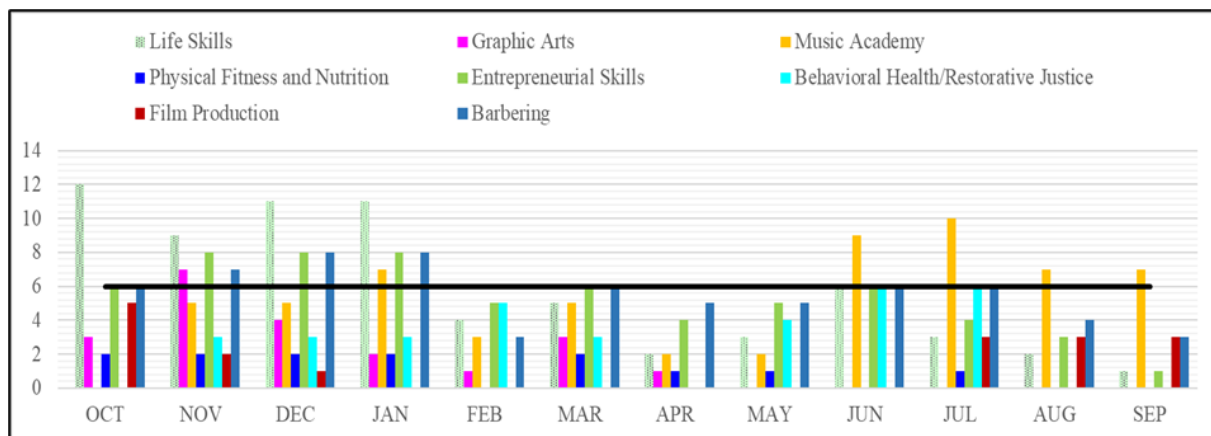


Figure 2 illustrates that in FY 2021, service providers failed to reach the minimum average attendance requirement stated in MOUs on 70 of 96 occasions, including 20 instances of providers recording no youth attendance.<sup>17</sup> Additionally, five providers experienced three or more consecutive months of attendance below the minimum monthly requirement, and two providers did not meet the requirement during a single month of the fiscal year. Of the seven providers that did not meet the monthly minimum attendance requirement, PLC did not renew three MOUs the following year and decreased the projected payment for another provider. There were two providers that experienced no modifications, and PLC nominally increased funding for one provider.

**Figure 2. FY 2021 service providers' average monthly attendance, by program<sup>18</sup>**



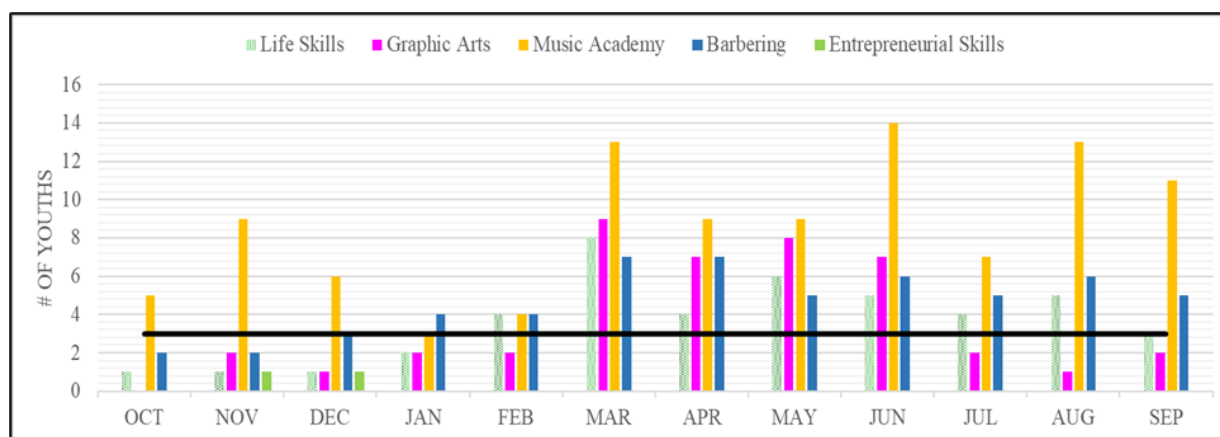
<sup>16</sup> DYRS did not provide attendance data for the tutoring service providers, but according to DYRS records, the service providers were still paid for their services in April 2020.

<sup>17</sup> DYRS provided attendance data for eight service providers.

<sup>18</sup> DYRS did not provide attendance data on the tutoring service provider.

In FY 2022, DYRS lowered the minimum average monthly attendance requirement to three youths per day. Figure 3 demonstrates that despite this change, service providers failed to reach the new minimum average attendance requirement on 17 of 51 occasions, including two instances of service providers recording no youth attendance.<sup>19</sup> The horizontal line in Figure 3 represents the new minimum monthly attendance requirement. Additionally, three providers failed to meet the requirement for at least three consecutive months.

**Figure 3. FY 2022 service providers' average monthly attendance, by program<sup>20</sup>**



PLC took several actions to increase program attendance through approaches such as technical assistance, raising youth awareness of programming, and increasing youth interest in programs with lower attendance rates. PLC reportedly provided technical assistance to service providers with low attendance rates through direct outreach with youth, as well as promoting the cooperation of low-attended programs with those of higher attendance.

Simultaneously, however, DYRS had shifted away from evaluating attendance to focus more on other performance measures, such as increasing referrals and retention of enrollees. Because DC Family Court does not mandate enrollee participation, and because the burden of marketing available programs and maximizing retention is DYRS' responsibility, DYRS reasoned that service providers were not solely responsible for attendance rates, and thus determined that attendance was not an appropriate performance measure.<sup>21</sup>

However, in the OIG's view, it may be beneficial for DYRS to resume tracking attendance as a performance measure to determine whether referral and retention efforts are effective. Tracking attendance may also help determine whether a program should be continued and if program funding should be increased or decreased.

In FY 2022, PLC issued five written warnings and offered numerous technical assistance sessions to providers who reported low attendance. However, in FYs 2020 and 2021, low/no

<sup>19</sup> DYRS provided attendance data for five service providers, and one of those providers' MOUs was terminated after December 2021.

<sup>20</sup> DYRS did not provide attendance data on the tutoring service provider.

<sup>21</sup> In this report, the terms "attendance" and "participation" are used interchangeably.

attendance did not always result in warnings or performance improvement plans. Despite low attendance, DYRS and PLC continued to reimburse Achievement Center service providers.

The OIG found that some Achievement Center service providers received payment for services regardless of having met the minimum attendance requirements or having served any youth. For months in which providers had no attendance, these payments totaled \$21,990.75 in FY 2020, \$140,456.82 in FY 2021, and \$15,805.59 in FY 2022. Further, DYRS paid service providers \$202,357.32 in FY 2020, \$365,020.74 in FY 2021, and \$127,949.53 in FY 2022 for months in which they served fewer youths than the minimum required number. Because PLC pays invoices regardless of whether youth attend programs, service providers are not incentivized to attract and retain youth. This may result in the District paying for services (i.e., programs) that no youth attend, thereby expending funds that could be put to better use.

The decrease in the total number of youths committed to DYRS may have contributed to low program attendance. Over the period covered by this evaluation, the number of committed youths decreased by 26 percent, from 255 individuals in FY 2020 to 188 individuals in FY 2022. Achievement Center attendance also decreased from 170 attendees in FY 2020 to 39 attendees in FY 2022, representing a 77 percent drop in attendance. Subsequently, the number of programs offered at the Achievement Centers decreased from 10 in FY 2020 to six in FY 2022.

Factors beyond DYRS' control contributed to the overall decrease in the committed youth population and participation in Achievement Center programs. According to a DYRS official, Family Courts had been diverting individuals to other youth-oriented programs, such as those offered by the DC Office of the Attorney General (OAG).<sup>22</sup> The COVID-19 pandemic also contributed to low participation, and although Achievement Centers closed during the pandemic, service providers pivoted to providing services through virtual classrooms. Some service providers noted it was challenging to connect virtually with participants, especially for programs intended to be hands-on, such as barbering, and that they had difficulty sustaining participant interest.

According to DYRS staff, attendance may have also been low because some committed youth lack interest in the programs being offered. The agency is working to improve youth engagement through increased marketing of Achievement Center programs, direct outreach, and revamping the services offered to make them more relevant.<sup>23</sup>

DYRS staff also explained that personal safety concerns are affecting youth attendance at the Achievement Centers. DYRS staff explained that many youths still feel unsafe traveling to the Achievement Centers using public transportation due to neighborhood disputes and the dangers

---

<sup>22</sup> The OAG offers the Alternatives to the Court Experience (ACE) diversion program. According to the OAG's website, ACE is a "creative, data-driven way to approach juvenile justice that strives for the best outcome for our community and for our young people." See OAG website, <https://oag.dc.gov/search?fulltext=Diversion> (last visited Sept. 8, 2023).

<sup>23</sup> On December 12, 2022, Mayor Muriel Bowser, former Director of DYRS Hilary Cairns, and interim Director of the Office of Neighborhood Safety and Engagement Delano Hunter jointly announced the Achievement Centers were "open to all 14- to 21-year-olds in DC" and youth did not need to be involved with DYRS to take advantage of the Achievement Center programs. While DYRS previously allowed non-committed youth to attend Achievement Center programming, DYRS did not refer the youths to sign up for the programs. DYRS staff reported that non-committed youth attend the programs and events more often than committed youth.

of crossing into other neighborhoods. DYRS currently administers a safe rides program that offers taxi rides for youth to get around the District safely to eliminate a barrier to attendance.

The OIG recommends the Director, DYRS:

**Recommendation 1:**

Mandate that DYRS-committed youths participate in a set number of hours or programs at the Achievement Centers and establish a standard for the number of hours or programs they must attend based on the length of their commitment;

**Management's Response:**

DYRS agrees, in part, with this recommendation.

The agency acknowledges the benefit of incorporating participation requirements in individual Community Placement Agreements for young people in the community. The agency will be evaluating these practices to determine the appropriate modifications required. DYRS will also meet monthly with Care Coordination supervisors and Achievement Center (AC) program managers to review participation data.

DYRS disagrees with a blanket mandate, requiring youth to participate in a set number of hours of programming at the Achievement Centers, as a combination of various activities outside of attending achievement center programs support the successful completion of youth treatment in the community.

Target completion on 9/30/2024.

**Recommendation 2:**

Create tangible and intangible incentives to motivate youths' attendance and program participation, and encourage service providers to promote available programs;

**Management's Response:**

DYRS agrees with this recommendation.

DYRS will continue to develop programs that will appropriately incentivize youth attendance and program participation. DYRS will also review current youth incentivization programs across the agency and work to incorporate them within the Achievement Center programming.

DYRS hosts an annual provider's conference to assist service providers with developing more widely publicized programs. Additionally, PLC provides technical assistance to providers on effective marketing strategies to increase youth enrollment. The agency will also work with Achievement Center and Case

Management Managers to develop strategies to maximize youth engagement at the Achievement Centers.

Target completion on 9/30/2024.

**Recommendation 3:**

Monitor and track average monthly attendance rates as a performance measure to determine whether referral and retention efforts are effective and whether program funding changes are needed, and include attendance rates in DYRS' quarterly report on key performance indicators to the Executive Office of the Mayor;

**Management's Response:**

DYRS agrees with this recommendation, with stipulation.

Stipulation: DYRS will work to determine the appropriate Achievement Center participation rate based on the individualized community placement and service needs of youth. Once a proper assessment is conducted, the agency will work to develop procedure and data methodology for reporting.

DYRS currently utilizes attendance reported by the Achievement Center (AC) providers' weekly census report and the AC Sign-in Kiosks to capture drop in and enrollment rates. DYRS utilizes attendance data as an indicator of performance and has previously dismissed providers that failed to meet requirements. Regular meetings are held with PLC and the program team to discuss the data captured and to make determinations on whether adjustments or modifications are needed to service delivery days, funding, etc.

Target completion on 9/30/2024.

**Recommendation 4:**

Modify service providers' MOUs to include a pay structure that adjusts to attendance fluctuations and is based on meeting the minimum monthly attendance requirements; and

**Management's Response:**

DYRS agrees with this recommendation, with stipulation.

Stipulation: DYRS will conduct an assessment to determine whether there is a pay structure, which considers fluctuation in attendance, that can work for its young people and service providers.

DYRS currently includes language in the Grants Management SOPs and Award Package indicating that Grant MOUs may be modified to reflect service provider performance. The agency will conduct monthly reviews to determine compliance

with performance metrics, to include attendance rates, and determine whether to modify the MOU or dismiss a provider.

Target completion on 9/30/2024.

**Recommendation 5:**

Explore the transportation and safety barriers committed youths experience and develop actionable solutions.

**Management’s Response:**

DYRS agrees with this recommendation.

In FY23, DYRS began partnering with the Department of For-Hire Vehicles through their Promise Rides Program to provide safe transportation for DYRS youth.

Additionally, we are exploring the use of Credible Messengers to determine safety issues, to include neighborhood and individual conflicts, before referring youth to Achievement Center programming.

Target completion on 6/30/2024.

**Some Credible Messenger Initiative and Achievement Center service providers did not submit required documentation along with their invoices, leaving program resources vulnerable to fraud, waste, abuse, or mismanagement**

The CPI Grant Award Notice outlines PLC’s responsibility for collecting and retaining “proper invoices and supporting documentation from subgrantees.”<sup>24</sup> Additionally, the Credible Messenger Initiative standard operating procedures (SOP) and MOUs between PLC and service providers state that “a subgrantee earns their share of the funding only when services have been provided.”<sup>25</sup> The Credible Messenger Initiative SOP and MOUs specify invoices must be accompanied by supporting documentation, such as attendance sheets, contact sheets, and receipts. The MOUs further explain that attendance sheets must include “date of service, time of youth entrance, [and] time of youth departure” and that “[t]he youth must sign the daily contact sheets at the end of session/activity **(the service provider cannot sign the daily contact sheet/timesheet in place of the youth)**.”<sup>26</sup> Finally, the Green Book requires that management “establish and operate monitoring activities to monitor the internal control system and evaluate the results.”<sup>27</sup>

---

<sup>24</sup> DC DEP’T OF YOUTH REHABILITATION SERV. CAPACITY BUILDING FOR THE COMMUNITY PROGRAM INITIATIVE GRANT NUMBER 2022-21-01, Attachment 1, Sec. C, Activity 4(a).

<sup>25</sup> DC DEP’T OF YOUTH REHABILITATION SERV. THE CREDIBLE MESSENGER INITIATIVE, STANDARD OPERATING PROCEDURES, PAYMENTS 95 (Fiscal Year 2022).

<sup>26</sup> See, e.g., Memorandum of Understanding between Progressive Life Center Inc. and D.O.L.L.S. & Dreams Inc., § (B)(a)(iii) (Contract Number 10-PLC/DD-21) (original emphasis).

<sup>27</sup> *Supra* note 10, § 16.01.

Examination of invoices revealed several examples of providers submitting event or activity invoices that did not include sign-in sheets specifying who was in attendance. For example, an Achievement Center service provider submitted invoices in FY 2020 totaling \$1,634.00 for 17 spa packages, 15 sandwiches from Subway, and cutlery from Walmart. The service provider submitted a screenshot of an iPhone note that listed the names of eight youths and seven staff members who attended the activity. The iPhone note did not include the date of service, time of entrance and departure, or any youth signatures.

Another example shows that in September 2021, a Credible Messenger submitted an invoice for \$3,025.19 for tickets to Kings Dominion amusement park. In September 2022, the same provider submitted multiple invoices totaling \$2,391.18 for tickets to Washington Commanders games. The Credible Messenger did not submit documentation that showed who attended either activity, even though the MOU requires supporting documentation, to include completed sign-in sheets. The sign-in sheets are supposed to include a youth's name, their own signature, the time they signed in, the time they signed out, and the mentor's initials (to confirm the information is correct).

PLC staff did not enforce invoice submission requirements as stipulated in service provider MOUs and the Credible Messenger Initiative SOP. The Credible Messenger Initiative SOP states that in order to receive payment for services provided, providers are required to submit invoices with backup documentation, which typically includes attendance sheets. However, PLC approved invoices without completed sign-in sheets as supporting documentation. The lack of enforcement by PLC and the absence of consequences for Credible Messengers allowed Credible Messengers to circumvent established requirements and violate the terms of their agreement while still receiving payments, leaving PLC and the District at risk of potential fraud and waste of District resources.

Additionally, without complete and accurate sign-in sheets, PLC is unable to verify which and how many youths attend scheduled events and activities. PLC staff are not usually present for events and are unable to independently verify attendance. PLC staff members explained that they can only verify attendance when youth participants meet at the Achievement Centers or PLC's office prior to attending an event, rather than meeting at the event location. By not monitoring or verifying attendance, PLC cannot confirm whether participants are committed and non-committed youth or if they are family and friends of the youths. Because PLC cannot verify who is actually taking part in these events and activities, program resources are at risk of being expended or wasted on those other than the programs' intended beneficiaries. The OIG did not observe or find evidence of this occurring, but it remains a risk, and PLC staff agreed that it was indeed possible for program resources to be expended or wasted by individuals who are not the programs' intended beneficiaries.

Events and activities are one way the Achievement Center and Credible Messenger Initiative programs connect with youth and drive their success. Failing to monitor attendance and enforce attendance verification through sign-in sheets leaves the program susceptible to fraud and increases the risk that grant funds are not used for their intended purposes.



The OIG recommends the Director, DYRS:

**Recommendation 6:**

Ensure providers adhere to the requirement of submitting completed sign-in sheets for scheduled programs, dining, and entertainment, and specify that DYRS and PLC will deny any invoice request if the provider fails to submit the specific supplemental documentation.

**Management’s Response:**

DYRS agrees with this recommendation.

The DYRS Credible Messenger Initiative SOP specifies the supplemental documentation that should be provided with invoices. Additionally, the agency has developed Cost Reimbursement Training that is provided to Credible Messengers and PLC to outline the documentation required for invoice approval. The agency will reject invoice packages and request revisions if the required documentation is insufficient.

Completed in FY23; will continue in FY24.

**DYRS and PLC’s CPI grant expenditure reports were inconsistent with the agency’s official financial record**

The Citywide Grants Manual and Sourcebook (Sourcebook) requires agencies to monitor grantees appropriately to determine whether their “operational, financial, and management systems and practices are adequate to account for program funds....”<sup>28</sup>

The Grants Management SOP states the DYRS Grant Management Division should track expenses incurred, maintain auditable electronic files, and ensure that PLC’s financial reports are thorough, accurate, and clear. Additionally, the Grants Management SOP explains that if the parties amend the grant agreement, DYRS must create a package that includes the following documentation:

- memo to the DYRS Director explaining the amendment;
- certification of funds availability;
- new risk assessment of the grantee;
- request from the grantee detailing the need for the change;
- amended grant budget;
- copy of the original grant award;
- Director’s letter to the grantee;

---

<sup>28</sup> See CITYWIDE GRANTS MANUAL AND SOURCEBOOK, § 11.2 (Dec. 2016). The Sourcebook establishes best practices policies and procedures for the programmatic and financial operations of grants. It states that agencies may supplement the Sourcebook with agency specific requirements. *Id.* § 1.0. <https://opgs.dc.gov/sites/default/files/dc/sites/opgs/publication/attachments/Revised%20Sourcebook2016%20%28003%29.pdf> (last visited May 22, 2023) (Sourcebook).

- grant award amendment;
- amended activities funded document; and
- updated work plan.<sup>29</sup>

Prior to October 2022 but within the scope of this engagement, the System of Accounting and Reporting (SOAR) was the District’s official financial system of record. DYRS collected PLC’s monthly expenditure reports and tracked CPI grant expenditures incurred during the grant period in a spreadsheet. The DYRS spreadsheet recorded budget modifications that included a decrease in funding for two service coalition providers, changes in funding amounts for direct, non-personnel categories, and increased funding for the Summer Youth Employment Program. Examination of FYs 2020 through 2022 budget and expenditures data revealed significant discrepancies between the totals DYRS and PLC reported compared to those recorded in SOAR. While the discrepancies between agencies' spreadsheets and SOAR may represent a complex landscape of increases or decreases to program budgets, it is still required that these updates are adequately tracked, recorded, and documented according to the Grants Management SOP.

**Table 1. CPI’s total budget and reported final expenditure amounts for FY 2020 to FY 2022<sup>30</sup>**

Program	FY 2020		FY 2021		FY 2022	
	Budget	Expended	Budget	Expended	Budget	Expended
<b>SOAR (local)</b>	\$7,688,388	\$7,688,388	\$7,605,580	\$7,605,580	\$7,605,580	\$7,597,580
<b>DYRS</b>	\$7,895,366	\$5,636,209	\$8,100,000	\$7,460,751	\$7,747,957	\$7,110,976
<b>PLC</b>	\$7,900,000	\$6,712,286	\$8,100,000	\$7,460,751	\$7,746,086	\$7,312,664

DYRS could not reasonably explain the discrepancies between the budget and expenditures data and does not have an effective system, or controls in place, to review and discuss CPI grant expenditures on a regular and recurring basis. DYRS staff explained that differences in budgeted items and final expenditures among DYRS, PLC, and SOAR may occur due to modifications, de-obligations, added services and funding, or revisions to original budgeted amounts. DYRS staff further explained that the changes would have been communicated via email, but the staff involved in those discussions were either no longer employed with the agency or on extended leave during the OIG’s fieldwork phase.

Although the Grants Management SOP requires the Grant Management Division to create a package for grant amendments, DYRS staff could not produce documentation for these modifications because none was retained in the agency’s files. Interviews revealed that DYRS and PLC met monthly to discuss CPI grant expenditures, but according to DYRS, these meetings were not productive and did not yield desired outcomes. Interviewees stated that the monthly meetings often had no agenda and that PLC frequently submitted invoices between one and two months late, impacting what should be discussed or adjudicated during those meetings. Furthermore, PLC staff stated that the meetings have not facilitated the correction of discrepancies in expenditure reports. Untimely invoice submission and the lack of discussion

<sup>29</sup> DEP’T OF YOUTH REHAB. SERVS., GRANTS MGMT. DIV., STANDARD OPERATING PROCEDURES 15.

<sup>30</sup> Only SOAR local CPI grant funds are included in Table 1. DYRS also received intra-District funds from various agencies between FY 2020 and FY 2022.

about transactions and expenditure reports could impact budget planning and the availability of resources.

Per the Green Book, management should internally communicate quality information about the agency's operational processes across reporting lines to enable staff to address risks and perform their roles in helping the agency's internal control system.<sup>31</sup>

Budget and expenditure discrepancies could be recording errors. Significant discrepancies in reported expenditures may indicate fraud, waste, or mismanagement of resources. The OIG did not observe or find evidence of fraud; however, the varying amounts and sources of noted discrepancies impede effective oversight and evaluation of DYRS' resource utilization.

The OIG recommends the Director, DYRS:

**Recommendation 7:**

Reconcile inconsistencies in expended CPI grant funds reported by SOAR, DYRS, and PLC, and report the findings to the OIG.

**Management's Response:**

DYRS agrees with this recommendation, with stipulation.

Stipulation: DYRS will review available data and make a good faith effort to reconcile inconsistencies in expended CPI grant funds. However, this review will be impacted by the District's transition to a new financial system of record, and DYRS no longer having access to information reported in SOAR. Additionally, the employees that maintained oversight of the financial reporting for CPI grant funds are no longer District employees.

DYRS has developed processes to ensure accurate reconciliation and reporting. The Grants Management unit conducts monthly expenditure meetings with PLC to review and discuss all budget line items. Additionally, the DYRS Resource Allocation team uses data from both internal tracking systems and DIFS to prepare monthly budget reports that are reviewed with the grants team. The end of year closeout process reviews and reconciles all information reported to maintain accurate data reporting.

Target completion on 6/30/2024.

**Recommendation 8:**

Require discussion and remediation of invoice submission timeliness and expenditure discrepancies specifically, in monthly expenditure meetings.

---

<sup>31</sup> *Supra* note 10, § 3.04.

### **Management’s Response:**

DYRS agrees with this recommendation.

DYRS has developed processes to ensure accurate reconciliation and reporting. The Grants Management unit conducts monthly expenditure meetings with PLC to review and discuss all budget line items. Additionally, the DYRS Resource Allocation team uses data from both internal tracking systems and DIFS to prepare monthly budget reports that are reviewed with the grants team.

Completed in FY23, will continue in FY24.

### **PLC failed to monitor gift cards purchased and disseminated by providers**

The Office of the Chief Financial Officer’s (OCFO) Financial Policies and Procedures Manual on Stored Value Gift Card Ordering (“Policy”) states District agencies should use gift cards for specific program services such as “transportation, food, clothing, and furniture.”<sup>32</sup> The OCFO Policy further delineates the agency is responsible for maintaining a tracking log of gift cards “requested, received, and disbursed to intended users who meet the program eligibility requirements.”<sup>33</sup> The agency must also complete a monthly reconciliation report of the gift cards.

The PLC Activities Funded document requires PLC to collect and retain proper invoices and sufficient documentation to justify service provider expenses. PLC used a spreadsheet to track the gift cards it had purchased using flex funds—funding allocated for spending outside of the Service Coalition or for emergency assistance<sup>34</sup>—but failed to track or monitor gift cards purchased directly by its providers and distributed to youths.

There is no policy specific to Credible Messengers or Achievement Center service providers who purchase gift cards. DYRS and PLC each provided the OIG with different policies for purchasing gift cards with grant funds. DYRS followed the OCFO Policy, while PLC followed the Flexible Funds Policy. This lack of clear policy represents a potential risk of fraud and abuse of tens of thousands of District funds.

Table 2 shows that a Credible Messenger purchased 80 gift cards totaling \$6,429.80 in September 2021. Table 3 shows the same provider purchased 79 gift cards totaling \$6,229.41 in September 2022. The value of individual gift cards the Credible Messenger purchased ranged from \$25 to \$365. The Credible Messenger submitted most gift cards with a receipt, a copy of the gift card, and sometimes an activity log sheet and a number identifying which gift card the youth had received.

---

<sup>32</sup> DC OFFICE OF THE CHIEF FINANCIAL OFFICER, OFFICE OF FINANCIAL AND TREASURY, FINANCIAL POLICIES AND PROCEDURES MANUAL, § 103101004.10 (Sept. 30, 2014).

<sup>33</sup> *Id.* § 103101004.30.

<sup>34</sup> DYRS’ The Flex Funds for Youth policy (Flex Funds Policy) defines flex funds as “monies allocated for DYRS’ committed and post-committed youth to allow for payment of certain goods and services. These goods and services include, but are not limited to, services and activities outside of the Service Coalition, as well as basic needs for youth when emergency assistance is required.” DC DEP’T OF YOUTH REHABILITATION SERV. FLEXIBLE FUNDS FOR YOUTH, § II (undated).

**Table 2. Gift cards purchased by a Credible Messenger in September 2021**

<b>Type of gift card</b>	<b>Number of gift cards</b>	<b>Total amount on gift cards</b>
Foot Locker	13	\$1,050.00
Uber	12	\$1,200.00
Walmart <sup>35</sup>	12	\$600.00
Last Stop	7	\$1,400.00
McDonald's	6	\$200.00
Visa/Mastercard	4	\$219.80
Chipotle	4	\$100.00
Red Lobster	4	\$300.00
Giant	2	\$200.00
Cheesecake Factory	4	\$300.00
Subway	3	\$150.00
Olive Garden	2	\$200.00
Happy Dining	2	\$200.00
Panera	2	\$200.00
Barnes and Noble	2	\$40.00
Nail Salon	1	\$70.00
<b>Total</b>	<b>80</b>	<b>\$6,429.80</b>

**Table 3. Gift cards purchased by a Credible Messenger in September 2022**

<b>Type of gift card</b>	<b>Number of gift cards</b>	<b>Total amount on gift cards</b>
Visa/Mastercard	51	\$4,429.41
Walmart	20	\$1,100.00
Uber	6	\$600.00
Subway	1	\$50.00
Jersey Mike's	1	\$50.00
<b>Total</b>	<b>79</b>	<b>\$6,229.41</b>

In addition, DYRS Care Coordinators play a key role in helping to ensure the needs of committed youths are met. Care Coordinators act as youth and family advocates, communicate decisions regarding the youths, develop youth success plans and monitor their progress, and act as a bridge between the youths, DYRS, and service providers. According to the Flex Funds Policy (see footnote 34), the DYRS Care Coordinator is also specifically responsible for requesting purchases using flex funds and is “solely responsible for...gift card[s], any unused money for the Flex Fund request and for the receipts to show proof of purchase (signed by the youth receiving the goods or service).”<sup>36</sup>

According to the Flex Fund Policy, the DYRS Care Coordinator is not authorized to disseminate the gift cards to anyone else once the request has been processed and is responsible for handling

<sup>35</sup> The receipt did not include pictures of the gift cards.

<sup>36</sup> *Supra* note 35, § II.

all transactions directly. Neither the OCFO nor the Flex Funds Policy authorizes subgrantees to purchase gift cards directly.

The lack of a policy governing gift cards purchased by Credible Messenger, Achievement Center service providers, and DYRS Care Coordinators leaves CPI grant funds vulnerable to fraud, waste, and abuse. The OIG did not observe specific instances of fraud, waste, or abuse; however, the lack of policy creates an environment where individuals may exploit the process to purchase and use the gift cards for personal use or distribute them to family and friends. Because there is a lack of control or oversight over the gift cards, PLC and DYRS cannot verify whether the intended recipient(s) received the gift cards, how the recipient(s) used the gift cards, whether the gift cards contain unspent funds, or whether a gift card is lost or stolen. Establishing and implementing policy for service providers purchasing and using gift cards would lessen the risk of service providers abusing their unmonitored use of gift card funds and wasting government funds on inappropriate purchases that are not directly intended for the youths.

The OIG recommends the Director, DYRS:

**Recommendation 9:**

Enforce the requirements for service providers to provide supporting documentation for all expenses included in their invoice submissions, and ensure PLC collects and retains invoices and associated supporting documents.

**Management's Response:**

DYRS agrees with this recommendation.

DYRS developed Cost Reimbursement Training for all service providers which outlines the documentation required for invoice approval. The agency will reject invoice packages and request revisions if the required documentation is insufficient. Additionally, PLC maintains a SharePoint folder that contains all invoice submissions and supporting documentation, to which DYRS has access through the Grants Financial Management Analyst.

Completed in FY23, will continue in FY24.

**Recommendation 10:**

Implement an internal control system to track and monitor gift cards purchased by Credible Messenger and Achievement Center service providers that are provided to program youths.

**Management's Response:**

DYRS agrees with this recommendation.

DYRS is currently reviewing gift card utilization and will develop a robust policy that outlines an internal control system to effectively track and monitor all gift cards utilized by the Credible Messenger and Achievement Center providers.

Target completion on 9/30/2024.

### **DYRS did not retain CPI grant administration documents**

The Grants Management SOP requires DYRS to retain all grant-related documents for a minimum of three years from the date of the final closeout report unless instructed otherwise. Additionally, the Green Book highlights the importance of document retention as a “means to retain organizational knowledge and mitigate the risk of having the knowledge limited to a few personnel....”<sup>37</sup>

The DYRS Grant Terms and Conditions document states that the terms and conditions of a grant may be modified only upon DYRS’ prior written approval<sup>38</sup> and that the modification shall be an amendment to the grant award notice. As stated in a previous finding, the DYRS Grants Management Division tracked PLC’s expenditures in a “master financial” spreadsheet, which showed that grant modifications occurred in FY 2021, but did not specify what the modifications were. Modifications also occurred during FY 2022, including decreased funding for two providers, changes in funding for direct non-personnel categories, and increased funding for one program, the Summer Youth Employment Program. To explain the modifications, DYRS staff stated that a lower budget might result from modifications or de-obligation of funds due to changes in grant expectations, or increased funding to implement violence prevention measures or bilingual Credible Messenger services. However, DYRS could not locate the relevant modifications or amendments.

DYRS also provides District of Columbia Public Schools (DCPS) and District of Columbia Public Library (DCPL) with Credible Messenger services and uses an MOU to guide these services. When asked, DYRS could not provide the DCPS MOUs for FYs 2020, 2021, or 2022, nor the DCPL MOUs for FYs 2020 or 2021. DYRS did provide DCPL’s MOU for FY 2022.

DYRS staff informed OIG that it communicated grant budget modifications via email; however, the agency could not provide documentation of such occurrences. Because DYRS sent grant modifications via email and did not save the amendments in a centrally accessible location, DYRS staff was unable to speak knowledgeably about the grant budget modifications or amendments, as the staff with additional knowledge about the grant modifications were not on duty or available during our evaluation. Furthermore, DYRS did not have established internal control activities (such as policies or procedures) to ensure the collection, retention, and dissemination of appropriate documentation.

Similar to our previous finding about missing or insufficient documentation to support gift card expenses, DYRS’ failure to retain grant documentation has resulted in inconsistencies in expenditure documentation. DYRS was unable to explain or rectify these inconsistencies during

---

<sup>37</sup> *Supra* note 10, § 3.10.

<sup>38</sup> DC DEP’T OF YOUTH REHABILITATION SERV. GRANT TERMS AND CONDITIONS, § 13 (Rev. Apr. 29, 2019).

our evaluation; its lack of document retention leaves no audit trail for managers and program reviewers to review grant expenditures or modifications.

Per the Grants Management SOP, agencies must collect and retain documentation in their files to support the legality and fiscal responsibility of each payment resulting from purchases and reimbursements. The lack of an audit trail and DYRS' failure to reconcile inconsistencies hindered the OIG's ability to evaluate how DYRS utilized its community-based resources and would also hinder any future oversight entity's ability. These deficiencies hinder the oversight of DYRS' financial and administrative records, increasing the risk of failing to detect and address waste, fraud, and abuse in a timely manner.

The OIG recommends the Director, DYRS:

**Recommendation 11:**

Develop and implement internal control activities (such as policies or procedures) that ensure the collection and retention of appropriate documentation of transactions.

**Management's Response:**

DYRS agrees with this recommendation.

The Grants Management SOP is currently being updated to include robust language that supports internal control activities that ensure the collection and retention of transactions. Currently, the Grants Financial Management Analyst collects and retains all transactional documentation and stores it on the centralized file sharing drive.

Target completion on 3/31/2024.

**Recommendation 12:**

Implement a formal process to document and retain organizational knowledge of grant expenditures and modifications in a file-sharing program accessible by all staff responsible for the grant as required by the Grants Management SOP and Green Book.

**Management's Response:**

DYRS agrees with this recommendation.

DYRS currently manages a file sharing drive that is accessible by all responsible parties in accordance with the agency's Grants Management SOP. Financial data related to grant expenditures are captured by both the Grants Team and the Resource Allocation Team for reference and reconciliation. DYRS will work on developing a formal process to document and retain organizational knowledge of grant expenditures and modifications on the shared drive. The agency's Grants Management and Research & Evaluation teams are also working to develop a



Quickbase system that will assist with document retention and information sharing for all service provider related data.

Target completion on 9/30/2024.

## **CONCLUSION**

---

During this evaluation, the OIG found that DYRS utilized and oversaw community-based services through the Achievement Centers and the Credible Messenger Program focused on key aspects of youth development, including work, education, relationships, community, health, and creativity. The DYRS Credible Messenger and Achievement Center service providers are responsible for serving committed youths, a vulnerable population. DYRS maintains that the most effective public safety strategy involves helping youth transition to become productive and independent adults and deter subsequent interactions with the criminal justice system.

In analyzing the utilization of DYRS' community-based services, the OIG found significant gaps in oversight of program spending, attendance, and document retention, putting the DYRS programs at higher risk of fraud, waste, abuse, and mismanagement. The OIG also found that there has been a decrease in recent years in the population of committed youth, the number of service providers, and participation in skills-building and related programs at Achievement Centers.

Due to factors beyond DYRS' control, the population of DYRS-committed youths significantly decreased during the evaluation period, which negatively impacted attendance in Achievement Center programs. However, the drop in attendance did not result in a corresponding drop in program costs, primarily due to DYRS continuing to pay service providers even though attendance decreased or stopped altogether. The OIG acknowledges that DYRS' duties include maintaining a system of care and community-based facilities and rehabilitative services for committed youths. However, because service providers continue to receive payments despite low or no attendance, the program is operating less economically and efficiently.

In addition, PLC did not enforce supplemental documentation requirements to verify youth attendance and receipt of goods or services. Further, DYRS and PLC did not maintain sufficient oversight of service providers' and Credible Messengers' purchase and use of gift cards, which are considered as cash equivalents. PLC's lack of monitoring of Credible Messenger and Achievement Center service provider expenses opens the door to contractual non-compliance and financial loss for the District, and leaves the program vulnerable to fraud, waste, and abuse without timely detection.

Finally, DYRS' recordkeeping for these services and programs requires improvement. Analyzing DYRS' resource utilization was challenging throughout the evaluation due to insufficient institutional knowledge of the CPI grant, inadequate document retention, and significant discrepancies between final expenditure reports.

These deficiencies have created the potential for bad actors to take advantage of DYRS' resources. To rectify these issues, DYRS and PLC must work together to address the cited deficiencies and strengthen the internal controls guiding the use of CPI funds and programs for youth. Otherwise, the potential for fraud, waste, and abuse of District resources will persist.

## **Appendix A. Objectives, Scope, and Methodology**

---

### **Objectives**

The objectives of this evaluation were to

- (1) identify the various types of community-based services that DYRS oversees; and
- (2) analyze the extent to which various community-based services have been used over the last three years.

### **Scope**

The scope of the evaluation included the evaluation of community-based services that DYRS oversaw in FYs 2020 – 2022, including those services provided through the Credible Messenger Initiative and Achievement Centers.

### **Methodology**

To accomplish the evaluation objectives, the OIG:

- researched DC Code and Regulations and listened to DC Council hearings to identify applicable criteria;
- reviewed DYRS’ policies and procedures, grant agreements, MOUs, and human care agreements to identify additional criteria;
- analyzed programmatic reports to obtain agency data and information;
- referred to GAO Green Book for internal control standards;
- reviewed providers’ monthly invoices and supplemental documents;
- conducted interviews with DYRS and PLC employees; and
- visited Achievement Centers to conduct observations and interview staff.

## **Appendix B. Acronyms and Abbreviations**

---

<b>Acronym/term</b>	<b>Description</b>
CPI	Community Programming Initiative
DCPL	District of Columbia Public Library
DCPS	District of Columbia Public School
DYRS	Department of Youth Rehabilitation Services
FY	Fiscal Year
GAO	U.S. Government Accountability Office
Green Book	GAO Standards for Internal Control in the Federal Government
MOU	Memorandum of Understanding
OCFO	Office of the Chief Financial Officer
OIG	Office of the Inspector General
PLC	Progressive Life Center
PYJ	Positive Youth Justice
SOAR	System of Accounting and Reporting
SOP	Standard Operating Procedures

---

## Appendix C. DYRS Response to the Draft Report



GOVERNMENT OF THE DISTRICT OF COLUMBIA  
**DEPARTMENT OF YOUTH REHABILITATION SERVICES**  
Office of the Director – 450 H St. NW, Washington DC, 20001

October 20, 2023

Daniel W. Lucas  
Inspector General  
Office of the Inspector General for the District of Columbia  
100 M Street SE, Suite 1000, Washington DC 20003

Dear Inspector General Lucas:

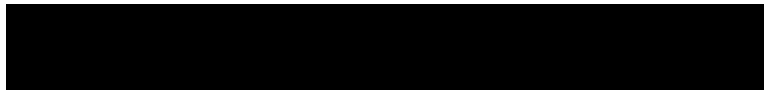
I am writing in response to the *DYRS Draft Report No. 23-E-04-JZ0* (Project 23-E-04-JZ0), which was published by your office as a part of its *Fiscal Year 2023 Audit and Inspection Plan*.

I have reviewed the report, including the findings and recommendations regarding DYRS Community-Based Services, and provided responses. The responses indicate whether the agency agrees or disagrees with the recommendation, and it includes information about actions taken, actions planned, target dates for completion, and reasons for disagreement with any recommendations.

Sincerely,

Sam Abed, Acting Director  
Department of Youth Rehabilitation Services

Cc:



**Findings and Recommendations**

**Finding 1: Some Achievement Center service providers were compensated for services despite failing to meet minimum attendance requirements.**

The OIG recommends the Acting Director, DYRS:

1. Mandate that DYRS-committed youths participate in a set number of hours or programs at the Achievement Centers and establish a standard for the number of hours or programs they must attend based on the length of their commitment.

Agree  Disagree

*Note: The agency agrees in part and disagrees in part (Please see Responses to Recommendations section below.).*

2. Create tangible and intangible incentives to motivate youths' attendance and program participation; and encourage service providers to promote available programs.

Agree  Disagree

3. Monitor and track average monthly attendance rates as a performance measure to determine whether referral and retention efforts are effective and whether program funding changes are needed; and include attendance rates in DYRS's quarterly report on key performance indicators to the Executive Office of the Mayor.

Agree  Disagree

4. Modify service providers' MOUs to include a pay structure that adjusts to attendance fluctuations and is based on meeting the minimum monthly attendance requirements.

Agree  Disagree

5. Explore the transportation and safety barriers committed youths experience and develop actionable solutions.

Agree  Disagree

---

<sup>1</sup> The agency agrees with a stipulation. Please see Responses to Recommendations Section below.

<sup>2</sup> The agency agrees with a stipulation. Please see Responses to Recommendations Section below.

**Finding 2: Some Credible Messenger Initiative and Achievement Center service providers did not submit required documentation along with their invoices, leaving program resources vulnerable to fraud, waste, abuse, or mismanagement.**

The OIG recommends the Acting Director, DYRS:

6. Ensure providers adhere to the requirement of submitting completed sign-in sheets for scheduled programs, dining, and entertainment, and specify that DYRS and PLC will deny any invoice request if the provider fails to submit the specific supplemental documentation.

Agree  Disagree \_\_\_\_\_

**Finding 3: DYRS and PLC's CPI grant expenditure reports were inconsistent with the agency's official financial record.**

The OIG recommends the Acting Director, DYRS:

7. Reconcile inconsistencies in expended CPI grant funds reported by SOAR, DYRS, and PLC, and report the findings to the OIG.

Agree  Disagree \_\_\_\_\_

8. Require discussion and remediation of invoice submission timeliness and expenditure discrepancies specifically, in monthly expenditure meetings.

Agree  Disagree \_\_\_\_\_

**Finding 4: PLC failed to monitor gift cards purchased and disseminated by providers.**

The OIG recommends the Acting Director, DYRS:

9. Enforce the requirements for service providers to provide supporting documentation for all expenses included in their invoice submissions, and PLC to collect and retain invoices and associated supporting documents.

Agree  Disagree \_\_\_\_\_

10. Implement an internal control system to track and monitor gift cards purchased by Credible Messenger and Achievement Center service providers that are provided to program youths.

Agree  Disagree \_\_\_\_\_

**Finding 5: DYRS did not retain CPI grant administration documents.**

The OIG recommends the Acting Director, DYRS:

---

<sup>3</sup> The Agency agrees with a stipulation. Please see Responses to Recommendations Section below.

11. Develop and implement internal control activities (such as policies or procedures) that ensure the collection and retention of appropriate documentation of transactions.

Agree  Disagree

12. Implement a formal process to document and retain organizational knowledge of grant expenditures and modifications in a file-sharing program accessible by all staff responsible for the grant as required by the Grants Management SOP and Green Book.

Agree  Disagree

**Responses to Recommendations**

<i>Responding Agency</i>	<i>Recommendation</i>	<i>Agency Response</i>
DYRS	1. Mandate that DYRS-committed youths participate in a set number of hours or programs at the Achievement Centers and establish a standard for the number of hours or programs they must attend based on the length of their commitment.	<p><i>Agree in Part. Disagree in Part.</i></p> <p><i>DYRS disagrees with a blanket mandate, requiring youth to participate in a set number of hours of programming at the Achievement Centers, as a combination of various activities outside of attending achievement center programs support the successful completion of youth treatment in the community.</i></p> <p><i>However, the agency acknowledges the benefit of incorporating participation requirements in individual Community Placement Agreements for young people in the community. The agency will be evaluating these practices to determine the appropriate modifications required. DYRS will also meet monthly with Care Coordination supervisors and Achievement Center (AC) program managers to review participation data.</i></p> <p><b><i>Target Date of Completion: 09/30/2024</i></b></p>
DYRS	2. Create tangible and intangible incentives to motivate youths' attendance and program participation; and encourage service providers to promote available programs.	<p><i>Agree</i></p> <p><i>DYRS will continue to develop programs that will appropriately incentivize youth attendance and program participation. DYRS will also review current youth</i></p>

		<p>incentivization programs across the agency and work to incorporate them within the Achievement Center programming.</p> <p>DYRS hosts an annual provider's conference to assist service providers with developing more widely publicized programs. Additionally, PLC provides technical assistance to providers on effective marketing strategies to increase youth enrollment. The agency will also work with Achievement Center and Case Management Managers to develop strategies to maximize youth engagement at the Achievement Centers.</p> <p><b>Target Date of Completion: 09/30/2024</b></p>
DYRS	<p>3. Monitor and track average monthly attendance rates as a performance measure to determine whether referral and retention efforts are effective and whether program funding changes are needed; and include attendance rates in DYRS's quarterly report on key performance indicators to the Executive Office of the Mayor.</p>	<p>Agree (with stipulation)</p> <p>DYRS currently utilizes attendance reported by the Achievement Center (AC) providers' weekly census report and the AC Sign-in Kiosks to capture drop in and enrollment rates. DYRS utilizes attendance data as an indicator of performance and has previously dismissed providers that failed to meet requirements. Regular meetings are held with PLC and the program team to discuss the data captured and to make determinations on whether adjustments or modifications are needed to service delivery days, funding, etc.</p> <p>Stipulation: DYRS will work to determine the appropriate Achievement Center participation rate based on the individualized community placement and service needs of youth. Once a proper assessment is conducted, the agency will work to develop procedure and data methodology for reporting.</p> <p><b>Target Date of Completion: 09/30/2024</b></p>
DYRS	<p>4. Modify service providers' MOUs to include a pay structure that adjusts to attendance fluctuations and is based on meeting the minimum monthly attendance requirements.</p>	<p>Agree (with stipulation)</p> <p>DYRS currently includes language in the Grants Management SOPs and Award Package indicating that Grant MOUs may</p>



		<p><i>be modified to reflect service provider performance.</i></p> <p><i>The agency will conduct monthly reviews to determine compliance with performance metrics, to include attendance rates, and determine whether to modify the MOU or dismiss a provider.</i></p> <p><i>Stipulation: DYRS will conduct an assessment to determine whether there is a pay structure, which considers fluctuation in attendance, that can work for its young people and service providers.</i></p> <p><b>Target Date of Completion: 09/30/2024</b></p>
DYRS	5. Explore the transportation and safety barriers committed youths experience and develop actionable solutions.	<p>Agree</p> <p><i>In FY23, DYRS began partnering with the Department of For-Hire Vehicles through their Promise Rides Program to provide safe transportation for DYRS youth.</i></p> <p><i>Additionally, we are exploring the use of Credible Messengers to determine safety issues, to include neighborhood and individual conflicts, before referring youth to Achievement Center programming.</i></p> <p><b>Target Date of Completion: 06/30/2024</b></p>
DYRS	6. Ensure providers adhere to the requirement of submitting completed sign-in sheets for scheduled programs, dining, and entertainment, and specify that DYRS and PLC will deny any invoice request if the provider fails to submit the specific supplemental documentation.	<p>Agree</p> <p><i>The DYRS Credible Messenger Initiative SOP specifies the supplemental documentation that should be provided with invoices. Additionally, the agency has developed Cost Reimbursement Training that is provided to Credible Messengers and PLC to outline the documentation required for invoice approval.</i></p> <p><i>The agency will reject invoice packages and request revisions if the required documentation is insufficient.</i></p> <p><b>Target Date of Completion: Completed in FY23 and continuing in FY24</b></p>
DYRS	7. Reconcile inconsistencies in expended CPI grant funds	<p>Agree (With Stipulation)</p>

	<p>reported by SOAR, DYRS, and PLC, and report the findings to the OIG.</p>	<p><i>DYRS has developed processes to ensure accurate reconciliation and reporting. The Grants Management unit conducts monthly expenditure meetings with PLC to review and discuss all budget line items. Additionally, the DYRS Resource Allocation team uses data from both internal tracking systems and DIFS to prepare monthly budget reports that are reviewed with the grants team. The end of year closeout process reviews and reconciles all information reported to maintain accurate data reporting.</i></p> <p><i>Stipulation: DYRS will review available data and make a good faith effort to reconcile inconsistencies in expended CPI grant funds. However, this review will be impacted by the District's transition to a new financial system of record, and DYRS no longer having access to information reported in SOAR. Additionally, the employees that maintained oversight of the financial reporting for CPI grant funds are no longer District employees.</i></p> <p><b>Target Date of Completion: 06/30/2024</b></p>
<p>DYRS</p>	<p>8. Require discussion and remediation of invoice submission timeliness and expenditure discrepancies specifically, in monthly expenditure meetings.</p>	<p><i>Agree</i></p> <p><i>DYRS has developed processes to ensure accurate reconciliation and reporting. The Grants Management unit conducts monthly expenditure meetings with PLC to review and discuss all budget line items. Additionally, the DYRS Resource Allocation team uses data from both internal tracking systems and DIFS to prepare monthly budget reports that are reviewed with the grants team.</i></p> <p><b>Target Date of Completion: Completed in FY23 and will continue in FY24</b></p>
<p>DYRS</p>	<p>9. Enforce the requirements for service providers to provide supporting documentation for all expenses included in their invoice submissions, and PLC to collect and retain invoices and associated supporting documents.</p>	<p><i>Agree</i></p> <p><i>DYRS developed Cost Reimbursement Training for all service providers which outlines the documentation required for invoice approval. The agency will reject invoice packages and request revisions, if the required documentation is insufficient.</i></p>

		<p><i>Additionally, PLC maintains a SharePoint folder that contains all invoice submissions and supporting documentation, to which DYRS has access through the Grants Financial Management Analyst.</i></p> <p><b>Target Date of Completion: Completed in FY23 will continue in FY24</b></p>
DYRS	10. Implement an internal control system to track and monitor gift cards purchased by Credible Messenger and Achievement Center service providers that are provided to program youths.	<p><i>Agree</i></p> <p><i>DYRS is currently reviewing gift card utilization and will develop a robust policy that outlines an internal control system to effectively track and monitor all gift cards utilized by the Credible Messenger and Achievement Center providers.</i></p> <p><b>Target Date of Completion: 09/30/2024</b></p>
DYRS	11. Develop and implement internal control activities (such as policies or procedures) that ensure the collection and retention of appropriate documentation of transactions.	<p><i>Agree</i></p> <p><i>The Grants Management SOP is currently being updated to include robust language that supports internal control activities that ensure the collection and retention of transactions. Currently, the Grants Financial Management Analyst collects and retains all transactional documentation and stores it on the centralized file sharing drive.</i></p> <p><b>Target Date of Completion: 03/31/2024</b></p>
DYRS	12. Implement a formal process to document and retain organizational knowledge of grant expenditures and modifications in a file-sharing program accessible by all staff responsible for the grant as required by the Grants Management SOP and Green Book.	<p><i>Agree</i></p> <p><i>DYRS currently manages a file sharing drive that is accessible by all responsible parties in accordance with the agency's Grants Management SOP. Financial data related to grant expenditures are captured by both the Grants Team and the Resource Allocation Team for reference and reconciliation. DYRS will work on developing a formal process to document and retain organizational knowledge of grant expenditures and modifications on the shared drive. The agency's Grants Management and Research &amp; Evaluation teams are also working to develop a Quickbase system that will assist with document retention and information sharing for all service provider related data.</i></p>

		<i>Target Date of Completion: 09/30/2024</i>
--	--	--

**To report fraud, waste, abuse, or mismanagement:**



(202) 724-TIPS (8477) and (800) 521-1639



[oig@dc.gov](mailto:oig@dc.gov)



<http://oig.dc.gov>

