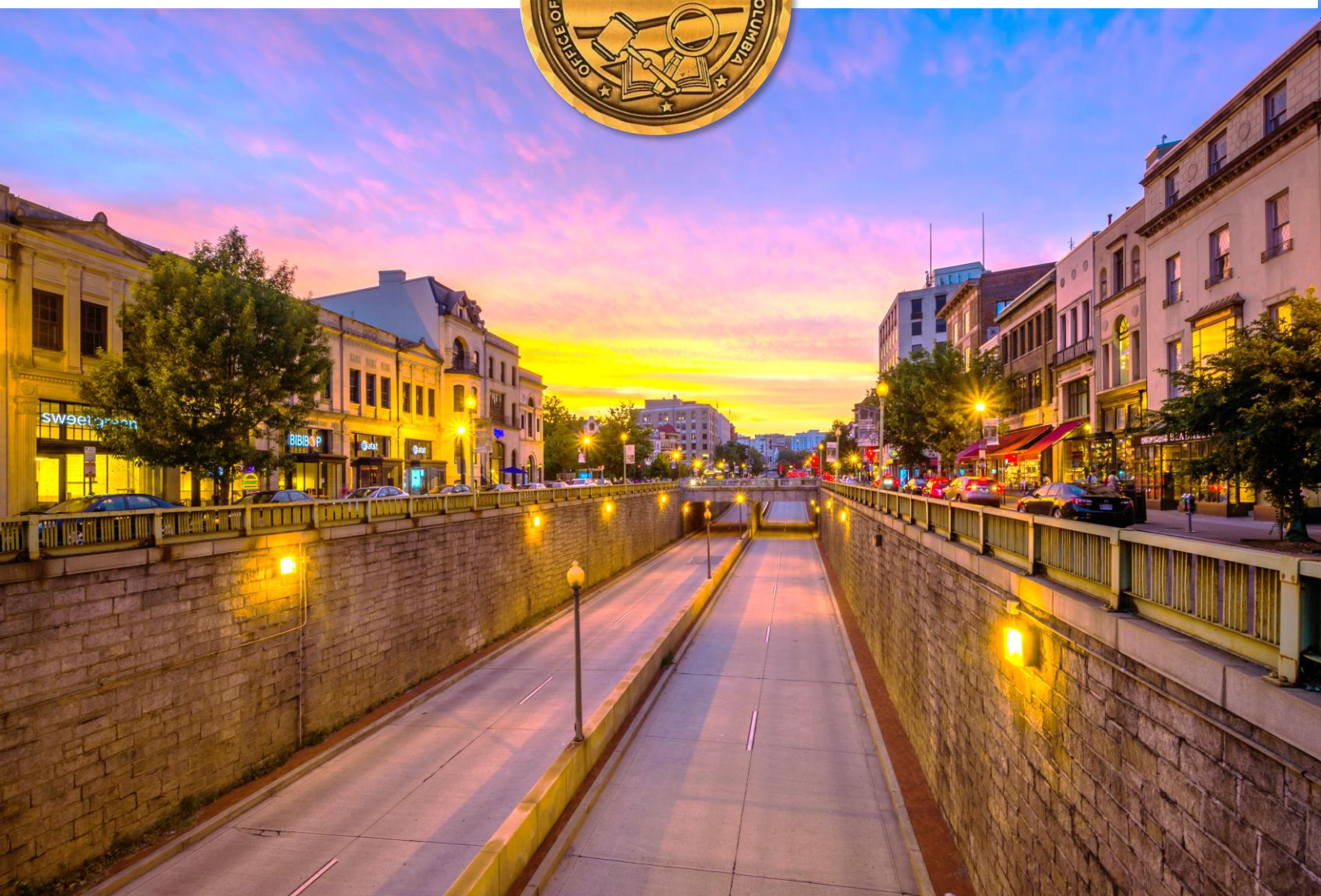


EVALUATION REPORT

DC Commission on the Arts and Humanities

OIG No. 24-E-03-BX0

March 21, 2025



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.






DISTRICT OF COLUMBIA | OFFICE OF THE INSPECTOR GENERAL

MEMORANDUM

To: Aaron Myers
Director, Commission on the Arts and Humanities

From: Daniel W. Lucas 
Inspector General

Date: March 21, 2025

Subject: **DC Commission on the Arts and Humanities**
OIG No. 24-E-03-BX0

This memorandum transmits our final report of our evaluation on the DC Commission of the Arts and Humanities (CAH).

We provided six recommendations and identified one opportunity for improvement to enhance CAH's grant administration processes. We submitted our draft report to CAH management on February 10, 2025; however, as of publication, CAH has not provided feedback on those recommendations. Therefore, this report is published without CAH management's response. Upon receipt of any response from CAH, we will append the report with a copy of their response as an attachment.

We will track open recommendations to ensure they are resolved and implemented. We will also notify the Council and the Mayor about our findings and report annually on actions taken—and not taken—to implement the recommendations. Finally, a copy of this report will be posted on our website.

Should you have questions or concerns, please contact me or Yulanda Gaither by email at Yulanda.Gaither@dc.gov or by phone at (202) 727-9029.



EXECUTIVE SUMMARY

DC Commission on the Arts and Humanities

Summary

The Office of the Inspector General (OIG) conducted this evaluation as part of its Fiscal Year (FY) 2024 Audit and Inspection Plan to evaluate grant management practices within the District. This engagement aligns with our ongoing efforts to review grant oversight within the District, identify control weaknesses, make recommendations to improve control deficiencies, and provide actionable insights for decision-makers.

Our evaluation of the Commission on the Arts and Humanities (CAH) found that while CAH has successfully expanded grant availability to District residents and organizations, several opportunities exist to enhance its grant management processes.

Objectives

1. Review executed District government grants for vulnerabilities to corruption, fraud, mismanagement, waste, and abuse; and
2. Assess whether grants are effectively operationalized to ensure the District receives maximum benefits.

Findings

Based on evidence and evaluation standards, we found that:

1. CAH implemented part of its strategic plan.
2. CAH provided grants to individuals not based in DC.
3. CAH awarded grants to organizations and individuals using incomplete grant applications.
4. CAH can improve oversight activities for the Fellowship Grant.
5. A Public Art Building Communities award did not fully conform to standards.
6. CAH should improve staff conflict of interest training practices.

Recommendations

We made six recommendations and identified one opportunity for improvement. Implementation of these recommendations will reduce the agency's vulnerability to corruption, fraud, waste, abuse, and mismanagement of grant resources and help ensure that the CAH and District receive maximum benefits.

Management Response

CAH management did not respond to our draft report.





DC Commission on the Arts and Humanities

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INTRODUCTION

Objectives

The objectives of this evaluation were to review the Commission on the Arts and Humanities' (CAH) grants for vulnerabilities to corruption, fraud, waste, abuse, and mismanagement and assess whether grant program requirements were effectively operationalized to ensure the District received maximum benefits.

See Appendix 1 for our evaluation scope and methodology.

Background

CAH supports programs that promote the diversity, education, and expression of the arts and humanities. CAH is an independent agency within the District government and has served as the designated state arts agency since 1968, with a majority of budgetary support coming from District funds and partial support coming from the National Endowment for the Arts.¹

Based on our evaluation, between fiscal years (FY) 2021 and 2024, CAH:

- Created and implemented the CAH Strategic Plan for FY 2021 – 2023;
- Updated the Public Art Master Plan;
- Received the "Leveraging State Investments in Creative Aging" grant award from the National Assembly of State Arts Agencies;
- Presented two grant-funded exhibitions;
- Hosted a two-day youth poetry program; and
- Partnered with the District Department of Transportation on a second iteration of the Color the Curb Program.

¹ "About CAH," DC Commission on the Arts and Humanities, <https://dcarts.dc.gov/page/about-cah>.

At the time of this report, CAH oversaw 14 individual and organizational art and humanities grant programs. Between FYs 2021 and 2024, CAH awarded \$142.3M to 4,551 individuals and organizations through grants (see Table 1).

Table 1. Grants awarded by fiscal year (2021-2024)

Fiscal Year	Grants Awarded	Dollars Awarded
2021	1,011	\$29,067,805
2022 ²	1,318	\$40,405,507
2023	1,027	\$38,143,793
2024	1,195	\$34,678,995
Total	4,551	\$142,296,100

CAH releases new Requests for Applications (RFAs) each fiscal year for individuals and organizations to apply for various grants. Once CAH receives and accepts RFAs, grant panelists review and score grant applications. Applications are then presented anonymously to the CAH Commissioners, who give final approval.

CAH has a 3-stage grantmaking standard operating procedure, including pre-application, application through award determination, and award and post-award processes. This standard operating procedure is used by (a) internal stakeholders, including in the onboarding of grant management specialists, and (b) external stakeholders to ensure fidelity and transparency in the process.

² The increase in the number of grantees and dollar amount for FY 2022 is attributable to a one-time increase in pandemic-related funding.

EVALUATION RESULTS

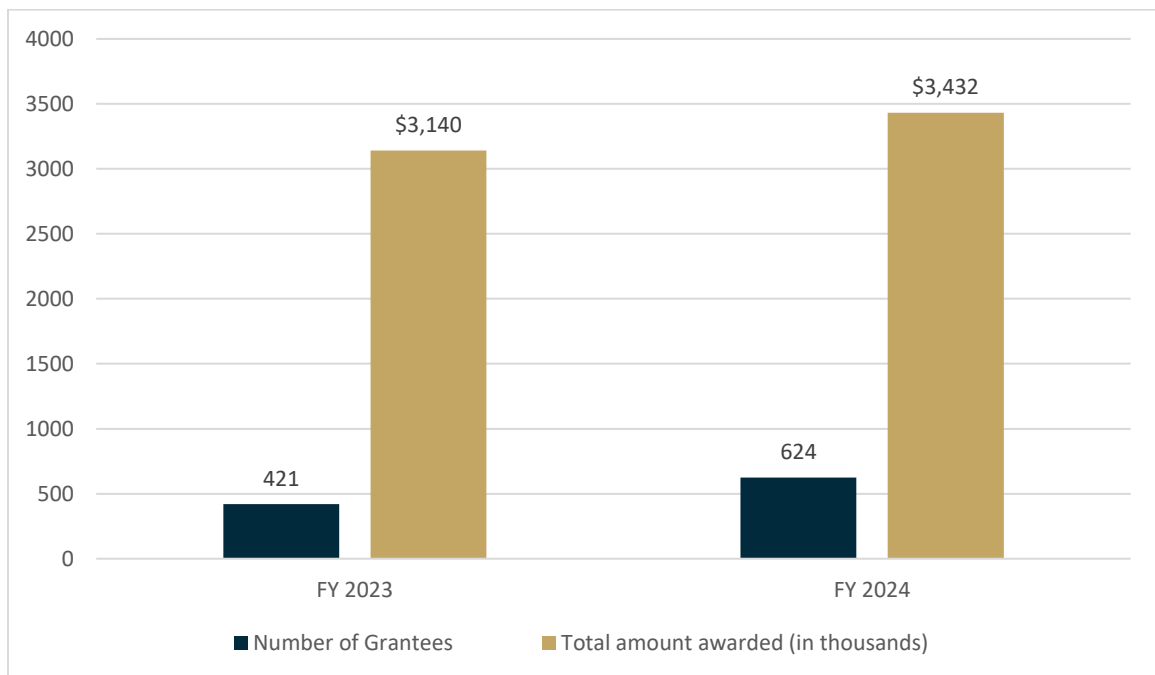
Finding 1: CAH Implemented Part of its Strategic Plan

CAH made progress in implementing its Strategic Plan by enhancing grant accessibility and promoting inclusion for DC residents. The agency focused on Inclusion, Diversity, Equity, and Accessibility (IDEA) by:

- creating an IDEA committee to raise awareness of social inequities in the community; and
- implementing a set award amount for all Arts and Humanities Fellowship Program (Fellowship) grant recipients, replacing a sliding scale approach.

This strategic change had a significant impact: the number of Fellowship grant awardees increased by 48 percent from FY 2023 to FY 2024, with CAH awarding grants to 203 additional artists. See Figure 1 for the total grantees and dollars awarded in FYs 2023 and 2024.

Figure 1. Fellowship program grants in FYs 2023 and 2024.



To support this growth, CAH implemented several key initiatives, including:

- Increasing community outreach through grant application workshops;
- Making grant management staff more accessible to artists; and
- Increasing visibility of its outreach team in conducting site visits, hosting workshops, and providing panel support.

CAH also implemented annual conflict-of-interest (COI) training for Commissioners and grants panelists, including forms acknowledging the COI training to minimize bias in the selection process. These strategic efforts have expanded the visibility and accessibility of District art grants while strengthening internal controls.

Finding 2: CAH Provided Grants to Individuals Not Based in DC

Our evaluation identified 98 grant recipients outside the District, out of compliance with DC Code. These non-local recipients were awarded grants through two grant programs—[Art Bank](#) and [Murals DC](#)—during FYs 2021-2024. Table 2 demonstrates the extent of this practice.

Table 2. Art Bank and Murals DC awards from FY 2021-2024 for artists not based in the District of Columbia.

Fiscal Year	Art Bank Grantees	Art Bank Award	Murals DC Grantees	Murals DC Award
2021	20	\$88,633	6	\$75,300
2022	15	\$59,185	5	\$65,000
2023	30	\$124,100	None ³	None
2024	22	\$88,070	None	None
Total	87	\$359,988	11	\$140,300

DC Code § 39-204(3) requires grants to be awarded competitively to individuals and organizations "based in and primarily serving the District[.]" This statutory requirement sets the baseline for grant allocation. Although CAH leadership has interpreted this law to include residents and organizations within a 50-mile radius of the District (including Baltimore, MD, and Falls Church, VA), the agency has awarded

³ No Mural DC grants were awarded in FY 2023 and FY 2024.

grants well beyond this radius to recipients in Colorado, Florida, California, Tennessee, and New York, raising questions about adherence to the District-based focus. CAH stated this interpretation would "allow for a robust and competitive applicant pool that best supports the broader goals ... of the Art Bank program and best serves the DC residents, local artists, and agency partners who benefit from the Art Bank program."

CAH awarded \$500,288 to 98 individuals who resided outside the District between FYs 2021 – 2024. CAH's interpretation of extending eligibility beyond the District's borders to such a broad geographic area does not comply with DC Code; CAH's interpretation of DC Code undermines the prioritization of local artists and organizations.

Recommendation 1
We recommend CAH management: <ol style="list-style-type: none">1. Update CAH grant policy to eliminate the 50-mile radius requirement and ensure that all grant recipients are based in and primarily serve the District, as required by DC Code § 39-204(3).
Management response: CAH management did not respond to our report.

Finding 3: CAH Awarded Grants to Organizations and Individuals Using Incomplete Grant Applications

Incomplete Grant Applications

The CAH [Guide to Grants \(FY 2024\)](#)⁴ and RFAs require complete documentation for grant application submissions.^{5,6} Our evaluation identified non-compliance across two grant programs, highlighting potential systemic weaknesses in the organization's grant application review process.

We reviewed a sample of grant files from the Arts and Humanities Fellowship Program (Fellowship grant), which is awarded to individuals, and the General Operating Support grant (GOS grant), which is awarded to organizations. The Fellowship grant aims to increase contributions from District artists and humanities professionals, while the GOS grant strengthens arts and humanities organizations based in the District.

These grant programs had distinct RFA requirements. Fellowship grant requirements included that applicants were District residents and applied for the grant as an individual artist.⁷ Key GOS grant requirements included that applicant organizations were incorporated as a 501c(3) nonprofit, were registered and authorized to do business in the District, and had a principal business address located in the District.⁸ Both grants required a [Certificate of Clean Hands](#), ensuring that individuals and organizations that owe the city money do not receive grants, safeguarding against fraud and waste.

⁴ Commission on the Arts and Humanities, "Guide to Grants (FY 2024)," October 31, 2023, https://dcarts.dc.gov/sites/default/files/dc/sites/dcarts/publication/attachments/CAH_FY_2024_Guide_to_Grants.pdf.

⁵ Commission on the Arts and Humanities "Request for Applications: FY24 Arts and Humanities Fellowship Program Grant," https://dcarts.dc.gov/sites/default/files/dc/sites/dcarts/publication/attachments/CAH%20FY24%20Arts%20and%20Humanities%20Fellowship%20Program%20Request%20for%20Applications_0.pdf.

⁶ Commission on the Arts and Humanities "FY 2024 General Operating Support Grant Program (GOS): Request for Applications," https://dcarts.dc.gov/sites/default/files/dc/sites/dcarts/publication/attachments/FY24%20GOS%20Generalists%20Guidelines_0.pdf.

⁷ CAH, "Request for Applications: FY24 Arts and Humanities Fellowship Program Grant."

⁸ CAH, "FY 2024 General Operating Support Grant Program (GOS): Request for Applications."

Our review of Fellowship grant files revealed that CAH accepted applications and awarded grants despite incomplete or missing documents. We tested the grant files for accuracy, completeness, and compliance with RFA requirements. From FY 2021 through FY 2024, 95 percent of sampled applications included proper DC residency verification, but only 69 percent had the required Clean Hands certification (see Table 3).

Table 3. Fellowship grant application completeness for FYs 2021 through 2024

Fiscal Year	DC Residency Verification	Certificate of Clean Hands
2021	16 out of 16 (100%)	9 out of 16 (56%)
2022	16 out of 18 (89%)	15 out of 18 (83%)
2023	21 out of 21 (100%)	10 out of 21 (48%)
2024	29 out of 31 (94%)	25 out of 31 (81%)

Note: OIG utilized a five percent random sample of approved Fellowship grants for this review.

Our review of GOS grant files revealed that CAH leadership did not enforce the requirement to submit complete application documentation. In FY 2024, 55 percent of applications were incomplete, with 22 percent lacking three or more required documents. Further, in FYs 2021 through 2023, no applications were complete and 43 percent were missing three or more required documents (see Table 4).

Table 4. GOS grant application completeness for FYs 2021 through 2024

Fiscal Year	Complete Application Documentation	Applications Missing Three or More Documents
2021	0 out of 6 (0%)	3 out of 6 (50%)
2022	0 out of 7 (0%)	3 out of 7 (43%)
2023	0 out of 8 (0%)	3 out of 8 (28%)
2024	4 out of 9 (45%)	2 out of 9 (22%)

Note: OIG utilized a five percent random sample of approved GOS grants for this review.

Relying on incomplete applications can increase the risks of awarding art grants to ineligible recipients and potentially denying other eligible artists grant opportunities. Therefore, incomplete applications should not be considered by CAH Commissioners and grant panelists.

Ineffective Grant Application Review

Staff ineffectively screened grant applications for completeness and eligibility requirements. According to the Guide to Grants and RFA, only complete and eligible applications should be considered for CAH grants; this includes a Clean Hands certification, proper proof of residency, and identification, among other documentation, prior to them being present to the Board of Commissioners for final approval.

CAH did not implement internal controls for ensuring the completeness of grant applications, thereby undermining the organization's ability to effectively screen and evaluate potential grant recipients. CAH's application review practices contradict best practices outlined in the Government Accountability Office's [Standards for Internal Control in the Federal Government](#) (hereinafter Green Book). Principle 12.05 emphasizes the need to assess control activities for relevance and effectiveness, while Principle 10.06 highlights the reliability and efficiency of automated controls over manual processes, such as the review employed by CAH staff.⁹ Furthermore, Principle 10.11 describes the need for management to evaluate the level of precision and consistency needed to perform a control activity, such as application screening. CAH's lack of an effective review process created a risk that incomplete applications advance to panel review out of compliance with the Guide to Grants, undermining the effectiveness of the grant evaluation system and increasing the risk of fraud, waste, or abuse.

Recommendation 2
We recommend CAH management: <ol style="list-style-type: none"> 2. Conduct and document periodic reviews of control activities to ensure compliance with the Guide to Grants and RFA document requirements.
Management response:
CAH management did not respond to our report.

⁹ Control activities are the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system, which includes the entity's information system.

Recommendation 3
We recommend CAH leadership: 3. Implement a control activity that confirms grant applications are complete before forwarding applications to the grant panelists and commissioners, as the Guide to Grants requires.
Management response: CAH management did not respond to our report.

Finding 4: CAH Can Improve Oversight Activities for the Fellowship Grant

As described in the Fellowship RFAs for FYs 2021 through 2024, the goals for the grant are to encourage the contributions of individual artists and humanities practitioners to the District by sustaining, highlighting, and elevating the professional accomplishments of artists and humanities professionals residing in the District. However, CAH leadership viewed the Fellowship Grant program primarily as a means of supporting artists' living expenses rather than increasing artistic production. CAH does not fulfill all its responsibilities to adequately oversee District funds by limiting its focus to artists' living expenses rather than supporting broader artistic production and community enrichment.

CAH describes its oversight responsibilities in the Fellowship RFAs as follows.

All grant recipients are subject to risk assessments and monitoring requirements. Those practices are discussed in greater detail in the applicants' grant agreements with CAH. Activities funded by CAH will be monitored and evaluated by its staff, to assure compliance with all applicable District of Columbia's statutes, regulations, orders and other requirements. This monitoring process may include site visits, an evaluation of allowable costs, [an] assessment of efforts to meet projected grant applicant benchmarks, providing proof of expenditures, etc.

Despite these requirements, CAH did not establish effective internal controls to track or evaluate Fellowship grantees' compliance with RFA requirements. From FY 2021 through 2024, CAH distributed \$11.4M in Fellowship grants across 1,711 individual grantees, which primarily were not monitored and evaluated. For example, CAH did not monitor the grantees' activities throughout the grant cycle or provide an independent evaluation of and documentation for District investment in artists. This systemic absence of monitoring created a gap in understanding grant recipients'

actual impact and accomplishments, undermining the District's ability to measure tangible returns on its investment.

Recommendation 4
We recommend that CAH management: 4. Establish and document procedures for monitoring activities that track and evaluate Fellowship grantees' artistic works, as stated in the Grant Agreement and the RFA.
Management response: CAH management did not respond to our report.

Finding 5: A Public Art Building Communities Award Did Not Fully Conform to Standards

CAH did not retain all required information for the \$125,000 FY 2022 [Public Art Building Communities](#) (PABC) grant related to the Friends of Kingman Park (FOKP) grantee. The RFA required the grantee to submit the following information, which was missing from grant files:

- project implementation schedule and execution logistics,
- detailed application responses, and
- interim and final progress reports.

As a result, CAH did not fully comply with DC Sourcebook § 8.8 related to the retention of interim and final reports, which states that the "Agency shall incorporate into its award files and retain the records of all awarded applications and subsequent reports for the period that is the greater of; 1) three (3) years, or 2) the time required by the applicable law, regulation or agreement governing the funding for such grant."¹⁰

¹⁰ Office of Partnerships and Grant Services, "Agency Post-Award Responsibilities", in *City-Wide Grants Manual and Sourcebook*, (2016), 23, <https://opgs.dc.gov/sites/default/files/dc/sites/opgs/publication/attachments/Revised%20Sourcebook2016%20%28003%29.pdf>.

CAH did not follow effective recordkeeping protocols and could not confirm that all grant documentation for the FOKP 2022 grant was obtained and maintained appropriately. As a result, CAH funded a public art project that did not fully meet grant requirements.

Without clear, enforced procedures that mandate specific documentation standards, tracking mechanisms, and accountability measures, CAH leaves itself vulnerable to administrative and financial risks. The absence of structured grant management protocols undermines the organization's ability to monitor, evaluate, and demonstrate the impact of its grants.

Recommendation 5
We recommend CAH management: 5. Establish procedures that provide effective grant administration oversight and ensure compliance with RFA and DC Sourcebook requirements.
Management response: CAH management did not respond to our report.

Finding 6: CAH Should Improve Staff Conflict-of-Interest Training Practices

CAH provided and documented COI training to commissioners and grant panelists but not to staff members, despite having a COI policy applicable to staff, contracted personnel, and commissioners. While the DC Sourcebook § 5.4 provides COI guidance for panelists that applies to employees, CAH's lack of formal staff training and acknowledgment of the same increases the risks of grant mismanagement, abuse, or fraud during the application referral process.

Recommendation 6
We recommend that CAH management: 6. Establish mandatory conflict-of-interest training for all CAH staff involved in grant processes, including new hires and ongoing refresher courses, with signed acknowledgment documenting completion.
Management response: CAH management did not respond to our report.

Observation 1: CAH Can Reduce Organizational Risk by Improving Continuity of Operations and Succession Planning

A Continuity of Operations Plan (COOP) ensures District departments and agencies can maintain essential functions during emergencies. District government agencies without detailed plans may face increased operational risks and compliance issues. Effective planning requires clear documentation of core functions, systems, and responsibilities, with regular updates and testing. A key COOP component is succession planning, which establishes a clear order of succession to maintain leadership and decision-making authority during emergencies.

Despite requirements for filling vacancies in key roles such as CAH Commissioners or the Executive Director, as described in DC Code § 7-2231.11(a)(5), CAH leadership did not establish a succession plan or COOP for key staff positions.¹¹ Principle 4 of the Green Book emphasizes that management should "define succession plans for key roles, choose succession candidates, and train succession candidates to assume the key roles." However, CAH leadership has not identified or prioritized succession planning for key staff positions. The lack of a succession plan for CAH's key roles in grantmaking risks creating knowledge gaps, decreased funding opportunities, and a lack of continuity in grant-related activities.

Opportunity for Improvement:
CAH management should consider identifying key CAH staff positions, develop and maintain current succession plans for each, and integrate them into the continuity of operations plan.

CONCLUSION

Our evaluation of the Commission on the Arts and Humanities revealed both achievements and areas requiring improvement in grant administration and oversight. While CAH expanded grant accessibility and implemented initiatives to promote inclusion, several systemic weaknesses undermine the effectiveness of its grant management process.

CAH demonstrated partial success in implementing its strategic plan, particularly in enhancing grant accessibility. However, the agency's interpretation of eligibility requirements—specifically the 50-mile radius practice—conflicted with DC Code

¹¹ DC Code [§ 7-2231.11](#), "District government continuity of operations planning."

requirements and potentially undermined support for District-based artists. This misalignment between practice and statutory requirements requires attention to ensure compliance and prioritization of local artists.

Deficiencies existed in CAH's grant application review process and internal controls. The manual review of applications led to inconsistent enforcement of documentation requirements and advanced incomplete applications and awarded ineligible grants. This systemic weakness compromised the integrity of CAH's grant administration.

The evaluation identified critical gaps in CAH's monitoring and oversight activities. The lack of structured monitoring for Fellowship grants limited CAH's ability to assess the impact of its investments and ensure accountability in grant outcomes. Additionally, we found deficiencies in the Public Art Building Communities grant program that indicated broader issues in recordkeeping and compliance monitoring.

The internal operations of CAH require strengthening to ensure effective grant management. CAH should implement comprehensive COI training for staff as an internal control measure. Additionally, the organization should consider developing formal succession plans and continuity of operations strategies to mitigate potential risks in institutional knowledge retention and grant administration.

The implementation of the six recommendations in this report will enhance CAH's grant administration and strengthen its ability to serve District residents effectively. These improvements are intended to: ensure CAH's compliance with DC Code, strengthen its internal controls over application review and grant oversight, and enhance its internal operations. We look forward to CAH's response to implementing these recommendations to better serve our arts community.



APPENDIX 1. OBJECTIVES, SCOPE & METHOD

Objectives

Our objectives for this evaluation were to assess whether the grant program requirements are effectively operationalized to ensure the District is receiving maximum benefits and to detect vulnerabilities to corruption, fraud, waste, abuse, and mismanagement by reviewing executed grants within the identified scope.

Scope

Between February 2024 and September 2024, we reviewed CAH agency grant documents, interviewed agency leadership and grant management staff, examined agency-supplied records, and analyzed a random five percent sample of individual and organization files from FYs 2021 to 2024.

Methodology

We conducted this evaluation in accordance with the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency (CIGIE) and the *Standards for Internal Control in the Federal Government* (the Green Book) issued by the US Government Accountability Office. The team relied on the District of Columbia Code, the Citywide Grants Manual and Sourcebook, and CAH agency grant documents.

The evaluation process began in the planning phase, during which an engagement letter was issued to CAH. The OIG conducted an entrance conference with the agency. We gathered background information on CAH and analyzed a 5 percent sample from the Fellowship and GOS grants for fiscal years 2021 – 2024. We conducted several interviews with CAH management and staff and requested additional documents for review. Upon completion of our fieldwork, we solidified our findings, conducted post hoc analysis, answered each objective, and held an exit conference with CAH leadership.



APPENDIX 2. MANAGEMENT RESPONSE

Agency management did not respond to our draft report.



APPENDIX 3. RECOMMENDATION STATUS

Recommendation	Status	Action Required
1. Update CAH grant policy to eliminate the 50-mile radius requirement and ensure that all grant recipients are based in and primarily serve the District, as required by DC Code § 39-204(3).	Open – Unresolved	Implementation
2. Conduct and document periodic reviews of control activities to ensure compliance with the Guide to Grants and RFA document requirements.	Open – Unresolved	Implementation
3. Implement a control activity that confirms grant applications are complete before forwarding applications to the grant panelists and commissioners, as the Guide to Grants requires.	Open – Unresolved	Implementation
4. Establish and document procedures for monitoring activities that track and evaluate Fellowship grantees' artistic works, as stated in the Grant Agreement and the RFA.	Open – Unresolved	Implementation
5. Establish procedures that provide effective grant administration oversight and ensure compliance with RFA and DC Sourcebook requirements.	Open – Unresolved	Implementation
6. Establish mandatory conflict-of-interest training for all CAH staff involved in grant processes, including new hires and ongoing refresher courses, with signed acknowledgment documenting completion.	Open – Unresolved	Implementation

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