

EVALUATION REPORT

District Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part I - DCPS

OIG No. 23-E-09-PS0(m)

July 9, 2025



DANIEL W. LUCAS
INSPECTOR GENERAL



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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.

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DISTRICT OF COLUMBIA | OFFICE OF THE INSPECTOR GENERAL

MEMORANDUM

To: Dr. Lewis D. Ferebee, Chancellor
District of Columbia Public Schools

From: Daniel W. Lucas, Inspector General 

Date: July 9, 2025

Subject: **District Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part I - DCPS | OIG No. 23-E-09-PS0(m)**

This memorandum transmits our final report, *District Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part I - DCPS*, OIG No. 23-E-09-PS0(m), the first in a series of three reports. Our evaluation concentrated on the compliance of contracts exceeding \$1M in effect between fiscal years (FYs) 2020 and 2023.

This report focused on the District of Columbia Public Schools (DCPS). The forthcoming reports, Parts II and III, will concern the compliance of two other District agencies with independent procurement authority and agencies under the authority of the District's Chief Procurement Officer (CPO), respectively.

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*¹ and the Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government* (known as the GAO Green Book).²

Our report includes four findings and eleven recommendations to improve DCPS' compliance with District procurement laws. DCPS agreed with seven

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

² Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, DC: GAO, 2014), <https://www.gao.gov/products/GAO-14-704G> [hereinafter GAO Green Book].

recommendations and disagreed with four. We have classified the seven agreed-upon recommendations as resolved pending verification of implementation and the four others as unresolved. We will continue to track all recommendations to ensure full implementation, verify the effectiveness of reported corrective actions, and engage DCPS on the unresolved items.

We will notify the Council and the Mayor of our findings and post a public version of the final report, which will include DCPS management's response (see Appendix 4), on our website. We will report annually on the actions DCPS has taken to implement the recommendations and on recommendations that DCPS has not implemented.

We appreciate the cooperation and courtesy extended to our staff during this evaluation. If you have any questions about this report, please contact me or Ms. Gaither. In addition to her email address above, you may contact Ms. Gaither by phone at 202-727-9029.



EXECUTIVE SUMMARY

District Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part I - DCPS

Summary

This report examines the District of Columbia Public Schools' (DCPS) contracting and procurement practices, focusing on how one of the District's largest agencies manages its purchasing to support 117 schools and Central Office operations through its Contracts and Acquisitions Division.

DCPS operates within a framework of contracting laws established by Congress and the DC Council to ensure competitive and transparent procurement of government goods and services. These laws require Council approval for non-emergency multi-year contracts and contracts exceeding \$1 million annually. DCPS must also provide the Office of the Chief Procurement Officer copies of contracts over \$100,000 for publication on its website for public transparency. During the COVID-19 pandemic, the Council temporarily relaxed pre-approval requirements for emergency procurements, requiring only post-award summaries within seven days.

This analysis represents the first of three reports evaluating District procurement practices within this regulatory environment.

Objective

The objective was to evaluate DCPS' compliance with the applicable procurement laws and regulations.

Findings

We found that DCPS did not comply with several laws, rules, and regulations governing the procurement of goods and services. Several lapses in internal controls contributed to DCPS' lack of compliance. These lapses in internal control also prevented required oversight by several District entities. Since FY 2023, DCPS has taken steps to address some of these internal control deficiencies, but further actions are needed.

Recommendations

We made 11 recommendations designed to bring DCPS into compliance with District procurement laws and regulations, and to strengthen its internal control environment and activities.

Management Response

DCPS agreed with 7 of our 11 recommendations and disagreed with 4 recommendations. For the recommendations they agreed with, DCPS cited actions already taken since January 2024, including implementing a new Procurement Manual, establishing staff training protocols, improving digital contract storage, and enhancing quality assurance processes. For the recommendations they disagreed with, DCPS stated they had already addressed the underlying issues through previous actions or that the recommendations were no longer applicable due to changes in their practices. Our comments on DCPS' response are included in the Evaluation Results section, and DCPS' complete response is included in Appendix 4.



District Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part I - DCPS

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INTRODUCTION

Objective

Our objective was to evaluate the District of Columbia Public Schools' (DCPS) compliance with the Home Rule Act and other relevant procurement laws and regulations governing contracts requiring the DC Council's approval. This report is the first in a series of three focused on District agencies' adherence to these procurement requirements.

See Appendix 3 for our evaluation scope and methodology.

Background

Why We Conducted This Evaluation

In 2022, DCPS executed multiple contracts exceeding \$1M without following required laws. These included an emergency contract for COVID-19-related healthcare staffing assistance that was not reported to the Council within the mandated seven-day timeframe, and two food service contracts, executed in June and July 2022 without obtaining the Council's pre-approval, as required by DC Code §§ 1-204.51 (Home Rule Act) and 2-352.02 (PPRA).³

In January 2023, OIG issued *Management Recommendations For The Year Ended September 30, 2022*, which detailed DCPS' failure to notify the Council of the healthcare staffing contract and made recommendations to address this deficiency.⁴ When DCPS subsequently submitted the two food service contracts for retroactive approval in February 2023, the Council called a hearing to address DCPS' procurement practices. In response to Council's inquiries, DCPS acknowledged 36 emergency and non-emergency

³ Office of the Inspector General, *Management Recommendations For the Year Ended September 30, 2022*, OIG Project No. 22-1-26MA(a) (January 2023), <https://oig.dc.gov/sites/default/files/Reports/OIG%20No.%2022-1-26MA%28a%29%20ACFR%20Management%20Letter.pdf> (last visited Apr. 25, 2024) [hereinafter FY 2022 ACFR Management Recommendations].

⁴ OIG, FY 2022 ACFR Management Recommendations.

contract packages exceeding \$1M that had not been properly submitted to Council, violating District procurement laws.⁵

The OIG's July 2023 *Management Implication Report (MIR) 23-R-002* highlighted DCPS' compliance issues and concluded that similar problems might exist across the District government, prompting this broader evaluation.

Procurement Laws and Procedures

The District's procurement framework is established by two key laws. First, the *District of Columbia Self-Government and Governmental Reorganization Act* of 1973 (commonly known as the "Home Rule Act") provides District residents with the powers of local self-government and requires the Mayor to obtain Council approval before entering into any contracts exceeding \$1M in a 12-month period.⁶ Second, the Procurement Practices Reform Act (PPRA) of 2010 modernized District procurement laws to enhance competition, efficiency, and public confidence.⁷ These laws create the legal foundation for how District agencies must conduct procurement activities, with specific requirements for high-value contracts and emergency procurements.

Most agencies operate under the authority of the District's Chief Procurement Officer (CPO) and must work with the Office of Contracting and Procurement (OCP) for procurements of over \$10,000. However, some agencies, including DCPS, have independent procurement authority and operate with their own CPO. With a few exceptions, agencies with independent procurement authority must comply with the requirements of the PPRA, including DCPS.

DCPS' Contracts and Acquisitions Division (C&A) coordinates the procurement of goods and services required by DCPS' 117 schools and its Central Office.⁸ Previously, C&A operated under the Office of Resource Strategy and was supervised by the Deputy Chancellor of Innovation and Systems Improvement. Beginning in June 2023, DCPS reorganized C&A under the Office of Fiscal Strategy overseen by the Deputy Chancellor of Finance and Operations.

⁵ We've disaggregated the 36 contract packages to the 42 \$1M+ contract actions. Through testing, we identified 16 additional contracts, which DCPS did not report to the Council: seven FYs 2021 – 2023 contracts totaling \$18M, and nine FY2020 contracts totaling \$65M. Of these 16 additional contracts, six were emergency contracts and ten were non-emergency contracts.

⁶ [Pub. L. No. 93-198](#), 87 Stat. 803, Sec. 102 (Dec. 24, 1973). See also DC Code § 1-204.51.

⁷ DC Code § 2-351.01(b).

⁸ DCPS Organizational Chart, July 2024, page 13.

DCPS' Processes for Awarding Contracts Exceeding \$1M

Although DCPS has independent procurement authority and does not require OCP's approval to procure goods and services, DCPS must still comply with the PPRA and other District's procurement laws and regulations.

DCPS' procurement process for non-emergency contracts exceeding \$1M involves several key steps:⁹

- DCPS identifies a procurement need, develops a statement of work, and secures a funding source.
- The contract specialist submits a requisition in the Procurement Automated Support System (PASS), issues a solicitation, and receives and evaluates vendor bids.
- Vendor selection is made and the contract specialist prepares a summary package for the contracting officer's review.
- The summary package is routed through the Office of the Attorney General (OAG) for a legal sufficiency review to verify legal compliance of the proposed contract.
- The summary package then undergoes Executive review.¹⁰
- Upon approval, the Mayor submits the summary package to the Council for its review and approval.
- Council approves the contract/summary package.
- DCPS awards the contract and notifies the agency/vendor to provide goods/services.

This approval process for contracts exceeding \$1M ensures that key stakeholders review these contracts before DCPS expends public funds. For non-emergency contracts, this review occurs before an award proceeds through the full approval process described above. For emergency contracts, oversight is maintained through required notification to the Council within specified timeframes.

For emergency contracts exceeding \$1M, the process and timeframes varied during the evaluation period. From March 2020 through January 13, 2022, agencies could award COVID-related emergency contracts without pre-approval but were required to notify the Council within seven days of award by providing a summary that included the goods/services description, selection method, award amount, and awardee name and publish the contracts online for transparency. Beginning January 13, 2022, the

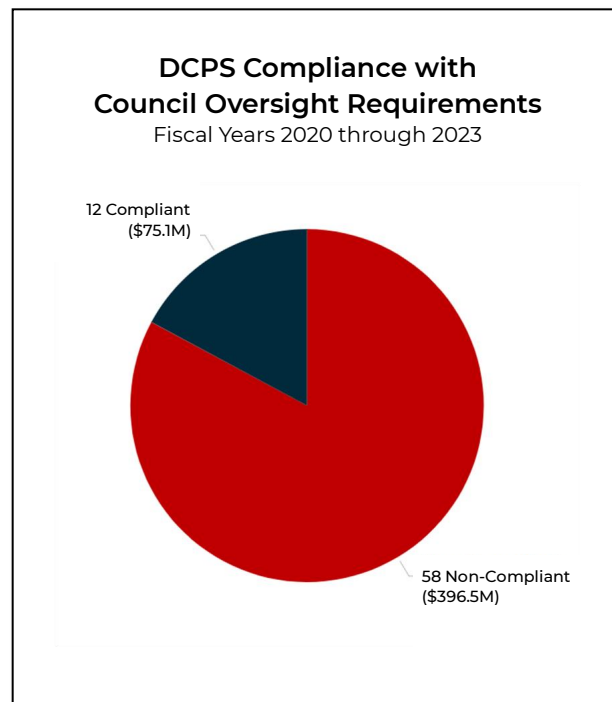
⁹ *DCPS Procurement Manual*, DCPS, January 16, 2024, page 26.

¹⁰ The Executive Office of the Mayor's review includes the Office of Policy and Legal Affairs, the relevant Deputy Mayor, the Office of the City Administrator, and the Mayor's Chief of Staff.

requirements became more stringent: agencies were required to notify the Council before awarding emergency contracts exceeding \$1M, rather than afterwards, while continuing to publish the contracts online for transparency.

EVALUATION RESULTS

Between FYs 2020 and 2023, DCPS managed 70 active contracts (including option years) exceeding \$1M, with a total value of nearly \$472M. Of these 70 contracts, DCPS submitted and received proper Council pre-approval for only 12 contracts. However, DCPS failed to submit the remaining 58 contracts for required notification or approval, representing approximately \$400M in public funds. The chart to the right illustrates the comparison between contracts lawfully awarded versus those that violated procurement requirements. See Table 1 on the following page for a summary of the requirements for each type of contract we reviewed.



Our evaluation identified four significant areas of noncompliance: (1) failure to obtain Council pre-approval for non-emergency contracts exceeding \$1M; (2) failure to notify the Council of emergency contracts within required timeframes; (3) failure to transmit contracts to the CPO for posting in transparency portal; and (4) inadequate maintenance of contract records.

These compliance issues stemmed from systemic internal control deficiencies at DCPS, including a lack of written guidance, agency-specific training, and inadequate segregation of procurement duties (detailed in the Internal Control Deficiencies section).¹¹ These breakdowns prevented oversight from entities like OAG, EOM, and the Council and exposed DCPS to increased risk of waste, fraud, and mismanagement.

While DCPS has taken steps since 2023 to strengthen its internal controls and comply with District procurement laws, implementing our 11 recommendations will further address these deficiencies.

¹¹ According to the GAO Green Book, an internal control deficiency is “[w]hen the design, implementation, or operation of a control does not allow management or personnel, in the normal course of performing their assigned functions, to achieve control objectives and address related risks.” *GAO Green Book*, page 76.

Table 1. Required Council Interaction by Type of Contract

Type of Contract	Full Contract Review and Approval	Pre-award Notification to Council	Post-award Notification to Council
Retroactive contracts¹²	Council may retroactively approval contract modifications per PPRA (see DC Code § 2-352.02(c-1))	Not Required	Not Required
Non-emergency contracts¹³	Council approval required for \$1M+ and multi-year contracts prior to award (see DC Code §§ 1-204.51 and 2-352.02)	Not Required	Not Required
Emergency contracts between 3/01/20 and 1/13/22¹⁴	Not Required	Not Required	Council notified of contract within 7 days of award (see DC Act 23-247)
Emergency contracts after 1/13/22¹⁵	Not Required	Council notified of contract prior to award (see DC Act 24-277)	Not Required

Finding 1 – Non-Emergency Contracts Did Not Receive Council Pre-Approval as Required

DC Code §§ 1-204.51 and 2-352.02 require agencies to obtain Council pre-approval for all non-emergency contracts exceeding \$1M in a 12-month period.¹⁶ Additionally, DC Code § 2-352.02(c-2) requires agencies to forward any retroactively approved contract modifications to the OIG for potential investigation of corruption, waste, fraud, abuse, or mismanagement.

DCPS awarded 46 non-emergency contracts exceeding \$1M, totaling approximately \$350M, without obtaining the required Council pre-approval and for which vendors received payment, in violation of DC Code §§ 1-204.51 and 2-352.02. Of these contracts, DCPS later submitted 22 contracts (worth

¹² See Appendix 5.

¹³ See Appendix 6.

¹⁴ See Appendix 7.

¹⁵ See Appendix 8.

¹⁶ DC Code § 1-204.51 requires that any contract exceeding \$1M in a 12-month period or multi-year contracts be submitted to the Council for its review and approval by the Mayor. DC Code § 2-352.02 establishes Council-enacted procedures for District agencies to implement this requirement.

\$132.2M) for retroactive approval,¹⁷ which the Council granted.¹⁸ As of June 2024, the remaining 24 contracts (worth \$217.8M) still lacked Council approval.¹⁹ Further, DCPS failed to forward any of the retroactively approved contract modifications to this office as required by DC Code § 2-352.02(c-2).²⁰

After DCPS requested the Council's retroactive approval for several non-emergency contract modification and other contract actions exceeding \$1M, the Council Chairman sent letters to the Office of the Chief Financial Officer (OCFO) in January and February 2023 to inform OCFO that the contracts lacked required approval. OCFO subsequently stopped payment on three contracts. In a May 3, 2023, letter to the Council, DCPS requested approval of these retroactive contract modifications and actions and asked to continue payments to vendors to “prevent any harm to students and teachers from the interruption of these essential contracted services.”²¹

Internal control breakdowns within DCPS' procurement processes contributed to these violations, including inadequate written guidance, insufficient training, and weak supervisory oversight (detailed in the [Internal Control Breakdowns](#) section).

These violations undermined the District's contract oversight system by preventing the Council from performing one of its core functions of contract review before public funds were committed. Other oversight bodies—including OAG, EOM, Procurement Accountability Review Board (PARB), and OIG—were also unable to fulfill their legally mandated duties. When the Council Chairman learned of these violations in early 2023, he

¹⁷ DC Code § 2-352.02(c-1) establishes a process whereby the Council may retroactively approve contract modifications if an agency submits the required information and documentation to the Council about the modification.

¹⁸ Of these 22 contracts ([Appendix 5, Table 2](#)), 13 met the PPRA's definition of a retroactive contract modification, meaning they involved “a change to the scope or amount of a contract” ([Appendix 5, Table 3](#)). However, nine contracts did not involve a modification and did not meet this definition. The Council approved these nine contracts using its general legislative authority established in DC Code § 1-204.04(a), which vests legislative power in the Council and includes the authority to enact retroactive legislation, such as the retroactive approval of contracts exceeding \$1M ([Appendix 5, Table 4](#)).

¹⁹ Of these 24 contracts ([Appendix 6, Table 5](#)), 11 contracts (worth \$173M) met the PPRA's definition of a retroactive contract modification ([Appendix 6, Table 6](#)) and 13 contracts (worth \$44M) did not meet the PPRA's definition of a retroactive contract modification ([Appendix 6, Table 7](#)).

²⁰ Of the 46 contracts that did not receive the Council's approval prior to award, 22 contracts, totaling more than \$111.5M, are exempt from crucial oversight mechanisms, namely the Procurement Accountability Review Board (PARB) and OIG because these contracts do not satisfy the contract modification requirements of DCDC Code § 2-352.02(c-1).

²¹ Letter from Chancellor Lewis Ferebee to Chairman Phil Mendelson, May 3, 2023 (copy on file with OIG).

notified OCFO, resulting in stopped payments on three contracts despite ongoing service delivery. Beyond the immediate disruption to services, these actions exposed DCPS staff and management to potential disciplinary action under DC Code § 2-352.02(f), which allows for suspension or dismissal of employees who knowingly circumvent Council approval requirements. Additionally, the District faced potential contractual liability with vendors who provided goods and services under non-compliant contracts, particularly in cases where payments were subsequently halted despite continued performance.

Recommendation 1
<p>We recommend that the Chancellor, DCPS:</p> <p>Establish and enforce a protocol for submitting all non-emergency contracts exceeding \$1M in a 12-month period to OAG, EOM, and the Council for pre-award approval, as required by DC Code § 1-204.51(b)(1).</p>
<p>DCPS Response:</p> <p>DCPS agrees with this recommendation. DCPS documented, implemented and trained relevant staff on the DCPS Procurement Manual in January 2024. This endeavor established appropriate internal controls to ensure that all contracts valued at \$1M and above are approved by the DC Council prior to their award and execution, as required by DC Code § 1-204.51(b)(1).</p>
<p>Our Notes:</p> <p>We consider this recommendation open and resolved, subject to verification.</p>

Recommendation 2

We recommend that the Chancellor, DCPS:

Establish and enforce a protocol, with specific timeframes, for the submission of all non-emergency contract modifications which meet the requirements of DC Code § 2-352.02(c-1).

DCPS Response:

DCPS agrees with this recommendation. The DCPS Procurement Manual was established and shared with procurement staff effective January 16, 2024. During the January 17, 2024, training on the manual, DCPS established protocols outlining the specific timeframes for the submission of all contracts and contract modifications with a value of \$1M or higher, as required by DC Code § 1-352.02(c-1). The Procurement Manual also established protocols for contract awards totaling \$500,000 - \$999,999.

Our Notes:

We consider recommendation two open and resolved, subject to verification.

Recommendation 3

We recommend that the Chancellor, DCPS:

Collaborate with the Council, EOM, and OAG, to secure retroactive approval for the 24 outstanding non-emergency contracts.²²

DCPS Response:

DCPS does not agree to secure retroactive approval for outstanding non-emergency contracts. DCPS presented these contracts for retroactive review by the DC Council in June 2023 and has made significant efforts to address the issues identified. In addition to participating in three Procurement Accountability Review Boards between June – October 2023, a third-party audit was conducted by BerryDunn to continue to identify and address any procurement related issues.

Our Notes:

We consider this recommendation open and unresolved.

²² See [Appendix 6](#) for the full list.

Recommendation 4

We recommend that the Chancellor, DCPS:

Refer to the OIG all retroactive contract modifications, including any future contract modifications that receive retroactive Council approval, as required by DC Code § 2-352.02(c-2).

DCPS Response:

DCPS does not agree with this recommendation. Effective September 30, 2023, DCPS does not engage in retroactive contracts and/or contract modifications. Also, effective October 1, 2023, DCPS implemented acquisition planning to ensure the agency's planned needs are procured in accordance with 27 DCMR and DC Code § 2-352.02(c-2).

Our Notes:

This recommendation addresses the need for DCPS to establish procedures for future compliance with referral requirements under DC Code § 2-352.02(c-2), including submitting retroactive contract modifications to the OIG. While DCPS states it will not engage in retroactive contract modifications, the recommendation seeks to ensure appropriate procedures are in place should such modifications become necessary.

We consider this recommendation open and unresolved.

Finding 2 – Emergency Contracts Were Not Reported to Council Within Required Timeframes

Effective January 13, 2022, during the COVID-19 emergency, the Council updated notification requirements for emergency contracts exceeding \$1M. Between March 2020 and January 13, 2022, agencies were required to notify the Council within seven days of award for COVID-related

emergency procurements.²³ After January 13, 2022, agencies were required to notify the Council before awarding such emergency contracts.²⁴

During FYs 2020 through 2023, DCPS failed to notify the Council within required timeframes of 12 emergency contracts worth \$46.5M. These contracts included ten awards totaling \$37.5M that were made before January 13, 2022, when notification rules changed.²⁵ After the rule change, DCPS awarded two additional contracts worth \$9M.²⁶ All 12 contracts funded COVID pandemic-related needs such as healthcare staffing services, teacher aides, and student tablets. While DCPS did report one emergency contract to the Council during this period, our [FY 2022 ACFR management recommendations](#) confirmed that this notification was late.

Systemic internal control weaknesses within DCPS' procurement processes were the primary cause of these compliance failures. These weaknesses included inadequate written guidance for staff, insufficient procurement-specific training, and ineffective supervisory oversight throughout the contracting process. Each of these deficiencies created opportunities for procurement laws to be violated without timely detection or correction. These control deficiencies are detailed in the [Internal Control Breakdowns](#) section of this report.

DCPS' failure to notify the Council about emergency contracts directly undermined the government's oversight framework for pandemic-related expenditures. The Council established specific notification requirements to maintain accountability during emergency situations when normal procurement safeguards were suspended. By circumventing these requirements, DCPS effectively prevented the Council from exercising its legally mandated oversight role over \$46.5M in public funds. This breakdown in accountability created potential risks for waste or inefficiency in emergency procurements at a time when pandemic-related spending was accelerating across the District government.

²³ The COVID-19 Response Emergency Amendment Act of 2020 ([DC Act 23-247](#)) allowed agencies to bypass pre-approval requirements for emergency procurements if they provided the Council with a summary within seven days of award. This summary needed to include the goods/services description, selection method, award amount, and awardee name. Though initially an emergency measure, this provision was continuously extended until November 2021.

²⁴ The Limited Coronavirus Procurement Extension Emergency Act of 2021 ([DC Act 24-277](#)) tightened requirements for COVID-related procurements. It narrowed which emergency procurements qualified for streamlined review, required Council notification before (rather than after) contract award, and mandated online publication of procurement summaries.

²⁵ See [Appendix 7](#).

²⁶ See [Appendix 8](#).

Recommendation 5

We recommend that the Chancellor, DCPS:

Communicate with the Council on the 12 emergency contracts not submitted to Council to determine what, if any, next steps should occur and document those steps in writing.

DCPS Response:

DCPS does not agree with this recommendation because DCPS submitted the contracts that were not provided to the Council, and no further action is needed.

Our Notes:

We consider this recommendation open and unresolved.

Finding 3 – Publication of Contracts Did Not Follow DC Code

DC Code § 2-361.04(c) requires agencies with independent procurement authority, such as DCPS, to transmit contracts exceeding \$100,000 to the CPO for publishing on OCP's Transparency Portal. This portal serves as the designated central database for contracts and other related information, providing transparency and facilitating oversight.

DCPS did not transmit any contracts exceeding \$100,000 to the CPO for publishing on OCP's Transparency Portal during the evaluation period, including all 70 contracts exceeding \$1M reviewed in this evaluation. Instead, DCPS followed its own practice of posting contracts only on its website. Additionally, DCPS does not use the Procurement Automated Support System (PASS) Contracts Module, which would enable electronic transmission of contracts to the CPO for posting.²⁷

Internal control breakdowns contributed to this noncompliance. DCPS officials provided no explanation for this practice other than asserting it was current and prior practice. One official noted that DCPS' non-use of the PASS Contracts Module resulted from a management decision by a former DCPS official. DCPS began posting emergency procurements

²⁷ Official 2 noted that the modules' use would have provided the necessary internal and external transparency and visibility into the procurement process to ensure that contracts exceeding \$1M were being prepared and sent to the Council. This official stated that the Contracts Module allows them to see who has the contract and where in the procurement lifecycle the contract is at any given time. Additionally, the Contracts Module allows DCPS to submit required documentation to external oversight entities, like OAG.

online in FY 2023, indicating some awareness of transparency requirements, but this action does not satisfy the legal requirement to transmit contracts to the CPO.

DCPS' failure to transmit contracts to the CPO for publishing impeded internal and external oversight of its procurement processes. This noncompliance reduced transparency about how DCPS expended public funds, diminished employee accountability for adhering to DC Code requirements, and created information gaps that complicated the monitoring of procurement activities.

Recommendation 6

We recommend that the Chancellor, DCPS:

Develop and implement a process to transmit all contracts exceeding \$100,000 to the CPO for posting on the OCP Transparency Portal, which could include using the PASS Contracts Module.

DCPS Response:

DCPS does not agree with this recommendation because it does not use the PASS contracts module. At this time, DCPS does not anticipate using this platform for our \$100,000+ contracts. The DCPS Procurement Manual outlines the process for posting \$100,000+ contracts onto the DCPS [website](#).

Our Notes:

DC Code § 2-361.04(c) requires DCPS to transmit contracts exceeding \$100,000 to the CPO for publishing on OCP's Transparency Portal. DCPS' response indicates they post contracts on their own website, but this does not satisfy the legal requirement to provide these contracts to OCP. DCPS needs to coordinate with OCP to establish a process for transmitting these contracts, whether through the PASS system or another method. We consider this recommendation open and unresolved.

Finding 4 – Record Retention of Awarded Contracts is Inadequate

DCPS is required to maintain complete contract records in accordance with its records retention schedule, which mandates that files for contracts

exceeding \$100,000 be retained for six years after payment.²⁸ These files should include all contract documentation, including the formal, written contracts, requisitions, funding documents, purchase orders, and related materials.

DCPS inconsistently stored and retained contract files, with significant gaps in both physical and digital records. When asked to provide the formal, written contracts for all awards exceeding \$1M from FYs 2020 through 2023, DCPS could not locate 12 out of 70 contracts executed during this period in its SharePoint database, PASS system, physical files, or thumb drives, despite the requirement to maintain these records. According to DCPS officials, before COVID-19, the agency created hard-copy files for all contracts and stored them in file cabinets in the DCPS office. During the pandemic, as staff worked remotely, DCPS transitioned to electronic record-keeping primarily using SharePoint and PASS, but this transition appears to have been implemented inconsistently.

DCPS' failure to maintain complete contract records has had negative consequences. In at least two instances identified in our evaluation, OAG determined that contracts were legally insufficient because DCPS staff could not locate the written contracts needed to obtain the Council's approval.²⁹ In these cases, OAG recommended contract termination and new solicitations for continued services. Beyond these examples, incomplete contract records hinder effective contract management, complicate financial oversight, and impede the agency's ability to demonstrate compliance with procurement laws. The absence of proper documentation also creates risks for dispute resolution should disagreements arise with vendors.

²⁸ District of Columbia Public Schools, Records Retention Schedule (October 2018), <https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/Records%20Retention%20Schedule%20%282018%29%20-%20English.pdf>.

²⁹ Memorandum from Robert Schildkraut, Section Chief of OAG's Government Contracts Section, to Tommy Wells, Director of the Office of Policy and Legislative Affairs (OPLA) regarding Payment for DCPS Student Occupation & Physical Therapy, May 10, 2023, pages 12-13 of the legislative record for A25-0097 (copy on file with the OIG); and Memorandum from Robert Schildkraut to Tommy Wells regarding Payment for Maintenance to the DCPS Video Surveillance System & Network, June 2, 2023, pages 12-13 of the legislative record for A25-0141 (copy on file with the OIG).

Recommendation 7

We recommend that the Chancellor, DCPS:

Develop and implement a secure, centralized digital storage process for all contract records, aligned with its records retention schedule.

DCPS Response:

DCPS agrees with this recommendation and has implemented a process to securely store contract records for three to six years, after final payment is made. Effective January 2024, complete files for contracts valued at \$100,000 and higher are digitally stored in SharePoint. PASS is the digital repository for small purchases valued at \$100,000 or less.

Our Notes:

We consider this recommendation open and resolved, pending verification.

INTERNAL CONTROL BREAKDOWNS

We identified significant internal control deficiencies within DCPS' procurement operations that directly contributed to the compliance failures detailed in Findings 1-4.³⁰ These breakdowns undermined DCPS' ability to adhere to District procurement laws and regulations.

Lack of Formal Written Guidance

From FYs 2020 through 2023, DCPS operated without agency-specific written processes for its procurement activities, despite its status as an agency with independent procurement authority.³¹ Instead, DCPS relied on the OCP *Procurement Procedures*

³⁰ GAO Green Book § OV1.03 articulates internal controls used to fulfill the mission, strategic plan, goals and objectives of an entity.

³¹ The GAO Green Book §§ 12.03 and 12.04 state that management should document responsibilities through appropriately detailed policies and procedures. GAO Green Book § 10.03 at 48 states that, in detailing written guidance, management documents this in management directives, administrative policies, or operating manuals.

Manual (OCP Manual), which was designed for agencies under the CPO's authority, not for agencies with independent procurement authority like DCPS.³²

In January 2024, DCPS addressed a critical gap by issuing the *DCPS Procurement Manual*.³³ This new manual documents key DCPS-specific processes across the procurement lifecycle, including acquisition planning, solicitation preparation and evaluation, contract approval, and document management. It clearly outlines special requirements for contracts requiring Council approval, establishes records retention procedures, and clarifies protocols for emergency procurements. This represents an important step toward strengthening DCPS' procurement governance and demonstrates DCPS' commitment to improving its processes.

While the *DCPS Procurement Manual* documents important agency specific procurement processes, additional refinements would further enhance its effectiveness. Specifically, the manual would benefit from adding:

1. expected timelines for key procurement functions (such as generating requisition numbers or statements of appropriated authority);
2. explicit procedures for referring retroactive contracts to PARB and OIG;
3. protocols for transmitting contracts exceeding \$100,000 to the CPO for online posting; and
4. processes to operationalize changes in procurement laws or regulations and effectively communicate those changes to appropriate staff through formal trainings and updates.

Inadequate Supervisory Oversight

The Office of Resource Strategy, which oversaw DCPS' Contracts and Acquisitions (C&A) Division during most of the evaluation period, failed to implement adequate supervisory controls for reviewing contracts and ensuring compliance with applicable laws. Between FYs 2020-2023, DCPS had inadequate quality assurance

³² There are key operational differences between the processes outlined in the OCP Manual and those of DCPS (later documented in the *DCPS Procurement Manual*). These differences include requiring a contracting officer to submit all contracts requiring Council review to OCP's Chief Contracting Officer and Deputy CPO for their review and approval; transmitting closed contract files to the OCP Records Management Unit; and requiring agency staff to collaborate with OCP contracting officers throughout a contract's lifecycle.

³³ In December 2023, a third-party auditor retained by the Deputy Mayor of Education completed an audit of DCPS' procurement processes and identified that DCPS lacked a procurement manual to provide guidance for its personnel with handling procurement activities. This auditor coordinated with DCPS to develop the *DCPS Procurement Manual*.

processes to verify that procurements met all legal requirements. DCPS began addressing this deficiency in June 2023 by creating the Office of Fiscal Strategy (OFS) and hiring staff with District procurement experience to oversee C&A activities. In February 2024, OFS implemented a monthly quality assurance review process that examines procurement samples for compliance and documentation completeness.

Inadequate Segregation of Key Procurement Duties

Between December 2020 and November 2023, the Director of Contracts Management (Director) position was vacant, forcing the Deputy Chief Procurement Officer (DCPO) to handle both roles simultaneously.³⁴ This matter was compounded in July 2021, when the DCPO left DCPS and a contract specialist was named Interim DCPO (later made permanent), resulting in one person performing multiple roles that should have been separate. This consolidation of duties eliminated critical checks and balances in the procurement process, creating opportunities for errors and omissions to go unnoticed.³⁵

Inadequate Procurement Training

DCPS failed to provide specialized training addressing its independent procurement authority status.³⁶ While C&A staff participated in OCP's Procurement Training Institute (PTI) courses, these standardized trainings did not cover the specific requirements relevant to agencies with independent procurement authority. This training gap was compounded by the absence of DCPS-specific written guidance until January 2024, when staff received training on the contents of the new procurement manual. During our interviews, one DCPS official emphasized the need for additional investment in training, both to enhance C&A staff performance and to educate non-procurement personnel about essential procurement functions.

³⁴ The DCPO functions as the primary contracting officer for contracts exceeding \$1M and the overall management and functioning of the C&A Division. The Director, who reports to the DCPO, is responsible for day-to-day contract management, including contract workflow activities and the assignment of contract activities with contract specialists for all contracts, P-card purchases, and the management of all C&A personnel. The Director does not have the authority to execute contracts exceeding \$1M.

³⁵ The GAO Green Book §§ 10.12-10.13 state management should consider segregation of duties in designing control activity responsibility so that incompatible duties are segregated as this segregation of duties helps to prevent fraud, waste and abuse.

³⁶ GAO Green Book § 10.03 at 46 states that management should provide its personnel with the right training that is aimed at developing and training employee knowledge, skills, and ability to meeting changing organizational needs.

These systemic internal control weaknesses created an environment where procurement laws were violated without timely detection or correction, ultimately leading to the significant compliance issues identified in our evaluation.

Recommendation 8
<p>We recommend that the Chancellor, DCPS:</p> <p>Review and revise the recently developed DCPS Procurement Manual, and any other written guidance, to address noted areas for improvement and determine if further revisions are warranted, including a process to transmit contracts in excess of \$100,000, and a process to refer to the OIG all retroactive contracts.</p>
<p>DCPS Response:</p> <p>DCPS agrees to review and amend the Procurement Manual annually between October and December. As outlined in the Procurement Manual, all contracts valued at \$1M or higher (or multi-year regardless of amount) must be submitted to Council prior to execution. Effective September 30, 2023, DCPS does not engage in retroactive contracts; therefore, a process to refer retroactive contracts to OIG will not be established.</p>
<p>Our Notes:</p> <p>We consider this recommendation open and resolved, subject to verification. While DCPS did not specifically address the requirement to submit contracts valued at \$100,000 for transparency in its response to Recommendation 8, we will monitor compliance with that requirement as part of our follow-up on Recommendation 6.</p>

Recommendation 9

We recommend that the Chancellor, DCPS:

Develop and implement DCPS-specific training on its procurement processes, including any updates to the DCPS Procurement Manual, for C&A and relevant non-C&A staff, supplemental to OCP's PTI training, and establish a regular schedule for this training.

DCPS Response:

As stated in DCPS' response to recommendation #8, DCPS will review its manual and train its staff annually. Also, the Contracts and Acquisitions (C&A) manual was established, disseminated, and implemented on January 16, 2024. The manual continues to be reviewed. If updates are needed, the manual will be revised and amended in accordance with DCMR regulations. If changes are implemented, both C&A and non-C&A staff will be trained on the updated manual and changes.

Our Notes:

We consider recommendation nine open and resolved, subject to verification.

Recommendation 10

We recommend that the Chancellor, DCPS:

Evaluate the current C&A staffing structure to ensure segregation of duties of key management roles and document the key responsibilities for each role.

DCPS Response:

DCPS agrees with this recommendation and prioritized hiring for key positions on the C&A staff. The key positions ensure there are layers of management to confirm segregation of duties.

Our Notes:

We consider this recommendation open and resolved, subject to verification.

Recommendation 11

We recommend that the Chancellor, DCPS:

Assess the recently implemented quality assurance mechanisms to ensure that all contracts exceeding \$1M comply with District procurement law and refine as needed.

DCPS Response:

DCPS agrees with this recommendation and has implemented a Quality Assurance (QA) process that consists of the Office of Fiscal Strategy (OFS) Director who is responsible for formulating and executing quality assurance measures and internal controls for the procurement process. The QA process consists of 1) generating regular reports that summarize the outcomes of quality assurance reviews conducted on procurement processes on all dollar amount thresholds and 2) collaborating with DCPS compliance to respond to external audits specifically focused on the procurement process.

Our Notes:

We consider this recommendation open and resolved, subject to verification.

CONCLUSION

Part I of this evaluation assessed DCPS' procurement practices from FYs 2020 through 2023. Our evaluation revealed significant noncompliance with aspects of the Home Rule Act (DC Code § 1-204.51(b)(1)), the PPRA (DC Code § 2-352.02(c-1)), emergency procurement laws, and DCPS' internal policies. Our findings include:

1. Failure to obtain Council approval for 46 contracts exceeding \$1M in a 12-month period prior to award, with 24 still lacking retroactive approval.
2. Non-adherence to legal timeframes for notifying the Council about 12 emergency procurements exceeding \$1M.
3. Failure to transmit contracts exceeding \$100,000 to the District's CPO for posting on the OCP Transparency Portal.
4. Inconsistent retention of contract documentation, including written contracts.

These violations raise serious concerns about the integrity of DCPS' procurement processes and its ability to effectively monitor the receipt of goods and services on behalf of the District.

Internal control breakdowns were the central reason that DCPS did not follow procurement laws with the issuance of non-emergency and emergency contracts exceeding \$1M. Since FY2023, DCPS has taken steps to effectively address some of these internal control deficiencies; however, further steps are needed.

Our 11 recommendations, if implemented, will help bring DCPS into compliance with District procurement laws and strengthen its internal control environment. By addressing these critical areas, DCPS can significantly improve its procurement practices, ensuring better stewardship of public resources and more effective support for its educational mission.



APPENDIX 1. FINDINGS TABLE

Findings Table

No.	Finding
1	Non-Emergency Contracts Did Not Receive Council Pre-Approval as Required
2	Emergency Contracts Were Not Reported to Council Within Required Timeframes
3	Publication of Contracts Did Not Follow DC Code
4	Record Retention of Awarded Contracts is Inadequate
5	Internal Control Breakdowns



APPENDIX 2. RECOMMENDATION STATUS

Recommendations Table

Agency	No.	Recommendation	Status	Action Required	Finding
DCPS	1	Establish and enforce a protocol for submitting all non-emergency contracts exceeding \$1M in a 12-month period to OAG, EOM, and the Council for pre-award approval, as required by DC Code § 1-204.51(b)(1).	Resolved	Verification	1
DCPS	2	Establish and enforce a protocol, with specific timeframes, for the submission of all non-emergency contract modifications which meet the requirements of DC Code § 2-352.02(c-1).	Resolved	Verification	1
DCPS	3	Collaborate with the Council, EOM, and OAG, to secure retroactive approval for the 24 outstanding non-emergency contracts.	Unresolved	Monitoring	1
DCPS	4	Refer to the OIG all retroactive contract modifications, including any future contract modifications that receive retroactive Council approval, as required by DC Code § 2-352.02(c-2).	Unresolved	Monitoring	1
DCPS	5	Communicate with the Council on the 12 emergency contracts not submitted to Council to determine what, if any, next steps should occur and document those steps in writing.	Unresolved	Monitoring	2
DCPS	6	Develop and implement a process to transmit all contracts exceeding \$100,000 to the CPO for posting on the OCP Transparency Portal, which could include using the PASS Contracts Module.	Unresolved	Monitoring	3
DCPS	7	Develop and implement a secure, centralized digital storage process for all contract records, aligned with its records retention schedule.	Resolved	Verification	4
DCPS	8	Review and revise the recently developed DCPS Procurement Manual, and any other written guidance, to address noted areas for improvement and determine if further revisions are warranted, including a process to transmit contracts in excess of \$100,000, and a process to refer to the OIG all retroactive contracts.	Resolved	Verification	5
DCPS	9	Develop and implement DCPS-specific training on its procurement processes, including any updates to the DCPS Procurement Manual, for C&A and relevant non-C&A staff, supplemental to OCP's PTI training, and establish a regular schedule for this training.	Resolved	Verification	5

DISTRICT COMPLIANCE WITH THE HOME RULE ACT, PPRA, AND DISTRICT CODE EVALUATION: PART I - DCPS

OIG NO. 23-E-09-PS0(M)

July 9, 2025

Agency	No.	Recommendation	Status	Action Required	Finding
DCPS	10	Evaluate the current C&A staffing structure to ensure segregation of duties of key management roles and document the key responsibilities for each role.	Resolved	Verification	5
DCPS	11	Assess the recently implemented quality assurance mechanisms to ensure that all contracts exceeding \$1M comply with District procurement law and refine as needed.	Resolved	Verification	5



APPENDIX 3. SCOPE & METHODOLOGY

Scope

We conducted fieldwork for Part I of this evaluation between January and April 2024. Part I focused on DCPS and the contracts in effect from FYs 2020 through 2023 (October 1, 2019, through September 30, 2023).

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 (GAO). The GAO Green Book sets the internal control standards for federal entities and may be adopted by state and local entities as an internal control system framework.

To ensure understanding of the legal requirements with which DCPS must comply, we reviewed the Home Rule Act, the Procurement Practices Reform Act (PPRA) as amended, the COVID-19 Response Emergency Amendment Act of 2020, and the Limited Coronavirus Procurement Extension Emergency Act of 2021.

To establish the scope of DCPS' compliance issue, we reviewed and analyzed the 70 contracts in effect between FYs 2020 and 2023. We obtained these contracts directly and indirectly from DCPS, through reviews of contract review and approval records in the Legislative Information Management System (LIMS), and through reviewing a report prepared by the third-party auditor DCPS hired to address its compliance issues, and purchase order spreadsheet.

In response to our initial request for contract documentation, DCPS provided a purchase order spreadsheet titled "\$1 mil+ Purchase Orders FY 2020 – 2023" of all purchase orders for its contracts exceeding \$1M during this period. The spreadsheet, which reflected 63 of the 70 contracts, included unique contract-identifiable information for each contract but did not include the specific terms and obligations for either party, as noted in a formal, written contract.

We further examined the internal control environment and activities DCPS established through interviews with DCPS officials and staff. We gained further insight into DCPS and the inter-agency review and approval process through interviews with District staff involved in these processes



APPENDIX 4. MANAGEMENT RESPONSE



June 30, 2025

Daniel W. Lucas
Inspector General
100 M Street, SE Suite 1000
Washington, D.C. 20003

Dear Inspector General Lucas,

The District of Columbia Public Schools (DCPS) is in receipt of your agency's June 6, 2025, draft evaluation report entitled, *District Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part I - DCPS*. We thank the Office of the Inspector General (OIG) for its work on this important matter, and for the opportunity to reaffirm our commitment to ensuring compliance to District contracting laws and regulations.

This letter outlines DCPS' responses to the 11 formal recommendations presented in the evaluation report.

OIG RECOMMENDATIONS and DCPS RESPONSES:

Recommendation 1:

Establish and enforce a protocol for submitting all non-emergency contracts exceeding \$1M in a 12-month period to OAG, EOM, and the Council for pre-award approval, as required by DC Code § 1-204.51(b)(1).

DCPS Response:

DCPS agrees with this recommendation. DCPS documented, implemented and trained relevant staff on the DCPS Procurement Manual in January 2024. This endeavor established appropriate internal controls to ensure that all contracts valued at \$1M and above are approved by the DC Council prior to their award and execution, as required by DC Code § 1-204.51(b)(1).

Recommendation 2:

Establish and enforce a protocol, with specific timeframes, for the submission of all non-emergency contract modifications which meet the requirements of DC Code § 2-352.02(c-1).

DCPS Response:

DCPS agrees with this recommendation. The DCPS Procurement Manual was established and shared with procurement staff effective January 16, 2024. During the January 17, 2024, training on the manual, DCPS established protocols outlining the specific timeframes for the submission of all contracts and contract modifications with a value of \$1M or higher, as required by DC Code § 1-352.02(c-1). The Procurement Manual also established protocols for contract awards totaling \$500,000 - \$999,999.

Recommendation 3:

Collaborate with the Council, EOM, and OAG, to secure retroactive approval for the 24 outstanding non-emergency contracts.

DCPS Response:

DCPS does not agree to secure retroactive approval for outstanding non-emergency contracts. DCPS presented these contracts for retroactive review by the DC Council in June 2023 and has made significant efforts to address the issues identified. In addition to participating in three Procurement Accountability Review Boards between June - October 2023, a third-party audit was conducted by BerryDunn to continue to identify and address any procurement related issues.

Recommendation 4:

Refer to the OIG all retroactive contract modifications, including any future contract modifications that receive retroactive Council approval, as required by DC Code § 2-352.02(c-2).

DCPS Response:

DCPS does not agree with this recommendation. Effective September 30, 2023, DCPS does not engage in retroactive contracts and/or contract modifications. Also, effective October 1, 2023, DCPS implemented acquisition planning to ensure the agency's planned needs are procured in accordance with 27 DCMR and DC Code § 2-352.02(c-2).

Recommendation 5:

Communicate with the Council on the 12 emergency contracts not submitted to Council to determine what, if any, next steps should occur and document those steps in writing.

DCPS Response:

DCPS does not agree with this recommendation because DCPS submitted the contracts that were not provided to the Council, and no further action is needed.

Recommendation 6:

Develop and implement a process to transmit all contracts exceeding \$100,000 to the CPO for posting on the OCP Transparency Portal, which could include using the PASS Contracts Module.

DCPS Response:

DCPS does not agree with this recommendation because it does not use the PASS contracts module. At this time, DCPS does not anticipate using this platform for our \$100,000+ contracts. The DCPS Procurement Manual outlines the process for posting \$100,000+ contracts onto the DCPS [website](#).

Recommendation 7:

Develop and implement a secure, centralized digital storage process for all contract records, aligned with its records retention schedule.

DCPS Response:

DCPS agrees with this recommendation and has implemented a process to securely store contract records for three to six years, after final payment is made. Effective January 2024, complete files for contracts valued at \$100,000 and higher are digitally stored in SharePoint. PASS is the digital repository for small purchases valued at \$100,000 or less.

Recommendation 8:

Review and revise the recently developed DCPS Procurement Manual, and any other written guidance, to address noted areas for improvement and determine if further revisions are warranted, including a process to transmit contracts in excess of \$100,000, and a process to refer to the OIG all retroactive contracts.

DCPS Response:

DCPS agrees to review and amend the Procurement Manual annually between October and December. As outlined in the Procurement Manual, all contracts valued at \$1M or higher (or multi-year regardless of amount) must be submitted to Council prior to execution. Effective September 30, 2023, DCPS does not engage in retroactive contracts; therefore, a process to refer retroactive contracts to OIG will not be established.

Recommendation 9:

Develop and implement DCPS-specific training on its procurement processes, including any updates to the DCPS Procurement Manual, for C&A and relevant non-C&A staff, supplemental to OCP's PTI training, and establish a regular schedule for this training.

DCPS Response:

As stated in DCPS' response to recommendation #8, DCPS will review its manual and train its staff annually. Also, the Contracts and Acquisitions (C&A) manual was established, disseminated, and implemented on January 16, 2024. The manual continues to be reviewed. If updates are needed, the manual will be revised and amended in accordance with DCMR regulations. If changes are implemented, both C&A and non-C&A staff will be trained on the updated manual and changes.

Recommendation 10:

Evaluate the current C&A staffing structure to ensure segregation of duties of key management roles and document the key responsibilities for each role.

DCPS Response:

DCPS agrees with this recommendation and prioritized hiring for key positions on the C&A staff. The key positions ensure there are layers of management to confirm segregation of duties.

Recommendation 11:

Assess the recently implemented quality assurance mechanisms to ensure that all contracts exceeding \$1M comply with District.

DCPS Response:

DCPS agrees with this recommendation and has implemented a Quality Assurance (QA) process that consists of the Office of Fiscal Strategy (OFS) Director who is responsible for formulating and executing quality assurance measures and internal controls for the procurement process. The QA process consists of 1) generating regular reports that summarize the outcomes of quality assurance reviews conducted on procurement processes on all dollar amount thresholds and 2) collaborating with DCPS compliance to respond to external audits specifically focused on the procurement process.

Inspector General Lucas, DCPS thanks you again for conducting this evaluation and helping us strengthen our efforts to comply with District regulations. We thank you for the opportunity to respond and stand in partnership with your office to enhance contracting regulations at the District of Columbia Public Schools.

Sincerely,


box SIGN 15Q6WKVW-426JQYYV

Lewis D. Ferebee, Ed.D., Chancellor
District of Columbia Public Schools



APPENDIX 5. NON-EMERGENCY CONTRACTS WITH RETROACTIVE APPROVAL

Table 2. All Non-Emergency Contracts With Retroactive Approval By Council (22 Contracts, Totaling \$132,168,055.50)

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	Retroactive Approval by Council	OIG Comment
GAGA-2021-C-0206	\$ 1,233,517.24	Fresh Farm Markets, Inc.	BY	Food services for DCPS students	22	10/1/21 - 9/30/22	A24-0375 (4/25/22)	
GAGA-2022-C-0260	\$ 5,517,905.30	DC Central Kitchen	No	Food services for DCPS students	22/23	7/1/22 - 6/30/23	A25-0068 (4/24/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-C-0016	\$ 2,390,064.00	Milestone Therapeutic Services	BY	Occupational Therapy and Physical Therapy Services	20	11/19/19 - 9/30/20	A25-0097 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-C-0016 ^{*37}	\$ 3,182,655.00	Milestone Therapeutic Services	OY1	Occupational Therapy and Physical Therapy Services	21	10/1/20 - 9/30/21	A25-0097 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-C-0016 *	\$ 3,313,638.00	Milestone Therapeutic Services	OY2	Occupational Therapy and Physical Therapy Services	22	10/1/21 - 9/30/22	A25-0097 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-C-0016 *	\$ 2,354,385.30	Milestone Therapeutic Services	OY3	Occupational Therapy and Physical Therapy Services	23	10/1/22 - 9/30/23	A25-0097 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0048	\$ 5,669,260.80	Security Assurance Management	BY	DCPS Security Services	22	7/9/22 - 9/30/22	A25-0096 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

³⁷ Within Appendices 4 through 7, contract numbers with an asterisk (*) identify the contract as one of the 12 contracts that DCPS did not provide to the OIG despite repeated requests. The OIG found the contract's identifiable information and payment reflected in DCPS' purchase order spreadsheet.

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	Retroactive Approval by Council	OIG Comment
GAGA-2022-C-0048	\$ 24,745,088.24	Security Assurance Management	OY1	DCPS Security Services	23	10/1/22 - 9/30/23	A25-0096 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0186	\$ 1,798,725.00	TAMAH	BY	Special education services for students with IEPs	22	6/27/22 - 9/30/22	A25-0095 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0186	\$ 4,551,238.50	TAMAH	OY1	Special education services for students with IEPs	23	10/1/22 - 9/30/23	A25-0095 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0142	\$ 4,057,912.00	Maxim Healthcare Staffing Services	BY	COVID-19 Temporary Healthcare Staffing Support	22	6/27/22 - 9/30/22	A25-0136 (6/15/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0142	\$ 12,439,784.00	Maxim Healthcare Staffing Services	OY1	COVID-19 Temporary Healthcare Staffing Support	23	10/1/22 - 9/30/23	A25-0136 (6/15/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-T-0125	\$ 1,224,763.68	CDW Corp.	OY2	Technology Enhancement and Equipment	23/24	11/1/22 - 10/31/23	A25-0139 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2021-C-0074	\$ 1,182,999.55	Curriculum Associates	OY1	English and math instructional assessment platform	22/23	9/1/22 - 8/31/23	A25-0133 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023. The base year and option year 2 contracts were pre-approved by Council.
GAGA-2022-T-0067	\$ 1,731,473.26	Gordon Food Service	BY	Food services for DCPS students	23	10/1/22 - 9/30/23	A25-0142 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	Retroactive Approval by Council	OIG Comment
GAGA-2021-C-0157	\$ 8,121,654.56	HI-TECH Solution, Inc.	BY	Smartboards Purchase & Installation	22	10/1/21 - 9/30/22	A25-0140 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2021-C-0157	\$ 6,800,941.00	HI-TECH Solution, Inc.	OY1	Smartboards Purchase & Installation	23	10/1/22 - 9/30/23	A25-0140 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0259	\$ 36,557,426.35	Sodexo Magic	Sole Source Contract	Food services for DCPS students	22/23	7/5/22 - 6/30/23	A25-0135 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2019-C-0010	\$ 1,306,900.00	Vision Security Services	OY1	Security cameras and video surveillance system	20	10/1/19 - 9/30/20	A25-0141 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2019-C-0010	\$ 1,379,080.00	Vision Security Services	OY2	Security cameras and video surveillance system	21	10/1/20 - 9/30/21	A25-0141 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2019-C-0010	\$ 1,455,905.00	Vision Security Services	OY3	Security cameras and video surveillance system	22	10/1/21 - 9/30/22	A25-0141 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2019-C-0010	\$ 1,152,738.72	Vision Security Services	OY4	Security cameras and video surveillance system	23	10/1/22 - 6/30/23	A25-0141 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Table 3. Non-Emergency Contracts with Retroactive Approval by Council That Meet Criteria of DC Code § 2-352.02(c-1) (13 Contracts, Totaling \$65,090,116.99)

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	Retroactive Approval by Council	OIG Comment
GAGA-2020-C-0016 *	\$ 3,182,655.00	Milestone Therapeutic Services	OY1	Occupational Therapy and Physical Therapy Services	21	10/1/20 - 9/30/21	A25-0097 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-C-0016 *	\$ 3,313,638.00	Milestone Therapeutic Services	OY2	Occupational Therapy and Physical Therapy Services	22	10/1/21 - 9/30/22	A25-0097 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-C-0016 *	\$ 2,354,385.30	Milestone Therapeutic Services	OY3	Occupational Therapy and Physical Therapy Services	23	10/1/22 - 9/30/23	A25-0097 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0048	\$ 24,745,088.24	Security Assurance Management	OY1	DCPS Security Services	23	10/1/22 - 9/30/23	A25-0096 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0186	\$ 4,551,238.50	TAMAH	OY1	Special education services for students with IEPs	23	10/1/22 - 9/30/23	A25-0095 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	Retroactive Approval by Council	OIG Comment
GAGA-2022-C-0142	\$ 12,439,784.00	Maxim Healthcare Staffing Services	OY1	COVID-19 Temporary Healthcare Staffing Support	23	10/1/22 - 9/30/23	A25-0136 (6/15/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-T-0125	\$ 1,224,763.68	CDW Corp.	OY2	Technology Enhancement and Equipment	23/24	11/1/22 - 10/31/23	A25-0139 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2021-C-0074	\$ 1,182,999.55	Curriculum Associates	OY1	English and math instructional assessment platform	22/23	9/1/22 - 8/31/23	A25-0133 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023. The base year and option year 2 contracts were pre-approved by Council.
GAGA-2021-C-0157	\$ 6,800,941.00	HI-TECH Solution, Inc.	OY1	Smartboards Purchase & Installation	23	10/1/22 - 9/30/23	A25-0140 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2019-C-0010	\$ 1,306,900.00	Vision Security Services	OY1	Security cameras and video surveillance system	20	10/1/19 - 9/30/20	A25-0141 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	Retroactive Approval by Council	OIG Comment
GAGA-2019-C-0010	\$ 1,379,080.00	Vision Security Services	OY2	Security cameras and video surveillance system	21	10/1/20 - 9/30/21	A25-0141 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2019-C-0010	\$ 1,455,905.00	Vision Security Services	OY3	Security cameras and video surveillance system	22	10/1/21 - 9/30/22	A25-0141 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2019-C-0010	\$ 1,152,738.72	Vision Security Services	OY4	Security cameras and video surveillance system	23	10/1/22 - 6/30/23	A25-0141 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Table 4. Non-Emergency Contracts with Retroactive Approval Actions by Council That Do Not Meet Criteria of DC Code § 2-352.02(c-1) (Nine Contracts, Totaling \$67,077,938.51)

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	Retroactive Approval by Council	OIG Comment
GAGA-2021-C-0206	\$ 1,233,517.24	Fresh Farm Markets, Inc.	BY	Food services for DCPS students	22	10/1/21 - 9/30/22	A24-0375 (4/25/22)	
GAGA-2022-C-0260	\$ 5,517,905.30	DC Central Kitchen	BY	Food services for DCPS students	22/23	7/1/22 - 6/30/23	A25-0068 (4/24/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-C-0016	\$ 2,390,064.00	Milestone Therapeutic Services	BY	Occupational Therapy and Physical Therapy Services	20	11/19/19 - 9/30/20	A25-0097 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0048	\$ 5,669,260.80	Security Assurance Management	BY	DCPS Security Services	22	7/9/22 - 9/30/22	A25-0096 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0186	\$ 1,798,725.00	TAMAH	BY	Special education services for students with IEPs	22	6/27/22 - 9/30/22	A25-0095 (5/19/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	Retroactive Approval by Council	OIG Comment
GAGA-2022-C-0142	\$ 4,057,912.00	Maxim Healthcare Staffing Services	BY	COVID-19 Temporary Healthcare Staffing Support	22	6/27/22 - 9/30/22	A25-0136 (6/15/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-T-0067	\$ 1,731,473.26	Gordon Food Service	BY	Food services for DCPS students	23	10/1/22 - 9/30/23	A25-0142 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2021-C-0157	\$ 8,121,654.56	HI-TECH Solution, Inc.	BY	Smartboards Purchase & Installation	22	10/1/21 - 9/30/22	A25-0140 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0259	\$ 36,557,426.35	Sodexo Magic	Sole Source Contract	Food services for DCPS students	22/23	7/5/22 - 6/30/23	A25-0135 (6/27/23)	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.



APPENDIX 6. NON-EMERGENCY CONTRACTS WITHOUT RETROACTIVE APPROVAL BY COUNCIL

Table 5. All Non-Emergency Contracts Without Retroactive Approval By Council (24 Contracts, Totaling \$217,836,164.17)

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
CW52393	\$22,907,893.70	Security Assurance Management	OY2	DCPS Security Services	19/20	7/9/19 - 7/8/20	
GAGA-2018-C-0014*	\$ 999,740.00	Context Global	OY2	ASL services	20	10/1/19 - 9/30/20	
GAGA-2016-C-0036A-2	\$ 6,514,328.08	DC Central Kitchen	OY4	Food services for DCPS students	20/21	7/1/20 - 6/30/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2016-C-0036A-1	\$ 38,530,693.41	Sodexo Magic	OY4	Food services for DCPS students	20/21	7/1/20 - 6/30/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
CW52393	\$ 23,948,006.20	Security Assurance Management	OY3	DCPS Security Services	20/21	7/9/20 - 7/8/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-T-0083	\$ 1,000,000.00	Office Depot	BY	Teacher supply cards	20/21	9/28/20 - 1/31/21	
GAGA-2021-T-0021	\$ 1,749,360.00	T-Mobile for Government	BY	Mobile hotspots due to COVID-19	21	10/1/20 - 12/31/20	Although COVID-related, DCPS did not classify this as an emergency contract, and it went beyond the duration of an emergency contract. The CPO noted this was included in the emergency contracts to Council. DCPS included it in the list of 36 contracts to Council in May 2023. OIG has no evidence when it was submitted to Council.
GAGA-2018-C-0014 *	\$ 916,050.00	Context Global	OY3	ASL services	21	10/1/20 - 9/30/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
CW86233	\$ 2,097,262.58	Athena Consulting	BY	COVID-19 Staffing Support (Educational Aides)	21/22	10/9/20 - 10/9/21	Although COVID related, DCPS did not classify this as an emergency contract, and it went beyond the duration of an emergency contract. The CPO noted this was included in the emergency contracts to Council. DCPS also included it in the contract list provided to the Council in May 2023. OIG has no evidence when it was submitted to Council.
GAGA-2021-T-0019 *	\$ 1,189,995.80	Sky LLC dba US Office Solutions	BY	COVID Emergency Water Bottles	21	10/30/20 - 12/31/20	
GAGA-2021-T-0052	\$ 1,907,416.00	T-Mobile for Government	BY	Mobile hotspots due to COVID-19	21	3/1/21 - 9/30/21	
GAGA-2021-T-0109	\$ 4,779,606.00	MVS Inc.	BY	Teacher Devices	21	6/1/21 + 45 days	
GAGA-2020-T-0084/081419-CDW	\$ 12,048,615.39	CDW Corp.	BY	Microsoft 365 Licenses	21	6/3/21 - 9/30/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2016-C-0036A-2	\$ 6,889,989.22	DC Central Kitchen	Sole Source Contract	Food services for DCPS students	21/22	7/1/21 - 6/30/22	DCPS included this contract in the list of 36 contracts provided to Council in May36 c 2023.
GAGA-2016-C-0036A-1	\$ 41,088,921.14	Sodexo Magic	Sole Source Extension	Food services for DCPS students	21/22	7/1/21 - 6/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
CW52393	\$29,191,775.16	Security Assurance Management	OY4	DCPS Security Services	21/22	7/9/21 - 7/8/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2019-C-0011	\$ 1,225,390.34	Great Minds, LLC	OY2	K-12 Math Curriculum & Assessment	21/22	8/1/21 - 7/31/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
GAGA-2021-T-0021 *	\$ 1,425,600.00	T-Mobile for Government	BY	Mobile hotspots due to COVID-19	21	Unknown	Although COVID related, DCPS did not classify this as an emergency contract, and it went beyond the duration of an emergency contract. CPO noted this was included in the emergency contracts to Council. DCPS included it in the list of 36 contracts to Council in May 2023. OIG has no evidence when it was submitted to Council.
GAGA-2018-C-0014 *	\$ 1,155,000.00	Context Global	OY4	ASL services	22	10/1/21 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0026 *	\$ 1,972,140.05	Smart Start Education	LC	Temporary substitute services	22	12/13/21 - 6/24/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0224 *	\$ 1,602,399.00	IIU Consulting Inc.	BY	HC staffing assisting with COVID-19 procedures	22	12/14/21 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0132	\$ 9,987,071.30	MVS Inc.	BY	Student Devices	22	6/16/22 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0217	\$ 3,574,910.80	MVS Inc.	BY	Teacher Devices - Dell Laptops	22	7/1/22 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-T-0317	\$ 1,134,000.00	ODP Business Solutions	BY	Teacher supply cards	22	8/10/22 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Table 6. Non-Emergency Contracts Without Retroactive Approval by Council, Non-Base Year Contracts (11 Contracts, Totaling \$173,367,787.25)

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
CW52393	\$22,907,893.70	Security Assurance Management	OY2	DCPS Security Services	19/20	7/9/19 - 7/8/20	
GAGA-2018-C-0014*	\$ 999,740.00	Context Global	OY2	ASL services	20	10/1/19 - 9/30/20	
GAGA-2016-C-0036A-2	\$ 6,514,328.08	DC Central Kitchen	OY4	Food services for DCPS students	20/21	7/1/20 - 6/30/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2016-C-0036A-1	\$ 38,530,693.41	Sodexo Magic	OY4	Food services for DCPS students	20/21	7/1/20 - 6/30/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
CW52393	\$ 23,948,006.20	Security Assurance Management	OY3	DCPS Security Services	20/21	7/9/20 - 7/8/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2018-C-0014 *	\$ 916,050.00	Context Global	OY3	ASL services	21	10/1/20 - 9/30/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2016-C-0036A-2	\$ 6,889,989.22	DC Central Kitchen	Sole Source Extension	Food services for DCPS students	21/22	7/1/21 - 6/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
GAGA-2016-C-0036A-1	\$ 41,088,921.14	Sodexo Magic	Sole Source Extension	Food services for DCPS students	21/22	7/1/21 - 6/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
CW52393	\$29,191,775.16	Security Assurance Management	OY4	DCPS Security Services	21/22	7/9/21 - 7/8/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2019-C-0011	\$ 1,225,390.34	Great Minds, LLC	OY2	K-12 Math Curriculum & Assessment	21/22	8/1/21 - 7/31/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2018-C-0014 *	\$ 1,155,000.00	Context Global	OY4	ASL services	22	10/1/21 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Table 7. Non-Emergency Contracts Without Retroactive Approval by Council, Base Year Contracts (13 Contracts, Totaling \$44,468,376.92)

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
GAGA-2020-T-0083	\$ 1,000,000.00	Office Depot	BY	Teacher supply cards	20/21	9/28/20 - 1/31/21	
GAGA-2021-T-0021	\$ 1,749,360.00	T-Mobile for Government	BY	Mobile hotspots due to COVID-19	21	10/1/20 - 12/31/20	Although COVID-related, DCPS did not classify this as an emergency contract, and it went beyond the duration of an emergency contract. The CPO noted this was included in the emergency contracts to Council. DCPS included it in the list of 36 contracts to Council in May 2023. OIG has no evidence when it was submitted to Council.
CW86233	\$ 2,097,262.58	Athena Consulting	BY	COVID-19 Staffing Support (Educational Aides)	21/22	10/9/20 - 10/9/21	Although COVID related, DCPS did not classify this as an emergency contract, and it went beyond the duration of an emergency contract. The CPO noted this was included in the emergency contracts to Council. DCPS also included it in the contract list provided to the Council in May 2023. OIG has no evidence when it was submitted to Council.
GAGA-2021-T-0019 *	\$ 1,189,995.80	Sky LLC dba US Office Solutions	BY	COVID Emergency Water Bottles	21	10/30/20 - 12/31/20	
GAGA-2021-T-0052	\$ 1,907,416.00	T-Mobile for Government	BY	Mobile hotspots due to COVID-19	21	3/1/21 - 9/30/21	

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
GAGA-2021-T-0109	\$ 4,779,606.00	MVS Inc.	BY	Teacher Devices	21	6/1/21 + 45 days	
GAGA-2020-T-0084/ 081419-CDW	\$ 12,048,615.39	CDW Corp.	BY	Microsoft 365 Licenses	21	6/3/21 - 9/30/21	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2021-T-0021 *	\$ 1,425,600.00	T-Mobile for Government	BY	Mobile hotspots due to COVID-19	21	Unknown	Although COVID related, DCPS did not classify this as an emergency contract, and it went beyond the duration of an emergency contract. CPO noted this was included in the emergency contracts to Council. DCPS included it in the list of 36 contracts to Council in May 2023. OIG has no evidence when it was submitted to Council.
GAGA-2022-C-0026 *	\$ 1,972,140.05	Smart Start Education	LC	Temporary substitute services	22	12/13/21 - 6/24/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0224 *	\$ 1,602,399.00	IIU Consulting Inc.	BY	HC staffing assisting with COVID-19 procedures	22	12/14/21 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-C-0132	\$ 9,987,071.30	MVS Inc.	BY	Student Devices	22	6/16/22 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
GAGA-2022-C-0217	\$ 3,574,910.80	MVS Inc.	BY	Teacher Devices - Dell Laptops	22	7/1/22 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-T-0317	\$ 1,134,000.00	ODP Business Solutions	BY	Teacher supply cards	22	8/10/22 - 9/30/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.



APPENDIX 7. EMERGENCY CONTRACTS AWARDED PRIOR TO JANUARY 13, 2022 (10 CONTRACTS, TOTALING \$37,521,190.75)

Table 8. Emergency Contracts Awarded Prior to January 13, 2022 (10 Contracts, Totaling \$37,521,190.75)

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
GAGA-2020-E-0077	\$ 5,730,782.66	CDW Corp.	BY	Technology Enhancement and Equipment	20/21	8/17/20 + 45 days	
GAGA-2020-E-0088	\$ 1,293,942.62	CDW Corp.	BY	Technology Enhancement and Equipment	20/21	8/24/20 + 45 days	
GAGA-2021-E-0122	\$ 4,888,297.50	Maxim Healthcare Staffing Services	BY	COVID-19 Temporary Healthcare Staffing Support	21	6/8/21 + 120 days	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-E-0018	\$ 3,632,395.00	Maxim Healthcare Staffing Services	BY	COVID-19 Temporary Healthcare Staffing Support	21	10/28/21 + 90 days	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2020-E-0085, CW59303	\$ 2,539,931.00	MVS Inc.	BY	ELI Initiative; PreK Devices	20	8/11/20 - 9/30/20	
GAGA-2021-E-0022	\$ 2,428,345.00	TAMAH	BY	Special education services for students with IEPs	21	11/9/20 - 1/29/21	
GAGA-2021-E-0192	\$ 2,430,412.50	TAMAH	BY	Special education services for students with IEPs	22	Unknown	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2021-E-0154 *	\$ 2,443,842.68	DES-DC Inc.	BY	Outdoor learning furniture	21	Unknown	DCPS did not provide information on the contract to OIG although requested. DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.

GAGA-2020-E-0076	\$ 6,899,976.69	CDW Government	BY	Technology Enhancement and Equipment	20	7/14/20 - 9/30/20	
GAGA-2021-E-0017 081419-CDW	\$ 5,233,265.10	CDW Government	BY	Technology Enhancement and Equipment	21	11/19/20 - 9/30/21	



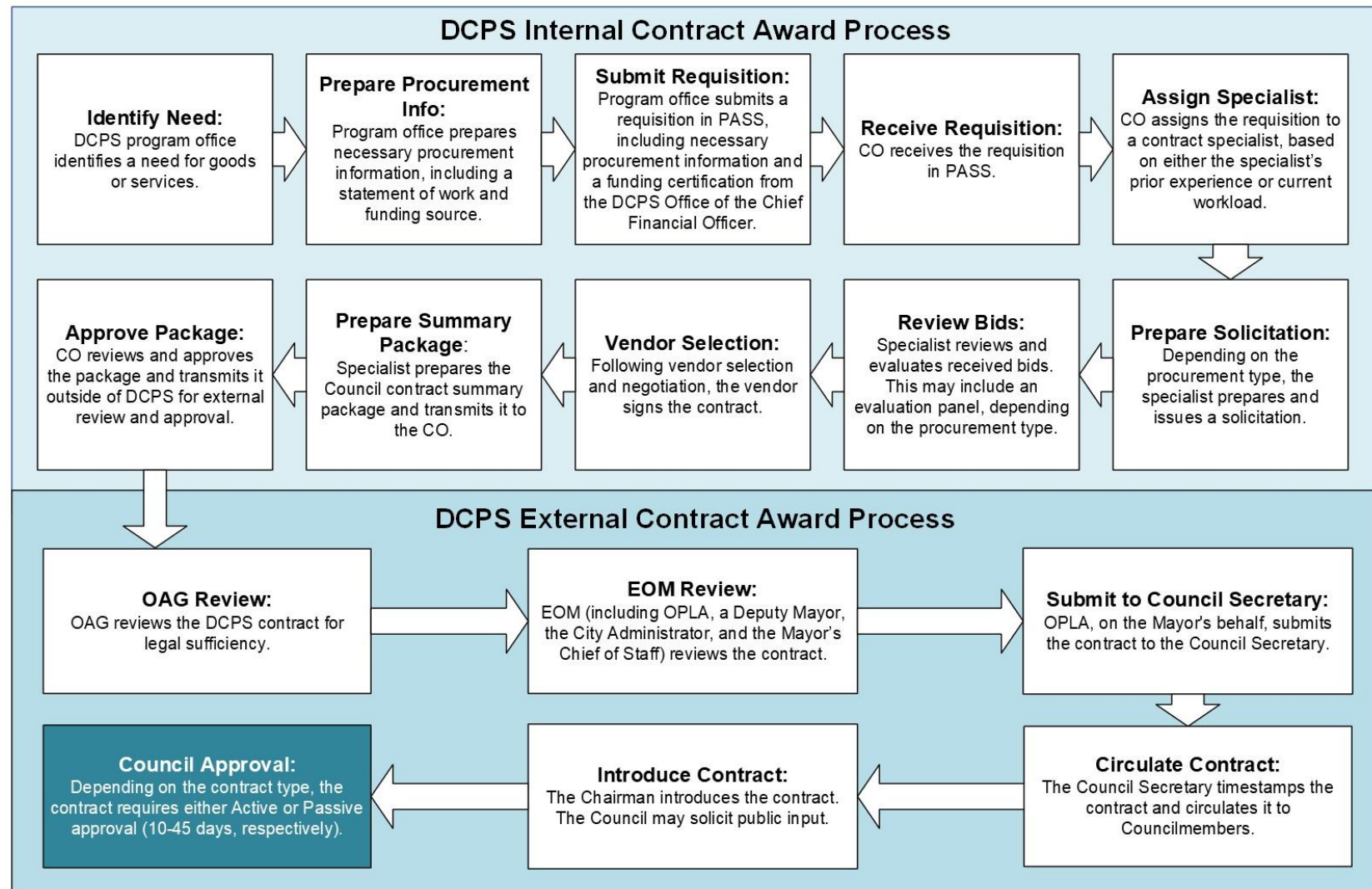
APPENDIX 8. EMERGENCY CONTRACTS AWARDED AFTER JANUARY 13, 2022 (2 CONTRACTS, TOTALING \$8,986,991.50)

Table 9. Emergency Contracts Awarded After January 13, 2022 (2 Contracts, Totaling \$8,986,991.50)

Contract Number	Amount	Vendor	Base (BY) or Option Year (OY)	Good/Service Description	FY	Period	OIG Comment
GAGA-2022-E-0032 *	\$ 1,269,593.50	TAMAH	Letter Contract	Special education services for students with IEPs	22	1/14/22 - 5/9/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023.
GAGA-2022-E-0096	\$7,717,398.00	Maxim Healthcare Staffing Services	BY	COVID-19 Temporary Healthcare Staffing Support	22	4/5/22 – 6/27/22	DCPS included this contract in the list of 36 contracts provided to the Council in May 2023. In the FY 2022 ACFR Management Recommendations, we noted that DCPS failed to notify the Council of this contract within the timeline prescribed by law.



APPENDIX 9. DCPS PROCUREMENT PROCESS FLOWCHART



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