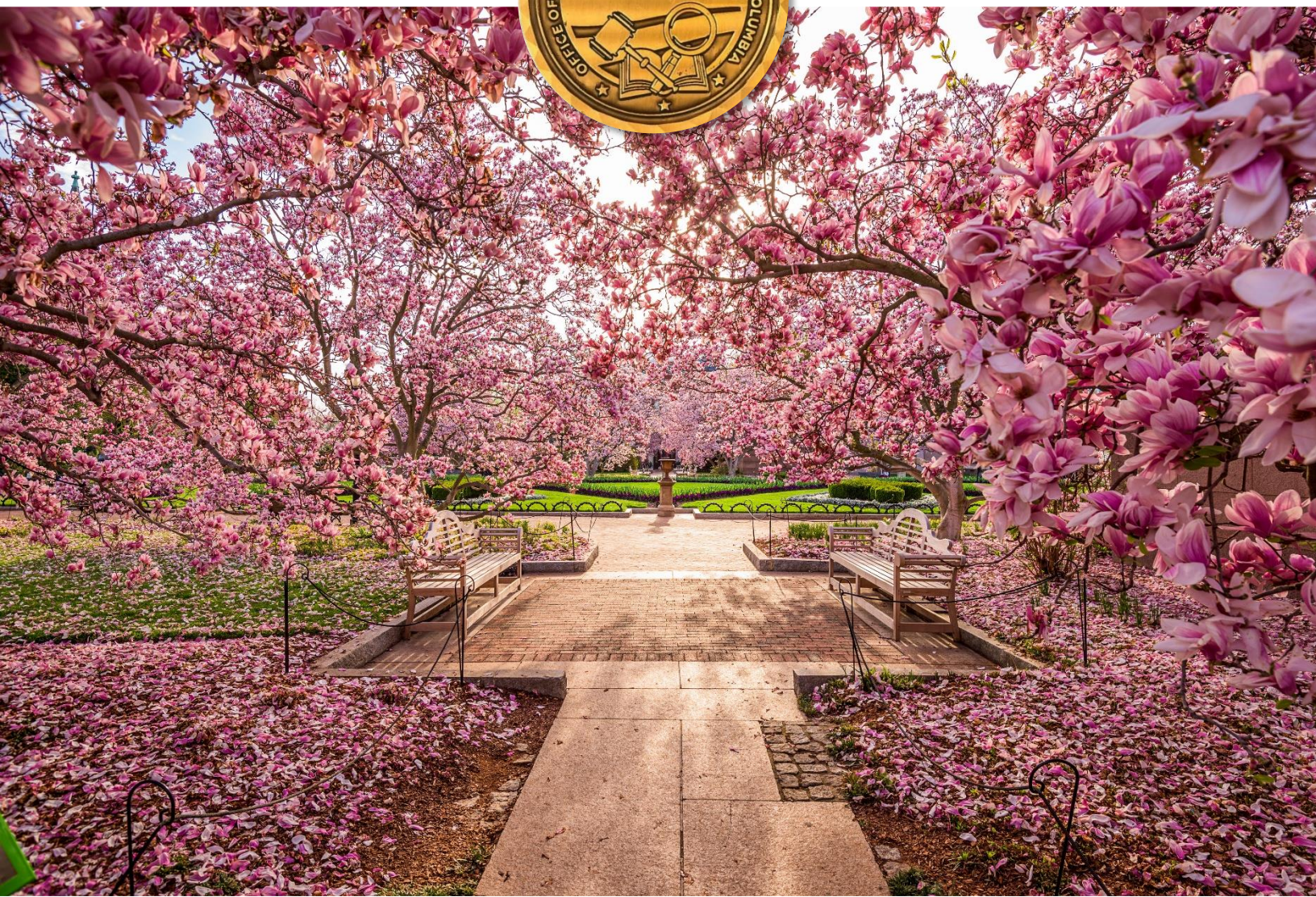


EVALUATION REPORT

District Compliance with the Home Rule Act, PPRA,
and District Code Evaluation: Part II – DGS and OCFO

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

January 21, 2026



DANIEL W. LUCAS
INSPECTOR GENERAL

OUR MISSION

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

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



OUR VISION

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

OUR VALUES

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

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

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

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

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

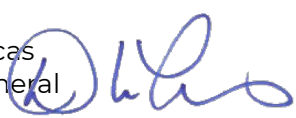
Transparency: Sunlight is our ally. Transparency illuminates our processes, decisions, and outcomes. By sharing information openly, we empower stakeholders, promote understanding, and reinforce our commitment to accountability.



MEMORANDUM

To: Delano Hunter
Director, Department of General Services

Glen Lee
Chief Financial Officer

From: Daniel W. Lucas
Inspector General 

Date: January 21, 2026

Subject: **District Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part II – DGS and OCFO | 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 II – DGS and OCFO*, OIG No. 23-E-09-PS0(m). This evaluation focused on the Department of General Services (DGS) and the Office of the Chief Financial Officer (OCFO). Neither DGS nor OCFO is subject to the authority of the District's Chief Procurement Officer (CPO)¹, yet both are statutorily required to conduct procurements in accordance with the "Government Procurement" Chapter of the DC Code.²

We conducted this evaluation following the Council of the Inspectors General on Integrity and Efficiency's (CIGIE) *Quality Standards for Inspection and Evaluation*³ and the Government Accountability Office's (GAO) Standards for Internal Control in the Federal Government (GAO Green Book)⁴. Our evaluation reviewed contracts that required Council

¹ DC Code § 2-352.01(b)(1) and (11).

² DC Code § 2-352.01(b).

³ 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> (last visited Dec. 16, 2025).

⁴ U.S. GOV'T ACCOUNTABILITY OFFICE, STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOV'T, GAO-14-704G (Sept. 2014), <https://www.gao.gov/products/GAO-14-704G> (last visited Aug. 4, 2025), (hereafter, GAO Green Book). [Note: DC Code § 1-204.49(4) mandates the District shall "give due consideration to the effectiveness of accounting systems, *internal control*, and related administrative practices of the respective agencies" (*emphasis added*). The OIG uses the GAO Green Book as criteria to assess the design, implementation, and operation of District internal control systems.]

review and approval, those over \$1M in a 12-month period and multi-year contracts. The contracts reviewed were active between fiscal years (FYs) 2020 and 2023.

We found that DGS and OCFO contracts generally received the required Council approval. However, we identified deficiencies in the agencies' procurement practices that warrant action. In total, our report includes four findings and seven recommendations to help DGS and OCFO address these deficiencies, enabling them to fully comply with District procurement laws and regulations.

In considering our findings and recommendations, it is important to note that the District's procurement statutes are to be "liberally construed and applied."⁵ In meeting this statutory mandate, all District agencies, irrespective of their individual procurement authorities, can maximize the use of the District's finite resources, efficiently complete the entirety of the procurement lifecycle, maximize competition, and reduce substandard procurement outcomes.

DGS and OCFO provided written responses on September 30, 2025. While several responses indicated agreement with recommendations, the agencies' proposed actions often did not fulfill the recommendations as written. We will monitor the implementation status of our recommendations and report annually on subsequent actions taken.

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

⁵ DC Code § 2-351.01(a).



EXECUTIVE SUMMARY

District Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part II – DGS and OCFO

Summary

This report examines the Department of General Services' (DGS) and the Office of the Chief Financial Officer's (OCFO) contracting and procurement practices, focusing on how two agencies with independent procurement authority manage \$1M+ and multiyear contracts to support District operations through their respective procurement divisions.

DGS and OCFO operate 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 \$1M+ and multi-year contracts. DGS and OCFO must also provide the Office of the Chief Procurement Officer with copies of contracts over \$100,000 for publication on its website for public transparency.

DGS and OCFO demonstrated adequate internal controls for the separation of duties and the use of written guidance for procurement staff. However, we identified areas where both agencies need to improve their compliance with contract publication requirements and Council approval processes.

Objective

The objective was to evaluate DGS' and OCFO's compliance with the applicable procurement laws and regulations.

Findings and Observations

While DGS and OCFO generally employ effective internal controls, there were areas where both agencies did not follow District laws regarding:

- **Contract Publication Requirements:** Both agencies failed to transmit contracts over \$100,000 to the District's CPO for posting on the District's transparency website, making it harder

for the public and Council to track spending.

- **Council Approval:** OCFO awarded a \$1.45 million contract without getting the required Council approval first.

Further, neither agency provided their staff with training specific to their agency's independent procurement authority requirements.

These deficiencies reduced transparency and prevented required oversight of public funds.

Recommendations

We made seven recommendations and identified three opportunities for improvement designed to bring DGS and OCFO into full compliance with District procurement laws and regulations, and to strengthen their respective internal control environments and activities.

Management Response

In total, we made seven recommendations – two to DGS and five to OCFO. DGS provided responses to both recommendations. OCFO responded to all five recommendations but disagreed with two, including the recommendation to transmit contracts to OCP for centralized posting on the Transparency Portal as required by DC Code § 2-361.04.

Of the seven recommendations, we consider four resolved and open pending implementation, two closed and unresolved due to agency unwillingness to comply with recommendations, and one unresolved and open due to incomplete implementation.

Full agency responses appear in Appendix 3 (DGS) and Appendix 4 (OCFO).



District Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part II – DGS and OCFO

CONTENTS

INTRODUCTION.....	1
Objective	1
Scope.....	1
Methodology	1
Background	1
Why We Conducted This Evaluation	1
Procurement Laws and Procedures	2
Processes for Awarding Contracts Exceeding \$1M	3
Contracts Reviewed	4
EVALUATION RESULTS.....	5
Finding 1: DGS and OCFO Have Segregation of Duties Within Their Procurement Functions.....	5
Finding 2: OCFO Established Comprehensive Guides to Aid in Procurement Compliance.....	6
Finding 3: DGS and OCFO Did Not Transmit Contracts to OCP for Required Publication.....	7
Finding 4: OCFO Awarded a Contract Without the Council's Pre-Approval.....	13

Observation 1: DGS and OCFO Did Not Provide Formal Agency-Specific Training to Their Staff on Agency Procurement Processes	18
CONCLUSION	21
APPENDIX 1. FINDINGS.....	22
APPENDIX 2. RECOMMENDATIONS.....	24
APPENDIX 3. DGS MANAGEMENT RESPONSE	26
APPENDIX 4. OCFO MANAGEMENT RESPONSE.....	28

INTRODUCTION

Objective

Our objective was to evaluate the Department of General Services' (DGS) and the Office of the Chief Financial Officer's (OCFO) compliance with the Home Rule Act and other relevant procurement laws and regulations governing contracts requiring the DC Council's approval.

Scope

We conducted fieldwork for Part II of this evaluation between May and October 2024. Part II focused on DGS and OCFO and their contracts requiring Council review and approval and in effect between fiscal years (FY) 2020 and 2023 (October 1, 2019, and 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 (GAO Green Book) issued by the US Government Accountability Office (GAO). The GAO Green Book sets internal control standards for federal entities and may be adopted by state and local entities as an internal control system framework.

To ensure an understanding of the legal requirements with which DGS and OCFO must comply, we reviewed the Home Rule Act and the Procurement Practices Reform Act (PPRA) as amended.

To establish the scope of any DGS and OCFO compliance issue, we reviewed and analyzed 392 DGS contracts and 94 OCFO contracts in effect between FYs 2020 and 2023. We obtained these contracts directly and indirectly from DGS and OCFO, through reviews of contract review and approval records in LIMS, and through reviews of DGS and OCFO's contract databases on their respective websites.

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

Background

Why We Conducted This Evaluation

In 2022, DCPS executed multiple contracts exceeding \$1M without following required procedures. These included an emergency contract for COVID-19-related healthcare staffing assistance that was not reported to 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 (enacted as part of the District of Columbia

Self-Government and Governmental Reorganization Act of 1973, commonly known as the Home Rule Act) and 2-352.02 (PPRA).⁶

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.⁷ 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 the Council's inquiries, DCPS acknowledged 36 emergency and non-emergency contract packages exceeding \$1M that had not been submitted to the Council, violating District procurement laws.

IG'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. This report is the second in a series of three focused on District agencies' adherence to procurement requirements.

Procurement Laws and Procedures

Provisions within two legislative acts establish the District's procurement framework. First, the Home Rule Act requires the Mayor to obtain Council approval before entering into any contracts exceeding \$1M in a 12-month period.⁸ Second, the Procurement Practices Reform Act of 2010 (PPRA) modernized District procurement laws to enhance competition, efficiency, and public confidence.⁹ These laws create the legal foundation for how District agencies must conduct procurement activities, with specific requirements for high-value and multi-year 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 DGS and OCFO, have independent procurement authority and operate with their own CPO.¹⁰ With a few exceptions, agencies with independent procurement authority must comply with the requirements of the PPRA, including DGS and OCFO.

DGS coordinates the procurement of goods and services required by District government operations, including construction, facilities management, and general services contracts.

⁶ 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].

⁷ OIG, FY 2022 ACFR Management Recommendations.

⁸ See [Pub. L. No. 93-198](#), § 451, codified at DC Code § 1-204.51.

⁹ [DC Code § 2-351.01\(b\)](#).

¹⁰ See [DC Code §§ 2-352.01\(b\)\(I\) and \(II\)](#), relating to OCFO and DGS respectively.

OCFO coordinates procurement for financial services, investment management, and benefit administration for District employees and retirees. Both agencies operate procurement divisions that handle these specialized contracting needs.

Processes for Awarding Contracts Exceeding \$1M

Although DGS and OCFO have independent procurement authority and do not require OCP's approval to procure goods and services, both agencies must comply with the PPRA and other District procurement laws and regulations.

DGS Process for Non-Emergency Contracts Exceeding \$1M

DGS' procurement process for non-emergency contracts exceeding \$1M involves the following steps:

- DGS identifies a procurement need, develops a statement of work, and secures a funding source.
- Contract specialists within DGS' specialized teams (schools, municipalities/construction, or goods & services) submit requisitions, issue solicitations, and receive and evaluate 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 either through the Office of the Attorney General (OAG) or DGS' internal counsel for a legal sufficiency review to verify legal compliance of the proposed contract.
- The summary package then undergoes Executive review by the Executive Office of the Mayor, including the Office of Policy and Legislative Affairs (OPLA), the relevant Deputy Mayor, the Office of the City Administrator, and the Mayor's Chief of Staff.
- Upon approval, the Mayor submits the summary package to the Council for its review and approval.
- The Council approves the summary package, which includes the contract.
- DGS awards the contract and notifies the vendor and agency of the finalized agreement.

OCFO Process for Non-Emergency Contracts Requiring Council Approval

OCFO's procurement process for non-emergency contracts exceeding \$1M follows a similar but distinct process:

- OCFO identifies a procurement need, develops a statement of work, and secures a funding source.

- Contract specialists submit requisitions, issue solicitations, and receive and evaluate vendor bids. New procurements are assigned based on staff availability and previous experience.
- Vendor selection is made using OCFO's comprehensive procurement checklists that include detailed guidance and legal citations to ensure compliance with OCFO policies and District procurement laws.
- The summary package is reviewed in-house by OCFO's Office of General Counsel (OGC) for legal sufficiency review to verify legal compliance of the proposed contract.
- The summary package then undergoes executive review by OCFO's Front Office (senior agency leadership), because OCFO is a statutorily independent agency under the Home Rule Act.
- Upon approval, OCFO submits the summary package to the Council for its review and approval.
- The Council approves the summary package, which includes the contract.
- OCFO awards the contract and notifies the vendor of the finalized agreement.

Contracts Reviewed

We reviewed contract information that DGS and OCFO provided, as well as information maintained on the agencies' public online contract databases and the DC Council's Legislative Information Management System. Between FYs 2020 and 2023, DGS and OCFO had active, multi-year or \$1M+ contracts:

- DGS had 392 such contracts, including exercised option years, totaling more than \$4.08B.
- OCFO had 94 such contracts, including exercised option years, totaling more than \$833M.

We checked these contracts to determine if the agencies followed District procurement laws for contracts requiring the Council's approval and found that DGS and OCFO generally followed the Council pre-approval rule for \$1M+ and multi-year contracts.

EVALUATION RESULTS

DGS and OCFO have established procurement practices and internal controls. Both agencies generally followed District laws for getting Council approval on \$1M+ and multi-year contracts and demonstrated separation of duties in their procurement processes. However, we also found areas where both agencies did not comply with District procurement laws and identified opportunities for both agencies to improve other internal controls.

Internal control strengths:

- DGS and OCFO properly segregated procurement duties among different staff so that no individual controls all key aspects of a procurement transaction; and
- OCFO developed comprehensive written guidance with checklists to help staff follow procurement laws and agency policies.

Opportunities for improvement:

- Both agencies failed to transmit contracts to the CPO for posting on the District's transparency portal;
- OCFO awarded one contract over \$1M without seeking Council pre-approval; and
- Neither agency provided formal agency-specific procurement training to agency staff.

These issues reduced transparency about how the agencies spend public money. Implementing our recommendations will help DGS and OCFO fully comply with District laws and strengthen their procurement operations.

Finding 1: DGS and OCFO Have Segregation of Duties Within Their Procurement Functions

DGS and OCFO separated procurement responsibilities for contracts requiring Council review across three positions: the agency CPO, Contracting Officer (CO), and Contract Specialist (CS). Within both agencies, the CPO oversaw the procurement division. Under the CPO are several COs who, in turn, supervise a team of several CSs. Separation of duties helps reduce the risk of errors, fraud, and misuse of public funds.

At DGS, these teams had specialized focus areas due to the volume and specialized nature of some of their contracts: schools; municipalities and construction; and goods and services.¹¹ At OCFO, new procurements were assigned based on staff availability and experience.

¹¹ Previously, the award of construction contracts was outsourced. When DGS transitioned to bring this function in-house, DGS management kept the construction team separate.

GAO Green Book standards recommend that agencies divide “key duties and responsibilities among different people to reduce” risks.¹² This includes “separating the responsibilities for authorizing transactions, processing and recording them, reviewing the transactions, and handling any related assets so that no one individual controls all key aspects of a transaction or event.”¹³

Both agencies designed their workforce framework to balance managerial oversight with operational efficiency. This structure controlled procurement processes, ensured appropriate team sizes for effective supervision and staff development, and helped ensure proper supervision and oversight of procurement processes, which reduced risks of errors and opportunities for waste, fraud, abuse, and mismanagement.

Finding 2: OCFO Established Comprehensive Guides to Aid in Procurement Compliance

OCFO used detailed checklists to help ensure staff follow District procurement laws and agency policy. These checklists included step-by-step guidance and legal citations to ensure staff actions comply with requirements regarding agency standards at each step in the procurement process. For example, the “Phase 5 – Award Checklist” required that contract folders include determinations and findings about the contractor’s responsibility and price reasonableness and cites the relevant regulation.

Under GAO Green Book standards, agencies should document responsibilities through detailed policies to allow for effective oversight of control activities. This documentation can be in the form of “management directives, administrative policies, or operating manuals[.]”

OCFO’s checklists were updated as laws, regulations, or other guidance changed. OCFO’s Office of General Counsel helped with these updates and OCFO trained Staff and supervisors to use the checklists. During interviews, OCFO staff praised these checklists and said they found them helpful to ensure their work conforms to applicable laws and policies.

¹² GAO Green Book § 10.04 at 66.

¹³ GAO Green Book § 10.04 at 66.

Finding 3: DGS and OCFO Did Not Transmit Contracts to OCP for Required Publication

DGS and OCFO did not transmit contracts over \$100,000 and required documentation to the District's CPO for centralized posting on OCP's Contracts and Procurement Transparency Portal (Transparency Portal). Instead, both agencies published their contracts separately on their contract databases.

District law requires the District's CPO to maintain a "database containing information regarding each contract executed by the District for an amount equal to or greater than \$100,000, including each such contract made by a District agency exempt from the authority of the CPO pursuant to § 2-351.05," and provides that "Agencies not subject to the authority of the [District's] CPO shall transmit the information required by this section to the CPO for posting on the internet, which the District CPO then provides in the Transparency Portal.¹⁴ Since 2011, District law has required the District CPO to maintain contract information on the internet.¹⁵ The Committee Report for later-enacted legislation noted that this provision in the law "requires a single, comprehensive database containing all the executed contracts in excess of \$100,000."¹⁶

Under this law, all contracts posted in the Transparency Portal must have a unique identifier and include the following information:

- a copy of the executed contract;
- all determinations and findings related to the contract;
- all contract modifications;
- all solicitation documents for the contract;
- any contract summary documents submitted to the Council for its review; and
- additional technical notations relating to the vendor, if relevant.¹⁷

¹⁴ [DC Code §§ 2-361.04](#) (b)(3) and (c).

¹⁵ See Procurement Practices Reform Act of 2010, § 1104(b), effective April 8, 2011 (DC Law 18-371; DC Code § 2-361.04(c)).

¹⁶ District of Columbia Council Committee of the Whole Report on Bill 21-334, the Procurement Integrity, Transparency, and Accountability Amendment Act of 2016, June 21, 2016) at 15, (discussing provision later codified at DC Code § 2-361.04(b)(2), available at https://lms.dccouncil.gov/downloads/LIMS/34425/Committee_Report/B21-0334-CommitteeReport1.pdf?Id=61570 (last visited November 5, 2025).

¹⁷ DC Code § [2-361.04\(b\)\(3\)](#).

As of April 2025, DGS and OCFO databases lacked required contract information. Even though the public can navigate to awarded DGS and OCFO contracts over \$100,000 on the agencies' contract databases, the information contained in these databases on their respective websites does not meet the minimum information requirements established by law, as follows:

- Of the contracts we reviewed, DGS did not include determinations and findings, solicitation, or Council summary documents, though they generally contained the awarded contract and a unique contract identifier.
- While OCFO's contracts database contains most of the required information (e.g., the awarded contract, a unique contract identifier, determinations and findings, and contract modifications), the database did not always contain a contract's solicitation and Council summary documents.

When reviewing the "Contracts" section of the Transparency Portal, it appears that DGS and OCFO did not have their contracts over \$100,000 posted on the Transparency Portal. As of April 2025, we found no OCFO contracts on the Transparency Portal. We found four contracts identified as DGC contracts, although these contracts appear to be incorrectly attributed to DGS.

Furthermore, within the "Independent Agency" section of the Transparency Portal, many links to agency websites were broken or incomplete:

- The DGS link redirects users to a solicitations page, not their contract database; and¹⁸
- When we tested in April 2025, the OCFO link returned an error message. When we tested more recently, the link redirected users to OCFO's solicitations page.¹⁹

Neither agencies' links redirect users to the agencies' contract databases; rather a user must click several links to find awarded contracts. Because OCFO and DGS attempt to meet their transparency requirements through these links, the information required to be in the Transparency Portal must then be present for each of their \$100,000 contracts for DGS and OCFO to be in compliance with DC Code § 2-361.04(b)(3).

¹⁸ OCP's General Services link takes users to DGS' Active Solicitations page at <https://dgs.dc.gov/page/active-solicitations> (last visited November 25, 2025); as noted, this link should take users to DGS' Contract Awards located at <https://octo.quickbase.com/db/bpizdhed2?a=showpage&pageid=51&ifv=20> (last visited November 25, 2025).

¹⁹ As of November 25, 2025, the OCFO link redirected users to the OFCO Officer of Contracts Solicitation Gateway at <https://dc.cobblestonesystems.com/gateway/>.

An OCFO official stated that OCP allowed the Transparency Portal workaround. The official noted that several years ago, OCP and OCTO worked with independent agencies to set up the current transparency structure. Officials from DGS and OCFO shared that they believe this structure is allowed because they each have procurement databases independent of OCP. However, this fragmented approach makes it difficult for the public and stakeholders to view and monitor how these agencies spend public funds does not result in inclusion of all of the required information in a single database as appears to be contemplated by DC Code § 2-361.04, reduces transparency, and creates information gaps that complicate government oversight.

Recommendation 1

We recommend that the Director, DGS:

Transmit all contracts and required contract information for awards of \$100,000 or more to the Chief Procurement Officer as required by DC Code § 2-361.04.

DGS Response:

DGS acknowledges that DC Code § 2-361.04(b)(3) requires OCP to maintain a database of all executed contracts exceeding \$100,000 with supporting documentation on OCP's Transparency Portal. DGS stated that OCP's Transparency Portal currently contains DGS contracts accessible via links to DGS' website, where contracts and supporting documents are posted. DGS indicated it will continue providing contracts and documentation to OCP's database via links to DGS' website and will cooperate with OCP on alternative methods, if feasible. DGS noted that DC Code § 2-361.04(c) requires DGS to "transmit the information required by [2-361.04] to the CPO for posting on the internet" but does not expressly prohibit the transmission of links, and that DC Code § 2-361.04(b)(2)(A) permits the use of links. Additionally, DGS stated it will conduct quarterly reviews to verify proper publication and address any discrepancies.

Our Notes

DGS did not explicitly agree or disagree with this recommendation.

The OIG will monitor DGS' implementation of corrective action. We consider this recommendation unresolved and open.

Recommendation 2

We recommend that the Director, DGS:

Collaborate with OCP to post historical DGS contracts and related information to the OCP Transparency Portal.

DGS Response:

DGS stated that, “to the extent feasible, [it] agrees on the importance of working with OCP to ensure that all historical DGS contracts and related documents are accessible via OCP’s Transparency Portal in accordance with DC Code § 2-361.04.” DGS indicated it “will identify and gather all signed contracts over \$100,000, including supporting materials such as determinations and findings, solicitation documents, modifications, and Council summaries.” DGS stated, “these contracts will be accessible on OCP’s website via links to DGS’ website,” and that “DGS will continue to coordinate with OCP on how to transmit the information to OCP for posting directly on OCP’s Transparency Portal, if feasible.”

Our Notes:

In its response, DGS agreed with this recommendation but conditions its compliance by stating it will work with OCP on transmission “if feasible” and will ensure accessibility “to the extent feasible.” Additionally, DGS proposes to make historical contracts “accessible on OCP’s website via links to DGS’ website” rather than transmitting the contracts and supporting documentation directly to OCP for centralized posting. However, compliance with DC Code § 2-361.04 is a legal requirement, not an optional or conditional undertaking.

The OIG will monitor DGS’ implementation of corrective action. We consider this recommendation unresolved and open.

Recommendation 3

We recommend that the Chief Financial Officer, OCFO:

Transmit all contracts and required contract information for awards of \$100,000 or more to the Chief Procurement Officer as described in DC Code § 2-361.04.

OCFO Response:

OCFO disagreed with both the finding and the recommendation. OCFO reads the provision in DC Code § 2-361.04(b)(3) as directing agencies exempt from the District CPO’s authority to transmit contract information as applying to those agencies that are exempt by virtue of being listed in DC

Code § 2-351.05. OCFO argues that because its exemption derives from the Home Rule Act (§ 1-204.26) and § 2-352.01, not from § 2-351.05, the requirements of DC Code § 2-361.04(b)(3) do not apply to it. OCFO contended that while DC Code § 2-361.04(b)(2) requires all exempt agencies to provide links to their solicitation websites (links requirement), only agencies identified in DC Code § 2-351.05 must transmit contracts exceeding \$100,000 to the District CPO for inclusion in the database. OCFO stated it complies with the links requirement by providing OCP with a link to its solicitation website. OCFO also stated that it will “update the OCFO Gateway to include Council summary documents for contracts, consistent with DC Code § 2-361.04(b)(3)(E), by conducting an internal audit and uploading any missing Council summary documents.”

Our Notes:

DC Code § 2-361.04 (b)(3) requires the District CPO to maintain a website that includes information about “each contract executed by the District for an amount equal to or greater than \$100,000, *including each such contract made by a District agency exempt from the authority of the CPO pursuant to § 2-351.05.*” One reading of the italicized language is that the District CPO must maintain a website including information about “each contract executed by the District for an amount equal to or greater than \$100,000, including [but not limited to] each such contract made by a District agency exempt from the authority of the CPO pursuant to § 2-351.05.” Another reading, relied on by the OCFO, interprets the italicized language to mean that the website must include information about “each contract executed by the District for an amount equal to or greater than \$100,000, including such contract made by an agency exempt from the authority of the CPO [but only if the exemption is] pursuant to § 2-351.05.

The first reading is consistent with the Council’s intention that District procurement information be available in a “single, comprehensive database.” The second reading recognizes that the Council referred specifically to DC Code § 2-351.05 and a logical purpose of that reference was to identify those agencies exempt from CPO authority that had to provide contract information for the CPO website.

Legislative clarification regarding the extent to which DC Code § 2-361.04(b)(3) applies to the OCFO would ensure that the District CPO and the OCFO implement the law as intended by the Council.

Given OCFO's position that it is already in compliance with statutory requirements and its disagreement with this recommendation, the OIG understands that OCFO does not intend to transmit contracts and supporting documentation to OCP as described in DC Code § 2-361.04. For this reason, the OIG considers this recommendation closed and unresolved.

Recommendation 4

We recommend that the Chief Financial Officer, OCFO:

Collaborate with OCP to post historical OCFO contracts and related information to the OCP Transparency Portal.

OCFO Response:

OCFO agreed with the recommendation. OCFO stated that the “OCFO Gateway contains information for historical contracts from 2015 to date,” which OCFO asserted “is in compliance with the document retention policy.” OCFO indicated it “plans to update the OCFO Gateway to include Council summary documents for historical contracts from 2015 to date...by conducting an internal audit and uploading any missing Council summary documents.” OCFO noted that historical contracts dating back to 2010 are listed in the OCFO Gateway with a message stating, “If there are no attachments shown below, please contact ocfo.contracts@dc.gov for more contract information.”

Our Notes

While OCFO stated it agrees with this recommendation, OCFO's response describes actions that do not fulfill the recommendation. The recommendation specifically calls for OCFO to collaborate with OCP to post historical OCFO contracts and related information to the OCP Transparency Portal—the District's centralized contract database. Instead, OCFO's response focuses exclusively on improving its own separate OCFO Gateway database, with no mention of working with OCP or transmitting historical contracts to the Transparency Portal.

Additionally, requiring members of the public to email OCFO for contract information dating back to 2010 is inconsistent with the transparency objectives of DC Code § 2-361.04, which provides for readily accessible, centralized contract information.

Given that OCFO's proposed actions do not address the substance of this recommendation, OCFO accordingly assumes the risks of not implementing appropriate corrective action. Therefore, we consider this recommendation closed and unresolved.

Finding 4: *OCFO Awarded a Contract Without the Council's Pre-Approval*

OCFO awarded a \$1.45 million contract to an investment consulting firm without first obtaining Council approval, as required by District law. OCFO relied on an internal policy that exempted certain contracts from Council review, but this policy conflicts with District law.

DC Code § 1-204.51(b)(1) requires the Mayor submit any contract in excess of \$1M in a 12-month period to the Council for its review and approval prior to its award. DC Code § 2-352.02(a)(1) requires that the Mayor, or an independent agency, submit all multiyear contracts or contracts in excess of \$1M in a 12-month period to the Council for its review and approval prior to the award. Furthermore, DC Code § 2-352.02(c-1) establishes a process whereby the Council may retroactively approve contract modifications if any agency submits the required information and documentation to the Council about the modification.

OCFO manages the Other Post-Employment Benefits Fund (OPEB Fund), which provides life and health insurance benefits to qualified District government annuitants.²⁰ In the Fiscal Year 2019 Budget Support Act of 2018 (2019 BSA) the Council amended this statute to clarify that monies within the OPEB Fund were District funds subject to authorization and appropriation, thus expressly acknowledging that the OPEB Fund contract was paid for with District funds.

On January 27, 2021, OCFO awarded a \$950,000 contract to AON Investments Inc. (AON) to purchase comprehensive investment management and consulting services for the Office of Finance and Treasury (OFT) for the OPEB Fund. OCFO subsequently modified this contract five times, two of those modifications (Modifications 2 and 5) increased the contract's value to \$1,450,000 for the base year and exercised option year 1, respectively.²¹ OCFO later paid AON more than \$1M for both the base year and option year 1. These payments were not recorded in the Procurement Automated Support System (PASS), the system through which District funds are expended and tracked.²² Although for an amount greater than the \$1M and thus in excess of the dollar threshold for Council submission of contracts, as specified in DC Code §§ 1-204.51(b)(1) and 2-352.02(a)(1), OCFO did not submit Modification 2 or 5 to the Council for its review and approval before OCFO entered into these modifications.

²⁰See [DC Code § 1-621.09](#) (establishing the OPEB Fund).

²¹ Modification 2 was awarded on May 5, 2021, for \$1,450,000 and the performance period was January 27, 2021, to January 26, 2022. Modification 5 was awarded on February 17, 2022, for \$1,450,000 and the performance period was January 27, 2022, to January 26, 2023.

²² OCFO's Financial Policies and Procedures Manual required vendor invoices to be uploaded into PASS prior to payment. For AON's services for the base year and option year 1, AON issued invoices directly to OCFO staff, rather than uploading the invoices into PASS. As of July 2024, we found no record of these invoices in PASS and confirmed with OCFO staff that these invoices were not located in PASS.

Instead, OCFO management stated that they adhered to a 2020 revision of CFO Order No. 15-14, an internal directive which gave the OCFO CPO the authority to award a \$1M+ or multiyear contract without the Council's review and approval.²³ The order governed "the procurement of services" for benefit plans administered by OCFO when these services are exempted from the Home Rule Act, the PPRA, and the Small and Certified Business Enterprise Development and Assistance Amendment Act of 2014.²⁴ The order exempted six specific benefit funds that OCFO managed, including the OPEB Fund; the order outlined benefit rules, which were substantially similar to the processes established under the PPRA, but did not require Council submission.²⁵ OCFO adhered to these benefit plan rules for Modifications 2 and 5: OCFO's OGC reviewed each for legal sufficiency, but OCFO submitted neither to the Council for its review and approval prior to each modification award.²⁶

CFO Order 15-14 was revised again on June 25, 2022. The latter revision of this order removed the OPEB Fund from the list of benefit funds exempt from the Council review and approval requirement; the other five funds remain exempt. The revised order was issued in response to a May 11, 2022, memorandum from OCFO's OGC regarding the applicability of the Home Rule Act and the PPRA to the OPEB Fund following the Council's 2018 revision to DC Code § 1-621.09. This revision provided that expenditures from the OPEB Fund were subject to authorization in an approved budget and financial plan.²⁷ In this memorandum, OCFO's OGC concluded that, unlike its determination in 2015, the funds OCFO uses to administer the OPEB Fund are appropriated funds and must follow the procurement process established under the Home Rule Act and the PPRA. Following this new determination and the issuance of the amended CFO Order 15-14, OCFO did not exercise option year 2 of the AON contract but instead began a new solicitation in compliance with the Home Rule Act and PPRA.

By not submitting these modifications to the Council, OCFO prevented the Council from carrying out one of its core functions, i.e., conducting its review

²³ This order was initially issued on May 4, 2015, but was revised on July 1, 2020, two years after the Council amended the OPEB Fund statute to clarify that the monies within it were District funds. See page 1 and Section 1032 of CFO Financial Management and Control Order 15-14, Revised July 1, 2020.

²⁴ See page 1 of CFO Financial Management and Control Order 15-14, Revised July 1, 2020.

²⁵ The other five funds are (1) District of Columbia 401(a) Defined Benefit Plan, (2) District of Columbia 457(b) Deferred Compensation Plan, (3) District of Columbia College Savings Program, (4) Not-For-Profit Hospital Corporation 401(a) Defined Benefit Plan, and (5) Not-For-Profit Hospital Corporation 457(b) Deferred Compensation Plan.

²⁶ Under CFO Order No. 15-14, the OCFO CPO was required to submit a contract to OCFO's OGC for a legal sufficiency review prior to the contract's (or modification's) award but was not required to submit \$1M+ or multiyear contracts (or modifications) for the six exempted funds to the Council. Of note, between FYs 2020 and 2023, OCFO submitted other, similar contracts for services for the benefit plans outlined in the order to the Council for its review and approval. See Section 1032 of CFO Financial Management and Control Order 15-14, Revised July 1, 2020.

²⁷ Fiscal Year 2019 Budget Support Act of 2018, § 1033(a), effective October 30, 2018 (DC Law 22-168, DC Code § 1-629.09(b)).

and approval of the AON contract modifications before their execution.²⁸ In addition, OCFO exempted itself from requirements under District procurement law.

Recommendation 5

We recommend that the Chief Financial Officer, OCFO:

Submit to the Council Modifications 2 and 5 of the AON contracts for retroactive approval, consistent with DC Code § 2-352(c-1).

OCFO Response:

OCFO disagreed with the recommendation and the underlying premise of the finding that OCFO had exempted itself from District procurement law. Rather, OCFO argued that it “examined the law and determined that it is not applicable to contracts that are not for the procurement of goods and services for the District and contracts that do not involve expenditure of District appropriated funds.” OCFO noted that the PPRA governs “the procurement of goods, services, and construction items by the District government” and that the Home Rule Act requires Council review only of contracts involving the expenditure of appropriated funds exceeding \$1 million in a 12-month period.

OCFO stated that it “administers contracts related to the OPEB Fund in its fiduciary capacity for the beneficiaries” and that “financial services contracts related to the OPEB Fund are not goods or services for the District.” OCFO further asserted that “contributions to the OPEB Fund are held in trust for beneficiaries and are not District funds. Modifications 2 and 5 of the AON contracts were paid directly from the fund, not from a separate appropriation for administrative costs of the OPEB Fund. Therefore, these expenditures were not paid from District appropriated funds subject to Council approval and retroactive Council approval is not appropriate.” OCFO stated that all contracts related to the OPEB Fund are currently administered in accordance with the PPRA and DC Code § 1-621.09(d-3).

²⁸ In addressing another agency, the Council Committee of the Whole emphasized in its Report and Recommendations on the FY24 Budget that the review of contracts is one of the Council’s “core function[s]” and agencies, including IPA agencies, must prepare and submit contracts for this review as part of their “core functions,” COUNCIL OF THE DISTRICT OF COLUMBIA, COMM. OF THE WHOLE, REPORT AND RECOMMENDATIONS OF THE COMM. OF THE WHOLE ON THE FISCAL YEAR 2024 BUDGET AND CORRESPONDING BUDGET SUPPORT ACT 35 (Apr. 27, 2023), <https://dccouncil.gov/wp-content/uploads/2023/05/COW-FY2024-Proposed-Budget-Report-Recommendations.pdf> (last visited Aug. 4, 2025).

Our Notes:

OCFO's legal analysis regarding the past contract modifications contradicts its own May 2022 Office of General Counsel memorandum and misrepresents District law requirements. In May 2022, OCFO's OGC concluded that the funds used to administer the OPEB Fund are appropriated funds and must follow the procurement process established under the Home Rule Act and the PPRA. This conclusion was based on the Council's October 2018 amendment to the OPEB Fund statute, which explicitly stated that "All expenses incurred by the Chief Financial Officer in administering the Fund, including hiring staff for the Office of the Chief Financial Officer, shall be paid out of the Fund, subject to appropriation."

OCFO's OGC memorandum explicitly stated that "funds used to pay the administrative costs of the Fund, which includes contract payments, are District appropriated funds. Therefore, contracts related to the OPEB Fund are subject to the PPRA, Home Rule Act and the CBE Act." Because this 2018 amendment occurred prior to when OCFO issued Modifications 2 and 5 in May 2021 and February 2022, respectively, the funds used to pay for those contracted services were, under District law at that time, appropriated funds subject to Council review and approval.

OCFO stated that AON did not provide goods and services to the District; however, the AON contract requires AON to provide specific services to the District. For instance, the AON contract requires AON to provide the District with a comprehensive report on the state of the Fund, monthly customized comprehensive reports to OCFO's OFT, an explanation of and justification for AON's asset allocation in the Fund, and recommendations regarding that allocation.

OCFO's response indicates that the contracts relating to the OPEB Fund will comply with District Code, including the PPRA, going forward. However, OCFO did not articulate actions it will take to ensure that past OPEB Fund contract actions are brought into compliance (i.e., submitting Modifications 2 and 5 of the AON contracts to the Council for retroactive Council approval) with the same District laws.

Given OCFO's response, we understand the agency does not intend to implement corrective actions to address these concerns and accordingly assumes the associated risks. Therefore, we consider this recommendation closed and unresolved.

Recommendation 6

We recommend that the Chief Financial Officer, OCFO:

Ensure that all invoices and payments related to contracted services for the OPEB Fund are appropriately documented and stored in PASS, consistent with OCFO's other contracts.

OCFO Response:

OCFO agreed with the recommendation. OCFO confirmed that “all current invoices and payments related to contracted services for the OPEB Fund are appropriately documented and stored in PASS, consistent with OCFO's other contracts.”

Our Notes:

The OIG will monitor OCFO's implementation of corrective action.

Recommendation 7

We recommend that the Chief Financial Officer, OCFO:

a) Determine whether CFO Order No 15-14 is consistent with the Home Rule Act and PPRA for the remaining five benefits funds; b) Consult with OAG and OCP on this matter; and c) Issue a revision to this order as needed.

OCFO Responses:

OCFO agreed with the recommendation. OCFO “reviewed the legal analysis underlying CFO Order No. 15-14 and determined that it remains consistent with the Home Rule Act and the PPRA and no revisions are needed.”

Our Notes

OCFO agreed with this recommendation, but its response does not fully address the recommendation. OCFO stated that it reviewed its legal analysis underpinning CFO Order No. 15-14 and concluded no further revisions were needed. OCFO did not state in its response whether it had consulted with the OAG and OCP for their input on this matter.

This is significant because when OCFO issued a revised CFO Order 15-14, which removed the OPEB Fund from the list of funds for which related contracts are exempt from the requirement that contracts be submitted to

the Council for advance review and approval, it did not remove the exemption for the five other benefit plans identified in the order.

The OIG considers this recommendation unresolved and open.

Observation 1: DGS and OCFO Did Not Provide Formal Agency-Specific Training to Their Staff on Agency Procurement Processes

The GAO Green Book states that in training personnel, management “should enable individuals to develop competencies appropriate for key roles, reinforce standards of conduct, and tailor training based on the needs of the role.”²⁹

Neither DGS nor OCFO had developed or implemented formal, mandatory procurement training that aligned with their status as an IPA agency. Also, neither agency had a standard or required set of training for its full-time equivalent (FTE) staff or, in the case of DGS contractors, to build or maintain procurement competencies. Instead, both agencies provided procurement staff with informal, ad hoc training in response to procurement law changes or operational needs. Examples included training during staff meetings and training reflections during brown bag lunch sessions.

Internally developed Trainings are Relevant but Given on an As-needed Basis.

Staff at OCFO and DGS have taken steps to develop some formal procurement training for relevant agency staff, but this training is not required. At OCFO, procurement management developed a “Procurement 101” training that they give to other agency staff and management on an as-needed basis, either as a reminder of OCFO’s procurement process and policies for existing staff or an introduction for those new to the agency or their role. Both agencies manage the suggested training primarily through individual development plans (IDP) in the annual performance reviews, rather than following an established procurement training curriculum.

OCP’s Procurement Training Institute Does Not Fully Meet the Training Needs of Agencies with Independent Procurement Authority.

While DGS and OCFO utilize OCP’s Procurement Training Institute (PTI), PTI only provides training on general District procurement matters. Our review of PTI courses found no training tailored to agencies with their own procurement authority. DGS staff shared that PTI instructors do not address the differences between IPA agencies and those under the authority of the District’s CPO; rather, instructors only address these differences in response

²⁹ GAO Green Book, § 4.05.

to specific questions from training participants who work at IPA agencies. Staff at both OCFO and DGS also shared their difficulties in registering for PTI training courses. Some DGS staff shared that although contracted personnel perform similar functions as DGS' FTE CSs, contracted personnel could not register for or attend PTI training as they do not have access to Peoplesoft.

Budgetary Constraints Impacted Staff Attendance at External Procurement Trainings

DGS and OCFO staff receive external training, such as through the Institute for Public Procurement (NIGP). An OCFO official noted that OCFO previously required its contract staff to receive and maintain NIGP certification but ended this requirement due to a reduction of its training budget. While these external training courses are not specific to District or agency procurement practices, they provide attendees guidance on government procurement industry best practices. Furthermore, in obtaining and maintaining NIGP certification, agency procurement staff can demonstrate their knowledge and abilities regarding government procurement best practices.

DGS' Contracted Procurement Staff are Restricted from Certain Procurement Training Opportunities

In addition to full-time employees, DGS employs contracted personnel to execute its contracting responsibilities. Our research revealed that a greater number of its contract specialists are contracted personnel than regular FTEs. Through interviews, we confirmed that the contracted and FTE contract specialists perform the same procurement tasks. However, because of their contracted status, those specialists are restricted from accessing PeopleSoft and thus, are unable to submit requests to attend PTI trainings. The inability to request and receive relevant training puts DGS' procurement function at risk:

- Without proper training, staff lack the knowledge and skills necessary to perform assigned duties.
- Insufficiently trained personnel may not identify and properly respond to emerging procurement risks.
- Inadequate training increases the risk of procedural errors, leading to procurement inefficiencies and compliance violations.

Overall, inadequate access to training increases DGS' and OCFO's vulnerability to waste, fraud, and abuse and potentially diminishes their operational effectiveness and compliance capability.

Opportunity for Improvement 1

DGS and OCFO should develop and implement an agency-specific training curriculum and determine the frequency necessary for full-time and contracted personnel conducting procurement-related activities.

OCFO Response:

OCFO agreed. The OCFO CPO has developed Procurement 101 training. The OCFO will work internally to roll out mandatory procurement training on an annual basis for full-time and, if any, contracted OCFO agency staff conducting procurement-related activities.

Opportunity for Improvement 2

DGS and OCFO should consider requiring NIGP certification for procurement staff, particularly for COs.

OCFO Response:

OCFO disagreed. All OCFO contracting officers are Certified Public Procurement Officers (CPPO) through the Universal Public Procurement Certification Council (UPPCC), which is recognized by the National Institute of Government Procurement (NIGP). Seven of the 11 Office of Contracts (OC) contracting personnel have a nationally recognized or OCP procurement training certification. OC is governed by the Home Rule Act and the Procurement Practices Reform Act (PPRA) of 2010. The PPRA Sec. 204(b)(12) requires the Chief Procurement Officer at OCP to develop guidelines for the recruitment, training, career development, and performance evaluation of all procurement personnel. As an independent agency, OCFO staff do not have full access to the Procurement Training Institute (PTI) developed by OCP and do not have access to the tiered core curriculum for personnel ranging from entry-level contract specialists to contracting officers provided to OCP staff through OCP's Procurement Training Institute. The OCFO OC has a great partnership with OCP and has been working with their team to identify a path forward to coordinate access to the PTI training for the OCFO. The OCP PTI is also developing a Learning Management System that will allow access to the independent agency procurement staff. The OCFO will continue to partner with OCP as they update accessibility of the PTI for independent agencies.

In addition, the OCFO does not have a certification requirement in the position descriptions for contracting personnel. Thus, there is no mandatory procurement training requirement within the OCFO. However, the OCFO CPO requires OC staff to participate in at least three (3) procurement-related training courses yearly as a competency evaluation part of the employees' annual performance evaluation plan.

Opportunity for Improvement 3

DGS should coordinate with OCP to make sure PTI training is available to contracted procurement personnel.

CONCLUSION

This evaluation assessed DGS' and OCFO's procurement practices from FYs 2020 to 2023. Our evaluation revealed internal control strengths regarding separation of procurement responsibilities and written guidance to ensure compliance with the Home Rule Act (DC Code § 1-204.51(b)(1)), the PPRA (DC Code § 2-352.02), and DGS' and OCFO's internal policies. However, we also identified several operational and compliance weaknesses, including:

1. DGS and OCFO failed to transmit contracts exceeding \$100,000 to the District's CPO for posting on the OCP Transparency Portal;
2. DGS and OCFO had not developed agency-specific training for their respective staff involved in procurement activities; and
3. OCFO failed to obtain the required Council review and approval for a contract it awarded in excess of \$1M.

These deficiencies raise concerns about the integrity of the agencies' procurement processes and the responsible management of District financial resources.

Our seven recommendations and three opportunities for improvement, if implemented, will

- aid in closing DGS' and OCFO's compliance gap with District procurement laws;
- strengthen the agencies' respective internal control environments; and
- ensure better stewardship of public resources.



APPENDIX 1. FINDINGS

Table of Findings

No.	Finding
1	DGS and OCFO Have Segregation of Duties Within Their Procurement Functions
2	OCFO Established Comprehensive Guides to Aid in Procurement Compliance
3	DGS and OCFO Did Not Transmit Contracts to OCP for Required Publication
4	OCFO Awarded a Contract Without the Council's Pre-Approval



APPENDIX 2. RECOMMENDATIONS

Table of Recommendations

Agency	No.	Recommendation	Status	Action Required	Finding
DGS	1	Transmit all contracts and required contract information for awards of \$100,000 or more to the Chief Procurement Officer as required by DC Code § 2-361.04.	Open	Tracking implementation	3
DGS	2	Collaborate with OCP to post historical DGS contracts and related information to the OCP Transparency Portal.	Open	Tracking implementation	3
OCFO	3	Transmit all contracts and required contract information for awards of \$100,000 or more to the Chief Procurement Officer as described in DC Code § 2-361.04.	Closed	Unwilling to implement	3
OCFO	4	Collaborate with OCP to post historical OCFO contracts and related information to the OCP Transparency Portal.	Closed	Unwilling to implement	3
OCFO	5	Submit to the Council Modifications 2 and 5 of the AON contracts for retroactive approval, consistent with DC Code § 2-352(c-1).	Closed	Unwilling to implement	4
OCFO	6	Ensure that all invoices and payments related to contracted services for the OPEB Fund are appropriately documented and stored in PASS, consistent with OCFO's other contracts.	Open	Tracking implementation	4
OCFO	7	a) Determine whether CFO Order No 15-14 is consistent with the Home Rule Act and PPRA for the remaining five benefits funds; b) Consult with OAG and OCP on this matter; and c) Issue a revision to this order as needed.	Open	Tracking implementation	4



APPENDIX 3. DGS MANAGEMENT RESPONSE

September 30, 2025

(Sent via E-Mail)

Daniel W. Lucas
Inspector General
Office of the Inspector General
717 14th Street, N.W.
Washington, DC 20005

**Re: District Compliance with the Home Rule Act, PPRA, and DC Code Evaluation: Part II
- DGS and OCFO | OIG No. 23-E-09-PS0(m)] ("Report")**

Dear Inspector General Lucas:

The Department of General Services ("DGS") is in receipt of the above-referenced Report, and we appreciate the opportunity to provide our responses to the report. DGS also appreciates your observations and welcomes the opportunity to constructively review your feedback on these critical District functions, as DGS continues its ongoing focus and efforts to improve and enhance the administration of our contracting process. DGS has prepared a response to Finding #3. We appreciate your inclusion of this response in the final Report.

DGS Responses to Finding #3

Recommendation 1

DGS recognizes that DC Code § 2-361.04(b)(3) requires OCP to provide a database of all executed contracts exceeding \$100,000, along with supporting documentation for publication on OCP's Transparency Portal. Currently, OCP's Transparency Portal contains a database of DGS contracts and supporting documentation, accessible via links to DGS's website, where these contracts and supporting documents are posted. To ensure continued compliance, DGS will continue to provide its contracts and documentation to OCP's database via links to DGS's website on OCP's website. Additionally, DGS will continue to cooperate with OCP on how to provide the same information without using links, if feasible. It should be noted that DC Code § 2-361.04(c) requires DGS to "transmit the information required by [2-361.04] to the CPO for posting on the internet," and it does not expressly prohibit the transmission of links to OCP for its posting of such links on the internet. It should be noted that per DC Code § 2-361.04(b)(2)(A), the use of links is permitted. Additionally, DGS will conduct quarterly reviews to verify proper publication and address any discrepancies.

Recommendation 2

To the extent feasible, DGS agrees on the importance of working with the OCP to ensure that all historical DGS contracts and related documents are accessible via OCP's Transparency Portal in accordance with DC Code § 2-361.04. DGS will identify and gather all signed contracts over \$100,000, including supporting materials such as determinations and findings, solicitation documents, modifications, and Council summaries. These contracts will be accessible on OCP's website via links to DGS's website. DGS will continue to coordinate with OCP on how to transmit the information to OCP for posting directly on OCP's Transparency Portal, if feasible.

If there are any questions, kindly let me know.

Respectfully,

 *Delana Hunter*

Director
DC Department of General Services

DH/

cc: Xavier Beltran, DGS General Counsel
Kristen Walp, DGS Senior Assistant General Counsel
Eric Njonjo, Acting Chief Procurement Officer



APPENDIX 4. OCFO MANAGEMENT RESPONSE

GOVERNMENT OF THE DISTRICT OF COLUMBIA

OFFICE OF THE CHIEF FINANCIAL OFFICER



Glen Lee
Chief Financial Officer

September 30, 2025

Daniel W. Lucas
Inspector General
Office of the Inspector General
717 14th Street, NW, First Floor
Washington, DC 20005

Dear Inspector General Lucas:

The Office of the Chief Financial Officer has reviewed the OIG's draft report on the District's Compliance with the Home Rule Act, PPRA, and District Code Evaluation: Part II-DGS and OCFO, report number OIG No. 23-E-09-PS0 (m). We are providing the following responses to the findings and recommendations outlined in the report.

**FINDING 3: DGS AND OCFO DID NOT TRANSMIT CONTRACTS TO OCP FOR
REQUIRED PUBLICATION**

Recommendation 3

We recommend that the Chief Financial Officer, OCFO:

Transmit all contracts and required contract information for awards of \$100,000 or more to the Chief Procurement Officer as required by D.C. Code § 2-361.04.

OCFO Response:

We do not agree with the finding that OCFO did not transmit contracts to OCP for required publication. [D.C. Code § 2-361.04\(b\)\(3\)](#) requires the CPO to publish certain contracts equal to or over \$100,000 in an online database. Specifically, this provision states:

(b)(3) A database containing information regarding each contract executed by the District for an amount equal to or greater than \$100,000, including each such contract made by a District agency exempt from the authority of the CPO pursuant to [§ 2-351.05](#). For each contract contained in the database, the database shall include a unique identifier and, at a minimum, the following...

The database of contracts established pursuant to this provision must include contracts made by District agencies "exempt from the authority of the CPO pursuant to [§ 2-351.05](#)." This

requirement does not apply to all agencies with independent procurement authority, only those agencies identified in [§ 2-351.05](#). Further, the agencies identified in [§ 2-351.05](#) are required, pursuant to § 2-361.04(c), to send all required information to OCP for posting on the internet. The OCFO's exemption from the authority of the CPO is not derived from [§ 2-351.05](#). It is derived from the Home Rule Act ([§ 1-204.26](#)) and [§ 2-352.01](#). Therefore, this requirement does not apply to the OCFO.

The Council intended to establish a single, comprehensive database containing all executed contracts in excess of \$100,000, as noted in the 2016 Committee Report on the "Procurement Integrity, Transparency, and Accountability Amendment Act of 2016" (the "2016 Act") cited by OIG. However, the law that was ultimately passed explicitly included this requirement for only those independent agencies identified in [§ 2-351.05](#). In contrast, § 2-361.04(b)(2) was also amended by the 2016 Act, and it stated, "Links to the contract solicitation websites of OCP and all District agencies are exempt from the authority of the CPO." The Council intentionally used this specific language to apply this requirement to all independent agencies. Therefore, based on the plain language of the statute, all independent agencies are required to provide OCP with links to their solicitation website, and independent agencies identified in [§ 2-351.05](#) are required to provide their contracts in excess of \$100,000. The OCFO has provided OCP with the link to our solicitation website and, as such, we are in compliance with the applicable requirements of D.C. Code § 2-361.04.

However, despite the fact that [D.C. Code § 2-361.04\(b\)\(3\)](#) does not apply to the OCFO, the OCFO Office of Contracts (OC) transmits contracts to OCP in support of the partnership between our agencies and in support of Transparency in Contracting across the District. The OCFO OC maintains an online contract database titled "OCFO Office of Contracts Solicitation Gateway" (OCFO Gateway) at <https://dc.cobblestonesystems.com/gateway/> that is linked to OCP's Transparency Portal. This link is located as part of the OCP Transparency Portal in two locations on the OCP Transparency Portal home page. The first location is a tab at the top of the OCP Transparency Portal titled "Independent Agencies." If the public clicks that tab, they will find "Chief Financial Officer (OCFO)" on the 1st page and the hyperlink takes them immediately to OCFO Gateway. The second location is found under a Tile for "Independent Agencies." If the public clicks the tile, it will take them to the above-referred 1st page, where they can click the "Chief Financial Officer (OCFO)" hyperlink, which takes them immediately to the OCFO Gateway main page. At the OCFO Gateway, they will find the main page entitled "Welcome to the OCFO Office of Contracts Solicitation Gateway. In the left-hand corner, they will find a 9-dot waffle menu icon. When the public hovers over that icon, a drop-down menu appears for both contracts and solicitations. The Contracts portion of the OCFO Gateway allows a user to search for a contract by contractor name, agency, status, contract number or contract title. Each contract has a copy of the executed contract, all determinations and findings related to the contract, and all contract modifications, if applicable. In an effort to ensure consistency of the contract information available online, the OCFO plans to update the OCFO Gateway to include Council summary documents for contracts, consistent with D.C. Code § 2-361.04 (b)(3)(E), by conducting an internal audit and uploading any missing Council summary documents.

The solicitations portion of the OCFO Gateway has all solicitation documents, including all requests for proposals and invitations for bids, and any amendments of such documents as required by D.C. Code § 2-361.04 (b)(3)(D). For the solicitation portion of the OCFO Gateway, a user can return to the 9-dot waffle menu icon and find Solicitation under the drop-down menu. There, they will find solicitation documents from fiscal year 2019 to date for contracts on the OCFO Gateway. If a member of the public is having difficulty finding the information, they can return to the 9-dot waffle menu icon, hover, and select the Help portion of the drop-down menu. There, they will find a vendor help email as well as the OC Staff Telephone and email addresses listed so that the OCFO can ensure that the public can easily find the information in support of transparency in contracting.

The error message identified in April 2025 on the OCP Transparency Portal has been corrected by our partners at OCTO. In April 2025, the top tab on the OCP Transparency Portal titled “Independent Agencies” was correctly linked to the OCFO Gateway; however, the error message appeared when you clicked on the tile titled “Independent Agencies.” The link, last visited on July 5, 2025, by OIG, directs users to the OCFO Gateway main page entitled “Welcome to the OCFO Office of Contracts Solicitation Gateway. The user must navigate the 9-dot waffle menu to find contracts or solicitations. The link is how the OCFO meets the applicable statutory requirements of D.C. Code §2-361.04. The OCFO agrees with the feedback that the public must click several links to find awarded contracts. In an effort to make the OCFO Gateway more user-friendly, the OCFO OC will work on revising the main page to make it clear on how to navigate the 9-dot waffle menu icon to find either contract documents or solicitations. The OCFO appreciates the partnership with OCP and OCTO in developing the capability to transmit the contracts seamlessly through the hyperlink to the OCFO Gateway.

Recommendation 4

We recommend that the Chief Financial Officer, OCFO:

Collaborate with OCP to post historical OCFO contracts and related information to the OCP Transparency Portal.

OCFO Response:

We agree. The OCFO Gateway has information for historical contracts from 2015 to date which is in compliance with the document retention policy. To ensure consistency of the contract information available online, the OCFO plans to update the OCFO Gateway to include Council summary documents for historical contracts from 2105 to date, consistent with D.C. Code § 2-361.04 (b)(3)(E), by conducting an internal audit and uploading any missing Council summary documents. Historical OCFO contracts dating back to 2010 are listed in the OCFO Gateway with a message stating “If there are no attachments shown below, please contact ocfo.contracts@dc.gov for more contract information.”

FINDING 4: OCFO AWARDED A CONTRACT WITHOUT THE COUNCIL’S PRE-APPROVAL

Recommendation 5

We recommend that the Chief Financial Officer, OCFO:

Submit to the Council Modifications 2 and 5 of the AON contract for retroactive approval, consistent with D.C. Code § 2-352(c-1).

OCFO Response:

We disagree. The underlying premise of this finding is that the OCFO exempted itself from requirements under District procurement law. On the contrary, the OCFO examined the law and determined that it is not applicable to contracts that are not for the procurement of goods and services for the District and contracts that do not involve expenditure of District appropriated funds. The PPRA governs “the procurement of goods, services, and construction items by the District government.” D.C. Code § 2-351.01(b)(1). The Home Rule Act requires Council review of District contracts involving the expenditure of appropriated funds that exceed \$1,000,000 in a 12-month period. D.C. Code § 1-204.51(b) and (c).

The OCFO administers contracts related to the OPEB Fund in its fiduciary capacity for the beneficiaries. Therefore, the financial services contracts related to the OPEB Fund are not goods or services for the District. Further, contributions to the OPEB Fund are held in trust for the beneficiaries and are not District funds. Modifications 2 and 5 of the AON contract were paid directly from the fund and not from a separate appropriation to pay the administrative costs of the OPEB Fund. Therefore, these expenditures were not paid out of District appropriated funds subject to Council approval and retroactive Council approval is not appropriate.

Currently, all contracts related to the OPEB Fund are administered in accordance with the PPRA and D.C. Code § 1-621.09(d-3), which now establishes a separate appropriation to pay the administrative costs of the OPEB Fund.

Recommendation 6

We recommend that the Chief Financial Officer, OCFO:

Ensure that all invoices and payments related to contracted services for the OPEB Fund are appropriately documented and stored in PASS, consistent with OCFO's other contracts.

OCFO Response:

We agree. The OCFO confirms that all current invoices and payments related to contracted services for the OPEB Fund are appropriately documented and stored in PASS, consistent with OCFO’s other contracts.

Recommendation 7

We recommend that the Chief Financial Officer, OCFO:

a) Determine whether CFO Order No 15-14 is consistent with the Home Rule Act and PPRA for the remaining five benefits funds; b) Consult with OAG and OCP on this matter; and c) Issue a revision to this order as needed.

OCFO Response:

We agree. The OCFO reviewed the legal analysis underlying CFO Order No. 15-14 and determined that it remains consistent with the Home Rule Act and the PPRA and no revisions are needed.

OBSERVATION 1: DGS AND OCFO DID NOT PROVIDE FORMAL AGENCY-SPECIFIC TRAINING TO THEIR STAFF ON AGENCY PROCUREMENT PROCESSES**Opportunity for Improvement 1**

DGS and OCFO should develop and implement an agency-specific training curriculum and determine the frequency necessary for full-time and contracted personnel conducting procurement-related activities.

OCFO Response:

We agree. The OCFO CPO has developed Procurement 101 training. The OCFO will work internally to roll out mandatory procurement training on an annual basis for full-time and, if any, contracted OCFO agency staff conducting procurement-related activities.

Opportunity for Improvement 2

DGS and OCFO should consider requiring NIGP certification for procurement staff, particularly for COs.

OCFO Response:

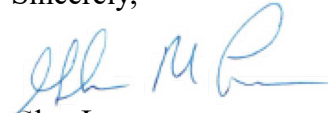
We disagree. All OCFO contracting officers are Certified Public Procurement Officers (CPPO) through the Universal Public Procurement Certification Council (UPPCC), which is recognized by the National Institute of Government Procurement (NIGP). Seven of the 11 OC contracting personnel have a nationally recognized or OCP procurement training certification. OC is governed by the Home Rule Act and the Procurement Practices Reform Act (PPRA) of 2010. The PPRA Sec. 204(b)(12) requires the Chief Procurement Officer at OCP to develop guidelines for the recruitment, training, career development, and performance evaluation of all procurement personnel. As an independent agency, OCFO staff do not have

full access to the Procurement Training Institute (PTI) developed by OCP and do not have access to the tiered core curriculum for personnel ranging from entry-level contract specialists to contracting officers provided to OCP staff through OCP's Procurement Training Institute. The OCFO OC has a great partnership with OCP and has been working with their team to identify a path forward to coordinate access to the PTI training for the OCFO. The OCP PTI is also developing a Learning Management System that will allow access to the independent agency procurement staff. The OCFO will continue to partner with OCP as they update accessibility of the PTI for independent agencies.

In addition, the OCFO does not have a certification requirement in the position descriptions for contracting personnel. Thus, there is no mandatory procurement training requirement within the OCFO. However, the OCFO CPO requires OC staff to participate in at least three (3) procurement-related training courses yearly as a competency evaluation part of the employees' annual performance evaluation plan.

If you have questions or require additional information, please contact Timothy Barry, Executive Director, Office of Integrity and Oversight, at (202) 442-6433.

Sincerely,



Glen Lee

cc: Angell Jacobs, Deputy CFO and Chief of Staff
Timothy Barry, Executive Director, Office of Integrity and Oversight

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