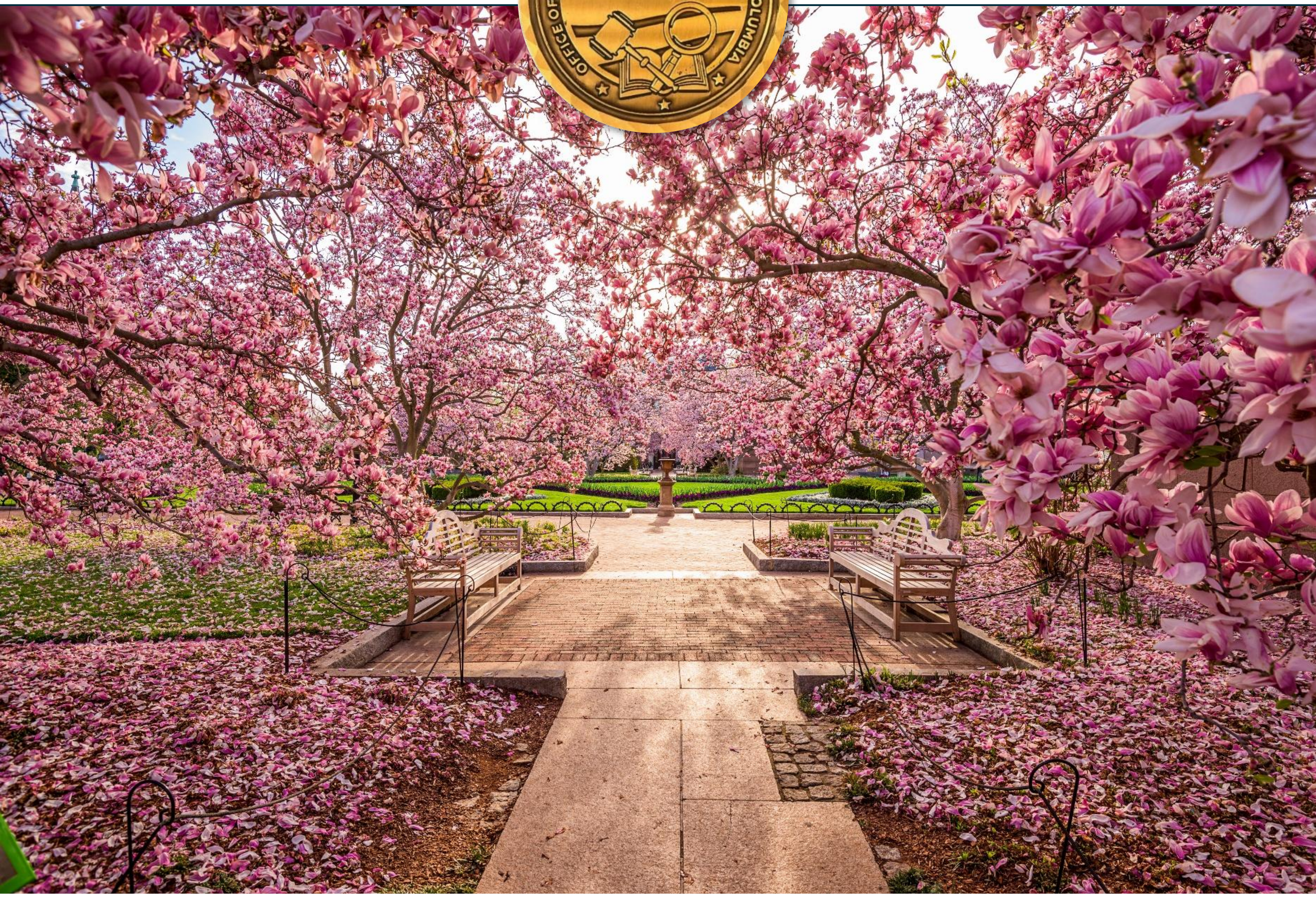
OFFICE OF THE
INSPECTOR GENERAL
DISTRICT OF COLUMBIA GOVERNMENT

AUDIT REPORT
District Agencies' Human Capital Management

OIG No. 25-1-02MA

July 16, 2026



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

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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: Sam Abed
Director, Department of Youth Rehabilitation Services

Marke Cross
Executive Director, Office of Police Complaints

Francisco J. Diaz, MD
Chief Medical Examiner

Steven Walker
Interim Director, Department of Human Resources

Fred Moosally
Director, Alcoholic Beverage and Cannabis Administration

From: Matthew Wilcoxson *Matthew Wilcoxson*
Interim Inspector General

Date: July 16, 2026

Subject: **District Agencies' Human Capital Management**
OIG No. 25-1-02MA

This memorandum transmits our final audit report, District Agencies' Human Capital Management. We conducted this audit in accordance with generally accepted government auditing standards. Our objective was to determine whether District agencies maintain effective policies across the human capital management lifecycle—from strategic planning and recruitment to staff development, retention, succession planning, and separation—and to assess these processes for compliance with District and federal requirements as well as industry best practices.

We identified six findings and made 15 recommendations to strengthen human capital management across the District government. These recommendations were directed to the Director of the Department of Human Resources (DCHR); the Director of the Department of Youth Rehabilitation Services; the Chief Medical Examiner of the Office of the Chief Medical Examiner; the Executive Director of the Office of Police Complaints; and the Director of the Alcoholic Beverage and Cannabis Administration.

Each agency provided written feedback on the recommendations applicable to them, and their responses have been incorporated into this report.

DCHR disagreed with finding one and recommendation two. DCHR noted that the recommended work is already occurring for recommendation one. DCHR stated that it primarily provides guidance to District agencies and emphasized the decentralized nature of the District's personnel management structure. However, its mission includes providing "human resource management services that strengthen individual and organizational performance," which encompasses both advisory functions and broader workforce management responsibilities. Although DCHR offers programs and resources to support agencies, its response does not meet the intent of our recommendation.

The remaining agencies acknowledged the recommendations and described steps they are taking, or plan to take, to improve workforce planning and address identified risks. Several agencies outlined ongoing efforts to enhance recruitment, training, and retention, while others stated they would integrate the recommended practices into existing processes. One agency noted constraints such as limited resources or competing priorities but expressed an intent to make incremental improvements. Although the specificity of responses varied, most agencies recognized the importance of a more structured, risk-informed approach to managing workforce challenges.

We have incorporated the agencies' responses into this report, and their verbatim replies are included as attachments. We will track open recommendations for resolution and implementation, notify the Council and the Mayor about our findings, and report annually on actions taken and on any recommendations that remain unresolved.

Should you have questions or concerns, please contact me or the Assistant Inspector General for Audits, Slemo Warigon, at slemo.warigon@dc.gov or 202-792-5684.

EXECUTIVE SUMMARY

District Agencies' Human Capital Management

Summary
People are the foundation of the District government. Every day, staff across more than 70 agencies deliver essential programs and services. The systems and policies that govern how they are hired, developed, supported, and transitioned out of service directly impact the government's ability to operate effectively. Managing human capital is therefore more than an administrative process—it is essential to effective governance. The Department of Human Resources (DCHR), as the District's central personnel authority, is responsible for establishing the policies and frameworks that agencies rely on to manage their workforce and support the people who carry out the District's mission.

The Office of the Inspector General initiated this audit to examine how effectively District agencies are managing their human capital, and whether DCHR is fulfilling its role as the policy leader for that work. We selected four agencies for in-depth examination: the Department of Youth Rehabilitation Services (DYRS), the Office of the Chief Medical Examiner (OCME), the Office of Police Complaints (OPC), and the Alcoholic Beverage and Cannabis Administration (ABCA).

Objectives
Our objective was to determine whether District agencies maintain effective policies throughout the human capital management lifecycle—from strategic planning and recruitment to staff development, retention, succession planning, and separation—and to assess these processes for compliance with applicable District and federal requirements as well as industry best practices.

Findings
We found that the District's human capital infrastructure has meaningful gaps at both the central and agency levels. DCHR has not established the kind of forward-looking succession planning framework that agencies need to prepare for employee transitions and protect critical institutional knowledge.

Across the agencies reviewed, we identified multiple instances of noncompliance with internal policies and procedures. These deficiencies were evident in how agencies managed system access for departing employees, documented hiring decisions, and invested in employees' professional development. These issues indicate that several agencies lack adequate policy infrastructure, and DCHR is not completely filling its role as the personnel authority.

Recommendations
This report presents six findings and 15 recommendations aimed at addressing these weaknesses. Implementation will require coordinated action—from DCHR, to establish the Districtwide framework its role demands, and from each agency, to strengthen the internal controls that protect their operations, their employees, and the residents they serve.

Management Response
Overall, management agreed in principle with our proposed recommendations, concurring with 11 of the 15 issued. Agencies' written responses have been incorporated into the report, and their full replies are included in the appendix.

District Agencies' Human Capital Management

INTRODUCTION

Effective management of an organization's workforce is among the most consequential responsibilities of any government. The District of Columbia employs over thirty thousand people across more than 70 agencies, and the policies governing how those employees are recruited, developed, and eventually separated from service shape the government's capacity to serve residents, business owners, and visitors.[1] The District of Columbia Department of Human Resources (DCHR) plays a central role in establishing and administering the personnel policies and regulations that govern District agencies throughout the employment lifecycle. The Office of the Inspector General (OIG) included this audit in its fiscal year (FY) 2025 Audit and Inspection Plan to determine whether District agencies are maintaining effective human capital management policies and implementing them consistently — and whether DCHR, as the District's central personnel authority, is providing the framework and oversight necessary to make that possible.

What is Human Capital Management?

The District's approach to managing its workforce is grounded in a statutory framework designed to ensure modern, merit-based personnel administration. The Comprehensive Merit Personnel Act of 1978 (CMPA), D.C. Law 2-139, codified at DC Code § 1-601.02, declares it the purpose and policy of the District to maintain "a modern flexible system of public personnel administration" — one that establishes the means to "recruit, select, develop, and maintain an effective and responsive work force consistent with merit principles." Those merit principles include training employees as needed to assure high-quality performance, retaining employees on the basis of performance, and providing equitable and adequate compensation. Together, these provisions express a Districtwide commitment not merely to compliance with personnel rules, but to the ongoing development and stewardship of the government's workforce as a matter of fundamental public administration.

The District's personnel regulations, promulgated under the CMPA's authority, give that commitment operational form. When the DC Department of Human Resources (DCHR) amended Chapter 2 of Title 6-B of the District of Columbia Municipal Regulations (DCMR) in 2021, it deliberately incorporated "strategic concepts from the human resources field, such as workforce planning, recruitment strategies, and onboarding" — modernizing the District's regulatory framework to reflect current practice in the profession.[2] The amended rules define talent acquisition as the District government's efforts to "prepare for future talent needs, attract highly skilled candidates to government service, and select individuals for employment," and require the personnel authority to implement a workforce planning process that identifies current and potential critical skills and knowledge gaps — using that data to develop gap-reduction strategies, inform agency structures, and identify and overcome internal and external barriers to accomplishing strategic workforce goals.[3] By

[1] GOV'T OF THE DISTRICT OF COLUMBIA FY 2026 APPROVED BUDGET AND FINANCIAL PLAN CONG. SUBMISSION, VOL. 1 EXEC. SUMMARY, I-12, TABLE 1-4 (Oct. 5, 2025), https://cfo.dc.gov/node/289642 (last visited Mar. 3, 2026).

[2] Notice of Final Rulemaking, 68 D.C. Reg. 2869 (Mar. 19, 2021).

[3] 6-B DCMR §§ 202.1, 203.2.

choosing to embed these concepts in binding regulation, DCHR signaled that the District's personnel system would be evaluated not only against procedural compliance, but against the substantive standards of effective workforce management.

"Human capital management" (HCM) is the organizing framework within which those standards are defined. The US Government Accountability Office (GAO), through its body of work on strategic human capital management, has established that effective management of a government's workforce requires aligning human capital programs with an organization's current and emerging mission and programmatic goals, and developing long-term strategies for acquiring, developing, and retaining the staff needed to achieve those goals. In *Human Capital: Key Principles for Effective Strategic Workforce Planning*, GAO identified five core principles that strategic workforce planning should address: involving top management and stakeholders in developing and communicating the workforce plan; determining the critical skills and competencies needed to achieve programmatic results; developing strategies tailored to address gaps in workforce alignment and capability; building organizational capacity to support workforce planning requirements; and monitoring and evaluating progress toward strategic goals.[4] These principles — synthesized from GAO's review of both federal agencies and leading workforce planning organizations — define what sound HCM practice looks like in the public sector, irrespective of jurisdiction.

The US Office of Personnel Management (OPM), as the federal government's authoritative source for human capital policy, has operationalized these principles through its Human Capital Framework, which establishes government-wide standards for strategic workforce planning, talent management, performance management, and evaluation.[5] OPM's HCM guidance makes clear that agencies must manage a series of interrelated functions that span an employee's entire career. These functions include planning and forecasting workforce needs, recruiting and hiring qualified candidates, onboarding new employees, developing and managing performance, engaging and retaining talent, preparing for future employee needs through succession planning, and conducting orderly separation and offboarding. Rather than treating these activities as isolated administrative tasks, OPM emphasizes that they operate as an integrated system, and that aligning them effectively is essential to supporting both employee success and agency mission delivery.[6] While OPM's regulatory authority extends only to federal agencies, its framework reflects broadly recognized standards for effective public-sector workforce management.

Taken together, the CMPA's mandate, DCHR's 2021 regulatory modernization, GAO's foundational principles, and OPM's operational framework define both the commitment the District has made to its workforce and the standards against which the District's performance should be assessed. The CMPA establishes what the District is required to achieve; DCHR's

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[4] US Government Accountability Office, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, GAO-04-39, (Dec. 11, 2003), https://www.gao.gov/products/gao-04-39.

[5] US Office of Personnel Management, *Human Capital Framework*, https://www.opm.gov/policy-data-oversight/human-capital-framework/, (last visited Mar. 3, 2026).

[6] OPM, *Human Capital Management*, https://www.opm.gov/policy-data-oversight/human-capital-management, (last visited Apr. 13, 2026).

own regulatory choices reflect a deliberate decision to be measured against contemporary HCM practice; and GAO's principles and OPM's framework describe how well-managed public organizations achieve it. For DCHR, as the District's central personnel authority, this means not only establishing policies that satisfy the CMPA's requirements, but providing the infrastructure, guidance, and oversight that enable agencies across the District government to fulfill that commitment — and positioning the government's workforce to serve residents, stakeholders, and visitors effectively today and into the future.

Why This Audit Matters

The District's FY 2025 approved operating budget totals $21.2 billion.[7] Of that amount, personnel services — the salaries, wages, and fringe benefits that fund the District's workforce — account for approximately $5.1 billion, or 24 percent of total expenditures.[8] For District residents, that figure is not a concept. It represents a significant category of public spending, and it reflects one of the government's most fundamental investments: the people it employs to deliver services every day.

The District government's ability to deliver those services depends directly on the quality, preparedness, and continuity of its workforce. When human capital management policies are missing or poorly implemented, the consequences go well beyond simple administrative tasks. They create cybersecurity vulnerabilities, expose the District to legal and compliance risk, and weaken the government's ability to develop and retain the people it needs to serve residents.

For this engagement, our audit objective was to:

> Determine whether District agencies maintain effective policies throughout the human capital management lifecycle — from strategic planning and recruitment to staff development, retention, succession planning, and separation-- and to assess these processes for compliance with District and federal requirements, as well as industry best practices.

The District of Columbia Department of Human Resources

DCHR's authority derives from a Mayoral delegation[9] of the personnel authority vested in the Mayor under the District's Comprehensive Merit Personnel Act, Title 1, Chapter 6, of the DC Official Code.[10] Through that delegation, DCHR establishes binding personnel rules, classification and compensation structures, hiring authorities, and workforce policies that

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[7] Gov't of the District of Columbia FY 2025 Approved Budget and Financial Plan Cong. Submission, Vol. 1 Exec. Summary, July 30, 2024, https://cfo.dc.gov/node/289642.

[8] Gov't of the District of Columbia FY 2025 Approved Budget and Financial Plan Cong. Submission, Vol. 6 Operating Appendices, https://app.box.com/s/89ool47wqzd92bcnic2cem8c5ekwwzax.

[9] District of Columbia, Mayor's Order 2008-81, Joint Delegation of Personnel Authority – Director of the D.C. Department of Human Resources and Agency Heads, June 5, 2008.

10 D.C. Code §§ 1-601.01 – 1-636.03, https://code.dccouncil.gov/us/dc/council/code/titles/1/chapters/6 (last visited Feb. 25, 2026).

agencies across the District are required to follow. The scope of DCHR's authority extends across a complex and decentralized government structure.

Although day-to-day HR matters are generally addressed by HR staff at individual agencies, DCHR sets Districtwide policy and promotes sound HR practices across the full workforce. Accordingly, any systemic gaps or weaknesses in human capital management across the District are appropriately examined through DCHR's role as the central authority. Because DCHR establishes policies that guide most agencies, it significantly influences how effectively human capital management functions across the District.

DCHR is organized into six divisions, called “administrations,” and the Office of the General Counsel, all of which report to the Director of DCHR. The Office of the Director provides executive management, policy direction, strategic and financial planning, and resource management, and offers consultation to the Mayor and members of the Cabinet on human resource matters.

DCHR's Policy and Compliance Administration designs and oversees unified personnel standards across the District, collaborating with agencies to develop modern HR practices and monitoring compliance with personnel requirements. Its Strategic Human Capital division manages the human capital planning process, including performance management oversight, workforce data analysis, and outcome monitoring.

Workforce Planning and Succession Planning

OPM's workforce planning guidance emphasizes the importance of data-driven analysis to understand current workforce capabilities, anticipate future skill needs, and address potential gaps before they impact mission delivery. Effective workforce planning requires agencies to consider factors such as attrition trends, retirement eligibility, recruitment challenges, and emerging skill demands and to develop strategies that ensure the workforce can meet both current and future operational requirements.[11]

OPM describes succession planning as a forward-looking component of workforce planning in which agencies identify mission-critical roles, assess the risks associated with vacancies in those roles, and develop internal talent to maintain leadership and operational continuity. Succession planning is intended to prepare a pool of employees who possess or are developing the competencies needed for key positions without predetermining outcomes or selecting individuals in advance. This distinction is essential in a merit-based hiring system, where preparation for future needs must occur without violating competitive hiring principles. While federal regulations such as 5 C.F.R. § 250.204(a)(5) apply only to federal agencies, they reflect a broadly recognized public-sector expectation that organizations

[11] OPM, Human Capital Framework.

ensure leadership continuity by implementing and evaluating recruitment, development, and succession strategies for key roles.[12]

Effective workforce management requires organizations to look beyond their immediate staffing needs and plan for future workforce risks. The District's Electronic Personnel Manual (E-DPM) requires DCHR, as the personnel authority, to implement a workforce planning process that identifies current and potential critical skills and knowledge gaps across District agencies. In responding to this audit, DCHR described workforce planning as a strategic process through which agencies anticipate and prepare for employee departures by analyzing attrition trends, retirement eligibility, and hiring patterns. This understanding of workforce planning reflects DCHR's interpretation of its responsibilities under the E-DPM and provides the basis for assessing whether a Districtwide framework is in place and functioning effectively.

DCHR has noted that pre-selecting individuals for specific future roles is not permissible under the District's merit-based hiring system, and the OIG acknowledges that requirement. At the same time, effective workforce management in the District must account for the practical realities of agency operations and the need to maintain continuity in mission-critical positions. In this report, "succession planning" refers to skills-focused talent development activities used to mitigate operational risk, not the selection of future appointees. Where the E-DPM establishes specific requirements, we apply its workforce planning framework. Properly understood, these concepts are complementary rather than conflicting: agencies can build the skills needed for continuity while fully adhering to merit-based hiring principles.

AUDIT METHODOLOGY

How We Conducted This Audit

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Risk-Based Assessment

We began with a formal risk assessment to identify the highest-risk areas that might affect the achievement of our audit objectives. This assessment identified seven key areas for potential review:

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[12] Title 5 C.F.R. § 250.204(a)(5) requires federal agencies to "[e]nsure leadership continuity by implementing and evaluating recruitment, development, and succession plans for leadership positions[.]"

- **Recruitment**: Risk of inadequate workforce planning leading to skill gaps, and of favoritism or nepotism in candidate selection.
- **Hiring**: Risk of incomplete background checks and credential verification, and falsification of hiring documentation.
- **Staff Development**: Risk that agencies lack formal training and career development programs, resulting in unmet employee development needs.
- **Performance Management**: Risk that performance evaluations do not meaningfully assess how employee performance supports agency and program objectives, resulting in unclear expectations and limited insight into workforce effectiveness.
- **Retention**: Risk of high employee turnover due to poor work culture or inadequate engagement strategies.
- **Succession Planning**: Risk that the absence of a strategic workforce planning framework leads to unaddressed skill and knowledge gaps—leaving agencies unprepared for employee departures, retirements, and transitions in key roles.
- **Separation and Offboarding** — Risk of incomplete offboarding procedures, including failure to revoke system access, and unauthorized salary payments to separated employees.

Evaluation Framework

Our risk-based assessment led us to concentrate this audit on three internal control principles drawn from the U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*, known as the Green Book, which served as our primary evaluation framework.[13] These control principles, assessed whether District agencies and DCHR had effective systems in place to:

1. Demonstrate commitment to competence, including through succession and contingency planning for key roles;
2. Design and implement information system controls that protect against unauthorized access and ensure data integrity; and
3. Maintain documentation sufficient to support management decisions, demonstrate compliance, and enable effective oversight.

[13] *Standards for Internal Control in the Federal Government*, GAO-14-704G (September 2014), also known as the Green Book, provides a framework for establishing and maintaining the policies, procedures, and oversight mechanisms that enable organizations to achieve their objectives and maintain accountability.

Where applicable, we supplemented the Green Book with the District's own regulatory standards, including the E-DPM, which establishes binding personnel rules and procedures that District agencies are required to follow, and the Office of the Chief Technology Officer's (OCTO) Personnel Security Policy, which governs information system access controls for District employees.

We also evaluated agency practices against established public-sector best practices articulated by OPM. OPM provides widely recognized federal standards for effective workforce management, including workforce planning, talent development, and leadership continuity. These benchmarks informed our assessment of whether District agencies' HCM policies and practices reflect the standards commonly applied in well-managed public organizations—particularly in areas, such as succession planning, where District regulations establish a baseline but do not fully define what effective implementation entails.

What We Reviewed

To gather sufficient, appropriate evidence to evaluate DCHR’s and District agencies' human capital management policies and practices against the three control principles identified above, we:

- Obtained, reviewed, and analyzed relevant laws, rules, regulations, policies, and procedures related to the HCM lifecycle, including the DC Official Code, DC Municipal Regulations, the Comprehensive Merit Personnel Act, the E-DPM, OCTO's Personnel Security Policy, OPM's human capital management guidance, and GAO's *Standards for Internal Control in the Federal Government* (Green Book);

- Reviewed DCHR's FY 2024 Performance Plans and Performance Accountability Reports, as well as agency budget documents and FTE counts;

- Held discussions with OIG Human Resources staff to gain an understanding of human capital management processes, policies, and procedures;

- Coordinated with the DC Auditor's Office to ensure no duplication of effort with their concurrent review of District human resources operations;

- Coordinated with OIG Investigations and Inspection and Evaluation units to identify any overlaps with ongoing OIG projects;

- Reviewed OIG Hotline complaints relating to District agencies' management of human capital;

- Distributed a human capital management survey to 77 District government agencies, received and analyzed responses from 31 agencies, and conducted follow-up meetings with selected agencies based on their responses;

- Obtained independent read-only access to PeopleSoft, DCHR's primary human resources information system, and received training from DCHR to understand how documentation is maintained and how to run queries for data analytics;

- Conducted walkthroughs and interviews with DCHR's Deputy Director and Associate Directors for Recruitment, Center for Learning and Development, and Policy and Compliance to gain an understanding of their roles and responsibilities;

- Conducted site visits at four selected District agencies (DYRS, OPC, OCME, and ABCA) where we reviewed documentation and interviewed agency officials and HR staff;

- Selected and tested a non-statistical sample of 35 employees across three strata (newly hired, active, and separated) to assess HCM lifecycle processes identified as high-risk areas; and

- Received, reviewed, and considered written agency responses to Notices of Finding and Recommendation issued during the audit.

Scope and Limitations

Our audit covered HCM policies and practices within the Evaluation Framework identified above for the period October 1, 2024, through March 31, 2025, operating at two levels. First, we assessed DCHR's role in establishing and overseeing specific elements of the District's workforce planning framework. Second, we evaluated implementation of that framework at DYRS, OPC, OCME, and ABCA. We also administered a survey to 77 District agencies, and we analyzed attributes of a sample of individual District employees. The four agencies were selected judgmentally from among the 31 agencies that responded to our survey. Our findings and recommendations reflect conditions at those four agencies and at DCHR in its role as the District's central personnel authority; they do not purport to represent the full universe of HCM practices across all District agencies.

Two limitations are worth noting. First, of the 77 agencies to which we distributed our HCM survey, only 31 responded — a response rate of approximately 40 percent. While we conducted follow-up outreach with non-responsive agencies, this limited our initial situational awareness of HCM conditions across the District government. This limitation did not impair our ability to achieve the audit objectives, as our conclusions are based on in-depth review and testing at selected agencies rather than survey responses alone.

Second, the sample of 35 employees selected for attribute testing was non-statistical and judgmental in nature. As a result, the findings from that testing reflect the specific cases examined and cannot be projected to the broader District workforce with statistical confidence. Nevertheless, the conditions identified through this testing represent actual control deficiencies that warrant corrective action regardless of their specific extent across the government.

KEY FINDINGS AND RECOMMENDATIONS

Our audit found that policies governing the HCM lifecycle exist, but agencies we examined do not consistently implement them, and DCHR lacks a District-wide framework to ensure consistent implementation. As a result, a cluster of operational, cybersecurity, and compliance risks compromise the District government's ability to manage its workforce.

We organized our findings into three categories that correspond with our evaluation framework and reflect the different levels at which corrective action is needed.

The first category, **Strategic Workforce Preparedness**, addresses a gap at the DCHR level. As the District's central personnel authority, DCHR is responsible for implementing a workforce planning process and equipping agencies to manage long-term workforce continuity. We found that DCHR has not developed and disseminated a framework to help agencies systematically identify critical positions, assess succession risks, and build talent pipelines — leaving agencies without consistent, structured guidance for managing leadership continuity.

The second category, **Information Security and Access Controls**, examines two agencies' failures to disable system access for employees who separated from their agencies. These findings carry the most immediate risk to the District: active accounts held by former employees create ongoing exposure to unauthorized access to government systems and data after the employment relationship has ended.

The third category, **Talent Acquisition and Employee Development**, encompasses three findings involving hiring documentation, residency preference verification, and the absence of required annual employee development plans. Each finding involves a different agency and a different point in the HCM lifecycle, but they share a common thread: agencies are not consistently following established District policies. Taken together, these findings also point to the absence of consistent Districtwide guidance and accountability mechanisms that would enable DCHR to detect and address these kinds of lapses before they are identified through audit.

For each finding, we provide specific recommendations to the relevant agency or agencies. Implementing these recommendations would strengthen the District's human capital management framework, reduce operational and compliance risk, and better position District agencies to attract, develop, and retain the workforce needed to serve District residents.

Strategic Workforce Preparedness

Finding 1: DCHR Did Not Establish a Districtwide Succession Planning Framework

Strong governance of any large organization requires not only managing the workforce of today but preparing for the workforce of tomorrow. Section 4.06 of the GAO Green Book, which establishes standards for internal control in government, requires management to define succession and contingency plans for key roles to ensure the entity can continue achieving its objectives. Succession plans address the long-term need to replace competent personnel, and contingency plans to address sudden vacancies that could compromise the internal control system. Sections 4.07 and 4.08 further require management to provide training to prepare employees to assume key roles and define contingency plans for assigning responsibilities when a key role is vacated without advance notice.[14]

The E-DPM establishes parallel guidance for DCHR as the District's personnel authority. Section 203.2 requires that "[t]he personnel authority shall implement a workforce planning process that identifies current and potential critical skills and knowledge gaps," with that data used to develop knowledge gap reduction strategies, inform agency structures, and identify strategies to overcome barriers to accomplishing strategic workforce goals. Section 203.3 provides that when required by the personnel authority, agencies shall develop agency-specific workforce plans that include, among other things, a list of mission key roles, core competencies by position type, turnover data, and the number of employees eligible to retire within two years. Section 203.4 requires that "[t]he personnel authority shall collect, aggregate, and analyze information from workforce plans to prepare recommendations for addressing workforce shortages." Together, these provisions impose a Districtwide obligation on DCHR to implement a process, equip agencies to contribute to it when directed, and synthesize the results into actionable recommendations.[15]

Our audit found that DCHR does not have a District-wide succession planning framework in line with current best practices, and provides no standardized guidance, tools, templates, or documented expectations to help agencies identify key roles, assess workforce vulnerabilities regarding the risks of losing employees in key roles, develop talent pipelines to step into those roles, or document transition procedures. The lack of a framework and guidance to agencies leaves the District government at risk of losing institutional knowledge and the interruption of critical functions in the event of staff departures.

Our survey asked agencies whether they have a formal succession plan. Twenty-five of the 31 responding agencies reported they did not. Of the six that answered yes, most referenced their Continuity of Operations Plan (COOP) as their succession plan. COOPs address operational continuity during emergencies; they are not designed for the kind of long-term, skills-based succession planning that the Green Book asserts.

DCHR disagrees with this finding. In its written response, DCHR contends that E-DPM § 203.2 requires a workforce planning *process*, not a formal policy, and that DCHR has implemented such a process through several initiatives: the Executive Leadership Program (ELP), designed to build executive-level talent pipelines across the District; the Certified Public Manager Program (CPM), a

[14] U.S. Gov't Accountability Office, Standards for Internal Control in the Federal Gov't, GAO-14-704G, §§ 4.06–4.08 (Sept. 2014).

[15] Electronic District Personnel Manual, Chapter 2: Talent Acquisition, §§ 203.2 - 203.4, https://edpm.dc.gov/chapter/2/ (last visited Mar. 3, 2026).

nationally accredited leadership development program for District managers; the Agency Workforce Planning Dashboard, which provides agencies real-time workforce data drawn from the PeopleSoft system; and a Recruitment General Information Guide and incentives issuance to support competitive hiring.[16] DCHR further contends that § 203.3's "when required" language gives it explicit authority to decide whether to require agency-specific plans, and that it has chosen not to impose what it characterizes as "one size fits all" mandates in its decentralized HR system. DCHR's response also references two forthcoming actions: an "HR Connection Lab" with a workforce planning workgroup, and a Districtwide HR training program scheduled for January 2026 implementation.[17]

OIG notes that the two forthcoming actions, the Connection Lab and the workforce planning group, were not in place when this audit was conducted. Further, OIG does not dispute that DCHR holds discretionary authority under § 203.3, and we acknowledge the initiatives DCHR has developed. The ELP and CPM are valuable professional development offerings, but they do not reflect key characteristics of a succession plan and therefore do not address important risks to District government operations. Both programs develop general leadership and management competencies in employees who elect to participate, but neither begins with an identification of which positions are mission critical, what specific competencies those roles require, or where skills gaps exist relative to those requirements. These initiatives work from the supply side, developing capability broadly without a systematic connection to where risk is most acute.

Absent a District-wide succession planning framework, DCHR cannot systematically identify or mitigate workforce-continuity risks, leaving agencies vulnerable to avoidable disruptions when mission-critical positions become vacant. The District government includes agencies whose key roles require specialized credentials, technical expertise, or institutional knowledge that cannot be quickly replaced through routine hiring. When those roles turn over—whether through planned retirement, resignation, or an unplanned departure—agencies that have not identified those positions as mission critical, mapped the competencies they require, and developed an internal talent pool with those competencies face avoidable disruption. Even where appointments to key roles are made through processes outside DCHR's direct

[16] Letter from D.C. Department of Human Resources to the OIG, Re: Response to Notice of Finding and Recommendation No. 25-1-02MA (Nov. 17, 2025) (copy on file with the OIG). The DCHR Executive Leadership Program is summarized on the agency website: https://dchr.dc.gov/page/executive-leadership-program-elp-0; and the Certified Public Manager Program at https://dchr.dc.gov/page/certified-public-manager-program-0.

[17] The HR Connection Lab workforce planning workgroup and the Districtwide HR training program were described in DCHR's November 17, 2025, response as prospective actions. They are noted here as evidence of DCHR's responsiveness to the audit and as context for the recommendation, but they do not reflect conditions during the audit period of FY2024 through March 31, 2025 of FY2025.

control, a robust internal talent pipeline, developed under a District-wide framework, gives decision-makers a stronger field of qualified candidates and reduces the operational impact of transitions. Without that framework, DCHR lacks a common standard to assess and manage risks and has no centralized visibility into where workforce continuity risks are most acute across the District government.

Recommendation 1
We recommend that the Director, DCHR: Develop and disseminate a District-wide workforce planning framework, inclusive of succession guides, that provides District agencies with standardized guidance, tools, and expectations for identifying key roles, assessing workforce vulnerabilities, and documenting transition and contingency procedures.
Management Response: *DCHR disagrees with the finding but explains that it is already carrying out the work described in the recommendation. The agency states that it launched an HR Connection Lab in October 2025, which includes a workforce-planning working group focused on developing consistent, data-informed approaches to workforce planning and succession planning across the District. According to DCHR, this group—composed of HR representatives from several agencies—has met biweekly since November 2025 and has produced a draft workforce planning template. The template was presented for feedback during a February 2026 HR community meeting, where DCHR also highlighted business-intelligence dashboards, including a workforce-planning dashboard. The agency reports that the template and associated resource tools are being finalized and will be posted on DCHR's website. DCHR further notes that it introduced an HR Foundations training program in March 2026, which includes instruction on strategic HR and data analysis intended to support workforce-planning activities.*

Our Notes:

DCHR's response describes several ongoing initiatives, but it does not demonstrate that the agency has established a District-wide succession-planning framework. The working group, draft templates, business-intelligence dashboards, and HR Foundations training program may strengthen workforce-planning capabilities generally, but they do not constitute the type of standardized, District-wide succession guidance envisioned under the E-DPM and the Green Book. The response does not show that DCHR has developed tools or expectations that would enable agencies to identify mission-critical roles, assess workforce-continuity risks, or document transition and contingency procedures in a consistent manner.

DCHR notes that a working group has been meeting since late 2025 and has produced a draft workforce-planning template that is still being finalized, and that additional tools will be posted on its website once complete. However, these materials were not in place during the audit period and have not yet been formally issued or adopted across the District. As a result, agencies still lack the unified framework necessary to support succession planning as contemplated by District regulations and internal-control standards. For these reasons, the condition identified in the finding remains unresolved.

Recommendation 2
We recommend that the Director, DCHR: Establish oversight mechanisms to monitor agency implementation of the succession planning framework, including periodic reviews to assess compliance and identify agencies that may require additional support or technical assistance.
Management Response: *DCHR disagrees with the recommendation to establish oversight mechanisms for monitoring agency implementation of a succession-planning framework. The agency explains that the District operates a decentralized human resources system, and while DCHR provides guidance and support, it intentionally avoids imposing broad mandates or uniform requirements on all agencies. According to DCHR, HR representatives participating in the workforce-planning working group expressed that workforce-planning needs vary significantly depending on an agency's size and workforce composition, and that agencies prefer having access to a range of templates and tools rather than a single, standardized requirement. DCHR asserts that by offering resources such as the tools and templates described in its response to Recommendation 1, it equips agencies to develop workforce-planning and succession-planning approaches suited to their individual needs, without imposing centralized oversight or compliance reviews.*

Our Notes:

The recommendation does not call for a rigid, uniform, or "one-size-fits-all" succession-planning mandate. Rather, it calls for DCHR to establish a mechanism to determine whether agencies are implementing whatever framework, guidance, and tools DCHR ultimately develops. A framework is designed to support flexibility, not limit it, and agencies would retain full discretion to tailor their workforce-planning documents to their operational needs.

DCHR states that it provides guidance and support but does not impose requirements; however, the E-DPM establishes obligations that extend beyond discretionary guidance. Under § 203.3, agencies are required to develop workforce plans when directed by the personnel authority, and under § 203.4, DCHR must collect and analyze information from those plans to prepare recommendations for addressing workforce shortages. Because agencies did not develop such plans and DCHR chose not to require them, DCHR has no means to obtain the information needed to carry out its responsibilities under the E-DPM.

The initiatives described in the response — such as templates, tools, and training — may support general workforce-planning capacity, but without an oversight mechanism, DCHR cannot determine whether agencies are identifying mission-critical roles, assessing workforce-continuity risks, or preparing plans that protect future agency operations. As a result, the condition identified in the finding remains unresolved, and we request that DCHR reconsider the intent of our recommendation and its position.

Information Security and Access Controls

Finding 2: OPC Did Not Maintain Evidence of Timely Account Deactivation for Separated Employees

The Office of Police Complaints (OPC) could not produce documentation or system records verifying that separated employees' user accounts had been disabled on or before their last working day. The absence of such records means OPC is unable to demonstrate that it met its obligations under District IT security policy.

OCTO Personnel Security Policy, Section 4.3, Personnel Separation, requires that District agencies, upon an individual's separation from the District workforce: (1) disable the user's information system access on the employee's last work day; (2) disable any authenticators or credentials associated with the individual; (3) conduct exit interviews that include a discussion of all items in the agency's separation checklist; (4) retrieve all agency property; (5) ensure that appropriate personnel retain access to data stored on a departing employee's information system; and (6) notify the agency's Service Desk within twenty-four hours of separation notification.[18] The GAO Green Book further establishes that management should design information system controls to achieve objectives and respond to risks (§ 11.01), and that general controls, including security management and logical access, should apply consistently across the entity's information systems (§ 11.07).[19]

On August 14, 2025, the OIG requested documentation verifying timely account deactivation for two separated OPC employees. OPC was unable to produce system logs, deactivation notifications, or confirmation from account settings for either employee. In attempting to locate the records, on August 19, 2025, OPC reported that "the user accounts for a large number of our separated employees inexplicably do not appear at all in the dashboard" in their account management software. On September 17, 2025, after escalating to OCTO for assistance, OPC reported that OCTO similarly "cannot seem [to] provide dates or verify the deactivation dates" for the accounts in question. While the accounts are no longer visible in the system, which is consistent with OCTO's practice of archiving mailboxes after 30 days of suspension, neither OPC nor OCTO could confirm when deactivation occurred or whether it happened on or before each employee's last working day, as required.

OPC did not design and implement adequate documentation procedures to verify and retain evidence that separated employees' accounts were deactivated on time. The agency lacked an established process for creating and retaining deactivation records, such as completed user account termination checklists or system-generated logs, as part of its offboarding workflow. As a result, OPC cannot demonstrate compliance with OCTO's personnel security requirements, and the risk remains that former employees may have retained unauthorized access to OPC systems, data, and resources after separation.

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[18] Office of the Chief Technology Officer, Personnel Security Policy, § 4.3 (published Feb. 22, 2021; revised Feb. 23, 2023), https://octo.dc.gov/publication/personnel-security-policy (last visited Feb. 19, 2026).

[19] GAO Standards for Internal Control in the Federal Government, GAO-14-704G (Sept. 2014).

Recommendation 3
We recommend that the Executive Director, OPC: Establish and enforce a documented procedure requiring the timely disabling of user accounts when employees separate from the agency, with a specific requirement that deactivation occur no later than the employee's last working day, consistent with OCTO's Personnel Security Policy.
Management Response: *OPC agrees with the recommendation and acknowledges the importance of establishing and documenting procedures to ensure that user accounts are disabled immediately upon an employee's separation. The agency states that it concurs with the OIG's determination and views the adoption of best practices for network security as essential given current cybersecurity risks. OPC commits to drafting and implementing a policy aligned with OCTO's Personnel Security Policy and consistent with the OIG's recommendations by December 31, 2026.*
Our Notes: *We consider this recommendation resolved and open, subject to implementation.*

Recommendation 4
We recommend that the Executive Director, OPC: Implement monitoring and documentation controls to ensure that evidence — such as user account termination checklists or system-generated logs — is created and retained to verify that user accounts were promptly and properly disabled upon employee separation.
Management Response: *Refer to OPC's response to Recommendation 3.*
Our Notes: *We consider this recommendation resolved and open, subject to implementation.*

Finding 3: DYRS Did Not Consistently Disable System Access for Separated Employees

The Department of Youth and Rehabilitation Services (DYRS) did not consistently disable user accounts for employees who separated from the agency. Of the nine separated employees reviewed during the audit, four retained active system access for months — in some cases nearly two years — beyond their departure date, which is not in accordance with DYRS's own internal procedures or the District IT security policy.

DYRS's Human Resources Division Employee Relations Standard Operating Procedures require that, for separations, the Employee Relations Specialist email and ensure that IT disables the departing employee's account accordingly.[20] OCTO's Personnel Security Policy, § 4.3, independently requires that District agencies disable a departing employee's information system access no later than the employee's last workday, disable associated authenticators and credentials, and notify the agency's Service Desk within twenty-four hours of separation notification.[21]

On August 14, 2025, the OIG requested documentation verifying that accounts had been disabled for nine separated DYRS employees. DYRS's IT Division provided the responsive records on August 19, 2025. Review of those records revealed that five of the nine accounts were disabled on or before the employees' separation dates, consistent with policy. The remaining four accounts, however, remained active well beyond the required deactivation date — for 158, 217, 536, and 606 days after the respective employees left the agency. Notably, all four of those accounts were disabled on August 19, 2025 — the same date DYRS responded to the OIG's request. There is no evidence that DYRS had identified or acted on any of these active accounts prior to the audit inquiry. Without OIG's intervention, those accounts may have remained accessible indefinitely.

This condition stemmed from three related control failures: insufficient monitoring controls to verify that separated employees' accounts had been disabled; inadequate policies and procedures to enforce timely deactivation; and a lack of formal, documented coordination between DYRS's HR and IT functions. Without a structured process that requires HR to notify IT upon each separation and requires IT to confirm and document completion of the deactivation, accounts can remain active without detection.

Four former DYRS employees—individuals who no longer had any authorized relationship with the agency—retained the ability to access DYRS systems,

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[20] DYRS Human Resources Division Employee Relations Standard Operating Procedures, Section G, Progressive Discipline, (2)(b)(ii)(7).

[21] Office of the Chief Technology Officer, Personnel Security Policy, § 4.3 (published Feb. 22, 2021; revised Feb. 23, 2023), https://octo.dc.gov/publication/personnel-security-policy (last visited Feb. 19, 2026).

data, and resources for periods ranging from five months to nearly two years. Given that DYRS serves youth in the District's juvenile justice system, unauthorized access to its systems and records carries heightened sensitivity. The extended duration of the unauthorized access, and the fact that this issue came to light only through an audit request rather than through DYRS, indicates an internal control breakdown rather than an isolated issue.

Recommendation 5
We recommend that the Director, DYRS: Implement monitoring tools or conduct periodic reviews to identify and disable user accounts associated with separated employees, ensuring no accounts remain active beyond an employee's last working day.
Management Response: *DYRS agrees with the recommendation to implement monitoring tools and conduct periodic reviews to identify and disable user accounts associated with separated employees. The agency states that it will develop and implement an Agency User Accounts Management Policy that includes monitoring protocols, periodic access reviews, and procedures for account deactivation. DYRS also plans to establish a monthly user-account reconciliation process comparing active accounts to HR separation records and to deploy automated monitoring tools to flag inactive or unauthorized accounts. Drafting and internal review of the policy are scheduled for completion by mid-August 2026, with monitoring tools and monthly reviews to be implemented by September 1, 2026.*
Our Notes: *We consider this recommendation resolved and open, subject to implementation.*

Recommendation 6
We recommend that the Director, DYRS: Modify or enhance DYRS policy to explicitly require the disabling of user accounts no later than the employee's last working day, and the notification of the agency's Service Desk within twenty-four hours of separation notification, consistent with OCTO's Personnel Security Policy.
Management Response: *DYRS agrees with the recommendation to modify its policy to require disabling user accounts within 24 hours of employee separation and to strengthen coordination between HR and IT to ensure timely deactivation. The agency states that it will incorporate a 24-hour deactivation requirement into its new Agency User Accounts Management Policy and will establish immediate HR-to-IT notification procedures triggered by employee resignations or terminations. DYRS will also require supervisors to notify HR and IT on the same day separations occur. The agency plans to finalize the notification workflow by July 30, 2026, and implement the revised system-access deactivation process by August 15, 2026.*
Our Notes: *We consider this recommendation resolved and open, subject to implementation.*

Recommendation 7
We recommend that the Director, DYRS: Establish formal, documented coordination procedures between the HR and IT functions for all employee separations, ensuring consistent communication, clear accountability, and a verifiable record that account deactivation was completed.
Management Response: *DYRS agrees with the recommendation to establish formal, documented coordination procedures between its HR and IT functions for all employee separations. The agency reports that it will incorporate these procedures into its Agency User Accounts Management Policy and will establish immediate notification workflows requiring HR, IT, and supervisors to coordinate timely deactivation of user accounts. The agency plans to finalize the workflow by July 30, 2026, and implement the revised deactivation process by August 15, 2026, with full completion targeted for September 30, 2026.*
Our Notes: *We consider this recommendation resolved and open, subject to implementation.*

Talent Acquisition and Employee Development

Finding 4: OCME Did Not Follow Required Hiring Procedures When Selecting Among Tied Candidates

The Office of the Chief Medical Examiner (OCME) did not comply with the District's merit-based hiring procedures at two distinct stages of a competitive selection process: first, by not dispositioning an unqualified candidate before scoring, and second, by resolving the resulting tied score using criteria outside those prescribed by the E-DPM (6B DCMR Chapter 2). The absence of documentation obscured both failures and left no auditable record to demonstrate that the selection was made on merit-based grounds.

The E-DPM establishes a sequential framework for competitive hiring. The DCHR Recruitment Guide requires that HR staff disqualify any candidate whose resume does not demonstrate that they meet the position requirements. This determination must occur during the qualification review, before candidates are scored.[22] When interviews are omitted and selection is based on initial screening scores, E-DPM § 216.7 then requires that the candidate with the highest score receives a conditional offer of employment. When more than one candidate is tied for the highest score, the agency must apply a defined order of priority: first, residency preference; second, veterans' or foster care preference; and third, the earliest submitted application by time and date.

The OIG's review of the hiring action at issue found that two candidates received identical initial screening scores of 90. Neither candidate claimed residency, veterans', or foster care preference. Under § 216.7's third criterion, the tie should have been resolved in favor of the candidate who submitted the earlier application. OIG's review of PeopleSoft records confirmed that the non-selected candidate applied on July 28, 2023, while the selected candidate applied on August 10, 2023. The earlier applicant should have received priority under the prescribed tie-breaking order.[23]

When OIG raised this discrepancy, OCME disclosed that the non-selected candidate had in fact been disqualified on the basis of their resume, with no mention of any related technical experience. OCME characterized the failure to note this disqualification on the Applicant Screening Table as a clerical error. OCME further noted that the selected candidate had been highly recommended based on a wealth of experience, professionalism, and capabilities and that DCHR approved the hiring packet as submitted.

The record reveals two sequential failures, each of which independently did not comply with the E-DPM's requirements. First, if the non-selected candidate's resume demonstrated no relevant experience, the DCHR Recruitment Guide required that candidate to be dispositioned during the qualification review, before receiving a score. Allowing an unqualified candidate to proceed to scoring, receive a score of 90, and appear as a tied applicant was itself a departure from prescribed procedure. Second, once the two candidates appeared as tied on the Applicant Screening Table, the agency was bound by § 216.7's priority order. OCME did not apply that order. Instead, the agency resolved the tie using qualifications and personal recommendation—factors the E-DPM's tie-breaking protocol does not include.

DCHR's approval of the hiring packet does not cure either failure. DCHR reviewed what was submitted; it could not evaluate a dispositioning

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[22] DC Dep't of Human Resources, Recruitment General Information Guide, Phase 3, QUALIFY: 2, at 18 (issued May 13, 2021) (DCHR Recruitment Guide or the Guide). The Guide uses "disqualified (dispositioned)" interchangeably. *See id.*, Phase 1, KNOW: 7, at 11.

[23] Electronic District Personnel Manual, Chapter 2, § 216.7, https://edpm.dc.gov/chapter/2/ (last visited Mar. 3, 2026); DCHR Recruitment Guide, *Id*.

determination that was never documented, nor could it apply the § 216.7 priority order to a tie that was not disclosed in the screening table.

The outcome of this hiring action may well have been substantively appropriate: a candidate with demonstrated experience is likely to be better qualified than one with none. But the purpose of the E-DPM's sequential qualification and tie-breaking framework is precisely to ensure that hiring outcomes can be demonstrated to be merit-based, and that personal relationships between candidates and agency officials do not, or do not appear to, influence results. When a candidate is selected over an earlier applicant based in part on a departing official's personal recommendation, and when neither the qualification determination nor the tie-breaking rationale is documented in the hiring file, the selection carries an appearance of preferential treatment that the merit system is designed to prevent. Whether or not the right candidate was ultimately hired, OCME cannot demonstrate that the process by which that candidate was selected complied with District hiring rules.

Recommendation 8
We recommend that the Chief Medical Examiner, OCME: Establish and enforce documented procedures requiring that the qualification review, including the dispositioning of any candidate whose resume does not demonstrate that they meet the position requirements, be completed and recorded in the Applicant Screening Table before candidates are scored, consistent with the DCHR Recruitment General Information Guide.
Management Response: *OCME does not concur with Finding 4 or Recommendations 8 and 9. The agency asserts that the hiring action in question was fully merit-based and complied with District personnel regulations, and that the issue identified by the OIG stemmed from a single clerical documentation error rather than a procedural failure. OCME maintains that the candidate who appeared tied with the selected candidate was in fact unqualified due to lacking required forensic photography experience and had been properly dispositioned during Phase 3 of the hiring process. According to OCME, the appearance of a tie resulted solely from an administrative oversight in not recording the disposition on the Applicant Screening Table.* *With respect to Recommendation 8, OCME states that its existing procedures already require qualification review and dispositioning before scoring, and that the incident described reflects an isolated documentation lapse rather than a need for revised procedures. Regarding Recommendation 9, OCME contends that tie-breaking criteria were never applicable because the unqualified candidate had already been screened out and no true tie existed; therefore, the agency asserts that its processes remain compliant with E-DPM § 216.7. OCME concludes that the matter*

does not represent a systemic issue and should not be included in the final audit report.
Our Notes: *The absence of required documentation in the hiring file prevents verification that the qualification review was completed as required and that the prescribed tie-breaking procedures were properly applied. The E-DPM requires agencies to document candidate dispositioning during qualification review and to apply tie-breaking criteria in a defined order when candidates receive identical screening scores. Because OCME did not record the disposition of the unqualified candidate and did not document the basis for resolving what appeared in the screening table as a tied score, the hiring file does not demonstrate compliance with those requirements.* *Although OCME characterizes its response to Recommendation 8 as a disagreement, its explanation affirms the underlying intent of the recommendation. OCME states that the qualification review and candidate dispositioning were completed but not documented due to an administrative oversight, which reflects the precise documentation gap the recommendation seeks to address. Because OCME acknowledges that the missing documentation should have been recorded, we consider the recommendation resolved but open, subject to verification.*

Recommendation 9
We recommend that the Chief Medical Officer, OCME: Establish and enforce documented procedures requiring that, when two or more candidates receive identical initial screening scores, the tie-breaking criteria prescribed by E-DPM § 216.7 are applied in the required order of priority and the basis for the selection is documented in the hiring file.
Management Response: *See management's response to Recommendation 8.*
Our Notes: *OCME's response to Recommendation 9 reiterates its view that the tie-breaking procedures were inapplicable because the unqualified candidate had already been dispositioned. This position also implicitly supports the intent of the recommendation, which is to ensure that the hiring file clearly reflects how ties are resolved or avoided through proper documentation. Accordingly, we consider this recommendation resolved but open, subject to verification.*

Finding 5: OPC Did Not Follow Required Procedures When Hiring a Candidate Who Claimed District Residency Preference

The Office of Police Complaints (OPC) hired an employee who had claimed District residency preference during the application process without obtaining the required proof of residency, securing the required written commitment to maintain residency, or invoking the statutory mechanism available when an employee's circumstances temporarily prevent compliance. In doing so, OPC bypassed obligations imposed directly by DC Code and circumvented the policy aims the Council intended those obligations to serve.

The District's residency preference framework for government employment is established by DC Code §§ 1-515.01 through 1-515.08. Under § 1-515.02(a)(2), a DC resident who claims the preference at the time of application shall be awarded a 10-point hiring preference over a non-resident applicant. Once claimed, the preference election is operative through scoring and carries binding downstream obligations. Under § 1-515.02(b)(1), an individual appointed to a position for which they claimed the preference must execute a written agreement to remain a DC resident for seven consecutive years from the effective date of appointment, which must be verified at District of Columbia new employee orientation.[24]

Under § 1-515.02(b)(2), failure to maintain that residency forfeits the appointment. Under § 1-515.04, the personnel authority must verify residency by reviewing the appointee's valid, non-expired DC DMV-issued driver's license or non-driver identification and confirming that the appointee has elected DC income tax withholding. When circumstances beyond an employee's control temporarily necessitate relocation outside the District, § 1-515.05 authorizes the personnel authority to issue a hardship waiver of up to one year. This mechanism suspends rather than extinguishes the residency obligation, thereby preserving the seven-year commitment and tax withholding requirements.

As an independent agency, OPC is bound directly by these statutory provisions. Under § 1-515.08, each independent agency is required to issue its own implementing rules through the rulemaking process established by the DC Administrative Procedure Act. OPC has not identified any such rules. In the absence of agency-issued implementing rules, the statute operates directly as the applicable standard.

The OIG's review of an OPC hiring action identified that a candidate who at the time of application claimed the residency preference, receiving 10 additional points during initial screening. According to OPC officials, during the hiring process, the candidate temporarily relocated outside the District. Rather than invoking the hardship waiver process under § 1-515.05, OPC determined on its

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[24] *See* DPM Issuance I-2020-3 at 3, https://edpm.dc.gov/issuances/residency/ (last visited Apr. 21, 2026).

own that the candidate still qualified without the preference points and proceeded with the hire. OPC did not obtain proof of DC residency as required by § 1-515.04, did not obtain the written seven-year residency commitment required by § 1-515.02(b)(1), and did not ensure the candidate elected DC income tax withholding. OPC's written response to the OIG's Notice of Finding and Recommendation (NFR) confirmed these facts and stated that "there were no supporting documents to obtain, verify, or maintain" because the candidate did not reside in the District during onboarding.

OPC's response also asserted that, as an independent agency, it has discretion regarding whether to follow E-DPM requirements, and that waiving documentation requirements in special circumstances falls within that discretion. The OIG does not dispute OPC's independent status or its discretion with respect to E-DPM procedures. The operative authority here, however, is not the E-DPM but the DC Code itself, which applies to OPC directly. Nothing in §§ 1-515.02, 1-515.04, or 1-515.05 authorizes a personnel authority to permit an applicant to withdraw a preference election after candidates have been qualified and scored, or to unilaterally strip preference points from an applicant's record during the hiring process. The statute provides exactly one mechanism for managing a situation where a preference-claiming employee temporarily cannot maintain DC residency: the hardship waiver under § 1-515.05. OPC did not use it.

The consequences extend beyond a documentation lapse. The Council enacted the residency preference code to advance specific policy objectives, including promoting local hiring[25] and keeping public salary dollars within the District's economy through the tax withholding requirement.[26] The seven-year commitment and tax withholding obligations that attach to a preference election are how those objectives are enforced at the individual level.

By proceeding without the hardship waiver, OPC allowed all of those obligations to lapse entirely rather than temporarily deferring them as the statute states. The employee received the benefit of the preference points during scoring but was never bound by the corresponding obligations the statute imposes as conditions of that benefit. OPC's stated rationale—that the employee has since returned to the District—does not remedy the procedural failure or retroactively satisfy the statutory requirements that applied at the time of appointment.

[25] District Government Employee Residency Amendment Act of 2017, D.C. Law 22-0315, Comm. Report on Bill 22-212, ("The Executive and the Council share a goal of increasing the number of District government employees who are District residents."), Nov. 26, 2018, https://lims.dccouncil.gov/downloads/LIMS/37785/Committee_Report/B22-0212-CommitteeReport1.pdf?Id=62292 (last visited Apr. 21, 2026) (Comm. Report).

[26] Comm. Report, *id* at 9 (testimony of Ventris C. Gibson, Director Department of Human [Resources] stating that one goal of the legislation was to "keep more tax revenue within the District[.]").

Recommendation 10
We recommend that the Executive Director, OPC: Develop implementing rules pursuant to DC Code § 1-515.08 and the DC Administrative Procedure Act establishing OPC's procedures for administering the District residency preference, including requirements for verifying proof of residency, obtaining the written seven-year residency commitment, confirming DC income tax withholding election, and processing hardship waiver requests under § 1-515.05.
Management Response: *OPC concurs with the recommendation to develop and implement rules establishing the agency's procedures for administering the District residency preference. The agency agrees that these rules must incorporate the statutory requirements for verifying proof of residency, obtaining the seven-year residency commitment, confirming DC tax-withholding elections, and processing hardship waivers under the DC Code. OPC reports that it has already begun incorporating the District Personnel Manual and statutory residency requirements into its hiring processes following notification of the OIG's initial findings. The agency also notes that it has assigned responsibility for administering residency-preference requirements to its HR staff and has provided training on applicable rules, with oversight by the deputy executive director. OPC plans to draft and fully implement the required policies by December 31, 2026.*
Our Notes: *We consider this recommendation resolved and open, subject to implementation.*

Recommendation 11
We recommend that the Executive Director, OPC: Establish internal controls to ensure that, for any hiring action in which a candidate has claimed District residency preference, the required proof of residency is collected and retained, the written residency commitment is verified at District of Columbia new employee orientation, and DC income tax withholding is confirmed prior to appointment—or, where temporary circumstances prevent compliance, a hardship waiver is sought and documented in accordance with DC Code § 1-515.05.
Management Response: *Refer to OPC's response to Recommendation 10.*
Our Notes: *We consider this recommendation resolved and open, subject to implementation.*

Finding 6: ABCA and OPC Did Not Prepare Required Annual Employee Development Plans

The Alcoholic Beverage and Cannabis Administration (ABCA) and the Office of Police Complaints (OPC) did not prepare an annual employee development plan during the audit period, as required by the E-DPM. Both agencies acknowledged this during interviews with the OIG. Without a formal development plan, neither agency has a documented framework for identifying training needs, allocating resources for employee growth, or measuring whether prior training investments produced results.

E-DPM Chapter 13 (6B DCMR Chapter 13) governs employee development across the District government. Under § 1300.1, the chapter's provisions apply to each District government employee, with the exception of Educational Service employees and employees of the Board of Education and the Board of Trustees of the University of the District of Columbia. ABCA and OPC employees fall within its scope. Section 1302.1 requires that the head of each agency, or a designee, prepare an annual employee development plan identifying: the subject matter areas where training is needed; the category and number of employees requiring training; sources of funding; and the cost for training. Section 1302.2 further requires that the plan evaluate the impact and success of prior training and employee development activities. Section 1302.4 additionally requires agencies to annually review training needs and identify training programs that bring about more effective performance at the least possible cost, individual employee training needs as related to program objectives, and short- and long-term program needs by occupation or organization.

During an April 21, 2025, meeting with the OIG, ABCA confirmed that it does not prepare an annual employee development plan. An ABCA official stated that the agency tracks training informally through budget requests during the budget development phase and expressed that the annual employee development plan was an aspiration the official hoped an HR Manager would formalize. The ABCA official further acknowledged that training requirements and certifications are not formally documented and that employees are responsible for maintaining their own training certificates.

During a July 8, 2025, meeting with the OIG, OPC confirmed that it does not have an annual employee development plan. Agency staff explained that OPC's approach to training is informal: investigators bring training needs to management's attention, and requests are accommodated when the training budget allows. OPC provides legal training through its legal counsel and sends investigators to conferences when budget and travel restrictions permit. The OPC official further confirmed that OPC does not have a workforce plan and that workforce needs are identified as they arise.

The absence of annual development plans at ABCA and OPC means that training decisions are made reactively rather than strategically. Neither agency has a systematic process for identifying which employees need training, which subject matter areas are most critical to mission performance, how training will be funded, or whether prior training yielded measurable benefit. This increases the risk that skill gaps go undetected and unaddressed, that training resources are allocated without regard to organizational priorities, and that employee development activities are not linked to the agency's programmatic objectives. E-DPM § 1302.3 provides that the Council may review and inspect all plans developed under this section — a review mechanism that presupposes the plans exist.

Recommendation 12
We recommend that the Director, ABCA: Prepare an annual employee development plan consistent with E-DPM §§ 1302.1 and 1302.2, identifying subject matter areas where training is needed, the category and number of employees requiring training, sources of funding, the cost of training, and an evaluation of the impact and effectiveness of prior training activities.
Management Response: *ABCA concurs with Recommendation 12 and states that it has begun moving from informal, budget-driven training practices to a structured employee-development framework. The agency reports that it has hired a dedicated HR Manager, whose performance plan now includes responsibility for developing, implementing, and maintaining compliant Employee Development Plans (EDPs). ABCA commits to ensuring that all employees have an individual EDP beginning in Fiscal Year 2027.* *ABCA notes, however, that limited training funds and the unpredictability of conference locations and registration timelines may affect its ability to fully execute certain individualized development plans. To mitigate these constraints, the agency plans to rely more heavily on no-cost professional development resources offered by District government entities, including DCHR.* *ABCA also recommends that DCHR assume a greater District-wide role in supporting smaller agencies by providing structural guidance, templates, and training strategies during monthly HR Advisor meetings. ABCA has established an implementation schedule that includes staff assessment through August 2026, finalization of individual plans by September 15, 2026, and full launch of agency-wide EDPs at the start of Fiscal Year 2027.*
Our Notes: *We consider this recommendation resolved and open, subject to implementation.*

Recommendation 13
We recommend that the Director, ABCA: Designate a staff member responsible for coordinating employee training and development activities and establish an oversight mechanism to monitor compliance with the annual development plan requirement on an ongoing basis.

Management Response: *ABCA concurs with Recommendation 13 (See the ABCA response to Recommendation 12). The agency reports that it has hired a dedicated HR Manager and has assigned responsibility for coordinating employee training and development activities to that position. Development, implementation, and maintenance of Employee Development Plans have been incorporated into the HR Manager's performance plan to ensure accountability. ABCA commits to establishing oversight mechanisms to monitor ongoing compliance with E-DPM requirements as part of this formalized HR function, with full implementation to begin in Fiscal Year 2027.*
Our Notes: *We consider this recommendation resolved and open, subject to verification.*

Recommendation 14
We recommend that the Executive Director, OPC: Prepare an annual employee development plan consistent with E-DPM §§ 1302.1 and 1302.2, identifying subject matter areas where training is needed, the category and number of employees requiring training, sources of funding, the cost of training, and an evaluation of the impact and effectiveness of prior training activities.
Management Response: *OPC concurs with the recommendation to prepare an annual employee development plan consistent with E-DPM requirements. The agency states that it will begin preparing annual employee development plans in Fiscal Year 2027 and will create its first plan before October 1, 2026. According to the response, each annual plan will identify training needs, funding sources, training costs, and an evaluation of the impact and effectiveness of prior training activities.*
Our Notes: *We consider this recommendation resolved and open, subject to implementation.*

Recommendation 15
We recommend that the Executive Director, OPC: Designate a staff member responsible for coordinating employee training and development activities and establish an oversight mechanism to monitor compliance with the annual development plan requirement on an ongoing basis.
Management Response: *OPC concurs with the recommendation to designate a staff member responsible for coordinating and overseeing all employee training and development activities. The agency reports that it has already assigned this responsibility to a staff member.*
Our Notes: *We consider this recommendation resolved and open, subject to verification.*

CONCLUSION

This audit examined whether DCHR and District agencies maintained effective human capital management policies across the full employment lifecycle—from strategic planning and recruitment through staff development, retention, succession planning, and separation—and whether those policies complied with applicable District and federal requirements and recognized industry standards. The audit focused on DCHR as the District's central personnel authority, and on four agencies selected for full examination: the Department of Youth Rehabilitation Services (DYRS), the Office of the Chief Medical Examiner (OCME), the Office of Police Complaints (OPC), and the Alcoholic Beverage and Cannabis Administration (ABCA).

The results show that District agencies are carrying preventable human capital risks, and that DCHR has not exercised the leadership its role requires. DCHR has not developed or deployed a succession planning framework for District agencies, leaving agencies without the tools, guidance, or expectations needed to manage leadership transitions and preserve institutional knowledge. Two of the four agencies reviewed, OPC and DYRS, could not demonstrate that they disabled system access for separated employees in a timely and consistent manner, creating cybersecurity exposure that persists after employment ends. OCME deviated from merit-based hiring procedures during a competitive selection, failing both to properly disposition an unqualified candidate and to apply the E-DPM's prescribed tie-breaking criteria. OPC hired a candidate who claimed District residency preference without collecting required proof of residency, obtaining the required written commitment to maintain residency, or using the statutory hardship waiver process — allowing the employee to receive the benefit of the preference without the corresponding obligations. Both ABCA and OPC failed to prepare annual employee development plans, leaving their workforces without documented frameworks for identifying training needs or measuring whether prior development investments achieved results.

These identified deficiencies point to a broader pattern: agencies are operating without adequate policy infrastructure, and DCHR is not filling that gap. The recommendations in this report call for DCHR to establish a District-wide succession planning framework, and for the affected agencies to implement internal controls governing system access deactivation, hiring documentation, residency preference verification, and employee development planning. Taken together, implementation of these recommendations will strengthen the District's ability to protect its information systems, ensure that hiring decisions are fair, documented, and defensible, and develop a workforce capable of sustaining critical public services over time. District residents depend on well-managed agencies. This report identifies concrete, actionable steps to bring those agencies closer to that standard.

APPENDIX 1. FINDINGS

Table of Findings

No.	Finding
1	DCHR Did Not Establish a Districtwide Succession Planning Framework
2	OPC Did Not Maintain Evidence of Timely Account Deactivation for Separated Employees
3	DYRS Did Not Consistently Disable System Access for Separated Employees
4	OCME Did Not Follow Required Hiring Procedures When Selecting Among Tied Candidates
5	OPC Did Not Follow Required Procedures When Hiring a Candidate Who Claimed District Residency Preference
6	ABCA and OPC Did Not Prepare Required Annual Employee Development Plans

APPENDIX 2. RECOMMENDATIONS

Table of Recommendations

Agency	No.	Recommendation	Status	Action Required	Finding
DCHR	1	Develop and disseminate a District-wide workforce planning framework, inclusive of succession guides, that provides District agencies with standardized guidance, tools, and expectations for identifying key roles, assessing workforce vulnerabilities, and documenting transition and contingency procedures.	Open	Tracking implementation	1
DCHR	2	Establish oversight mechanisms to monitor agency implementation of the succession planning framework, including periodic reviews to assess compliance and identify agencies that may require additional support or technical assistance.	Open	Tracking implementation	1
OPC	3	Establish and enforce a documented procedure requiring the timely disabling of user accounts when employees separate from the agency, with a specific requirement that deactivation occur no later than the employee's last working day, consistent with OCTO's Personnel Security Policy.	Open	Tracking implementation	2
OPC	4	Implement monitoring and documentation controls to ensure that evidence — such as user account termination checklists or system-generated logs — is created and retained to verify that user accounts were promptly and properly disabled upon employee separation.	Open	Tracking implementation	2
DYRS	5	Implement monitoring tools or conduct periodic reviews to identify and disable user accounts associated with separated employees, ensuring no accounts remain active beyond an employee's last working day.	Open	Tracking implementation	3
DYRS	6	Modify or enhance DYRS policy to explicitly require the disabling of user accounts no later than the employee's last working day, and the notification of the agency's Service Desk within twenty-four hours of separation notification, consistent with OCTO's Personnel Security Policy.	Open	Tracking implementation	3
DYRS	7	Establish formal, documented coordination procedures between the HR and IT functions for all employee separations, ensuring consistent communication, clear accountability, and a verifiable record that account deactivation was completed.	Open	Tracking implementation	3
OCME	8	Establish and enforce documented procedures requiring that the qualification review, including the dispositioning of any candidate whose resume does not demonstrate that they meet the position requirements, be completed and recorded in the Applicant Screening Table before candidates are scored, consistent with the DCHR Recruitment General Information Guide.	Open	Tracking implementation	4
OCME	9	Establish and enforce documented procedures requiring that, when two or more candidates receive identical initial screening scores, the tie-breaking criteria prescribed by E-DPM § 216.7 are applied in the required order of priority and the basis for the selection is documented in the hiring file.	Open	Tracking implementation	4

Agency	No.	Recommendation	Status	Action Required	Finding
OPC	10	Develop implementing rules pursuant to DC Code § 1-515.08 and the DC Administrative Procedure Act establishing OPC's procedures for administering the District residency preference, including requirements for verifying proof of residency, obtaining the written seven-year residency commitment, confirming DC income tax withholding election, and processing hardship waiver requests under § 1-515.05.	Open	Tracking implementation	5
OPC	11	Establish internal controls to ensure that, for any hiring action in which a candidate has claimed District residency preference, the required proof of residency is collected and retained, the written residency commitment is verified at District of Columbia new employee orientation, and DC income tax withholding is confirmed prior to appointment—or, where temporary circumstances prevent compliance, a hardship waiver is sought and documented in accordance with DC Code § 1-515.05.	Open	Tracking implementation	5
ABCA	12	Prepare an annual employee development plan consistent with E-DPM §§ 1302.1 and 1302.2, identifying subject matter areas where training is needed, the category and number of employees requiring training, sources of funding, the cost of training, and an evaluation of the impact and effectiveness of prior training activities.	Open	Tracking implementation	6
ABCA	13	Designate a staff member responsible for coordinating employee training and development activities and establish an oversight mechanism to monitor compliance with the annual development plan requirement on an ongoing basis.	Open	Tracking implementation	6
OPC	14	Prepare an annual employee development plan consistent with E-DPM §§ 1302.1 and 1302.2, identifying subject matter areas where training is needed, the category and number of employees requiring training, sources of funding, the cost of training, and an evaluation of the impact and effectiveness of prior training activities.	Open	Tracking implementation	6
OPC	15	Designate a staff member responsible for coordinating employee training and development activities and establish an oversight mechanism to monitor compliance with the annual development plan requirement on an ongoing basis.	Closed	Tracking implementation	6

APPENDIX 3. MANAGEMENT RESPONSE

Alcoholic Beverage and Cannabis Administration

Fred Moosally, Director
June 1, 2026

ABCA Alcoholic Beverage and Cannabis Administration

899 North Capitol Street, NE
Suite 4200-B
Washington, DC 20002

For more info, visit abca.dc.gov

MEMORANDUM

TO: Daniel W. Lucas, Inspector General
Office of the Inspector General

FROM: Fred Moosally, Director Fred Moosally
Alcoholic Beverage and Cannabis Administration

DATE: June 1, 2026

SUBJECT: ABCA Response to OIG Report 25-1-02MA
Recommendation 12 –Employee Development Plans

This document reflects the response of the Alcoholic Beverage and Cannabis Administration (ABCA) to OIG Report Recommendation 12 – Employee Development Plans. ABCA's response to Recommendation 12 is as follows:

Agency Response: CONCUR WITH COMMENTS

ABCA appreciates the Office of the Inspector General's review and concurs with Recommendation 12. ABCA recognizes the value of moving from informal training tracking to a strategic, documented professional development framework.

To formalize this process, ABCA has successfully fulfilled its commitment to recruit and hire a dedicated Human Resources (HR) Manager. The development, implementation, and maintenance of compliant agency Employee Development Plans (EDPs) have been explicitly integrated into this HR Manager's performance plan, ensuring clear administrative accountability. Under this leadership, ABCA commits to ensuring that all employees across the agency will have an individual Employee Development Plan in place starting in Fiscal Year 2027 (FY27).

However, the agency must highlight ongoing fiscal realities that impact the execution of these individualized plans. Budgetary constraints directly dictate the feasibility of certain individual training tracks. Specifically, budgeting for external industry trainings and professional conferences remains challenging because host locations fluctuate, and registration deadlines—particularly time-sensitive "early bird" pricing windows—often do not align with the District's fixed annual budgeting cycles.

To proactively mitigate these financial constraints and support every employee's growth, ABCA's new HR leadership will make every effort to identify and utilize free trainings, courses, and professional development resources provided directly by District government agencies, including the D.C. Department of Human Resources (DCHR). This strategy will ensure comprehensive training access while remaining fiscally responsible.

Agency Recommendation for Systemic Support

To support District-wide compliance with E-DPM Chapter 13, ABCA recommends that the OIG encourage DCHR to assume a centralized responsibility for supporting small and independent agencies in the creation and execution of individual EDPs. Specifically, ABCA recommends that DCHR integrate structural guidance, compliance templates, and training plan strategies into their existing monthly Human Resources Advisor (HRA) meetings. This collaborative oversight would streamline compliance across the District and ensure all agency HR managers are equipped with uniform best practices.

Implementation Timeline

- **Development & Staff Assessment Phase**: May 2026 – August 2026
- **Final Individual Plan Finalization**: September 15, 2026
- **Full Launch for All Staff**: October 1, 2026 (Launch of Fiscal Year 2027)

Department of Human Resources

Charles Hall, Jr., (Former) Director
May 27, 2026

May 27, 2026

Daniel W. Lucas
Office of the Inspector General
100 M Street, S.E.
Washington, D.C. 20003

Subject: **District Agencies' Human Capital Management**

Dear Inspector General Lucas:

The Department of Human Resources ("DCHR") received your report entitled, "District Agencies' Human Capital Management." Below are DCHR's responses to the recommendation one and two outlined in the report.

Finding	Recommendation	Executive Response
DCHR did not establish a Districtwide succession planning Framework.	1. Develop and disseminate a District-wide workforce planning framework, inclusive of succession guides, that provides District agencies with standardized guidance, tools, and expectations for identifying key roles, assessing workforce vulnerabilities, and documenting transition and contingency procedures.	1. Although the Executive disagrees with the finding, DCHR notes that the recommended work is already occurring. As mentioned in the OIG's report, DCHR launched a HR Connection Lab in October 2025 which includes a working group that focuses on developing consistent, data-informed approaches to workforce planning that help agencies forecast needs, strengthen succession planning, and ensure talent aligns with organizational goals across the District. The working group consists of HR professionals from several agencies across the District who have been meeting biweekly since November 2025 and have developed a draft workforce planning template. In addition, the working group

		presented and received feedback on a workforce planning template during a HR community meeting held in February 2026. During the same February 2026 HR community meeting, DCHR also presented on business intelligence dashboards and specifically the workforce planning dashboard. The working group is finalizing the workforce planning template and supporting resource tools which will be posted on DCHR's website. To further support the HR Community, in March 2026 DCHR launched the HR Foundations training. This comprehensive HR training provides the HR community with the opportunity to learn or receive refresher training on key HR topics and includes a course on Strategic HR and Data Analysis. During this course, participants learn how to use data to understand HR patterns and improve HR outcomes and processes including workforce planning. Upcoming classes on this topic are scheduled for August and September 2026.
	2. Establish oversight mechanisms to monitor agency implementation of the	2. The Executive does not agree with this recommendation. DCHR oversees a decentralized human resources system. While DCHR provides support and

	succession planning framework, including periodic reviews to assess compliance and identify agencies that may require additional support or technical assistance.	guidance to agencies, DCHR has chosen not to impose broad mandates or "one size fits all" solutions for agencies' succession and workforce planning needs. During the workforce planning working group sessions, agency HR representatives expressed that workforce planning will vary based on factors including size and workforce composition. Instead of mandating broad workforce planning, they prefer to have access to several templates and tools that can support their unique agency specific workforce planning needs. By providing support as appropriate and tools like those described under #1, DCHR equips agencies to develop succession and workforce planning solutions that work for them.

We appreciate the collaboration with your team during the audit process and look forward to answering any additional questions you may have. Feel free to contact me at Charles.hall@dc.gov with any questions.

Sincerely,

Charles Hall, Jr.

Charles Hall, Jr.
Director
District of Columbia Department of Human Resources

Department of Youth Rehabilitation Services

Lennie Moore, Chief HR Officer
June 1, 2026

OFFICE OF HUMAN RESOURCES
450 H Street, NW
Washington, DC 20001

(202) 299-3592
www.dyrs.dc.gov

MEMORANDUM

TO: Dr. Slemo Warigon, Assistant Inspector General for Audits
Office of the Inspector General

FROM: Lennie Moore, Chief HR Officer
DC Department of Youth Rehabilitation Services

DATE: June 1, 2026

SUBJECT: DYRS Response and Corrective Action Plan to OIG NFR# 25-1-02MA NFR-06

DYRS is committed to strengthening internal controls, reducing risk exposure, and ensuring full compliance with system-access management requirements. The corrective actions outlined below will support timely user-account deactivation, enhance interdepartmental coordination, and prevent unauthorized access.

OIG Audit Finding: DYRS did not consistently disable system access for separated employees.

Corrective Action 1:

Implement monitoring tools, including periodic reviews, to identify and disable user accounts of separated employees or unauthorized users.

Agency Answer: Agree

Actions:
- Develop and implement an Agency User Accounts Management Policy outlining monitoring protocols, periodic access reviews, and procedures for account deactivation.
- Establish a monthly user-account reconciliation process comparing active accounts to HR separation records.
- Implement automated access monitoring tools to flag inactive or unauthorized accounts.

Responsible Parties:
- DYRS Chief Information Office
- DYRS Chief Human Resources Officer
- Program Managers (to verify staff status)

Timeline:
- Draft policy completed: July 15, 2026
- Internal review and approval: August 15, 2026
- Implementation of monitoring tools and monthly review process: September 1, 2026

Corrective Action 2:

Modify or enhance the DYRS policy to require disabling user accounts within 24 hours of employee separation.

Ensure effective coordination between HR and IT functions to more timely disable user accounts for all separated employees

Agency Answer: Agree

Actions:
• Integrate a 24-hour deactivation requirement into the Agency User Accounts Management Policy.
• Establish immediate HR-to-IT notification procedures that are triggered by an employee resignation or termination
• Require supervisors to notify HR and IT of employee separations the same day they occur.

Responsible Parties:
• Chief HR Officer (separation notification)
• Chief Information Officer (system deactivation)
• Supervisors/Program Managers (initiate notifications)

Timeline:
• Notification workflow finalized: July 30, 2026
• System access deactivation process implemented: August 15, 2026

Overall Completion Target: September 30, 2026

Attachment: Account Management Policy (Proposed)

Office of the Chief Medical Examiner

Beverly Fields, Esq., Chief of Staff
May 29, 2026

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CHIEF MEDICAL EXAMINER
401 E St, SW, 6th Floor
Washington, D.C. 20024

Francisco Diaz, M.D. FCAP FASCP
Chief Medical Examiner

202-698-9001 (Office)
202-698-9101 (Fax)

MEMORANDUM

TO: **Office of the Inspector General (OIG)**

FROM: **Beverly Fields, Esq., PRP** Beverly Fields
OCME Chief of Staff

DATE: **May 29, 2026**

SUBJECT: OIG No. 25-1-02MA - District Agencies' Human Capital Management Audit

---

Thank you for the opportunity to review the draft audit report entitled, "District Agencies' Human Capital Management" (OIG No. 25-1-02MA). After extensive review, the Office of the Chief Medical Examiner (OCME) respectfully submits that it does not concur with Finding 4, Recommendation 8, and Recommendation 9. The OCME asserts that the hiring action in question was entirely merit-based and adhered to District personnel regulations. The audit report's finding stems from an ***isolated, one-time documentation error***, amongst the numerous recruitment actions and applicant reviews that the OCME has processed.

Response to Finding 4

The draft report concludes that OCME did not follow required procedures for tied candidates in this one instance. OCME maintains that the hiring action adhered to established merit-based procedures and contests this finding for the following reasons:

- **The "Tie" Was an Illusion:** The candidate cited by the OIG, as tied with the selected candidate, actually lacked the essential requirements for the position (specialized forensic photography experience). The experience provided included: 'kids behavior technician," "babysitter, "intern" and "diner host server." During Phase 3, this unqualified candidate was properly dispositioned and eliminated from contention.
- **No Tie Occurred:** Because the unqualified candidate was already removed, there was no tie. OCME simply selected the highest-scoring qualified candidate, as verified by the District of Columbia Department of Human Resources guidelines.
- **Isolated Clerical Error:** The appearance of a tie on the Applicant Screening Table resulted solely from an administrative error—failing to document the unqualified candidate's Phase 3 disposition.

Response to Recommendation 8

Recommendation 8 proposes that OCME establish new procedures to ensure qualification reviews and candidate dispositioning are documented prior to scoring.

- **Existing Compliance:** OCME affirms its current procedures already meet this requirement. The issue identified in the draft report was a documentation oversight, not a process failure.
- **Procedure Not Warranted:** The qualification review and required dispositioning were indeed completed during the appropriate hiring stage, albeit missing from the screening table in this singular instance. Therefore, new or revised procedures are unnecessary.

Response to Recommendation 9
Recommendation 9 recommends establishing procedures to ensure tie-breaking criteria are applied in the order required by E-DPM § 216.7.

- **No Tiebreaker Required:** Because the unqualified applicant was properly screened out during Phase 3, no tie occurred. Consequently, tie-breaking rules were not applicable and could not have been misapplied.
- **Clerical, Not Procedural:** The OIG's conclusion stems from a missing entry on the Applicant Screening Table, not a failure to follow § 216.7. OCME's standard procedures remain fully aligned with the District's E-DPM Framework.

Conclusion
OCME remains fully committed to the District's merit-based hiring standards. The circumstances noted in Recommendations 8 and 9 stem from one isolated clerical error on a spreadsheet, not systemic gaps in our processes. Because the hiring decision was correctly executed and there is no evidence of a routine or recurring error, OCME respectfully asserts that this finding does not rise to the level of inclusion in the final audit report.

Office of Police Complaints

Marke Cross, Executive Director
June 3, 2026

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF POLICE COMPLAINTS

MEMORANDUM

TO: Daniel W. Lucas, Inspector General
Office of the Inspector General

FROM: Marke Cross, Executive Director
Office of Police Complaints

Marke Cross

DATE: June 3, 2026

SUBJECT: OPC Response to OIG Report 25-1-02MA

This document serves as the response of the Office of Police Complaints (OPC) to Recommendations 3, 4, 10, 11, 14, and 15 from OIG Report 25-1-02MA.

Agency response to Recommendations 3 and 4: **Concur.**

OPC concurs with the Office of Inspector General's determinations and recommendations for establishing and documenting procedures for the timely and immediate disabling of user accounts upon separation of an employee and for implementing controls to ensure that evidence is created and retained to verify that all user accounts were promptly and properly disabled. OPC believes that the adoption and implementation of best practices for network security are imperative in the current climate of increased risks of cybersecurity attacks.

Timeline

OPC will draft and implement a policy consistent with OCTO's Personnel Security Policy and in accordance with OIG's recommendations by December 31, 2026.

Agency response to Recommendation 10: **Concur.**

OPC concurs with the Office of Inspector General's determination and recommendation for developing and implementing rules to establish OPC's procedures for properly administering the District residency preference, which includes incorporation of the requirements for verifying proof of residency, obtaining a written seven year residency commitment, confirming DC income tax withholding election, and processing hardship waiver requests under the DC Code.

Agency response to Recommendation 11: **Concur.**

OPC concurs with the Office of Inspector General's determination and recommendation for establishing internal controls to ensure that for any hiring action in which a candidate has claimed District residency preference, the required proof of residency is collected and retained, the written residency commitment is verified at District of Columbia new employee orientation, and DC income tax withholding is confirmed prior to appointment, or where temporary circumstances prevent compliance, a hardship waiver is sought and documented in accordance with DC Code.

Timeline for Recommendations 10 and 11

After OIG communicated its initial findings to OPC, the agency implemented the guidance from the District Personnel Manual and the residency requirements under the DC Code into its administration of residency preference for new hires. In addition, OPC has assigned this task to its HR staff and provided them with training on the District's rules and regulations with respect to residency requirements. OPC's deputy executive director oversees the entire process, including the retention and review of all relevant documents regarding residency preference for new hires. OPC plans to have these policies drafted and fully implemented in accordance with OIG's recommendations by December 31, 2026.

Agency response to Recommendation 14: **Concur.**

OPC concurs with the Office of Inspector General's determination and recommendation for preparation of an annual employee development plan consistent with E-DPM §§ 1302.1 and 1302.2. OPC will begin preparing annual employee development plans in Fiscal Year 2027. The plans will identify subject matter areas requiring training, the source of funding, the cost of training, and an evaluation of the impact and effectiveness of all training activities. A new plan will be prepared prior to every new fiscal year. The deadline for preparation of the annual plans will be October 1 of every fiscal year.

Timeline

OPC will begin preparing annual employee development plans in Fiscal Year 2027. OPC will create its first plan before October 1, 2026.

Agency response to Recommendation 15: **Concur.**

OPC concurs with the Office of Inspector General's determination and recommendation for designating a staff member to coordinate and oversee all employee training and development activities.

Timeline

OPC has designated a staff member for this purpose.

APPENDIX 4. AUDIT STANDARDS

Government Auditing Standard (GAS) § 9.08 states that the purposes of audit reports are to (1) clearly communicate the results of audits to those charged with governance, the appropriate officials of the audited entity, and the appropriate oversight officials, and (2) facilitate follow-up to determine whether appropriate corrective actions have been taken. In addition, GAS § 8.30 requires auditors to evaluate whether the audited entity has taken appropriate corrective action to address findings and recommendations from previous engagements that are significant within the context of the audit objectives.

DC Code § 1-301.115a(a-1)(3) requires OIG to provide a means for keeping the Mayor, Council, and District government department and agency heads fully and currently informed about problems and deficiencies relating to the administration of District programs, and operations and the necessity for and progress of corrective actions.

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