



October 6, 2026

OIG No. 26-1-02MA



Government of the District of Columbia
Office of the Inspector General

ASSESSMENT REPORT

Fiscal Year 2026 Procurement Risk Assessment

MATTHEW WILCOXSON
INTERIM INSPECTOR GENERAL

OUR MISSION

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

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

OUR VISION

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



OUR VALUES

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

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

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

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

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

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



DISTRICT OF COLUMBIA | OFFICE OF THE INSPECTOR GENERAL

MEMORANDUM

To: Hon. Muriel Bowser
Mayor

Hon. Phil Mendelson
Chairman, Council of the District of Columbia

From: Matthew Wilcoxson *Matthew Wilcoxson*
Interim Inspector General

Date: October 6, 2026

Subject: **Fiscal Year 2026 Procurement Risk Assessment | OIG No. 26-1-02MA**

Enclosed is the Office of the Inspector General's (OIG) final report entitled *Fiscal Year 2026 Procurement Risk Assessment*. The OIG contracted with Williams, Adley & Company-DC, LLP (Williams Adley) to perform a comprehensive risk assessment of the District of Columbia's procurement activities, consistent with DC Code § 1-301.115a(a)(3)(E).¹ The objectives of this engagement were to assess the District of Columbia government's: (1) procurement system; (2) agencies' procurement regulations, policies, and practices; (3) internal controls over procurement; and (4) status of issues identified in the [Fiscal Year 2022 Procurement Risk Assessment](#). The purpose of the engagement is to provide District stakeholders with a structured understanding of procurement related risks that may influence the efficiency, effectiveness, integrity, and reliability of procurement operations.

¹ To meet this statutory mandate, and in the interest of economy, the OIG conducts triennial risk assessments of the District's procurement system. Using the procurement risk assessment results, the OIG conducts additional engagements and makes recommendations to District agencies that are designed to help mitigate the identified procurement risk areas. Conducting the procurement risk assessment every three years affords District agencies with adequate time to implement our recommendations prior to reevaluating the District's procurement system.

Standards and Framework

The assessment evaluated the District's procurement environment using applicable District laws and regulations, internal procurement policies and procedures, recognized procurement leading practices, and best practices for internal control. The primary laws, regulations, and guidance included the Procurement Practices Reform Act of 2010, Title 27 DCMR (as amended), Procurement Integrity, Transparency, and Accountability Amendment Act of 2016, OCP's Procurement Procedures Manual (2018), National Association of State Procurement Officials Practical Guide 4th Edition (2024), American Bar Association Model Procurement Code (2000), and the Government Accountability Office's *Standards for Internal Control in the Federal Government* (GAO Green Book, 2014). This engagement was a risk assessment, not an audit, and it does not present audit findings, conclusions, or recommendations under Generally Accepted Government Auditing Standards (GAGAS).

What Is a Risk Assessment

A risk assessment is a forward-looking analysis that:

- identifies inherent and emerging risks that could impede objectives;
- evaluates likelihood and impact and organizes results into risk profiles;
- prioritizes areas where vulnerability may exist so management can determine the appropriate risk response (accept, mitigate, avoid, or transfer).

To accomplish the objectives of this procurement risk assessment, Williams Adley performed a combination of procurement data analysis, agency questionnaires, interviews, policy and procedure reviews, and internal control assessments.

By contrast, a risk assessment **does not**:

- determine compliance or issue audit findings, conclusions, or recommendations;
- require evidence of actual harm, error, or misstatement; and
- represent a judgment on historical performance or solvency.

Instead, it highlights potential exposures so that District leadership can make informed decisions about risk tolerances and responses.

Overview of Risk Observations Identified

The assessment identified nine risk observations related to the District's procurement activities. These include:

- inconsistent agency identifiers and naming conventions across procurement and financial systems limit data reliability and undermine District-wide procurement oversight;
- lack of reconciliation between PASS and DIFS, which limits the reliability of procurement-related financial information;
- outdated centrally maintained procurement SOPs that may contribute to inconsistent procurement practices and weaken District-wide controls;
- use of purchase orders to process claim payments at DBH without documented procedures increases risk of inconsistent processing and reduced oversight;
- Council approval threshold and multi-layered review process for procurements over \$1 million create timing, continuity, and control risks;
- non-uniform procurement governance structure results in inconsistent procurement controls and practices across agencies
- PASS, cross-system integration limitations, and fragmented documentation practices reduce procurement data reliability, transparency, and oversight;
- limited awareness of the District's fraud-prevention, detection and reporting processes increases the risk that fraud may occur or go unreported; and
- the Office of the Chief Financial Officer's (OCFO) fiscal management policies and practices may have contributed to the increases in fiscal year-end spending, which appears to be operationally unsupported spend-downs of budgetary authority that could have a significant adverse financial impact to the District.

How District Leadership Should Use This Risk Assessment

This assessment provides a system-level view of procurement risks across District agencies operating under multiple authority structures. These results are intended to inform the District's PASS modernization project, ongoing procurement oversight efforts, and provide a basis for understanding systemic and emerging risks within the procurement environment. It highlights vulnerabilities that, if unaddressed, may impede procurement efficiency, weaken controls, or increase exposure to waste, fraud, or operational disruption.

The OIG will conduct further engagements based on the risk observations identified by Williams Adley. We appreciate the cooperation and courtesies extended to OIG staff and Williams Adley throughout this engagement. Should you have questions or concerns, please contact me or Erica Clarke, Supervisory Auditor, at erica.clarke@dc.gov.



Fiscal Year 2026 Risk Assessment of the District of Columbia's Procurement System

Contract No: CW129928

Task Order: T0001 - CW129928

September 29, 2026

Table of Contents

Table of Contents	2
Background	4
Purpose and Objectives	4
Results in Brief	5
Scope and Methodology	6
Risk Assessment Framework and Criteria	8
Constraints and Limitations	9
Project Approach.....	10
Objective 1: Assessment of the District's Procurement System	10
Objective 2: Assessment of the District Agencies' Procurement Regulations, Policies, and Practices.	21
Objective 3: Assessment of the District's Internal Controls over Procurement	24
Objective 4: Assessment of Remediation Efforts over FY 2022 Procurement Risk Assessment Results	26
Risks Identified.....	28
Risk Overview	28
Risk Observation 1 - Inconsistent Agency Identifiers and Naming Conventions Across Procurement and Financial Systems Limit Data Reliability and Undermine District-wide Procurement Oversight...	31
Risk Observation 2 - Lack of Reconciliation Between PASS and DIFS Limits Reliability of Procurement-Related Financial Information (Repeat).....	32
Risk Observation 3 - Outdated Centrally-Maintained Procurement SOPs May Contribute to Inconsistent Procurement Practices and Weaken District-Wide Controls (Repeat).....	33
Risk Observation 4 - Use of Purchase Orders to Process Claim Payments at DBH Without Documented Procedures Increases Risk of Inconsistent Processing and Reduced Oversight.....	34
Risk Observation 5 - Council Approval Threshold and Multi-Layered Review Process for Procurements Over \$1 Million Create Timing, Continuity, and Control Risks.....	36
Risk Observation 6 - Non-Uniform Procurement Governance Structure Results in Inconsistent Procurement Controls and Practices Across Agencies (Repeat).....	37
Risk Observation 7 – PASS, Cross-System Integration Limitations, and Fragmented Documentation Practices Reduce Procurement Data Reliability, Transparency, and Oversight (Repeat).....	38
Risk Observation 8 – The Lack of Knowledge of the District's Processes for Prevention, Detection and Reporting Potential Fraud Increases the Risk for Potential Opportunities of Fraud to be Perpetuated (Repeat).....	39

Risk Observation 9 – Office of the Chief Financial Officer’s (OCFO) Fiscal Management Policies and Practices May Have Contributed to Increases in Fiscal Year-End Spending, Which Appears to be Operationally Unsupported Spend-Downs of Budgetary Authority that Could Have a Significant Adverse Financial Impact to the District (Repeat)40

Appendix A – Procurement Authority of In-Scope Agencies42

Appendix B – District Agency Questionnaire Responsiveness45

Appendix C – Procurement System Assessment Questionnaire Responses48

Appendix D – GAO Greenbook’s Control Components and Principles60

Background

The District of Columbia Code (D.C. Code) § 1-301.115a(a)(3)(E) requires the Office of the Inspector General (OIG) to annually conduct an operational audit of the District of Columbia's (District) procurement activities. To support this statutory responsibility, the OIG performs a comprehensive procurement risk assessment every three years to identify high-risk areas and inform future audit and oversight activities. Accordingly, the OIG engaged Williams, Adley & Company-DC, LLP (defined as "Williams Adley," "we," and "our" in this assessment) to conduct a qualitative risk assessment of the District's procurement system.

The District's procurement system operates under multiple procurement authority models established by the Procurement Practices Reform Act (PPRA), including agencies served by the Office of Contracting and Procurement (OCP), agencies operating under delegated procurement authority, agencies with independent procurement authority, and exempt agencies. As a result, procurement activities, such as contract awards, purchase orders, vendor payments, and related processes, are performed across a decentralized environment with varying governance structures, policies, procedures, systems, and oversight responsibilities that require a District-wide perspective when assessing procurement risks.

The Fiscal Year (FY) 2026 Procurement System Risk Assessment (defined as "assessment") provides a District-wide, system-level perspective of procurement risks by evaluating procurement governance, regulations, policies, practices, internal controls, information systems, monitoring activities, and the status of risks identified in the FY 2022 Procurement Risk Assessment.

The risks summarized in this assessment reflect conditions identified based on the information provided and available during the assessment period. These results are intended to support the District's ongoing procurement oversight efforts and provide a basis for understanding systemic and emerging risks within the procurement environment. Accordingly, no assurance is provided, and the assessment does not include evaluation of management's responses or corrective actions.

Purpose and Objectives

Williams Adley was engaged to conduct a risk assessment of the District's procurement system to identify areas of elevated risk across processes, systems, and governance activities. The purpose of the engagement is to provide the District with a structured understanding of procurement related risks that may influence the efficiency, effectiveness, integrity, and reliability of procurement operations.

The engagement was organized around four interrelated objectives that collectively address the requirements of the Statement of Work and support the OIG's risk-based oversight of the District's procurement system. Our assessment was designed as a structured, system-level evaluation of the District's procurement processes, governance practices, internal controls, and supporting systems to identify systemic risks that may affect efficiency, compliance, and accountability, including considerations related to oversight mechanisms, segregation of duties, approval workflows, system capabilities, and the reliability of procurement and financial data used to support decision making. We used a combination of data analytics, surveys, document reviews, and interviews to accomplish the following objectives:

Objective 1: Assessment of the District's Procurement System

We assessed the District's procurement system through a comprehensive, system-level assessment of procurement governance, operations, and outcomes during FY 2024 – FY 2025 (October 1, 2023 through September 30, 2025), emphasizing systemic risks that cut across agencies and procurement authorities.

Objective 2: Assessment of the District Agencies' Procurement Regulations, Policies, and Practices

We assessed District agencies' procurement regulations, policies, and practices for alignment with applicable laws, centralized guidance provided by OCP, and leading procurement practices, including evaluating consistency, completeness, clarity, and the degree of uniformity or variation across agencies.

Objective 3: Assessment of the District's Internal Controls over Procurement

We examined the District's internal control environment over procurement activities using the U.S. Government Accountability Office's (GAO's) Green Book as the primary framework, with a focus on control design, implementation, and monitoring.

Objective 4: Assessment of the Status of Issues Identified in the FY 2022 Procurement Risk Assessment

We assessed the status of the risk areas identified in the [Fiscal Year 2022 Procurement Risk Assessment](#) (OIG Project No. 21-1-29MA) to determine whether previously-identified risks remain, have been mitigated, or warrant continued or additional oversight.

Results in Brief

The assessment identified nine systemic procurement risk observations affecting the District's procurement environment. These observations represent the procurement areas identified as presenting significant systemic procurement risks to the efficiency, transparency, accountability, and reliability of the District's procurement system and are summarized in Table 1 below.

Table 1: FY 2026 Systematic Procurement Risk Observations

Risk No.	Risk Observation
1	Inconsistent agency identifiers and naming conventions across procurement and financial systems limit data reliability and undermine District-wide procurement oversight
2	Lack of reconciliation between PASS and DIFS limits reliability of procurement-related financial information (Repeat)
3	Outdated centrally maintained procurement SOPs may contribute to inconsistent procurement practices and weaken District-wide controls (Repeat)
4	Use of purchase orders to process claim payments at DBH without documented procedures increases risk of inconsistent processing and reduced oversight
5	Council approval threshold and multi-layered review process for procurements over \$1M create timing, continuity, and control risks
6	Non-uniform procurement governance structure results in inconsistent procurement controls and practices across agencies (Repeat)
7	PASS, cross-system integration limitations, and fragmented documentation practices reduce procurement data reliability, transparency, and oversight (Repeat)
8	Lack of knowledge of the District's processes for prevention, detection, and reporting potential fraud increases exposure to fraud opportunities (Repeat)
9	OCFO fiscal management policies and practices may have contributed to increases in fiscal year-end spending that appear operationally unsupported (Repeat)

The assessment also evaluated the status of each risk identified in the FY 2022 Procurement Risk Assessment to determine whether it remains relevant, has been mitigated, or has evolved since the prior assessment. Of the nine risk areas identified in the FY 2022 Procurement Risk Assessment, one was assessed as no longer significant, one was assessed as partially mitigated, and the remaining seven continue to remain relevant, indicating that many of the systemic procurement challenges identified in the prior assessment remain unresolved. Additional information regarding the assessment of each FY 2022 risk area and its relationship to the FY 2026 risk observations is presented in the [Objective 4: Assessment of Remediation Efforts over FY 2022 Procurement Risk Assessment Results](#) section below.

Collectively, the identified risk observations highlight systemic challenges related to procurement and financial data reliability, procurement governance, policies and procedures, procurement documentation and system functionality, agency procurement practices, fraud awareness and reporting, and fiscal management practices. These observations are intended to assist the OIG in prioritizing future audits, evaluations, inspections, and other oversight activities by identifying the areas presenting the highest systemic procurement risk across the District.

Scope and Methodology

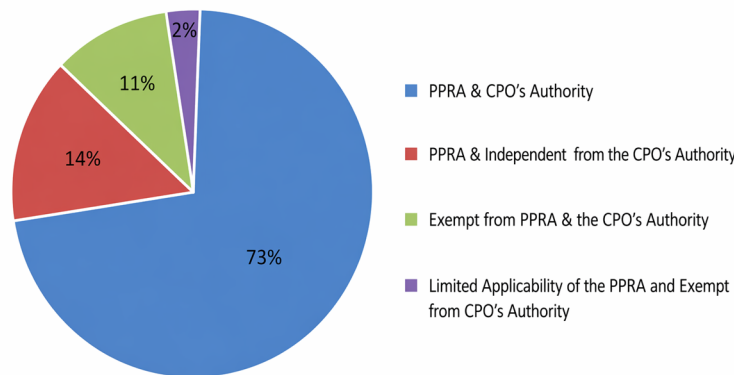
The scope of this assessment included non-personnel services procurement activity for FY 2024 and FY 2025 (October 1, 2023, through September 30, 2025), as defined in the Budget and Financial Plan of the District. The assessment covered 100 District agencies operating under different procurement authorities, as summarized in Table 2.

Table 2. Agencies Subject to Assessment and Procurement Authority Summary¹

Procurement Authority	Number of Agencies
Agencies Subject to the Procurement Practices Reform Act of 2010 (PPRA) and the Chief Procurement Officer's (CPO) Authority	73
Agencies Subject to PPRA and Independent from the CPO's Authority	14
Agencies Exempt from the PPRA and the CPO's Authority	11
Limited Applicability of the PPRA and Exempt from the CPO's Authority	2
Total	100

¹ Agency identification and procurement authority classifications were provided by the District's OIG. Williams Adley's assessment relied on this information as provided and did not independently validate the completeness of the agency population or authority designations. Our agency population differs from OCP's District Agency Procurement Authority list (as of March 2024, 111 agencies) by 11 agencies. Of these, all 11 were excluded either because no point of contact was available to WA, or because OIG confirmed the agency was non-mandatory, exempt, or otherwise appropriately excluded from this assessment. Further, two agencies included in this assessment (the District of Columbia Public Charter School Board and the Office of Neighborhood Safety and Engagement) are not reflected on OCP's list; however OIG confirmed their applicable procurement authority for purposes of this assessment.

Figure 1. Agency Distribution by Authority



The assessment methodology was designed to identify, evaluate, and prioritize systemic procurement risks across the District by obtaining and evaluating information from multiple sources. The assessment methodology included procurement data analytics (using procurement activity for FY 2024 – FY 2025), a District-wide survey, reviews of applicable laws, regulations, policies, procurement documentation, and other supporting information, as well as interviews with District personnel. Assessment procedures were conducted between March 2026 and June 2026.

Additional information regarding the assessment procedures performed under each objective, together with the resulting observations used to identify and evaluate systemic procurement risks, is presented in the sections that follow.

The assessment evaluated the District's procurement environment using applicable District laws and regulations, internal procurement policies and procedures, recognized procurement leading practices, and the U.S. Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government* (Green Book). The primary assessment criteria are summarized in Table 3 below:

Table 3. Key Laws, Regulations, and Guidance

Source	Version	Description
Procurement Practices Reform Act of 2010 (PPRA)	As amended ²	Establishes the District's statutory framework for public contracting, including procurement authority, required procurement methods, and core procurement requirements.
Title 27, District of Columbia Municipal Regulations (DCMR)	As amended ³	Implements procurement regulations and requirements applicable to District agencies, including procedures and requirements related to contracting and property management.

² This assessment used the version of the PPRA publicly available on the Council of the District of Columbia website as of April 2026. A more recent version may exist and was not evaluated as part of this assessment.

³ This assessment used the version of the DCMR publicly available on the OCP website as of April 2026. A more recent version may exist and was not evaluated as part of this assessment.

Source	Version	Description
Procurement Integrity, Transparency, and Accountability Amendment Act of 2016 (PITAAA)	2016	Provides statutory requirements intended to strengthen procurement integrity, transparency, and accountability across District procurement activities.
OCP Procurement Procedures Manual ⁴	2018	Provides OCP's procedural guidance for conducting procurements and documenting procurement actions for agencies subject to OCP authority.
National Association of State Procurement Officials (NASPO) Practical Guide, 4th Edition	2024	Industry reference used to benchmark public procurement practices, processes, and governance against commonly accepted leading practices.
American Bar Association (ABA) Model Procurement Code	2000	Model statutory framework used as a reference point for evaluating the design of procurement rules, internal controls, and governance structures.
GAO Standards for Internal Control in the Federal Government (Green Book)	2014 ⁵	Provides the authoritative framework for internal control systems across federal agencies and serves as a comprehensive benchmark for non-federal entities.

Risk Assessment Framework and Criteria

This assessment was conducted using a qualitative, risk-based approach guided by the Green Book. The assessment emphasized Green Book principles related to identifying, analyzing, and responding to risks while considering governance, information and communication, monitoring activities, and the design and implementation of internal controls across the District's procurement environment. For purposes of this assessment, risk is defined as the potential for conditions or practices within the District's procurement system to adversely affect efficiency, compliance, transparency, or accountability. The risks identified through the procedures performed reflect systemic issues rather than isolated transactional errors or instances of noncompliance. Further, for the purposes of the assessment, systemic refers to risks or issues that are pervasive across multiple agencies or processes, rather than isolated incidents.

Each risk observation identified during the assessment was evaluated qualitatively using professional judgment based on four primary factors:

- **Likelihood** – the probability that a condition could occur or continue based on observed practices, governance structures, or system design.
- **Potential Impact** – the potential effect on procurement operations, achievement of procurement objectives, stewardship of public resources, transparency, accountability, or oversight.
- **Pervasiveness** – the extent to which a condition affects multiple agencies, procurement authorities, procurement processes, or supporting systems.
- **Mitigating Controls** – the extent to which existing governance, oversight activities, policies, or internal controls appeared designed and implemented to reduce the identified risk.

⁴ The OCP Procurement Procedures Manual was obtained directly from OCP; the manual is not published online.

⁵ The 2025 revision of the Green Book was effective beginning FY 2026. As the scope of this period represented non-personnel services procurement activity from October 2023 through September 30, 2025, we determined the September 2014 edition was applicable for our assessment.

These factors were considered collectively using professional judgment to evaluate the results of the assessment procedures and prioritize those observations that represented the most significant systemic procurement risks affecting the District's procurement environment. Using professional judgment informed by the four evaluation factors above, each risk observation was assigned a Risk Severity/Impact Rating. These ratings help prioritize systemic procurement risks for OIG oversight, future audit planning, and management attention. The categories are:

- **Critical** – Conditions that pose an immediate and significant threat to procurement integrity, transparency, compliance, or continuity of operations. Critical risks are systemic, have high likelihood of occurrence, and lack sufficient mitigating controls.
- **High** – Conditions that substantially affect procurement operations or oversight, create material exposure to inefficiency or noncompliance, or significantly undermine reliability of procurement or financial information.
- **Moderate** – Conditions that impair procurement effectiveness or transparency but are less pervasive, partially mitigated, or more limited in operational impact than High or Critical risks.
- **Low** – Conditions with limited operational or compliance impact or those where mitigating controls meaningfully reduce the likelihood or consequences of occurrence.

Assignments were made based on the collective evidence obtained through the assessment and reflect the severity of each risk observed across the District. Risk Severity/Impact Ratings serve three primary purposes:

- **Prioritization** – Highlighting systemic procurement risks that warrant immediate attention, oversight, or remediation.
- **Alignment** – Connecting FY 2026 observations with recurring risks identified in prior assessments to evaluate remediation status and significance.
- **Planning** – Informing OIG's future audit, evaluation, inspection, and monitoring activities by identifying areas of highest systemic vulnerability.

The prioritized risk observations are presented in the [Risks Identified](#) section below.

Constraints and Limitations

During the course of the assessment, Williams Adley encountered constraints and limitations that should be considered in the interpretation of the observations offered in this report.

- Our analytics were constrained by data integrity and comparability issues across the District's procurement and spending data sources. Although we obtained data from the Procurement Automated Support System (PASS), the OCP Transparency Portal, and the District Integrated Financial System (DIFS), and developed an agency-naming crosswalk to reconcile naming variations across systems, we identified variances between PASS and DIFS that could not be reconciled at the agency level in certain instances. In the aggregate, reconciling procedures performed identified total PASS purchase order amounts (\$7.99 billion) and total DIFS ordered amounts (\$10.15 billion) reflecting a variance of approximately \$2.16 billion. Upon identifying these variances, we made inquiry of OCFO and OCP; OCFO attributed the variances to DIFS's year-end closeout/obligation adjustments and differences in how each system attributes activity to an agency, and OCP attributed variances to differences between contract ceiling amounts and actual purchase order amounts. Due to inherent differences in how PASS and DIFS are designed

to capture and report data, we were unable to independently validate these explanations, consistent with the qualitative, risk-based nature of this assessment.

- We experienced delays and challenges in obtaining a complete listing of District agencies and timely and accurate agency points of contact (POCs).
- We received no questionnaire responses from 21 of 100 agencies (21%). See [Appendix B](#) for identification of the survey respondents.
- Among the 25 sampled agencies, 10 (40%) provided no supporting documentation to corroborate self-reported practices. Finally, for two agencies, we received no communication throughout the engagement.

This engagement did not constitute a financial audit, performance audit, or attestation engagement as defined by Government Auditing Standards. Rather, our work was intended as an assessment of existing practices, policies, and procedures to help identify risks that should be addressed in the development of future detailed audit plans, as well as potential opportunities for improvement for management's consideration.

Project Approach

To accomplish the objectives of this assessment, we performed a combination of procurement data analysis, agency questionnaires, interviews, policy and procedure reviews, and internal control assessments. The results and observations by objectives are presented below.

Objective 1: Assessment of the District's Procurement System

For Objective 1, we performed a structured, system-level assessment of the District's procurement system focused on procurement governance, operations, and outcomes during FY 2024 – FY 2025, with emphasis on systemic risks that cut across agencies and procurement authorities. We used a combination of procurement data analytics, a District-wide questionnaire, interviews and site visits, and document reviews to identify system-level themes and risks that may affect efficiency, compliance, transparency, and accountability, and to inform OIG's engagement planning.

Procurement Data Analysis

We obtained District procurement and spending data from multiple automated systems, including PASS, the OCP Transparency Portal, and DIFS, covering non-personnel procurement activity for FY 2024 – FY 2025. These data sources included contract awards, purchase orders, and vendor payment transactions.

Given the known limitations in data standardization and system integration identified in prior procurement risk assessments, we performed validation and reconciliation procedures on the full population of PASS and DIFS data obtained for the scope period to assess the completeness, consistency, and usability of data across these systems. Specifically, we:

- Normalized agency names across all data sources to address inconsistent naming conventions and increase the accuracy of the aggregation of procurement activity by agency.
- Compared aggregated procurement amounts across PASS, the OCP Transparency Portal, and DIFS data to identify variances and potential system-specific limitations (e.g., differences in how each system records or categorizes procurement data).
- Evaluated the extent to which DIFS procurement data could be reconciled to OCP Portal and PASS data and documented instances where full reconciliation was not feasible due to system design differences, timing differences, or inconsistent data fields. Specifically, we identified an aggregate variance of approximately \$2.16 billion between total PASS purchase order amounts

and total DIFS ordered amounts, with DIFS amounts exceeding PASS in 55 agencies, PASS amounts exceeding DIFS in 28 agencies, and 9 agencies reflecting DIFS activity with no corresponding PASS activity. We also noted that PASS reflected data for 85 agencies while DIFS reflected data for 110 agencies for the same period.⁶ Where full reconciliation was not feasible, we did not perform additional testing to independently determine the cause of each variance; instead, we relied on inquiry of OCFO and OCP, as discussed in the Constraints and Limitations section, to understand the general drivers of these differences.

Using the procurement datasets, we performed a series of analytical procedures designed to identify patterns and indicators of elevated procurement risk at the agency level. These analyses included:

- *Procurement Volume:* We aggregated FY 2024 - FY 2025 contract awards, purchase orders, and payment transactions by normalized agency name across all District agencies included in the analysis. Total procurement activity analyzed exceeded \$16.8 billion in combined contract and purchase order activity, consisting of approximately \$9.5 billion in contract awards⁷ and \$8 billion in purchase orders⁸.
- *Budget Data Analysis:* We considered but did not incorporate budget data into the agency sample selection scoring methodology due to inconsistencies in availability and comparability of budget data across District agencies. For example, differences in how agencies structure and report budget information (e.g., standalone versus consolidated or embedded appropriations), limited our ability to apply budget data consistently across the full agency population. We determined that budget size does not provide a reliable indicator of procurement risk beyond the risk factors captured through contract awards, purchase orders, and payment data. Available budget information was reviewed for context, and we confirmed that agencies with the largest budgets were already included in the sample based on financial activity and risk scoring results.
- *Vendor Concentration Analysis:* Using vendor-level contract and purchase order data, we assessed the concentration of procurement dollars flowing to individual vendors by agency. This assessment was factored into our methodology used to select agencies for additional procedures; see further details on agency risk scoring and selection on [Page 15](#). Thirteen agencies with a disproportionate share of procurement dollars awarded to a single vendor were identified as higher risk due to reduced competition and increased susceptibility to procurement inefficiencies or abuse. This analysis measured the concentration of procurement dollars by vendor and did not evaluate the method of award (e.g., competitive, sole source) or the extent of competition for individual procurements. The following agencies had a single vendor that accounted for more than 50% of total procurement spend for that agency during FY 2024–FY

⁶ According to OCFO, the difference in agency counts reflects how each system assigns transactions to an agency. PASS assigns transactions to the agency of the PASS user, while DIFS assigns transactions to the financial agency. As a result, activity reported under a single agency in PASS may be recorded under multiple agency codes in DIFS.

⁷ As reported in the OCP Transparency Portal. Total contract award activity attributable to an identified agency was approximately \$9.5 billion, which includes approximately \$667 million in contract awards associated with transactions that did not have an identifiable agency in the OCP Transparency Portal data. Contract award activity attributable to an identified agency was therefore approximately \$8.8 billion (\$9.5 billion less \$667 million). Combined with the \$8.0 billion in purchase orders, total procurement activity attributable to an identified agency was approximately \$16.8 billion.

⁸ This amount (\$7,981,000,045.48) is as reported in the PASS report provided by OCP. The purchase orders reported on the OCP Transparency Portal instead showed a total of \$7,865,576,560.43. Sufficient explanation for the variance was not provided.

2025, with total procurement action dollar volume were greater than \$1,000,000 for that agency during the same period:

1. Department of Transportation
2. District Department of Energy & Environment
3. DC Sentencing Commission
4. Office of Victim Services and Justice Grants
5. Office of the Deputy Mayor for Planning & Economic Development

The following agencies that had a single vendor accounted for more than 50% of total procurement spend for the agency during FY 2024–FY 2025, with total procurement action dollar volume less than \$350,000 for that agency during the same period:

1. Office of the Tenant Advocate
 2. Public Employees Relations Board
 3. Office of Employee Appeals
 4. Deputy Mayor for Public Safety, Justice & Operations
 5. Office of General Counsel to the Mayor
 6. Real Property Tax Appeals Commission
 7. Rental Housing Commission
 8. Commission on Judicial Disabilities and Tenure
- *Year-End Spending Concentration Analysis:* Using FY 2024 –FY 2025 non-personnel expenditure data from PASS and the OCP Transparency Portal (and DIFS where available⁹), we analyzed spending activity during the final two months (August and September) of each fiscal year relative to each agency's total annual procurement spending. To identify statistically significant year-end spending patterns, we applied an interquartile range (IQR) methodology.¹⁰

In this assessment, the IQR methodology was applied to identify District agencies with statistically anomalous spending during the fiscal year-end period (August and September) relative to their own historical spending patterns. For each agency, monthly non-personnel transaction data was aggregated into monthly spending totals. Q1, Q3, and the resulting IQR were calculated separately for each agency based on its own monthly spending distribution, and an upper threshold of $Q3 + (1.5 \times IQR)$ was established. Agency months in which spending exceeded this threshold were flagged as statistically anomalous and warranting further risk assessment. Because thresholds were calculated on an agency-specific basis, this methodology identifies deviations from an agency's typical spending pattern rather than comparisons across agencies. Six agencies were flagged for year-end spending percentages exceeding the upper bound threshold ($Q3 + 1.5 \times IQR$) and identified as exhibiting elevated year-end spending

⁹ Because DIFS data could not be fully reconciled to PASS and Portal data (see Constraints and Limitations), we reviewed DIFS data to confirm that the differences between DIFS and PASS data did not have a significant impact on our assessment of spending patterns.

¹⁰ The IQR is a statistical measure of data spread, calculated as the difference between the third quartile (Q3, the value below which 75 percent of observations fall) and the first quartile (Q1, the value below which 25 percent of observations fall). It is commonly used to identify outliers, observations that deviate significantly from the rest of a dataset, because it is based on the middle 50 percent of the data and is therefore less affected by extreme values than other measures of spread, such as the standard deviation. A common convention for identifying outliers is to establish an upper threshold of $Q3 + (1.5 \times IQR)$; any value exceeding this threshold is considered a statistical outlier.

concentration risk. This analysis did not compare year-end spending to agency acquisition plans required under D.C. Code § 2-361.05.

Table 4. Agencies Exceeding the IQR Upper Bound Threshold (>36% Year-End Concentration)

Agencies Exceeding the IQR Upper Bound Threshold¹¹			
Agency	FY24 + FY25 Expenditure Total	FY24 and FY25 August + September (YE) Spend	Year-End Spend %
Office of the Tenant Advocate	\$459,576.31	\$189,840.19	41%
Department of Motor Vehicles	\$98,123,517.07	\$41,789,734.54	43%
Office of Finance and Resource Management	\$506,292.80	\$219,191.18	43%
Department of Energy and the Environment	\$294,602,914.97	\$136,195,018.69	46%
Office of Veterans Affairs	\$105,389.50	\$52,694.75	50%
Special Education Transportation (SET) ¹²	\$11,464,022.82	\$6,955,265.88	61%

Agency Questionnaire

We developed and administered a District-wide procurement questionnaire to gather information regarding agencies' procurement practices, policies, controls, and oversight activities. The questionnaire was distributed electronically to District agencies, and responses were tracked throughout the administration period. We monitored response rates, issued reminders, coordinated follow-up with nonresponding agencies, and worked with the OIG to address extensions or instances of noncompliance, as necessary.

Questionnaire results were used as one input to identify and prioritize systemic risk themes and to target follow-up procedures (e.g., interviews, site visits, and document review) where responses indicated elevated risk, recurring weaknesses, or limited visibility into agency practices.

A total of 100 questionnaires were distributed to the in-scope agencies listed in [Appendix A](#). We received 79 complete questionnaires, resulting in an overall response rate of 79%. Response rates varied by procurement authority:

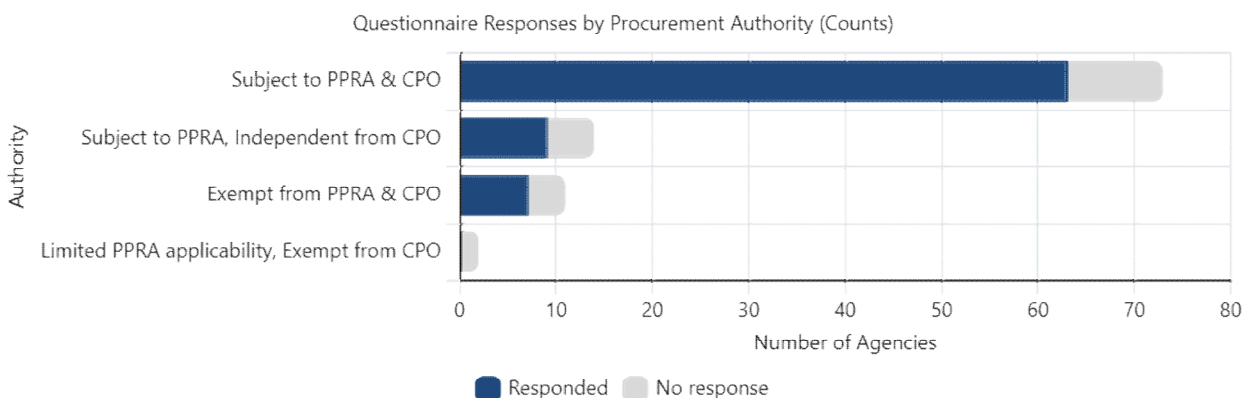
- 86% (63 out of 73) of agencies subject to PPRA and the CPO's authority responded.
- 64% (9 out of 14) of agencies subject to PPRA but not under the CPO's authority responded.
- 64% (7 out of 11) of agencies exempt from PPRA and the CPO responded.

¹¹ The underlying analysis was performed on expenditure amounts reflecting combined FY 2024–FY 2025 activity.

¹² Although the procurement data reported here used the agency name "Special Education Transportation (SET)", this is not a valid agency name. The related SET operations were consolidated under the Office of the State Superintendent of Education (OSSE) in 2010. While OSSE spending data did not meet the threshold for elevated year-end spending analysis overall, we increased their associated risk level in this area due to the SET data being recorded.

- 0% (0 out of 2) agencies with limited PPRA applicability and exempt from the CPO responded.

Figure 2. Agency Responses by Authority



As noted in Figure 2 above, we did not receive responses to the questionnaire from 10 agencies under PPRA & CPO authority, five under PPRA but not under CPO, four exempt from PPRA and CPO, and two with limited PPRA and exempt from CPO. See [Appendix B](#) for Questionnaire Responsiveness by agency.

Questionnaire responses were scored using a weighted methodology and normalized to a 0–100 scale, where 100 represents the highest risk. The questionnaire consisted of 49 structured questions mapped to nine procurement risk domain categories, with control objectives aligned to PPRA, Title 27 DCMR, NASPO leading practices, and risk themes identified in the FY 2022 Procurement Risk Assessment.

An overall risk score for each agency was produced by applying domain-level weights that reflect the expected impact of each domain on procurement integrity, operational effectiveness, and compliance. In addition, we tracked “red flag” indicators (i.e., responses that signal potential control breakdowns or elevated fraud risk) and used these as qualitative inputs to prioritize follow-up interviews and document reviews. The aggregated results helped identify which risk domains were most frequently elevated across the District and informed the structure of subsequent fieldwork. Domain-level and overall risk scores were calculated using a weighted formula based on question-level risk points (ranging from zero, indicating lowest risk, to three, indicating highest risk) and each question's assigned domain weight. Based on these calculated scores, we established procurement risk levels of Low (0–25), Moderate (26–50), High (51–75), and Critical (76–100).

Table 5. Aggregated Domain Category Scores

Risk Domain Category	Domain Score	Risk Level
Incomplete Procurement Procedures Manual	50	Moderate
Inadequate Monitoring of Receipt and Quality of Goods and Services	38	Moderate
Misalignment Between Organization and Function	33	Moderate
Lack of Procurement Planning and Coordination	22	Low
Misalignment Between Systems' Data Fields	22	Low
Fraud Prevention	21	Low
OCFO Fiscal Management	11	Low
Surplus Property Disposal Program	8	Low
Unsupported Procurement Actions	0	Low

Agencies were then assigned to one of four risk ratings (Low, Moderate, High, or Critical) based on their overall scores. Of the 79 responding agencies, 21 were classified as Low, 32 as Moderate, 19 as High, and 7 as Critical.

Figure 3. Agency Distribution by Risk

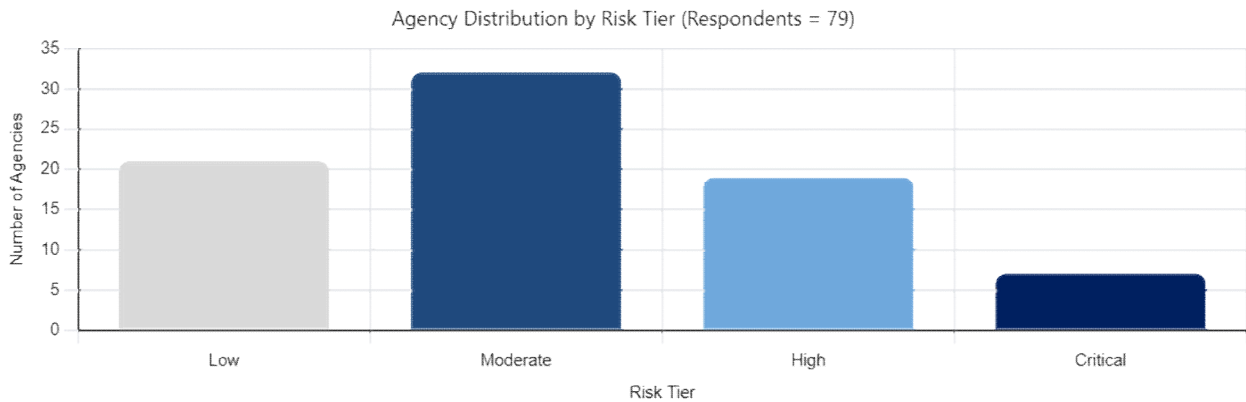


Table 6. Critical and High Risk Scored Agencies

Agency Name	Overall Risk Score	Risk Rating
Office of the Tenant Advocate	82	•Critical
DC State Board of Education	81	•Critical
Office of Campaign Finance	81	•Critical
Office of Advisory Neighborhood Commissions	79	•Critical
Alcoholic Beverage and Cannabis Administration	77	•Critical
Office of Risk Management and the Employees' Compensation Fund	76	•Critical
District of Columbia Judicial Nomination Commission	76	•Critical
Office of Chief Medical Examiner	75	•High
Deputy Mayor for Health and Human Services	73	•High
D.C. Sentencing Commission	71	•High
Public Employee Relations Board	71	•High
Department of Motor Vehicles	68	•High
Department of Aging and Community Living	65	•High
Office of Police Complaints	64	•High
Criminal Justice Coordinating Council	64	•High
Homeland Security and Emergency Management Agency	64	•High
Metropolitan Police Department	64	•High

We combined the results of our procurement data analytics and questionnaire responses into a consolidated agency risk scoring model that quantified multiple dimensions of procurement risk, including procurement volume, vendor concentration, and year-end spending concentration. Questionnaire responsiveness and survey-based risk indicators were also evaluated and incorporated as qualitative risk inputs to inform overall risk scoring and sample selection. Agencies were evaluated based on their total risk scores. Using professional judgment and OIG-approved criteria, we selected a sample

of agencies to conduct additional procedures over ,ensuring coverage across the following OIG approved criteria:

- High-risk agencies,
- Agencies with significant procurement dollar volume,
- Agencies exhibiting statistically significant year-end spending concentration, and
- A mix of procurement governance structures, including agencies subject to the PPRA and those independent from or exempt from the CPO's authority.

The scoring model assigned risk point values for procurement dollar value, questionnaire results (including non-response), vendor concentration, year-end spending concentration, and other risk factors identified during the assessment. Agencies that received 175 or more points were categorized as High, agencies scoring between 100–174 points were categorized as Moderate, and agencies with fewer than 100 points were classified as Low. The additional planned procedures for the selected sample included performing a detailed review of the Agency's structure, procurement policies, procedures, and practices.

Table 7. Agencies Selected for Further Testing

Sample No.	Agency	Procurement Authority	Total Procurement Activity (Contract Awards + POs)	Questionnaire Completed	Risk Rating
1	Department of Transportation	Subject to PPRA & CPO's Authority	\$5,199,644,506	Yes	High
2	Department of Human Services	Subject to PPRA & CPO's Authority	\$741,166,805	Yes	Low
3	Office of the Chief Technology Officer	Subject to PPRA & CPO's Authority	\$480,888,669	Yes	Moderate
4	Department of Behavioral Health (DBH)	Subject to PPRA & CPO's Authority	\$335,495,232	Yes	Low
5	District Department of Energy & Environment	Subject to PPRA & CPO's Authority	\$182,193,038	Yes	High
6	Metropolitan Police Department	Subject to PPRA & CPO's Authority	\$150,830,462	Yes	Moderate

Sample No.	Agency	Procurement Authority	Total Procurement Activity (Contract Awards + POs)	Questionnaire Completed	Risk Rating
7	Department of Motor Vehicles	Subject to PPRA & CPO's Authority	\$52,857,561	Yes	High
8	Department of Health Care Finance	Subject to PPRA & CPO's Authority	\$1,682,509,177	No	High
9	Department of Public Works	Subject to PPRA & CPO's Authority	\$183,839,734	No	High
10	Deputy Mayor for Education (EOM)	Subject to PPRA & CPO's Authority	\$9,696,987	No	Moderate
11	Office of Contracting & Procurement	Subject to PPRA & CPO's Authority	\$518,801,639	Yes	High
12	Office of the Chief Medical Examiner	Subject to PPRA & CPO's Authority	\$6,737,835	Yes	Low
13	Executive Office of the Mayor (EOM)	Subject to PPRA & CPO's Authority	\$4,021,635	Yes	Low
14	Office of the State Superintendent of Education	Subject to PPRA & CPO's Authority	\$322,462,785	Yes	High
15	DC Sentencing Commission	Subject to PPRA & CPO's Authority	\$1,133,642	Yes	High
16	State Board of Education	Subject to PPRA & CPO's Authority	\$70,871,491	Yes	Moderate

Sample No.	Agency	Procurement Authority	Total Procurement Activity (Contract Awards + POs)	Questionnaire Completed	Risk Rating
17	Office of Cable Television, Film, Music & Entertainment	Subject to PPRA & CPO's Authority	\$11,617,702	No	Moderate
18	Office of the Deputy Mayor for Planning & Economic Development	Subject to PPRA & CPO's Authority	\$591,028,787	No	High
19	Health Benefits Exchange Authority	Exempt from PPRA & CPO	\$42,694,828	Yes	Low
20	Council of the District of Columbia	Limited PPRA Applicability, Exempt from CPO	\$7,355,456	No	Low
21	District of Columbia Public Schools	Subject to PPRA, Exempt from CPO	\$375,555,706	Yes	Low
22	Office of the Chief Financial Officer	Subject to PPRA, Exempt from CPO	\$218,411,728	Yes	High
23	Child & Family Services Agency	Subject to PPRA, Exempt from CPO	\$95,045,403	Yes	Moderate
24	Department of General Services	Subject to PPRA, Exempt from CPO	\$2,303,463,494	No	High
25	Office of Finance and Resource Management	Subject to PPRA, Exempt from CPO	\$283,375	No	High

Agency Interviews

From the sampled 25 agencies presented in Table 7 above, we requested interviews with 20 agencies (see Table 8 below). We offered to conduct interviews in person if preferred by the agency, however all interviews conducted were performed virtually. We selected agencies for interviews based on the risk-based approach in connection with Table 7 above, with a focus on questionnaire results (including nonresponses), and prior observations to ensure coverage across higher-risk, lower-risk, and unknown-risk agencies. Specifically, we used the procurement risk analytics and questionnaire scoring

to assign interview priority through a weighted tiering methodology that assigned a weighted score based on five factors: overall questionnaire risk tier (5%), year-end spending concentration (20%), vendor concentration (25%), questionnaire non-response (25%), and high-dollar procurement activity (25%), treating questionnaire nonresponse as an elevated risk condition due to reduced visibility into agency controls. Based on this methodology, we selected 14 agencies for initial interview scheduling, with the expectation that additional agencies could be added to the interview list as documentation requests were received and revealed elevated risk warranting direct inquiry. In total, we requested interviews with 20 agencies, of which 17 were held, and are presented in Table 8 below.

We developed general interview protocols and agency-specific question sets tailored to each agency's procurement profile and identified risk indicators, and we conducted interviews to obtain additional qualitative information regarding procurement operations, controls, and governance practices, supplementing the quantitative analytics described above. We also performed a second round of interview selections to address documentation-driven gaps identified after initial scheduling. Specifically, we identified six additional agencies for interview consideration where (1) no requested documents were provided, limiting our ability to assess procurement internal controls through documentation review alone, or (2) the agency provided only OCP policy and procedure—despite operating outside CPO authority—indicating potential reliance on policy insufficient for the agency's own procurement requirements.

Table 8. Agencies Selected for Interview/Site Visits

Agency	Procurement Authority	Interview Held
Department of Behavioral Health	Subject to PPRA & CPO's Authority	Yes
Office of the Deputy Mayor for Planning & Economic Development (EOM)	Subject to PPRA & CPO's Authority	Yes
DC Sentencing Commission	Subject to PPRA & CPO's Authority	Yes
Department of Transportation	Subject to PPRA & CPO's Authority	Yes
Department of Public Works	Subject to PPRA & CPO's Authority	Yes
Office of the State Superintendent of Education	Subject to PPRA & CPO's Authority	Yes
District Department of Energy & Environment	Subject to PPRA & CPO's Authority	Yes
Executive Office of the Mayor (EOM)	Subject to PPRA & CPO's Authority	Yes
Deputy Mayor for Education (EOM)	Subject to PPRA & CPO's Authority	Yes
Department of Human Services	Subject to PPRA & CPO's Authority	Yes
State Board of Education	Subject to PPRA & CPO's Authority	Yes
Office of Cable Television, Film, Music & Entertainment	Subject to PPRA & CPO's Authority	Yes
Department of Health Care Finance	Subject to PPRA & CPO's Authority	No ¹³
Office of Contracting & Procurement	Subject to PPRA & CPO's Authority	Yes

¹³As of April 30, 2026, the interview closure date, the Department of Health Care Finance did not respond to multiple interview requests and reminders, including outreach by the OIG, and no interview was scheduled or conducted for purposes of this assessment.

Agency	Procurement Authority	Interview Held
Office of the Chief Medical Examiner	Subject to PPRA & CPO's Authority	No ¹⁴
Office of the Chief Financial Officer	Subject to PPRA, Exempt from CPO	Yes
Department of General Services	Subject to PPRA, Exempt from CPO	Yes
Child & Family Services Agency	Subject to PPRA, Exempt from CPO	Yes
Office of Finance and Resource Management	Subject to PPRA, Exempt from CPO	No ¹⁵
Council of the District of Columbia	Limited PPRA Applicability, Exempt from CPO	Yes

Information obtained through interviews was documented for each agency and mapped to seven standardized interview risk categories, then summarized and quantified (i.e., prevalence by risk category across interviewed agencies) to support comparative analysis and the identification of systemic procurement risks. The risk themes in Table 9 are presented in descending order based on the number of agencies in which each theme was identified during interviews.

Table 9. Recurring Risk Themes Identified Through Interviews

Preliminary Recurring Risk Themes	No. of Agencies
System/cross-system visibility limitations	9
High-dollar approval and urgent procurement timing constraints	8
Documentation/workflow fragmentation and contract file completeness risk	7
Competition constraints driven by specialized procurement needs, incumbent/vendor dependence, experience-based vendor screening, or otherwise limited qualified supplier pools	7
OCP support limitations	5
High reliance on purchase cards/small purchases increasing threshold, documentation, and oversight risk	3
Budget uncertainty/partial funding and fiscal constraints affecting procurement planning, continuity, and execution	3

Identification and Evaluation of System Risks

Throughout the engagement, we maintained a procurement system risk and observation tracker to document weaknesses, observations, and recurring risk themes identified during the assessment procedures. The tracker consolidated results from procurement data analysis, agency questionnaires, interviews and site visits, and reviews of District-wide and agency-level policies and procedures.

Observations were evaluated based on likelihood, potential impact, and pervasiveness across agencies and procurement activities, and were mapped, where applicable, to risk areas identified in the FY 2022 Procurement Risk Assessment to assess the status of remediation and significance. The tracker supported

¹⁴As of April 30, 2026, the interview closure date, the Office of the Chief Medical Examiner did not respond to interview requests or reminders, including outreach by the OIG, and no interview was scheduled or conducted as part of this assessment.

¹⁵Given that the Office of Finance and Resource Management operates as a component organization within the Office of the Chief Financial Officer and that all procurement activity is executed through the centralized OCFO procurement function, a separate OFRM interview was deemed not necessary for purposes of this assessment.

risk prioritization for reporting and informed OIG consideration of areas warranting continued oversight or future audit work.

Our risk assessment identified multiple systemic procurement risks affecting procurement governance, control design, information reliability, and monitoring across the District's procurement environment. Several of the conditions observed are entity-level in nature and are driven by fragmented systems, inconsistent guidance, and variation in governance structures across agencies. These risks include:

- Repeat risk areas (updated)
 - PASS–DIFS data reconciliation gaps – Lack of reconciliation between procurement and financial systems limits the accuracy, completeness, and reliability of procurement-related data used for oversight and decision making.
 - Outdated procurement SOPs – Failure to update centrally-maintained procurement procedures increases reliance on outdated guidance, resulting in inconsistent practices and weakened procurement control across agencies.
 - Non-uniform procurement governance model – Differences in governance structures between OCP-reliant and independent agencies lead to inconsistent implementation of procurement controls and varying levels of process maturity.
- Additional risk areas identified
 - Inconsistent agency naming governance – Inconsistent use of agency naming conventions across systems and documentation reduces transparency and increases the risk of misclassification and inaccurate reporting of procurement activity.
 - OCP capacity and support limitations – Constraints in OCP staffing, guidance, and support processes result in inconsistent and delayed procurement assistance, reducing overall effectiveness and oversight.
 - Fragmented procurement systems environment and documentation – Lack of an integrated, end-to-end procurement system contributes to reliance on multiple platforms and manual processes, increasing the risk of errors, inefficiencies, and limited visibility. Additionally, records are stored across multiple systems and storage methods, increasing the risk of incomplete documentation and limiting oversight.
 - Approval process design and delays – The council approval threshold, combined with a multi-layered review process, create pressure for agencies to manage timing and continuity of services in ways that increase the risk of inconsistent application of procurement requirements or noncompliance.
 - Budget uncertainty – Certain agencies interviewed described experiencing partial funding and fiscal constraints that they indicated disrupted procurement planning and execution, creating risks to contract performance and service continuity.

Objective 2: Assessment of the District Agencies' Procurement Regulations, Policies, and Practices

For Objective 2, our review of agency-level procurement regulations, policies, and practices identified meaningful variation in how agencies document and operationalize key procurement requirements. Overall, results from the policy and practice review indicate that gaps in completeness and clarity, together with inconsistent alignment with key PITAA and NASPO Practical Guide provisions, may contribute to inconsistent execution, varying documentation expectations, and reduced transparency across the District's procurement environment.

Review of Procurement Policies, Procedures, and Practices

We selected a diverse subset of agencies (see [Table 7](#)) for detailed review of procurement policies, procedures, and practices. For each selected agency, we requested the following relevant procurement policies and procedures through a document request list (DRL):

- Agency procurement policies, procedures, and directives active during FY 2024 – FY 2025.
- Agency procurement guides, resources, and templates used during FY 2024 – FY 2025.
- Results of any internal review, risk assessment, or audit regarding procurements and/or procurement practices during FY 2024 – FY 2025.
- Chart and/or description of the agency's procurement organizational structure.

Across the 25 agencies we requested documents from, responsiveness and the availability of agency-specific procurement guidance varied by procurement authority:

Table 10. Provision of Requested Documentation by Procurement Authority

Procurement Authority Category	DRL Issued to No. of Agencies	DRL Submissions from No. of Agencies
Subject to PPRA & CPO Authority	18	11 (61%)
Subject to PPRA, Exempt from CPO Authority	5	4 (80%)
Exempt from PPRA & CPO Authority	1	1 (100%)
Limited PPRA applicability (Exempt from CPO)	1	0 (0%)
Total	25	16 (64%)

To identify and assess key requirements related to procurement activities, we reviewed applicable District laws and regulations, District-issued centralized procurement guidance, and established procurement standards. We identified and documented provisions relevant to procurement governance, delegations of authority, acquisition planning, competition and source selection, contract administration, ethics and transparency, and socioeconomic or public-interest requirements.

Provisions¹⁶ were considered key if they established mandatory requirements, approvals, documentation obligations, or oversight responsibilities, or if noncompliance could result in operational, compliance, or reporting risk. Each key provision was documented using standardized language, mapped to its authoritative source, and assigned corresponding testing attributes to support objective, consistent assessment of agency policy and practice alignment. Key provisions were categorized by procurement lifecycle area to support analysis, reporting, and downstream audit planning.

See [Appendix A](#) for Criteria Applicability for Sampled Agencies.

Agencies were scored at the key-provision level using a standardized 0–3 completeness and clarity scale based solely on documented policy language. For each applicable provision, we assessed whether agency policies, procedures, and practices clearly and fully established the required processes, roles, approvals, and documentation outlined in the key provision.

- A score of 3 (Fully Aligned) indicated comprehensive, unambiguous coverage with no material gaps;

¹⁶A total of 52 key provisions were identified across six authoritative sources, including 10 from Title 27 DCMR, 12 from the PPRA, six from PITAAA, 12 from the OCP Procurement Procedures Manual, five from the NASPO Practical Guide, and four from the ABA Model Procurement Code.

- 2 (Substantially Aligned) indicated the requirement was addressed but needed minor clarification or additional detail;
- 1 (Partially Aligned) reflected references to the requirement with missing vital elements; and
- 0 (Not Addressed) indicated the requirement was absent from policy.

Standardized gap descriptions were required for scores of 0–2, reflecting identified gaps; a score of 3 indicated full alignment and therefore did not require a gap description. Results were documented in a standardized matrix.

Table 11. Results of Policy, Procedure, and Practices Review

Agency	Procurement Authority	Score (out of 3)
Department of Transportation	Subject to PPRA & CPO's Authority	2.96*
Department of Human Services	Subject to PPRA & CPO's Authority	2.96*
Office of the Chief Technology Officer	Subject to PPRA & CPO's Authority	2.96*
Department of Behavioral Health	Subject to PPRA & CPO's Authority	2.96*
District Department of Energy & Environment	Subject to PPRA & CPO's Authority	2.96*
Metropolitan Police Department	Subject to PPRA & CPO's Authority	2.96*
Department of Motor Vehicles	Subject to PPRA & CPO's Authority	2.96*
Department of Health Care Finance	Subject to PPRA & CPO's Authority	No DRLs Provided
Department of Public Works	Subject to PPRA & CPO's Authority	No DRLs Provided
Deputy Mayor for Education	Subject to PPRA & CPO's Authority	No DRLs Provided
OCP	Subject to PPRA & CPO's Authority	2.96*
Office of the Chief Medical Examiner	Subject to PPRA & CPO's Authority	No DRLs Provided
Executive Office of the Mayor	Subject to PPRA & CPO's Authority	No DRLs Provided
Office of the State Superintendent of Education	Subject to PPRA & CPO's Authority	2.96*
DC Sentencing Commission	Subject to PPRA & CPO's Authority	2.96*
State Board of Education	Subject to PPRA & CPO's Authority	No DRLs Provided
Office of Cable Television, Film, Music & Entertainment	Subject to PPRA & CPO's Authority	No DRLs Provided
Office of the Deputy Mayor for Planning & Economic Development	Subject to PPRA & CPO's Authority	1.69
Health Benefits Exchange Authority	Exempt from PPRA & CPO	2.78
Council of the District of Columbia	Limited PPRA applicability, exempt from CPO	No DRLs Provided
District of Columbia Public Schools	Subject to PPRA, Exempt from CPO	2.94
Office of the Chief Financial Officer	Subject to PPRA, Exempt from CPO	2.46
Child & Family Services Agency	Subject to PPRA, Exempt from CPO	2.96*
Department of General Services	Subject to PPRA, Exempt from CPO	2.46
Office of Finance and Resource Management	Subject to PPRA, Exempt from CPO	No DRLs Provided

*This agency provided only OCP policies and procedures and did not indicate independent processes; as a result, scoring reflects reliance on OCP for procurement-related documentation and compliance with procurement guidance.

Based on our testing results, we identified limited but recurring policy-level risks across sampled agencies, primarily related to completeness and clarity (rather than the absence of core procurement controls). Specifically, PITAAA-related requirements related to Agency Ombudsmen for Contracting and Procurement and to identify and restrict inherently governmental functions present the most gaps, agencies generally lacked consistently documented Ombudsmen and a formal, systemic process for the latter.¹⁷ In addition, provisions aligned to NASPO leading practices for Supplier Relationship Management (SRM) were generally only substantially addressed, as existing procedures emphasize compliance-focused contract administration rather than a clearly defined strategic SRM framework. Generally, procurement risks related to competition, ethics, contract administration, transparency, and CBE requirements were mitigated through uniform reliance on OCP procedures, resulting in a low overall risk profile.

Objective 3: Assessment of the District's Internal Controls over Procurement

For Objective 3, we evaluated the effectiveness of the District's internal control environment over procurement activities using GAO's Green Book as the primary framework, with a focus on control design, implementation, and monitoring. This assessment integrated evidence across data analytics, questionnaires, interviews, site visits, and policy/procedure reviews conducted under Objectives 1 and 2. Our purpose was to determine how well the District's internal controls prevent, detect, and respond to procurement risks, and how identified weaknesses align with the systemic issues observed throughout the engagement.

The results below summarize where control breakdowns are occurring, organized by the five Green Book components and seventeen associated principles. See [Appendix D](#) for GAO's five components and seventeen associated principles.

Control Environment (Principles 1–5)

What We Examined: Governance structures, procurement authority models, delegations, training, and accountability expectations across agencies operating under the PPRA and those with independent authority.

Key Vulnerabilities Identified:

- ***Non-uniform procurement governance model across agencies*** - particularly between agencies operating under CPO authority and those with independent procurement authority, results in inconsistent implementation of procurement controls and oversight practices.
- ***Limited agency knowledge of fraud prevention, detection, and reporting processes*** - indicates that expectations regarding ethical conduct and fraud risk management are not consistently communicated or embedded across the procurement workforce.
- ***Agency-specific procurement practices not supported by standardized or documented procedures*** - increases the risk of inconsistent execution and reduced accountability.

Why It Matters: A strong control environment is foundational and these gaps weaken tone-at-the-top, hinder consistent control execution, and elevate the risk of fraud or mismanagement.

¹⁷ D.C. Code § 2-357(b) states: "Each District agency with independent procurement authority pursuant to section 201 [i.e., D.C. Code § 2-352.01(b)] shall designate an Agency Ombudsman for Contracting and Procurement."

Risk Assessment (Principles 6–9)

What We Examined: Agency approaches to identifying, analyzing, and responding to procurement risks; expenditure patterns; vendor usage; fraud-related controls; and risk-driven practices identified during questionnaires, interviews and analysis of non-personnel expenditures and vendor utilization covering October 2023 through September 2025.

Key Vulnerabilities Identified:

- ***Fiscal management practices and incentives are not consistently aligned with risk mitigation*** - as evidenced by persistent year-end spending patterns that suggest risks related to budget execution are not sufficiently identified, analyzed, or addressed at the enterprise level.
- ***Procurement planning risks are elevated due to external approval thresholds and multi-layered review processes*** - which introduce timing and execution uncertainties that are not fully accounted for in risk identification and response strategies.

Why It Matters: Controls cannot function effectively when risks are not consistently identified or when underlying incentives undermine risk-reduction goals.

Control Activities (Principles 10–12)

What We Examined: Documentation and implementation of procurement policies and procedures, including system-embedded controls in PASS and related financial systems.

Key Vulnerabilities Identified:

- ***Outdated centrally-maintained procurement SOPs*** - increase the risk of inconsistent procurement practices and limit standardization across agencies.
- ***Fragmented procurement documentation and workflow practices*** - with records maintained across multiple systems and locations, limit the completeness and reliability of procurement documentation and reduce auditability.

Why It Matters: Control activities are the mechanism most directly responsible for preventing risk, and misalignment directly leads to inconsistent execution and unsupported procurement decisions.

Information and Communication (Principles 13–15)

What We Examined: How procurement information is communicated internally among procurement personnel and externally through publicly available procurement guidance and reporting mechanisms.

Key Vulnerabilities Identified:

- ***System fragmentation and cross-system integration limitations*** - result in inconsistent, incomplete, and difficult-to-interpret procurement data, reducing transparency and impairing decision making.
- ***Inconsistent agency identifiers and naming conventions across systems*** - increase the risk of misclassification, commingling, and reduced traceability of procurement transactions.

Why It Matters: Accurate, consistent information is essential for effective decision making, transparency, and oversight. Data fragmentation is one of the District's most significant systemic risks.

Monitoring (Principles 16–17)

What We Examined: How procurement controls and risk responses are monitored over time, including the extent to which management and oversight functions use available data and exception reporting to evaluate control performance and address identified issues. Inquiries during interviews focused on

whether agencies perform periodic supervisory reviews, follow up on system or financial red flags, and track the status of corrective actions related to procurement compliance, documentation retention, and vendor management.

Key Vulnerabilities Identified:

- **Lack of reconciliation between procurement (PASS) and financial (DIFS) systems** - limits the accuracy, completeness, and reliability of procurement-related financial information.
- **Monitoring of procurement and financial activity is constrained by system limitations and lack of integrated data**, limiting management's ability to perform effective oversight and identify anomalies in a timely manner.
- **Lack of formal tracking and documentation of corrective actions related to prior risk assessments** limits the ability to evaluate whether identified deficiencies have been remediated over time.

Why It Matters: Without strong monitoring, control breakdowns go unaddressed, and past risk findings persist without remediation.

Figure 4. Summary of Key Vulnerabilities by GAO Greenbook Component

Control Environment	• Fragmented governance across agencies • Limited knowledge of fraud prevention • Agency practices lacking documentation
Risk Assessment	• Fiscal management incentives conflict with risk mitigation • Procurement planning risks are elevated
Control Activities	• Outdated central procurement SOPs • Fragmented documentation practices • Inconsistent identifiers and naming conventions
Information & Communication	• Cross-system integration issues • Inconsistent identifiers
Monitoring	• Lack of reconciliation between systems • Monitoring hindered by system limitations • Corrective actions not consistently tracked

Objective 4: Assessment of Remediation Efforts over FY 2022 Procurement Risk Assessment Results

For Objective 4, we assessed the status of remediation efforts associated with findings and risk areas identified in the FY 2022 Procurement Risk Assessment to determine whether previously identified risks remained (i.e., represent repeat risks), had been mitigated (i.e., represent fully mitigated risks), or warranted continued or additional oversight (i.e., represent partial or not mitigated risks). We evaluated available information across the engagement and incorporated the results into our overall risk assessment to support OIG's risk-based oversight and future engagement planning including:

- **Corrective Action Plans:** OCP disclosed that a formal corrective action plan, or equivalent remediation monitoring, was not developed in response to the 2022 Procurement Risk Assessment. Additionally, OCP did not respond to follow up requests for identification of process implementation or modification since 2022 which may mitigate the prior risks.
- **Questionnaire Responses:** Where possible, the Agency Questionnaire discussed under Objective 1 included questions designed to reassess the significance of prior risk areas. Apart from Risk 4, for which our assessment relied on policy analysis, each prior risk area was assessed using

between one and five questionnaire items, depending on the complexity and scope of the risk area being evaluated. Our analysis of responses indicated higher relative risk scores associated with fraud prevention knowledge, procurement planning, organizational alignment, monitoring of goods and services, and systems data alignment (Risks 1, 5, 6, 7, and 8).

- **Data Analysis:** Financial and procurement data analysis was performed to identify objective indicators of continued risk conditions related to fiscal management and year-end spending concentration (Risk 4). However, data inconsistencies across procurement and financial sources (PASS, OCP's Transparency Portal, and DIFS) both limited the reliability of our analysis and indicated continued misalignment between system data fields (Risk 8).
- **Agency Interviews:** Agency interviews provided primarily qualitative and anecdotal insight into procurement practices and helped validate whether 2022 risks remained present in operational environments. Interviews identified ongoing challenges related to documentation practices, procurement planning, organizational alignment, and system fragmentation (Risks 3, 5, 6, and 8) including reliance on outdated systems, duplicative manual processes, and inconsistent coordination across agencies. While our interview with OCP suggested procurement monitoring (Risk 7) showed partial improvements, agency feedback overall corroborated that many 2022 risks—particularly those related to systems, planning, and workflow consistency—continue to persist through outdated systems, duplicative manual processes, and inconsistent coordination across agencies, consistent with conditions observed in FY2022.

Table 12 summarizes our assessment of the status of each risk area identified in the FY 2022 Procurement Risk Assessment, including its remediation status and, where applicable, the related FY 2026 risk observation(s).

Table 12. Assessment of FY 2022 Procurement Risks and Relationship to FY 2026 Risk Observations

Risk No.	Risk Description (2022 Procurement Risk Assessment)	Remediation Status¹⁸	Related FY 2026 Risk Observation(s)
1	The lack of knowledge of the District's processes for prevention, detection and reporting potential fraud increases the risk for potential opportunities of fraud to be perpetuated.	Not Mitigated	#8 – Fraud awareness and reporting (Repeat)
2	Office of the Chief Financial Officer's (OCFO) Fiscal Management policies and practices may have contributed to the increases in fiscal year-end spending, which appears to be operationally unsupported spend-downs of budgetary authority that could have a significant adverse financial impact to the District.	Not Mitigated	#9 – Fiscal management practices (Repeat)
3	The lack of uniformity for what should be uploaded and retained in automated workflow makes management and oversight of the procurement function much more difficult and contributes to increased risks of	Not Mitigated	#7 – Fragmented System, Documentation, and Workflow (Repeat)

¹⁸ "Not Mitigated" used for clarity of presentation, signifies that action to mitigate the described risk was not demonstrated by procedures performed and evidence collected.

Risk No.	Risk Description (2022 Procurement Risk Assessment)	Remediation Status ¹⁸	Related FY 2026 Risk Observation(s)
	unsupported procurement actions and decisions.		
4	Incomplete procurement procedures manual coverage of the procurement process leads to risks for procurement inconsistencies and inefficiencies.	Not Mitigated	#3 - Outdated Centrally Maintained Procurement SOPs
5	Lack of procurement planning and coordination across the District agencies increases risk in potential lost opportunities for competitive pricing.	Not Mitigated	#5 - Council Approval Threshold and Multi-Layered Review Process
6	Misalignment between organization and functions creates challenges and risks with retaining staffing, adherence to established procedures, and the ability to obtain an understanding of the agency operations.	Not Mitigated	#6 - Non-uniform Procurement Governance Model
7	Inadequate monitoring of the receipt and quality of goods and services provided to the District may result in an inefficient use of resources, a need for rework, or program delays.	Partially Mitigated	No significant risk observation
8	Misalignment between systems' data fields hinder the ability to conduct meaningful data analytics on procurement data.	Not Mitigated	#2 - Lack of Reconciliation Between PASS and DIFS; #7 – Fragmented System, Documentation, and Workflow (Repeat)
9	Surplus property disposal program.	Not Mitigated	No significant risk observation

Based on the procedures performed, seven FY 2022 risk areas continue to present systemic procurement risks, one risk area has been partially mitigated but continues to warrant oversight, and one risk area no longer represents a significant systemic procurement risk.

Risks Identified¹⁹

Risk Overview

The following section presents the key areas of risk identified during this assessment. As outlined in the objectives for this project, we present each of the key risk areas noted in relation to a specific project

¹⁹ This risk assessment presents the results of procedures performed during the current engagement and reflects the risks identified based on those procedures. Certain risks may overlap with, refine, or build upon risks identified in prior assessments; however, this section is not intended to provide a comprehensive update of all risks reported in the FY 2022 Procurement Risk Assessment and does not include all previously identified risks.

objective as well as the federal Green Book principle(s) to which each risk area aligns. In some instances, select risk areas apply to more than one objective.

Table 13. FY 2026 Risk Observations by Procurement Risk Assessment Objective

Objective Title	Objective Definition	Risk Observation No.
Objective 1: Assessment of the District's Procurement System	Conduct a comprehensive, system-level assessment of the District's procurement environment to identify high-risk systemic issues affecting procurement governance, operations, and outcomes during FY 2024 – FY 2025.	Risk Observation 1 – Inconsistent agency identifiers and naming conventions across procurement and financial systems limit data reliability and undermine District-wide procurement oversight Risk Observation 2 – Lack of reconciliation between PASS and DIFS limits reliability of procurement-related financial information (Repeat) Risk Observation 3 – Outdated centrally maintained procurement SOPs may contribute to inconsistent procurement practices and weaken District-wide controls (Repeat) Risk Observation 5 – Council approval threshold and multi-layered review process for procurements over \$1 million create timing, continuity, and control risks Risk Observation 6 – Non-uniform procurement governance structure results in inconsistent procurement controls and practices across agencies Risk Observation 7 – PASS, cross-system integration limitations, and fragmented documentation practices reduce procurement data reliability, transparency, and oversight (Repeat) Risk Observation 9 – OCFO fiscal management policies and practices may have contributed to increases in fiscal year-end spending that appear operationally unsupported (Repeat)
Objective 2: Assessment of District Agencies' Procurement Regulations, Policies, and Practices	Assess agency-level procurement regulations, policies, and practices for alignment with applicable laws, centralized guidance, and leading procurement practices; identify gaps, inconsistencies, and areas where lack of standardization may increase risk.	Risk Observation 3 – Outdated centrally maintained procurement SOPs may contribute to inconsistent procurement practices and weaken District-wide controls (Repeat) Risk Observation 4 – Use of purchase orders to process claim payments at DBH without documented procedures increases risk of inconsistent processing and reduced oversight Risk Observation 5 – Council approval threshold and multi-layered review process for procurements over \$1 million create timing, continuity, and control risks

Objective Title	Objective Definition	Risk Observation No.
		Risk Observation 6 – Non-uniform procurement governance structure results in inconsistent procurement controls and practices across agencies Risk Observation 7 – PASS, cross-system integration limitations, and fragmented documentation practices reduce procurement data reliability, transparency, and oversight (Repeat)
Objective 3: Assessment of the District's Internal Controls over Procurement	Evaluate the effectiveness of the District's internal control environment over procurement activities, using GAO's Green Book as the primary framework, with a focus on control design, implementation, monitoring, information systems, and communication of control responsibilities.	Risk Observation 1 – Inconsistent agency identifiers and naming conventions across procurement and financial systems limit data reliability and undermine District-wide procurement oversight Risk Observation 2 – Lack of reconciliation between PASS and DIFS limits reliability of procurement-related financial information (Repeat) Risk Observation 3 – Outdated centrally maintained procurement SOPs may contribute to inconsistent procurement practices and weaken District-wide controls (Repeat) Risk Observation 6 – Non-uniform procurement governance structure results in inconsistent procurement controls and practices across agencies Risk Observation 7 – PASS, cross-system integration limitations, and fragmented documentation practices reduce procurement data reliability, transparency, and oversight (Repeat)
Objective 4: Assessment of Remediation Efforts over FY 2022 Procurement Risk Assessment Results	Assess the status of remediation efforts associated with the findings and risk areas identified in the FY 2022 Procurement Risk Assessment; determine whether previously identified risks remain, have been mitigated, or warrant continued or additional oversight.	Risk Observation 2 – Lack of reconciliation between PASS and DIFS limits reliability of procurement-related financial information (Repeat; Data and Systems Alignment) Risk Observation 3 – Outdated centrally maintained procurement SOPs may contribute to inconsistent procurement practices and weaken District-wide controls (Repeat; Procurement Procedures) Risk Observation 7 – PASS, cross-system integration limitations, and fragmented documentation practices reduce procurement data reliability, transparency, and oversight (Repeat; Procurement Documentation / Data & Systems Alignment)

Objective Title	Objective Definition	Risk Observation No.
		Risk Observation 8 – Lack of knowledge of the District's processes for prevention, detection, and reporting potential fraud increases risk of fraud opportunities (Repeat; Fraud Awareness and Reporting) Risk Observation 9 – OCFO fiscal management policies and practices may have contributed to increases in fiscal year-end spending that appear operationally unsupported (Repeat; Fiscal Management Practices)

Based on the procedures performed, we identified nine systemic procurement risk areas that may affect the District's ability to consistently achieve procurement objectives and safeguard public resources. These risks primarily relate to data and system reliability, governance and oversight (including approval structures), policy and procedural consistency, procurement documentation and workflow controls, and agency-specific procurement practices.

The risk observations discussed below include a summary of the identified systemic procurement risks followed by the supporting analyses. Discussions of each risk reflect the results of the procurement data analysis, procurement questionnaire, document reviews of laws, regulations, policies and procedures, and interviews with District personnel, as applicable, performed under the assessment objectives described above.

Risk Observation 1 - Inconsistent Agency Identifiers and Naming Conventions Across Procurement and Financial Systems Limit Data Reliability and Undermine District-wide Procurement Oversight

During our procurement data analysis, we identified deficiencies in data integrity at the agency name level that limit the reliability of District-wide procurement reporting and increase the risk of misclassification of procurement activity. Specifically, procurement and financial systems do not consistently apply standardized agency identifiers, resulting in the same entity or function appearing under multiple agency names or acronyms across data sources. For example, procurement activity related to the District's criminal code revision function appears under several variations of agency names across the OCP Transparency Portal, PASS, and DIFS, including "District of Columbia Sentencing Commission," "District of Columbia Sentencing and Criminal Code Revision Commission," and "DC Sentencing and Criminal Code Revision Commission." The lack of uniform agency naming conventions and validation controls increases the risk that procurement activity is incorrectly attributed, obscures oversight of agency-specific spending and accountability, and undermines the accuracy of trend analysis, agency comparisons, and risk identification across the procurement system.

Impact

Inconsistent agency identifiers and naming conventions limit the District's ability to produce accurate, complete, and reliable procurement and spending reports. Misclassification of procurement activity may result in inaccurate spend totals by agency, reduced transparency over true program costs, and inefficiencies during budget formulation, forecasting, and oversight activities.

Control Environment

A standardized chart of agencies and uniform application of agency identifiers are foundational elements of an effective information and reporting control environment. The absence of standardized agency naming conventions and validation controls across PASS, DIFS, and public facing reporting platforms weakens system level controls over procurement data. Without clear ownership and governance over agency master data, the district lacks assurance that procurement activity is consistently recorded, aggregated, and reported in accordance with its intended organizational structure.

Economy and Efficiency

The lack of consistent agency identifiers increases administrative burden and reduces efficiency for District personnel and oversight bodies performing data analysis, reconciliations, and monitoring activities. Additional manual effort is often required to normalize agency names, resolve duplicative entries, and validate results before meaningful analysis can occur. These inefficiencies delay reporting, complicate cross agency comparisons, and limit the District's ability to efficiently leverage procurement data to identify trends, risks, or strategic sourcing opportunities.

Fraud, Waste, and Abuse

Data integrity weaknesses related to inconsistent agency identifiers create conditions that may obscure procurement activity, reduce transparency, and hinder effective oversight. When procurement transactions cannot be reliably attributed to the correct agency or functional owner, the risk increases that improper, unsupported, or inappropriate procurement actions go undetected. These conditions may create opportunities for fraud, waste, or abuse by weakening audit trails and impairing ability to monitor procurement behavior and enforce accountability across agencies.

Resolution Level

Resolution of this risk would likely require coordinated action by the OCP, the Office of the Chief Technology Officer (OCTO) and the Office of the Chief Financial Officer (OCFO) to establish, enforce, and maintain standardized agency identifiers and naming conventions across procurement and financial systems. Governance mechanisms would be needed to ensure consistent application of these standards Districtwide, including for agencies operating under different procurement authorities and system configurations.

Risk Observation 2 - Lack of Reconciliation Between PASS and DIFS Limits Reliability of Procurement-Related Financial Information (Repeat)

During our procurement data analysis, we identified a lack of reconciliation between PASS and DIFS. Differences in system design, data fields, timing, and usage across agencies prevent procurement and payment transactions from being consistently and completely reflected across systems. As a result, management's ability to ensure the accuracy, completeness, and reliability of procurement-related financial information used for oversight, reporting, and decision making is limited.

Impact

The lack of reconciliation between PASS and DIFS increases the risk that procurement obligations and related payments are inaccurately reported, misstated, or incomplete across systems. Inaccurate procurement-related financial information may impair the District's ability to monitor spending trends, assess budget execution, and support informed financial and operational decisions. While we did not quantify a specific dollar impact during this risk assessment, unresolved discrepancies between procurement and financial systems increase the potential for undetected errors or unsupported transactions.

Control Environment

The absence of a documented, District-wide reconciliation process between PASS and DIFS represents a control weakness that limits assurance over the integrity of procurement and payment data. Without standardized reconciliation procedures, management lacks reasonable assurance that procurement activity recorded in PASS is accurately reflected in DIFS, and vice versa.

Economy and Efficiency

The lack of automated or standardized reconciliation between PASS and DIFS increases reliance on manual data normalization, ad hoc reconciliations, and judgment-based analysis to support procurement oversight and reporting. These workarounds are time-consuming, reduce efficiency, and limit the District's ability to perform timely, reproducible analytics across agencies and fiscal periods. Inefficiencies related to data reconciliation also constrain the District's ability to fully leverage procurement data for strategic sourcing, performance monitoring, and risk identification.

Fraud, Waste, and Abuse

Incomplete or inconsistent reflection of procurement and payment transactions across systems weakens audit trails and reduces transparency over the lifecycle of procurement actions. When procurement and financial data cannot be reliably reconciled, the risk increases that improper, unsupported, or inappropriate transactions go undetected. These conditions may create opportunities for fraud, waste, or abuse by limiting management's and oversight entities' ability to identify anomalies, verify transaction completeness, and monitor procurement activity effectively.

Resolution Level

Resolution of this risk would likely require coordinated action by the OCP and the OCFO to establish reconciliation requirements and accountability for aligning PASS and DIFS data. Addressing this risk may involve consideration of whether the reconciliation processes between PASS and DIFS can be standardized across agencies, and if so, whether such standardization would need to account for differences in agency authority structure (e.g. CPO, PPRA, or independent agencies). Additional considerations may include defining reconciliation ownership, standardizing key data elements, implementing routine reconciliation procedures, and documenting variance resolution processes to improve the reliability of procurement-related financial information District-wide.

Risk Observation 3 - Outdated Centrally-Maintained Procurement SOPs May Contribute to Inconsistent Procurement Practices and Weaken District-Wide Controls (Repeat)

The FY 2022 OIG Procurement Risk Assessment concluded that the OCP procurement procedures manual was incomplete and outdated, creating risks of procurement inconsistencies and inefficiencies across District agencies. Identified gaps included inadequate guidance over contract amendments, extensions, renewals, and terminations; insufficient documentation of delegation of authority and segregation of duties; lack of procedures for conducting and documenting market research; and the absence of a clearly stated update/version control for the manual. The OIG further noted that incomplete policies weaken the overall control environment and increase the risk of unsupported procurement actions, inefficiencies, and potential exposure to fraud, waste, and abuse.

During our review of District-wide procurement governance and supporting documentation, we noted that centrally-maintained procurement standard operating procedures (SOPs issued by the OCP) have not been updated to address the specific gaps and risks identified in the FY 2022 Procurement Risk Assessment. We determined the risks identified in FY 2022 have not been fully mitigated and therefore continue to represent systemic procurement risks in FY 2026.

Impact

Outdated and incomplete procurement SOPs increase the risk that procurement actions are executed inconsistently or without full alignment to current requirements, potentially resulting in unsupported procurement actions, delays, rework, or corrective actions. These conditions may contribute to increased administrative costs and reduced value derived from procurement expenditures.

Control Environment

The absence of current, comprehensive, and centrally-maintained procurement SOPs represents a control environment weakness. Clearly defined and up-to-date policies and procedures are foundational elements of an effective internal control system. Continued reliance on outdated SOPs limits management's ability to ensure consistent control design and implementation across agencies, particularly in a procurement environment characterized by varying governance models and degrees of reliance on OCP guidance.

Economy and Efficiency

Incomplete and outdated SOPs reduce efficiency by increasing reliance on informal guidance, institutional knowledge, and agency-specific interpretations of procurement requirements. These conditions contribute to inconsistent workflows, delays in procurement processing, and additional effort to resolve questions or correct deficiencies, reducing overall efficiency across the District's procurement system.

Fraud, Waste, and Abuse

Weaknesses in procurement guidance and documentation standards may undermine approval controls, segregation of duties, and audit trails. When procurement requirements are not clearly or consistently documented, the risk increases that inappropriate, unsupported, or noncompliant procurement actions go undetected, increasing exposure to fraud, waste, or abuse.

Resolution Level

Resolution of this risk would likely require action by OCP to comprehensively review, update, and formally reissue centrally-maintained procurement SOPs to address previously identified gaps and reflect current laws, regulations, systems, and governance practices. Governance and version-control mechanisms would be needed to ensure ongoing maintenance and consistent District-wide application.

Risk Observation 4 - Use of Purchase Orders to Process Claim Payments at DBH Without Documented Procedures Increases Risk of Inconsistent Processing and Reduced Oversight

During our review of agency procurement practices and interviews with the Department of Behavioral Health (DBH), we noted that DBH processes a significant volume of behavioral health claim payments using purchase orders to support service delivery needs. DBH officials stated that DBH operates in many respects as a healthcare payer, processing approximately \$20 million annually in behavioral health claims using standard healthcare transaction formats (ANSI X12 837 (Health Care Claim) and 835 (Health Care Claim Payment/Advice)). DBH officials also stated that because DBH pays these claims with local funds and lacks a revolving fund authority, claim payments must be routed through purchase orders that support the human care agreements with its provider network, rather than through claims payment system.

This practice is not addressed in the OCP's centrally maintained procurement standard operating procedures, and DBH does not maintain independent, documented procedures governing the use of purchase orders for claim-based payments. As a result, DBH relies on operational practice, institutional

knowledge, and coordination with embedded OCP and OCFO personnel rather than formally documented guidance to execute and oversee these transactions.

DBH reported that routing healthcare claims through purchase order-based procurement workflows creates administrative burden, may introduce processing delays—particularly during fiscal year transitions and system shutdown periods—and reduces visibility over claims utilization and payment status. In the absence of documented procedures, there is limited transparency regarding approval workflows, documentation requirements, and roles and responsibilities associated with claim payment processing.

Impact

The absence of clearly documented procedures governing claim payment processing through purchase orders increases the risk of unsupported, delayed, or inaccurate payments to providers. Processing delays or rework may affect provider cash flow and service continuity and may result in administrative inefficiencies or the need for corrective actions, leading to inefficient use of District resources.

Control Environment

The lack of documented procedures specific to DBH's claim payment processes represents a control design weakness. While DBH operates under OCP policies, those policies do not address this nonstandard use of purchase orders for healthcare claims payments. Without DBH-specific written procedures governing this process, DBH management lacks assurance that controls governing authorization, documentation, segregation of duties, and oversight are consistently designed and implemented for a high-volume, high-dollar payment process.

Economy and Efficiency

Reliance on undocumented, PO-based workflows for claim payments reduces efficiency by increasing administrative workload and dependence on informal coordination among DBH, OCP, and OCFO staff. DBH reported that this misalignment requires additional effort to avoid payment delays, particularly during periods of staff turnover among embedded procurement personnel and at fiscal year-end when system availability is constrained.

Fraud, Waste, and Abuse

Undocumented and nonstandard claim payment processes may weaken audit trails and reduce transparency over procurement-related payments. When processing expectations and documentation requirements are not clearly defined, the risk increases that improper, duplicate, or unsupported payments may go undetected, increasing exposure to fraud, waste, or abuse.

Resolution Level

Resolution of this risk would likely require coordination among DBH, OCP, and OCFO to establish and formally document governance over purchase order-based claim payment processing. Addressing the risk would likely require clearly defined responsibilities, approval workflows, documentation expectations, and oversight mechanisms. Longer-term resolution may also depend on District-level decisions regarding funding mechanisms or the organizational responsibility for processing healthcare claims.

Risk Observation 5 - Council Approval Threshold and Multi-Layered Review Process for Procurements Over \$1 Million Create Timing, Continuity, and Control Risks

During our review of District-wide procurement practices and interviews with multiple agencies, we identified risks associated with the \$1,000,000 contract approval threshold established in Code of the District of Columbia § 2-352.02. This threshold has remained unchanged since its enactment in the late 1990s and has not been adjusted to reflect inflation, growth in procurement activity, or changes in service-delivery costs. Agencies reported that, as a result, a growing number of routine, recurring, and operationally necessary contracts now exceed the threshold and are subject to Council approval requirements that may not align with the volume, frequency, and cost of contracts procured under current operational conditions, pricing levels, or service delivery models.

Agencies consistently indicated that procurements meeting or exceeding the \$1,000,000 threshold are materially affected by the Council approval requirement. While D.C. Code § 2-352.02 establishes the Council's review period, agencies reported that the overall approval process often takes 10 weeks or longer once packages are transmitted. Interviewees reported that the threshold captures not only exceptional or discretionary procurements, but also essential service contracts—such as human services, infrastructure maintenance, and transportation-related procurements—where continuity of performance is critical. As procurement costs and service scopes have increased over time, agencies stated that the unchanged threshold has elevated timing risk for a broader subset of procurements than originally intended.

To mitigate the risk of service gaps while awaiting approval, agencies described reliance on interim mechanisms such as continuation letters, letter contracts, partial funding actions, emergency procurements, or retroactive approvals. These mechanisms are valid procurement tools available under existing policy; however, agencies indicated that they are frequently driven to use them because of the threshold rather than truly emergent or unforeseen circumstances, raising concern that mechanisms intended for exceptional situations are instead being used as routine workarounds to the standard approval process.

Impact

The current approval threshold increases the likelihood of extended procurement timelines for high-value but routine contracts, potentially delaying contract execution, modifications, or renewals. Interim funding actions and re-processing of procurement packages may increase administrative costs and reduce efficiency in the use of District resources.

Control Environment

While Council review provides a necessary oversight function, capture of a broad range of procurements under the current threshold may weaken front-end controls by encouraging compressed internal timelines and reliance on stop-gap measures. These conditions increase the risk that authorization, documentation, and compliance controls are applied inconsistently as agencies attempt to meet operational and statutory service obligations.

Economy and Efficiency

Agencies reported that the \$1,000,000 threshold contributes to longer procurement lead times, increased rework of approval packages, and repeated sequencing of reviews for contracts that are recurring and operationally predictable. Procurement staff, program offices, legal reviewers, and financial personnel expend significant effort managing timing constraints driven by the threshold, reducing overall procurement efficiency.

Fraud, Waste, and Abuse

The \$1,000,000 approval threshold may create incentives to structure or split requisitions to avoid Council review, weakening transparency and oversight. In addition, reliance on interim or retroactive actions to maintain service continuity can reduce audit trail completeness and increase exposure to unsupported or noncompliant procurement actions.

Resolution Level

Resolution of this risk would likely require District-level consideration of the \$1,000,000 Council approval threshold established in Code of the District of Columbia § 2–352.02. Addressing this risk may involve legislative or policy action to reassess the threshold considering current procurement volumes, contract values, and operational needs, while preserving appropriate oversight for high-risk or nonroutine procurements.

Risk Observation 6 - Non-Uniform Procurement Governance Structure Results in Inconsistent Procurement Controls and Practices Across Agencies (Repeat)

During our assessment of the District's procurement governance structure, we identified that the District's multi-authority procurement governance structure results in uneven control design and execution across agencies. Agencies operating under CPO authority and relying on OCP procedures demonstrated more complete and clearly defined procurement processes than agencies operating outside that authority, with OCP-reliant agencies averaging 2.96 out of 3.00 in completeness and clarity compared to 2.36 out of 3.00 for independent or non-OCP-reliant agencies (i.e., agencies outside CPO authority).

OCP-reliant agencies generally operate within a more formalized governance framework, with established procedures and defined oversight. Agencies outside that framework reported greater reliance on agency-specific processes, informal guidance, or institutional knowledge. As a result, similar procurement activities are executed under differing processes, documentation standards, and levels of oversight depending on the agency's authority structure.

Collectively, these conditions result in inconsistent application of procurement controls, limit comparability across agencies, and constrain the District's ability to implement and monitor procurement practices consistently across governance models.

Impact

Differences in procurement governance and control application increase the risk of inconsistent execution of procurement requirements, which may result in inefficiencies, rework, and increased costs associated with inconsistent processes and outcomes across agencies.

Control Environment

A non-uniform governance structure weakens the consistency of the control environment by creating variation in how procurement authority, procedures, and oversight controls are established and implemented. As a result, management cannot rely on a uniform set of procurement controls operating consistently across agencies, limiting assurance over compliance and internal control effectiveness.

Economy and Efficiency

Variability in governance structures and procurement processes reduces standardization and limits the efficiency benefits of centralized procurement. Agencies may duplicate effort, develop independent

processes, or rely on informal practices, increasing administrative burden and reducing process efficiency.

Fraud, Waste, and Abuse

Inconsistent procurement controls, documentation standards, and oversight mechanisms across agencies create gaps in monitoring and accountability. These conditions increase the risk that noncompliant, unsupported, or improper procurement actions are not consistently prevented, identified, or corrected.

Resolution Level

Resolution of this risk would likely require District-level efforts to address governance alignment across procurement authority structures, including clarifying roles and responsibilities, strengthening oversight expectations for agencies operating outside of OCP authority, and promoting greater consistency in the design and implementation of procurement controls. Efforts may also include expanding the use of standardized procedures, guidance, and support mechanisms to reduce variability and improve consistency in procurement practices across agencies.

Risk Observation 7 – PASS, Cross-System Integration Limitations, and Fragmented Documentation Practices Reduce Procurement Data Reliability, Transparency, and Oversight (Repeat)

Assessment results and consistent agency feedback indicate that PASS does not function as an integrated, end-to-end procurement and contract management system, and that, as a result, procurement documentation and workflow support are frequently fragmented across PASS, internal shared drives, SharePoint sites, email, and other tools. Agencies reported that PASS has limited reporting functionality, provides inconsistent or nonspecific error messages, and does not reliably synchronize contract funding, purchase order amounts, or workflow status across PASS, DIFS, and agency-specific tools.

As a result, agencies rely on multiple systems, off-system documentation, and manual workarounds to manage procurement and contract activity, impairing real-time visibility and management oversight. Key pre-award, award, and post-award records are not consistently retained within the procurement system of record, and this practice was reported as common across agencies and phases of the procurement lifecycle.

Agencies reported that these limitations hinder effective monitoring across the procurement lifecycle. For example, the DC Sentencing Commission stated that PASS is difficult to use for tracking contract balances and payments, prompting reliance on parallel tracking mechanisms. The District Department of Transportation (DDOT) similarly reported that procurements must be tracked across PASS, ProTact, and related portals, with mismatched contract numbering conventions and delayed funding updates resulting in fragmented visibility over contract status and remaining balances.

As a result of these conditions, procurement files may be incomplete, documentation may not be readily accessible for oversight or audit purposes, and approvals and key decisions may not be fully evidenced. Collectively, these system and documentation limitations reduce transparency, increase the risk of incomplete or inconsistent procurement and financial information, delay the identification of issues requiring management attention, and limit the District's ability to obtain reliable assurance that procurement activities are consistently documented and comply with applicable requirements.

Impact

Reliance on manual reconciliations, parallel tracking tools, and reconstruction of incomplete or dispersed procurement documentation increases the risk of errors in contract balances, funding availability, and payment status, and may result in delayed payments, unintentional over- or under-obligations, rework, and inefficient use of District resources.

Control Environment

Fragmented systems, limited integration, and dispersed documentation weaken the information, reporting, and record-retention components of the internal control environment. When procurement and financial data and supporting documentation cannot be reliably viewed, reconciled, or verified across systems, management lacks assurance that procurement actions are fully authorized, accurately recorded, appropriately monitored, and consistently documented.

Economy and Efficiency

Agencies expend additional time and effort maintaining duplicative tracking tools, storing documentation across multiple locations, reconciling data across systems, and resolving inconsistencies. These manual workarounds increase administrative burden, complicate knowledge transfer, and reduce efficiency in procurement execution, monitoring, and closeout, diluting the benefits of automated procurement workflows.

Fraud, Waste, and Abuse

Limited system integration and reliance on manual tracking, combined with incomplete or dispersed procurement records, reduce audit trail completeness and may obscure visibility into contract funding, payment activity, and key decision points. These conditions increase the risk that improper, duplicate, unsupported, or noncompliant procurement actions are not promptly identified or corrected.

Resolution Level

Resolution of this risk would likely require District-level efforts to improve system integration, reporting functionality, and data synchronization between PASS, DIFS, and related systems; establish clearer expectations regarding the procurement system of record; standardize documentation retention requirements; and implement stronger controls to ensure complete, consistent, and accessible contract files are maintained within an integrated procurement and contract management environment that supports real-time visibility and oversight across agencies. The OCP is currently working on a PASS modernization project; however, this effort was outside the scope of this assessment.

Risk Observation 8 – The Lack of Knowledge of the District's Processes for Prevention, Detection and Reporting Potential Fraud Increases the Risk for Potential Opportunities of Fraud to be Perpetuated (Repeat)

During our assessment of fraud prevention, detection, and reporting practices, we evaluated questionnaire responses from 79 agencies, interviewed District personnel, and reviewed procurement policies and procedures. Results indicate that knowledge of fraud prevention and reporting processes varies across agencies, particularly with respect to awareness of available reporting mechanisms and fraud risk management responsibilities. Based on responses from 79 agencies, the average fraud prevention risk score was 48 out of 100, indicating a moderate but persistent level of District-wide risk consistent with FY 2022 concerns related to fraud prevention, detection, and reporting processes. In addition, 37 percent (29 of 79 agencies) were rated as High or Critical risk in this domain, indicating that knowledge gaps and weaknesses in fraud awareness and reporting processes remain present in a meaningful subset of agencies. Interviews conducted as part of this assessment did not identify fraud

prevention, detection, or reporting knowledge gaps as a recurring theme. However, questionnaire results suggest that, notwithstanding interview results, awareness and understanding of fraud prevention and reporting mechanisms remain uneven across agencies. Our policy review evaluated whether sampled agencies have documented procurement policies and standard operating procedures aligned with their procurement authorities and leading-practice benchmarks. With limited exceptions, procurement policy coverage related to ethics, integrity, transparency, and contract administration appears to be generally mitigated through uniform reliance on OCP procedures, resulting in a low risk profile for those specific procurement policy areas.

Impact

Weaknesses in fraud awareness and reporting increase the risk that fraudulent financial reporting, misappropriation of assets, corruption, or other improper procurement activities may not be identified or reported in a timely manner, potentially resulting in financial loss or misuse of District resources.

Control Environment

The primary responsibility for the prevention and detection of fraud rests with management and those charged with governance. It is important that management, with the oversight of those charged with governance, place a strong emphasis on fraud prevention to strengthen the overall control environment. A key component of a fraud prevention program is to have an anonymous whistleblower program in place so that employees can report potential fraud without fear of retaliation.

To protect District employees from retaliation in the event of observing unethical and illegal activities in the workplace, the District government has a whistleblower statute in effect for employees under Title 1, Chapter 6, Subchapter XV-A, Whistleblower Protection, of the D.C. Code.

Economy and Efficiency

Differing levels of awareness of fraud prevention and reporting processes may reduce the effectiveness of existing fraud risk management activities and increase the administrative effort required to identify, investigate, and resolve potential fraud concerns.

Fraud, Waste, and Abuse

A strong emphasis on fraud prevention can help reduce the opportunities, pressures, and incentives that may lead individuals to commit fraud and may deter fraud as individuals are dissuaded from acting on these pressures because of the increased likelihood of detection.

Resolution Level

Resolution of this risk would likely require District-wide efforts, led by the OIG in coordination with agency management, to strengthen awareness of fraud prevention, detection, and reporting processes and promote consistent understanding of available reporting mechanisms.

Risk Observation 9 – Office of the Chief Financial Officer's (OCFO) Fiscal Management Policies and Practices May Have Contributed to Increases in Fiscal Year-End Spending, Which Appears to be Operationally Unsupported Spend-Downs of Budgetary Authority that Could Have a Significant Adverse Financial Impact to the District (Repeat)

As identified in the DC OIG's FY 2022 Procurement Risk Assessment, some agencies continue to show patterns of significantly increased spending in the final months of the fiscal year.

Impact

Analytics on FY24 to FY25 expenditures show that agencies continue to exhibit elevated year-end spending patterns. These persistent, concentrated spending spikes increase the likelihood of misaligned expenditures, reduce the District's ability to optimize non-personnel services spending, and may contribute to inadvertent overspending or year-end procurement errors.

Control Environment

The year-end spending patterns observed in FY24–FY25 demonstrate that fiscal management controls have not effectively mitigated prior year-end spending risks. The persistence of spending outliers in August and September of each reviewed fiscal year shows that existing fiscal oversight has not curbed the continued concentration of spending at the end of the fiscal year identified in the FY22 Risk Assessment. Additionally, continued misalignment between PASS, the OCP Transparency Portal, and DIFS further limits real-time visibility into spending activity, and constrains the effectiveness of the control environment intended to regulate expenditures throughout the fiscal year. Without an OCFO-driven approach to budgeting discipline and consistent spending oversight, agencies may default to end-of-year spending to ensure full use of budget authority.

Economy and Efficiency

Increases in fiscal year-end spending appear to be operationally unsupported spend-downs of budgetary authority that could have a significant adverse financial impact on the District. Year-end spend-downs of budgetary authority procurements could be interpreted as a waste of District resources, depending on the circumstances of the expenditures. Our analysis (see Tables 4, 5, and 6 above) indicates that this spending pattern continues to occur across multiple agencies and fiscal years, suggesting that concentrated year-end spending remains an established practice within the District's procurement environment.

Fraud, Waste, and Abuse

Persistent concentrations of fiscal year-end spending increase the risk that procurements are driven by the availability of expiring budget authority rather than operational need, creating conditions that may contribute to wasteful spending or inefficient use of District resources.

Resolution Level

Resolution of this risk would likely require District-wide fiscal management oversight led by OCFO to strengthen budgeting practices, promote more consistent spending throughout the fiscal year, and enhance visibility over agency spending patterns.

Appendix A – Procurement Authority of In-Scope Agencies

Table 14. Procurement Authority of In-Scope Agencies

Agency	Procurement Authority
Alcoholic Beverage and Cannabis Administration	Subject to PPRA & CPO's Authority
Board of Ethics & Government Accountability	Subject to PPRA & CPO's Authority
Board of Elections & Ethics	Subject to PPRA & CPO's Authority
Department of Behavioral Health	Subject to PPRA & CPO's Authority
Commission on the Arts & Humanities	Subject to PPRA & CPO's Authority
Contract Appeals Board	Subject to PPRA & CPO's Authority
Department of Licensing & Consumer Protection	Subject to PPRA & CPO's Authority
Department of Corrections	Subject to PPRA & CPO's Authority
Department of Disability Services	Subject to PPRA & CPO's Authority
Department of Employment Services	Subject to PPRA & CPO's Authority
DC Health	Subject to PPRA & CPO's Authority
Department of Health Care Finance	Subject to PPRA & CPO's Authority
Department of Housing & Community Development	Subject to PPRA & CPO's Authority
Department of Human Resources	Subject to PPRA & CPO's Authority
Department of Human Services	Subject to PPRA & CPO's Authority
Department of Insurance, Securities & Banking	Subject to PPRA & CPO's Authority
Department of Motor Vehicles	Subject to PPRA & CPO's Authority
Department of Parks and Recreation	Subject to PPRA & CPO's Authority
Department of Public Works	Subject to PPRA & CPO's Authority
Department of Small and Local Business Development	Subject to PPRA & CPO's Authority
Department of Transportation	Subject to PPRA & CPO's Authority
Department of Youth Rehabilitation Services	Subject to PPRA & CPO's Authority
DC National Guard (DC employees only)	Subject to PPRA & CPO's Authority
DC Sentencing Commission	Subject to PPRA & CPO's Authority
Department of For-Hire Vehicles	Subject to PPRA & CPO's Authority
District Department of Energy & Environment	Subject to PPRA & CPO's Authority
Executive Office of the Mayor (EOM)	Subject to PPRA & CPO's Authority
Deputy Mayor for Education (EOM)	Subject to PPRA & CPO's Authority
Mayor's Office on Talent and Appointments (EOM)	Subject to PPRA & CPO's Authority
Office of Community Affairs (EOM)	Subject to PPRA & CPO's Authority
Office of Victim Services and Justice Grants (EOM)	Subject to PPRA & CPO's Authority
Office of Lesbian, Gay, Bisexual & Transgender & Questioning Affairs (EOM)	Subject to PPRA & CPO's Authority
Office of Volunteerism & Partnership (EOM - Serve DC)	Subject to PPRA & CPO's Authority
Office of Policy & Legislative Affairs (EOM)	Subject to PPRA & CPO's Authority
Office of Risk Management (EOM)	Subject to PPRA & CPO's Authority
Office of the City Administrator (EOM)	Subject to PPRA & CPO's Authority

Agency	Procurement Authority
Office of the Deputy Mayor for Planning & Economic Development (EOM)	Subject to PPRA & CPO's Authority
DC Workforce Investment Council (EOM)	Subject to PPRA & CPO's Authority
Office of General Counsel to the Mayor (EOM)	Subject to PPRA & CPO's Authority
Office of the Secretary (EOM)	Subject to PPRA & CPO's Authority
Office on African American Affairs (EOM)	Subject to PPRA & CPO's Authority
Office on Asian & Pacific Islander Affairs (EOM)	Subject to PPRA & CPO's Authority
Office on Latino Affairs (EOM)	Subject to PPRA & CPO's Authority
Office on Women's Policy & Initiatives (EOM)	Subject to PPRA & CPO's Authority
Deputy Mayor for Health & Human Services (EOM)	Subject to PPRA & CPO's Authority
Deputy Mayor for Public Safety, Justice & Operations (EOM)	Subject to PPRA & CPO's Authority
Fire & Emergency Medical Services Department	Subject to PPRA & CPO's Authority
Homeland Security & Emergency Management Agency	Subject to PPRA & CPO's Authority
Metropolitan Police Department	Subject to PPRA & CPO's Authority
Office of Administrative Hearings	Subject to PPRA & CPO's Authority
Office of Cable Television, Film, Music & Entertainment	Subject to PPRA & CPO's Authority
Office of Campaign Finance	Subject to PPRA & CPO's Authority
Office of Contracting & Procurement	Subject to PPRA & CPO's Authority
Office of Employee Appeals	Subject to PPRA & CPO's Authority
Office of Human Rights	Subject to PPRA & CPO's Authority
Office of Labor Relations & Collective Bargaining	Subject to PPRA & CPO's Authority
Office of Planning	Subject to PPRA & CPO's Authority
Office of Police Complaints	Subject to PPRA & CPO's Authority
Office of Unified Communications	Subject to PPRA & CPO's Authority
Mayor's Office of Veterans Affairs (EOM)	Subject to PPRA & CPO's Authority
Office of the Chief Technology Officer	Subject to PPRA & CPO's Authority
Office of the Chief Medical Examiner	Subject to PPRA & CPO's Authority
Office of the State Superintendent of Education	Subject to PPRA & CPO's Authority
Office of the Tenant Advocate	Subject to PPRA & CPO's Authority
Office of Disability Rights	Subject to PPRA & CPO's Authority
Office of Zoning	Subject to PPRA & CPO's Authority
Department of Aging & Community Living	Subject to PPRA & CPO's Authority
Department of Forensic Sciences	Subject to PPRA & CPO's Authority
Public Employees Relations Board	Subject to PPRA & CPO's Authority
Real Property Tax Appeals Commission	Subject to PPRA & CPO's Authority
Rental Housing Commission	Subject to PPRA & CPO's Authority
State Board of Education	Subject to PPRA & CPO's Authority
Department of Buildings	Subject to PPRA & CPO's Authority
Office of the Attorney General	Subject to PPRA, Exempt from CPO
Department of General Services	Subject to PPRA, Exempt from CPO
District of Columbia Public Library	Subject to PPRA, Exempt from CPO
District of Columbia Public Schools	Subject to PPRA, Exempt from CPO

Agency	Procurement Authority
Office of the Chief Financial Officer	Subject to PPRA, Exempt from CPO
University of the District of Columbia	Subject to PPRA, Exempt from CPO
Child & Family Services Agency	Subject to PPRA, Exempt from CPO
Criminal Justice Coordinating Council	Subject to PPRA, Exempt from CPO
District of Columbia Housing Authority	Subject to PPRA, Exempt from CPO
Office of Finance and Resource Management	Subject to PPRA, Exempt from CPO
Office of the People's Counsel	Subject to PPRA, Exempt from CPO
Public Service Commission	Subject to PPRA, Exempt from CPO
Corrections Information Council	Subject to PPRA, Exempt from CPO
District of Columbia Public Charter School Board (DCPCSB)	Subject to PPRA, Exempt from CPO
District of Columbia Housing Finance Agency	Exempt from PPRA & CPO
Health Benefits Exchange Authority	Exempt from PPRA & CPO
District of Columbia Retirement Board	Exempt from PPRA & CPO
Commission on Judicial Disabilities and Tenure	Exempt from PPRA & CPO
District of Columbia Advisory Neighborhood Commissions	Exempt from PPRA & CPO
District of Columbia Water and Sewer Authority	Exempt from PPRA & CPO
District Public Defender Service	Exempt from PPRA & CPO
Judicial Nomination Commission	Exempt from PPRA & CPO
Washington Convention and Sports Authority	Exempt from PPRA & CPO
Green Finance Authority	Exempt from PPRA & CPO
Neighborhood Safety and Engagement (ONSE)	Exempt from PPRA & CPO
Council of the District of Columbia	Limited PPRA applicability, exempt from CPO
Office of Public-Private Partnerships	Limited PPRA applicability, exempt from CPO

Appendix B – District Agency Questionnaire Responsiveness

Table 16. District Agency Questionnaire Responsiveness

Agency Title	Received Responses	No Response
Alcoholic Beverage and Cannabis Administration	✓	
Board of Ethics & Government Accountability	✓	
Board of Elections & Ethics	✓	
Department of Behavioral Health	✓	
Commission on the Arts & Humanities	✓	
Contract Appeals Board	✓	
Department of Licensing & Consumer Protection	✓	
Department of Corrections	✓	
Department of Disability Services	✓	
Department of Employment Services	✓	
DC Health	✓	
Department of Health Care Finance		✓
Department of Housing & Community Development	✓	
Department of Human Resources	✓	
Department of Human Services	✓	
Department of Insurance, Securities & Banking	✓	
Department of Motor Vehicles	✓	
Department of Parks and Recreation	✓	
Department of Public Works		✓
Department of Small and Local Business Development	✓	
Department of Transportation	✓	
Department of Youth Rehabilitation Services	✓	
DC National Guard (DC employees only)	✓	
DC Sentencing Commission	✓	
Department of For-Hire Vehicles	✓	
District Department of Energy & Environment	✓	
Executive Office of the Mayor (EOM)	✓	
Deputy Mayor for Education (EOM)		✓
Mayor's Office on Talent and Appointments (EOM)	✓	
Office of Community Affairs (EOM)	✓	
Office of Victim Services and Justice Grants (EOM)	✓	
Office of Lesbian, Gay, Bisexual & Transgender & Questioning Affairs (EOM)	✓	
Office of Volunteerism & Partnership (EOM - Serve DC)	✓	
Office of Policy & Legislative Affairs (EOM)	✓	
Office of Risk Management (EOM)	✓	
Office of the City Administrator (EOM)		✓
Office of the Deputy Mayor for Planning & Economic Development (EOM)		✓
DC Workforce Investment Council (EOM)	✓	
Office of General Counsel to the Mayor (EOM)	✓	

Agency Title	Received Responses	No Response
Office of the Secretary (EOM)	✓	
Office on African American Affairs (EOM)	✓	
Office on Asian & Pacific Islander Affairs (EOM)	✓	
Office on Latino Affairs (EOM)	✓	
Office on Women's Policy & Initiatives (EOM)	✓	
Deputy Mayor for Health & Human Services (EOM)	✓	
Deputy Mayor for Public Safety, Justice & Operations (EOM)	✓	
Fire & Emergency Medical Services Department	✓	
Homeland Security & Emergency Management Agency	✓	
Metropolitan Police Department	✓	
Office of Administrative Hearings	✓	
Office of Cable Television, Film, Music & Entertainment		✓
Office of Campaign Finance	✓	
Office of Contracting & Procurement	✓	
Office of Employee Appeals	✓	
Office of Human Rights	✓	
Office of Labor Relations & Collective Bargaining	✓	
Office of Planning		✓
Office of Police Complaints	✓	
Office of Unified Communications	✓	
Mayor's Office of Veterans Affairs (EOM)	✓	
Office of the Chief Technology Officer	✓	
Office of the Chief Medical Examiner	✓	
Office of the State Superintendent of Education	✓	
Office of the Tenant Advocate	✓	
Office of Disability Rights	✓	
Office of Zoning		✓
Department of Aging & Community Living	✓	
Department of Forensic Sciences	✓	
Public Employees Relations Board	✓	
Real Property Tax Appeals Commission		✓
Rental Housing Commission		✓
State Board of Education	✓	
Department of Buildings	✓	
Office of the Attorney General	✓	
Department of General Services		✓
District of Columbia Public Library	✓	
District of Columbia Public Schools	✓	
Office of the Chief Financial Officer	✓	
University of the District of Columbia	✓	
Child & Family Services Agency	✓	
Criminal Justice Coordinating Council	✓	
District of Columbia Housing Authority	✓	
Office of Finance and Resource Management		✓

Agency Title	Received Responses	No Response
Office of the People's Counsel		✓
Public Service Commission		✓
Corrections Information Council		✓
District of Columbia Public Charter School Board (DCPCSB)	✓	
District of Columbia Housing Finance Agency		✓
Health Benefits Exchange Authority	✓	
District of Columbia Retirement Board	✓	
Commission on Judicial Disabilities and Tenure	✓	
District of Columbia Advisory Neighborhood Commissions	✓	
District of Columbia Water and Sewer Authority		✓
District Public Defender Service		✓
Judicial Nomination Commission	✓	
Washington Convention and Sports Authority	✓	
Green Finance Authority		✓
Neighborhood Safety and Engagement (ONSE)	✓	
Council of the District of Columbia		✓
Office of Public-Private Partnerships		✓

Appendix C – Procurement System Assessment Questionnaire Responses

This appendix includes all 49 questions asked in the Procurement System Assessment questionnaire provided to the 100 agencies. The percentages represent the distribution of how the 79 questionnaire respondents answered the question.

Table 17. Procurement System Assessment Questionnaire Responses²⁰

1. Apart from mandated and formally documented District procurement regulations or guides required for use by the agency, does your agency have internal customized policies/procedures/user reference guides to help manage its procurement processes?	
a. Customized and documented policies and procedures and specific control activities do not exist.	45%
b. Customized and documented policies and procedures and specific control activities exist and have been updated less than every three (3) years.	16%
c. Customized and documented policies and procedures and specific controls exist and have been updated within the last three (3) years.	22%
d. Customized and documented policies and procedures and specific controls exist and are updated annually.	17%
2. Do your agency's policies and procedures for managing and documenting compliance with its source selection methods address the following areas:	
• Requirements for competitive sealed bids • Requirements for competitive sealed proposals • Regulation of the use of sole source procurements • Regulation of provisioning and authorizing exemptions for competition requirements. • Authorization for emergency procurements • Authorization for human care agreements • Requirements for small purchase procurements • Authorizations for special procurements • Requirements for the cancellation of solicitations	
a. The agency does not have any other policies, procedures, or standardized checklists and forms to help manage and document source selection.	42%
b. The agency has updated policies and procedures and required standardized forms and checklists, but they do not cover any of the listed areas in a comprehensive manner.	1%
c. The agency has updated policies and procedures and required standardized forms and checklists for some of the above categories of procurements to help manage and document compliance with the source selection methods and has a policy to regularly review and update them if necessary.	35%
d. The agency has policies and procedures and required standardized forms procurements and checklists for all of the above categories of procurements to help manage and document compliance with the source selection methods and has a policy to regularly review and update them if necessary.	22%

²⁰ Percentages reflect rounding to the nearest whole percentage point; totals may not sum to exactly 100% as a result.

3. Does the agency have specific procedures in place regarding awarding and documenting justification via a determination and findings for sole source procurements?	
a. The agency does not have specific procedures for awarding or documenting sole source procurements.	39%
b. Procedures are informal, obsolete, or not fully documented, but are generally followed.	10%
c. Complete procedures exist but are not consistently followed.	0%
d. The agency has formal, written procedures that are consistently followed in sole source procurement awarding and documentation, including a description of factors establishing the vendor as the only source and a description of the related market survey conducted and results.	51%
4. Does the agency have specific procedures in place regarding awarding and documenting justification via a determination and findings for emergency procurements?	
a. The agency does not have specific procedures governing emergency procurements.	46%
b. Procedures are informal, outdated, or not fully documented, but are generally followed.	13%
c. Complete procedures exist but are not consistently followed.	0%
d. The agency has formal, written procedures for emergency procurements and documentation of the emergency determination, including a description of the emergency and efforts made to ensure that proposals or bids are received from as many potential sources as possible.	41%
5. Does the agency define supplier requirements in a manner to help maximize competition by avoiding these issue areas?	
• Placing unreasonable requirements on firms in order for them to qualify to do business • Requiring unnecessary experience and excessive bonding; • Noncompetitive pricing practices between firms or between affiliated companies; • Noncompetitive contracts to consultants that are on retainer contracts; • Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance or other relevant requirements of the procurement; and • Any arbitrary action in the procurement process.	
a. The agency does not maintain requirements to help maximize supplier competition.	14%
b. The agency outlined requirements to help maximize competition, but the requirements are not updated to its current supplier market.	1%
c. The agency maintains and observes updated requirements to help maximize supplier competition.	57%
d. The agency follows current requirements for maximizing competition and has implemented systems/protocols to ensure internal observation of such requirements	28%
6. Of all agency procurement actions in the FY24 to FY25 period, approximately what share required repeat advertisement or solicitation due to over stringent supplier requirements?	
a. None	43%
b. 1% - 5%	22%
c. 5% - 25%	35%
d. Greater than 25%	0%

7. Does the agency have a formally documented delegation of authority process for procurement that separates the roles of initiator, approver, monitoring, etc.? And how often does the agency update the delegation of authority process?	
a. The agency does not have a formally documented delegation of authority process.	35%
b. The agency has a formally documented delegation of authority process and updated less than every three (3) years.	16%
c. The agency has a formally documented delegation of authority process updated within the last three (3) years.	28%
d. The agency has a formally documented delegation of authority process updated at least annually.	22%
8. Does the agency have a formally documented process for cancellation of solicitations?	
a. The agency does not have a formally documented nor an informally observed process for cancellation of solicitations.	41%
b. The agency does not have formally documented procedures; however, the agency does observe an informal practice occasionally for cancellation of solicitations.	4%
c. The agency regularly practices informal procedures for the solicitation process for cancellation of solicitations.	3%
d. The agency has and observes a formally documented process for cancellation of solicitations.	52%
9. Does the agency have a formally documented resolution process for contractual disputes that arise during performance of a contract?	
a. The agency does not have a formally documented nor an informally observed process for the resolution of contractual disputes.	35%
b. The agency does not have formally documented procedures for the resolution of contractual disputes; however, the agency does observe an informal practice for such disputes on occasion.	10%
c. The agency regularly practices informal procedures for the resolution of contractual disputes.	6%
d. The agency has and observes a formally documented resolution process for contractual disputes that arise during performance of a contract.	49%
10. Does the agency have formally documented rules and procedures to prevent nepotism in public procurement?	
a. The agency does not have a formal or informal procedure in place.	43%
b. The agency has a formal process, but it's not followed. Instead, the agency occasionally follows informal internal procedures to help prevent nepotism.	4%
c. The agency has a formal process, but it's not followed. Instead, the agency routinely executes informal internal procedures to help prevent nepotism.	0%
d. The agency has a formally documented process that is routinely followed to help prevent nepotism.	52%
11. Are procurement policies and procedures to prevent nepotism in public procurement easy to understand and perform?	
There are no policies and procedures to prevent nepotism in public procurement.	33%
The policies and procedures regarding nepotism in public procurement are somewhat difficult to understand and perform.	0%

The policies and procedures regarding nepotism in public procurement are straightforward to understand and perform.	67%
12. Does the agency formally utilize different processes to award and maintain contracts under different financing arrangements (i.e. fixed fee, time and materials, cost-plus-a-percentage)?	
a. The agency has no formal or informal process in place to differentiate unique contract financing arrangements.	45%
b. The agency has a formal process in place, but it's not followed. The agency routinely executes informal internal procedures to differentiate unique contract financing arrangements.	3%
c. The agency has formally documented templates and processes that are routinely followed to differentiate unique contract financing arrangements.	52%
13. Does the agency have a formal spending monitoring procedure in place, as well as periodic comprehensive spending status reports of products and services to help ensure expenditures are within budget?	
a. The agency does not have any formal spending monitoring procedure or periodic spending status reports in place.	16%
b. The agency does not have formal spending monitoring procedures in place but there are occasional spending status reports distributed.	3%
c. The agency does not have formal spending monitoring procedures in place, but there are routine comprehensive spending status reports distributed	9%
d. The agency has formal spending monitoring procedures in place, as well as routine comprehensive spending status reports distributed.	72%
14. Does the agency have easy to understand spend monitoring procedures designed to help ensure procurement expenditures remain within budget?	
a. There are no policies and procedures monitoring procurement spending to help ensure expenditures remain within budget.	70%
b. The policies and procedures monitoring procurement spending to help ensure expenditures remain within budget are somewhat difficult to understand and perform.	1%
c. The policies and procedures monitoring procurement spending to help ensure expenditures remain within budget are straightforward to understand and perform.	29%
15. Which answer best characterizes your agency's spending patterns throughout the fiscal year?	
a. Spending increases in the final month(s) and is driven primarily by an effort to use remaining budget authority.	1%
b. Spending increases in the final month(s), but most expenditures are planned and operationally justified.	35%
c. Spending patterns remain generally consistent throughout the year, with minimal increase in the final month(s).	59%
d. Spending decreases in the final month(s).	4%
16. Does the agency have a formal negotiation process for contract terms and conditions that is regularly employed, reviewed, and updated?	
a. The agency does not employ any formal negotiation processes.	28%
b. The agency has some high-level negotiation process in place and it is occasionally employed and has not been updated within the past three (3) years.	6%
c. The agency has a negotiation process in place and it is regularly employed, reviewed, and updated at least every three (3) years.	19%

d. The agency has a negotiation process in place and it is regularly employed, reviewed, and updated at least annually.	48%
17. Are procurement policies and procedures regarding negotiation processes easy to understand and perform?	
a. There are no policies and procedures regarding contractual negotiations.	39%
b. The policies and procedures regarding contractual negotiations are somewhat difficult to understand and perform.	6%
c. The policies and procedures regarding contractual negotiations are straightforward to understand and perform.	55%
18. Does the agency regularly conduct vendor cost and market pricing analyses to determine if a vendors set prices for goods and/or services are reasonable?	
a. The agency does not conduct vendor cost and market pricing analyses to determine if a vendor's set prices for goods and/or services are reasonable.	10%
b. The agency conducts vendor cost and market pricing analyses using data that has not been updated for greater than three (3) years to determine if a vendor's set prices for goods and/or services are reasonable.	1%
c. The agency conducts vendor cost and market pricing analyses to determine if a vendor's set prices for goods and/or services are reasonable using data that is updated at least every three (3) years.	32%
d. The agency conducts vendor cost and market pricing analyses to determine if a vendor's set prices for goods and/or services are reasonable using data that is updated at least annually.	57%
19. Does the agency have formal processes in place for contract maintenance, documentation, and retention processes and guidelines?	
a. The agency does not have a formal or informal process in place for contracting actions regarding documentation maintenance and retention.	33%
b. The agency has a formal process, but it is not followed. The agency routinely executes informal internal procedures for contracting actions regarding documentation maintenance and retention.	7%
c. The agency has a formally documented process that is routinely followed for contracting actions regarding documentation maintenance and retention.	59%
20. Does the agency consistently save, maintain, and retain all procurements and contracting documents in a centrally maintained, and secure location?	
a. The agency does not consistently save, maintain, and retain all procurements and contracting documents.	4%
b. The agency occasionally saves, maintains, and retains all procurements and contracting documents, but not in both a centrally maintained and secure location.	3%
c. The agency routinely saves, maintains, and retains all procurements and contracting documents, but not in both a centrally maintained and secure location.	9%
d. The agency routinely saves, maintains, and retains all procurements and contracting documents in a centrally maintained, and secure location.	84%
21. Does the agency have specific procedures and contract document templates for different types of contracts (e.g., goods vs. services, construction, IT arrangements, etc.)?	
a. The agency has no formal or informal procedures and contract document templates in place for different types of contracts.	33%

b. The agency occasionally follows informal internal procedures differentiating between different contract types.	1%
c. The agency routinely follows informal internal procedures differentiating between different contract types.	7%
d. The agency has formal procedures and contract document templates for different contract types, and the agency routinely follows formal procedures differentiating between different contract types.	58%
22. How does the agency manage its procure-to-pay process?	
a. The agency completes purchase orders and accounts payable transactions manually under loosely defined and non-uniform procedures with limited control/approvals.	7%
b. The agency uses semi-automatic processes where purchase orders and accounts payables systems need to be manually adjusted.	6%
c. The agency adopted tenants of procurement to help automate transactions and reduce processing time (via transmission and receipt of electronic transactions with suppliers.)	10%
d. The agency uses a centralized accounts payable (invoice and payment activity) and transactional procurement shared service center. The agency has a full integration with key suppliers for Procure to-Pay transactions.	77%
23. Does the agency make efforts to ensure that contracted Certified Business Enterprises (CBEs) cover a diverse range of CBE categories?	
a. The agency does not have a formal policy nor resources to help ensure contracted CBEs cover a diverse range of CBE categories.	35%
b. The agency has a formal policy to help ensure contracted CBEs cover a diverse range of CBE categories; however no resources have been assigned to the role.	9%
c. The agency has a formal policy to help ensure contracted CBEs cover a diverse range of CBE categories and a team/role in charge of ensuring the supplier selection is diverse.	12%
d. The agency has a formal policy to help ensure contracted CBEs cover a diverse range of CBE categories and a team/role in charge of ensuring a diverse supplier set, all of which are reviewed at least annually.	45%
24. Does the agency have a process in place to help make every reasonable effort to ensure that goods and/or services are not duplicated and that a contract vehicle for a supplier for such goods and/or services can be leveraged?	
a. The agency does not have a formal or informal process established to help identify duplicative suppliers for procurement opportunities.	25%
b. The agency has an informal process to help determine if a preferred supplier already exists, but is not consistently enforced.	23%
c. The agency has a formal process to help determine if a preferred supplier already exists, but it is not consistently enforced.	6%
d. The agency has a formal process to help determine if a preferred supplier already exists, and it is routinely enforced.	46%
25. Does the agency have a process in place to help identify new qualified suppliers and vendors for procurement opportunities unique to the agency?	
a. The agency does not have a formal or informal process established to help identify new qualified suppliers for procurement opportunities	45%

b. The agency has an informal pre-qualification process to help determine supplier eligibility to work within the subject agency, but is not consistently enforced.	12%
c. The agency has a formal pre-qualification process to help determine supplier eligibility to work within the subject agency, but is not consistently enforced.	4%
d. The agency has a formal pre-qualification process to help determine supplier eligibility to work with the subject agency, and it is routinely enforced.	39%
26. Does the agency have a process that reports on the quality and delivery of products (non-services)?	
a. The agency does not have a formal or informal process established that monitors the quality of products.	26%
b. The agency has an informal process that monitors the quality of products, but is not consistently enforced.	6%
c. The agency has a formal process that monitors the quality of products, but is not consistently enforced.	28%
d. The agency has a formal process that monitors the quality of products which is routinely enforced.	41%
27. Does the agency have a process that monitors quality of services contracted? (such as reporting on deliverable quality, internal management of quality assurance, contracting for third-party quality assurance services)	
a. The agency does not have a formal or informal process established that monitors the quality of services.	19%
b. The agency has an informal process that monitors the quality of services, but is not consistently enforced.	14%
c. The agency has a formal process that monitors the quality of services, but is not consistently enforced.	12%
d. The agency has a formal process that monitors the quality of services which is routinely enforced.	55%
28. Does the agency have internal processes and procedures utilizing the Contractor Performance Evaluation System (CPES)?	
a. The agency does not have a formal or informal process that utilizes CPES.	42%
b. The agency has an informal process that utilizes CPES, but is not consistently enforced.	10%
c. The agency has a formal process that utilizes CPES, but is not consistently enforced.	6%
d. The agency has a formal process that utilizes CPES which is routinely enforced.	42%
29. Does the agency pursue/practice segmentation of its supplier base (e.g. strategic suppliers - 5%, critical suppliers - 10%, operational suppliers - balance of suppliers) and have a process to help achieve supplier segmentation?	
a. The agency does not pursue/practice segmentation of its supplier base nor is it desired.	45%
b. The agency achieved some supplier segmentation, however there is no formal approach in place to help facilitate the process.	7%
c. The agency has incorporated some regular supplier segmentation in its operations. The agency maintains a specific guide that helps promote desired segmentation.	35%

d. The agency has fully incorporated supplier segmentation in its operations. The agency utilizes a segmentation model which is reviewed and updated at least annually.	13%
30. Does the agency maximize use of available technology to help optimize the collaboration with the suppliers e.g., responding to proposals, on-line ordering, assessing user satisfaction?	
a. The agency does not have and/or is unable to use available technology to help optimize the collaboration with the suppliers.	45%
b. The agency has technology available but is unable to meaningfully use it to help optimize the collaboration with the suppliers.	4%
c. The agency invested in technology that will quickly transfer its requirements to suppliers.	28%
d. The agency uses customized technology solutions to help manage the supply chain system process.	23%
31. What level of forecasting transparency reporting does the agency conduct and communicate with its suppliers?	
a. The agency does not conduct any forecasting activities.	39%
b. The agency conducts and communicates forecasting on a sparse basis (annually or greater).	28%
c. The agency conducts and communicates forecasting on a semi-annual basis.	9%
d. The agency conducts and communicates forecasting on a quarterly or more frequent basis.	25%
32. Does the agency demonstrate transparency by outlining the key selection criteria necessary for contract award to bidders/proposers?	
a. The agency does not communicate formal selection criteria and does not communicate feedback to its bidding/proposing suppliers.	35%
b. The agency has an informal selection criteria process and occasionally communicates feedback to its bidding/proposing suppliers.	12%
c. The agency has a formal selection criteria process and communicates feedback to its bidding/proposing suppliers but occasionally enforces the procedures.	6%
d. The agency has a formal selection criteria process and routinely communicates feedback to its bidding/proposing suppliers.	48%
33. Does the agency have well-documented standards addressing system access and database management (e.g. system and database user access rights and who has rights to change access)?	
a. The agency has no formal or informal system access and database standards in place.	23%
b. The agency has informal system access standards in place, but they are not well documented and are passed down from another agency.	12%
c. The agency has formal documented standards in place and they are updated at least every three (3) years.	30%
d. The agency has formal documented standards in place and they are updated at least annually.	35%
34. Does the agency perform deliberate procedures to help address fraud risks?	
a. The agency does not consider these risk items as part of the agency's procurement policies and procedures.	12%
b. The agency considers some such risks as part of the agency's procurement policies, however there are no procedures developed to address such risks.	12%

c. The agency considers such risks as part of the procurement process, procedures were developed and documented to address such risks and some employee training is provided.	49%
d. The agency considers such risks and recognizes them as part of the procurement policies and procedures. The agency has addressed and documented such risks. These are updated at least annually, and regular employee training is provided.	28%
35. When was the last time the agency had an audit or assessment that included testing over procurement-related transactions?	
a. The agency has not undergone an audit or assessment that included procurement activities in greater than 3 years.	54%
b. The agency had audits or assessments that included procurement activities performed within the last three (3) years.	9%
c. The agency had audits or assessments that included procurement activities performed within the last two (2) years.	4%
d. The agency had audits or assessments that included procurement activities performed within the last year.	33%
36. In the most recent audit or assessment that included testing over procurement related transactions, what were the results?	
a. The agency has not undergone an audit or assessment that included procurement activities in greater than 3 years.	49%
b. The audit results did not require corrective action plan.	29%
c. The audit results identified findings or exceptions, but the agency did not develop a corrective action plan.	1%
d. The audit results identified findings or exceptions and a corrective action plan was developed and implemented (or is being implemented).	20%
37. Does the agency provide training programs to help manage competitive solicitations, risk assessments, negotiation strategies/tactics, contracting and on-going supplier performance management throughout the supplier engagement lifecycle?	
a. The agency does not provide training programs to help manage competitive solicitations, risk assessments, negotiation strategies/tactics, contracting and on-going supplier performance management throughout the supplier engagement lifecycle.	25%
b. The agency provides procurement related training programs to all employees; however, they are not mandatory to attend.	10%
c. The agency provides updated mandatory procurement training programs to all employees less frequently than annually but at least every three (3) years.	54%
d. The agency provides regularly updated mandatory procurement training programs to all employees at least annually.	12%
38. Does the agency have policies and procedures to help manage conflicts of interest (e.g., employee certifications, training programs to help understand fraud risks throughout the procurement process)?	
a. The agency has no policies/procedures in place to help manage conflicts of interest.	25%
b. The agency offers fraud risk trainings for procurement to all employees; however, they are not mandatory to attend.	3%

c. The agency requires updated mandatory procurement fraud risk trainings for employees less frequently than annually but at least every three (3) years.	51%
d. The agency requires updated mandatory procurement fraud risk training for employees at least annually.	22%
39. Does the agency employ and actively use an anonymous whistleblower reporting mechanism (e.g., hotline, web portal, drop-box)?	
a. The agency does not have a whistleblower reporting mechanism.	46%
b. The agency employs a whistleblower reporting mechanism but it is not communicated to employees or publicly advertised.	3%
c. The agency employs a whistleblower reporting mechanism that is communicated, but lacks supporting protocols for monitoring/analyzing activity.	28%
d. The agency employs a whistleblower reporting mechanism, communicates the availability of it to employees and the public and has supporting protocols for monitoring/analyzing activity.	23%
40. Does the agency have a formal process and resources in place to address complaints submitted to an anonymous whistleblower reporting mechanism (e.g., hotline, web portal, drop-box)?	
a. The agency does not have a formal process nor resources to take actions regarding complaints submitted to an anonymous whistleblower reporting mechanism.	29%
b. The agency has a formal process to take actions regarding complaints submitted to an anonymous whistleblower reporting mechanism; however, no resources have been assigned to the role.	23%
c. The agency has a formal process to take actions regarding complaints submitted to an anonymous whistleblower reporting mechanism and an internal team in charge of managing this process.	22%
d. The agency has a formal policy to take actions regarding complaints submitted to an anonymous whistleblower reporting mechanism and an independent third-party in charge of managing this process.	26%
41. Does the agency perform regular assessments of the determinations and rationale of contract changes and extensions?	
a. The agency performs no assessment on contract changes and extensions.	28%
b. The agency performs limited assessments on contract changes and extensions (cost-driven changes only under a threshold).	16%
c. The agency performs complete assessments on contract changes and extensions (all cost-driven changes).	9%
d. The agency performs complete assessments on contract changes and extensions (all cost-driven changes and no-cost driven changes).	48%
42. Does the agency have formal processes regarding processing change order requests?	
a. The agency does not have a formal or informal process regarding processing change order requests.	38%
b. The agency has a formal process, but it's not followed. The agency routinely executes informal internal procedures when processing change order requests.	3%
c. The agency has a formal process in place, but it is only occasionally enforced. The agency occasionally follows informal internal procedures when processing change order requests.	3%
d. The agency has formal documented procedures for processing change order requests that is consistently followed and enforced.	57%

43. Does the agency have a formal process regarding standardization of procurement data entered into PASS and DIFS?	
a. The agency does not have formal or informal processes for standardizing procurement data entered into PASS and DIFS.	13%
b. The agency relies on informal guidance or individual practices rather than documented processes for standardized procurement data entry.	16%
c. The agency has documented processes for standardized procurement data entry in PASS and DIFS, but application is inconsistent.	12%
d. The agency has fully documented processes for standardized procurement data entry in PASS and DIFS, that are consistently used and enforced.	59%
44. Does the agency outsource its procurement management function to another District agency or to a third-party vendor other than OCP?	
a. The agency completely outsources its procurement management function to another agency or a third-party vendor.	6%
b. The agency does not completely outsource its procurement management function to another agency or a third-party vendor, but it does utilize outsourcing for some of its procurement functions, such as through temporary staffing service contracts for at least one procurement function/role.	4%
c. The agency manages its complete procurement management function internally and does not outsource any of its procurement management function to another agency or a third-party vendor.	17%
d. The agency's procurement function is completely managed by OCP.	72%
45. How is your agency supported by procurement personnel?	
a. One contracting resource from OCP, who supports multiple agencies remotely.	26%
b. Multiple contracting personnel, managing goods and services and/or capital requests remotely.	32%
c. One or two internal contracting resources, supporting only your agency, co-located with your agency.	14%
d. Multiple contracting personnel (CCO, CO, CS, etc.) co-located with your agency.	28%
46. Which statement best describes your agency's awareness and participation in OCP's surplus property program?	
a. Not aware of the program prior to this survey	10%
b. Some awareness, but not participating	4%
c. Aware but participating on a limited basis	19%
d. Fully aware and actively participating	67%
47. How has your agency participated in the OCP's surplus property program?	
a. Have not participated at all.	17%
b. Have used to dispose of surplus property.	32%
c. Have participated in auctioning or acquisition of surplus goods.	23%
d. Have used to dispose of surplus property and have participated in auctioning or acquisitions for surplus goods.	28%
48. How would you characterize your agency's experience with request processing times under OCP's surplus property disposal program?	
a. N/A, we have not utilized OCP's surplus disposal program.	0%

b. Frequently delayed and impacts agency operations.	22%
c. Generally timely, with occasional delays.	29%
d. Consistently timely, with minimal to no delays.	49%
49. What is the main reason your agency is not using the OCP surplus property program?	
a. N/A, our agency participates in the surplus property program to dispose of and/or obtain property.	80%
b. We utilize the Federal warehouse program instead.	1%
c. We have not had surplus property or it is minimal and we keep it on site in storage.	9%
d. We were not aware of the program or did not have enough information on it.	10%

Appendix D – GAO Greenbook's Control Components and Principles

Table 18. GAO Greenbook's Control Components and Principles

Component	Principle No.	Principle
Control Environment	1	Demonstrate commitment to integrity and ethical values
	2	Exercise oversight responsibility
	3	Establish structure, responsibility, and authority
	4	Demonstrate commitment to competence
	5	Enforce accountability
Risk Assessment	6	Define objectives clearly to enable identification of risks and tolerances
	7	Identify, analyze, and respond to risks
	8	Assess Fraud Risk
	9	Identify, analyze, and respond to significant changes
Control Activities	10	Design control activities
	11	Design Activities for the Information System
	12	Implement control activities
Information & Communication	13	Use quality information
	14	Communicate internally
	15	Communicate externally
Monitoring	16	Perform monitoring activities
	17	Evaluate issues and remediate deficiencies

[This page is intentionally blank.]



REPORT WASTE, FRAUD, ABUSE, AND MISMANAGEMENT

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



<https://oig.dc.gov>

oig@dc.gov

STAY UP TO DATE



[instagram.com/OIGDC](https://www.instagram.com/OIGDC)



x.com/OIGDC



[facebook.com/OIGDC](https://www.facebook.com/OIGDC)



Sign-up for email/text updates from OIG