

DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

OIG Project No.23-E-06-EB0(m)

July 2024



Economic Development Programs Evaluation

GUIDING PRINCIPLES

ACCOUNTABILITY * INTEGRITY * PROFESSIONALISM

TRANSPARENCY * CONTINUOUS IMPROVEMENT * EXCELLENCE



OUR MISSION

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

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

OUR GUIDING PRINCIPLES

- Accountability
- Continuous Improvement
- Excellence
- Integrity
- Professionalism
- Transparency





EXECUTIVE SUMMARY

Economic Development Programs Evaluation

Background

Each year the grant programs administered by the Office of the Deputy Mayor for Planning and Economic Development (DMPED) and the Department of Small and Local Business Development (DSLBD) award tens of millions of dollars in grant funds to support business development and neighborhood revitalization. Collectively, these programs support initiatives aimed at recruiting and retaining businesses, creating jobs, improving and beautifying commercial and retail properties and streetscapes, and attracting consumers.

The Office of the Inspector General undertook this evaluation to identify opportunities to improve these programs' internal controls that otherwise may expose the District to fraud, waste, and mismanagement of District resources.

Recommendations

Our report contains eight recommendations for DMPED and DSLBD to strengthen policies and procedures and improve collaboration with agency partners to more effectively support the District's economic development goal of advancing "inclusive economic expansion and resilience by growing the economy and reducing employment disparities across race, geography, and educational attainment status."¹ Working together, DMPED and DSLBD can strengthen their grant award processes with improved oversight and effectiveness that will bolster the District's economic development efforts.

We requested a response to our draft evaluation from DMPED and DSLBD. These responses can be found at Appendix C.

Evaluation Objective

The objective of this evaluation was to review economic development programs, focusing on the processes that minimize opportunities for fraud and redundancies and maximize program effectiveness.

Summary of Our Evaluation

We concluded that DMPED and DSLBD can strengthen several of their internal controls to improve grant administration and oversight practices.

Interagency Collaboration

There was a lack of effective communication between DMPED and DSLBD about the grant programs administered by each agency. This lack of communication precluded transparency in grant administration and limited effective oversight of grant spending.

Conflict of Interest Monitoring

The evaluation found that conflict of interest risks were not sufficiently monitored by the agencies. Inadequate written policies and procedures left the District's grant programs and funds vulnerable to fraud, waste, and mismanagement.

Equitable Distribution of Grant Funds

DSLBD and DMPED had not formalized processes to ensure the equitable distribution of grant programs and funds across the District.

¹ THE OFFICE OF PLANNING, THE COMPREHENSIVE PLAN FOR THE NATIONAL CAPITAL DISTRICT, Chapter 7 Economic Development, § 7-5, available at https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/07_ED.pdf, (last visited July 15, 2024).



DISTRICT OF COLUMBIA | OFFICE OF THE INSPECTOR GENERAL

July 24, 2024

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Director
Department of Small and Local Business Development
441 4th Street NW, Suite 850N
Washington, DC 20001

Subject: **Economic Development Programs Evaluation** | **Project No. 23-E-06-EB0(m)**

Dear Deputy Mayor Albert and Director Suggs-Evans,

The Office of the Inspector General (OIG) Inspections and Evaluations Unit (I&E) has concluded its evaluation of grant programs managed by the Office of the Deputy Mayor for Planning and Economic Development (DMPED) and the Department of Small and Local Business Development (DSLBD), which was included in our *Fiscal Year 2023 Audit and Inspection Plan*.

The objective for this evaluation was to review economic development programs, specifically grant programs, focusing on the processes your agencies employ to minimize opportunities for fraud, guard against redundancies, and maximize program effectiveness.

We conducted our evaluation applying the Council of the Inspectors General on Integrity and Efficiency's (CIGIE) *Quality Standards for Inspection and Evaluation*²

² COUNCIL OF THE INSPECTORS GENERAL ON INTEGRITY AND EFFICIENCY, QUALITY STANDARDS FOR INSPECTION AND EVALUATION (2020),
<https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf>
(last visited Sep. 20, 2023) [hereinafter Blue Book].

and the Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government* (known as the Green Book).³

Our report includes three findings and eight recommendations to DMPED and DSLBD to improve grant program management.

If you have any questions, please contact me or Yulanda Gaither, Assistant Inspector General for Inspections and Evaluations, by email at yulanda.gaither@dc.gov or by phone at 202-727-9029.

Sincerely,



Daniel W. Lucas
Inspector General

DWL/YG

³ U.S. Gov't. ACCOUNTABILITY OFFC., STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOV'T, GAO-14-704G (2014), <https://www.gao.gov/products/GAO-14-704G> (last visited Sep. 20, 2023).



Economic Development Programs Evaluation

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BACKGROUND

Grants are assistance in the form of money, property, or technical expertise that the government awards to eligible applicants to provide goods or services that benefit society;⁴ which may be used to support or stimulate the accomplishment of a public purpose as defined by the law that authorizes the grant.⁵ The Citywide Grants Manual and Sourcebook (Sourcebook) states that a grantmaking agency shall:⁶

prescribe and implement grant or subgranting procedures by written policy or, where applicable, formal rulemaking, to ensure fiscal accountability and prevent waste, fraud, and abuse in programs administered[...]. The [grantmaking agency] shall conduct and document oversight to ensure compliance with the District's or the original grantor's award requirements. It shall maintain an administrative and monitoring system that ensures that all grantees perform in accordance with the terms, conditions, and specifications of their grants or subgrants. The system should include a minimum of two monitoring activities per year to check for fiscal and programmatic compliance.⁷

Between fiscal years (FYs) 2020 and 2023, the Office of the Deputy Mayor for Planning and Economic Development (DMPED) and Department of Small and Local Business Development (DSLBD) provided more than \$40M in grant funding to local businesses to drive economic development in our communities throughout the District. DMPED and DSLBD economic development programs have employed District residents, fostered entrepreneurship, encouraged redevelopment of commercial and residential corridors, rescued and supported retail businesses from decline and subsequent closure, and more.

OFFICE OF THE DEPUTY MAYOR FOR PLANNING AND ECONOMIC DEVELOPMENT

DMPED assists the Mayor in the coordination, planning, supervision, and execution of economic development efforts in the District of Columbia with the goal of creating and preserving affordable housing, creating jobs, and increasing tax revenue. DMPED pursues policies and programs that create strong neighborhoods,

⁴ OFFC. OF MANAGEMENT AND BUDGET, Grants.gov, Grants 101, A Short Summary of Federal Grants, <https://www.grants.gov/learn-grants/grants-101.html> (last visited Mar. 29, 2024).

⁵ [D.C. Code § 1-328.11\(5\)](#).

⁶ CITYWIDE GRANTS MANUAL AND SOURCEBOOK, <https://is.dc.gov/book/citywide-grant-manual-and-sourcebook> (hereinafter Sourcebook).

⁷ /d. § 11.1 Post-Award Requirements, <https://is.dc.gov/book/citywide-grants-manual-and-sourcebook/110-post-award-requirements> (last visited Mar. 27, 2024).

expand and diversify the local economy, and provide residents with pathways to the middle class.⁸ The number of DMPED-administered grant program awards increased gradually, from 57 in 2020, to 61 in 2021, to 67 in 2022.⁹

We evaluated the following DMPED-administered grant programs:

- **Great Streets** - helps small businesses in designated commercial corridors to make capital improvements in their business and create job opportunities for District residents. Over FYs 2020-2022, Great Streets grant awards totaled \$9,585,988.
- **Locally Made** - assists small business capital improvements of commercial property with a designated industrial use. Over FYs 2021-2022, Locally Made awards totaled \$1,317,300.
- **Neighborhood Prosperity Fund** - provides gap financing for projects that attract private investment to distressed communities located within the Neighborhood Prosperity Fund (NPF) boundary. Over FYs 2020-2022, NPF awards totaled \$9,835,000.
- **Small & Medium Business Growth Fund** - supports large-scale capital improvements, equipment purchasing, and technology advancements in green innovation. In FY 2022, Small and Medium Business Growth Fund awarded one grant for \$5,381,319.¹⁰

DEPARTMENT OF SMALL AND LOCAL BUSINESS DEVELOPMENT

Through its Business Development Division, DSLBD helps District-based businesses and residents explore entrepreneurship opportunities, gain access to capital to open and grow their businesses, and work with lenders to establish microloans for business owners who may not meet the requirements of traditional lenders. The number of DSLBD-administered grant awards increased substantially, from 199 in 2020, to 249 in 2021, to 542 in 2022.¹¹

We evaluated the following DSLBD-administered grant programs:

- **CBE Equity Impact** - helps CBEs with equity impact enterprise designation; funds wages, inventory, insurance, cleaning supplies, bookkeeping services, taxes, office equipment, etc.

⁸ OFFICE OF THE DEPUTY MAYOR FOR PLANNING AND ECONOMIC DEV., About DMPED, <https://dmped.dc.gov/page/about-dmped> (last visited Mar. 14, 2024).

⁹ See [Appendix D](#) for additional information on DMPED grant awards.

¹⁰ *Id.*

¹¹ See [Appendix E](#) for additional information on DSLBD grant awards.

- **CBE Green** - supports certified, small, resident-owned, and disadvantaged businesses interested in pursuing contract opportunities with DOEE and District of Columbia (DC) Sustainable Energy Utility. In FY 2022, CBE Green awards totaled \$250,000.
- **Clean Teams** - improves commercial district appearances to increase foot traffic, sales, and jobs; and reduce litter/graffiti/posters, which contribute to the perception of unsafe commercial areas. In FY 2020, Clean Teams awards totaled \$4,247,321.¹²
- **Dream Pitch** - helps microbusinesses in Wards 7 and 8 receive training in: business pitches, financial projections and accounting, marketing and branding, and mentorship. In FYs 2020-2022, Dream Pitch awards totaled \$751,000.
- **Food Waste Innovation** - assists businesses that produce, process, or serve food and beverages to minimize the food waste going to landfills; and to minimize urban rat populations. In FY 2022, Food Waste Innovation awards totaled \$493,310.
- **Made in DC** supports and promotes DC resident-owned businesses that make products locally, including intellectual property (music, art, patent, and written works). In FY 2021, Made in DC awards totaled \$213,000.
- **Main Streets** grants have been used since 2002 to stimulate and support economic revitalization of designated business corridors. In FY 2020, Main Streets awards totaled \$633,115.¹³
- **Robust Retail** grants are open to existing DC-based retail businesses in maintaining operations and viability during the FY 2023 small business crisis. In FYs 2020 and 2021, Robust Retail awards totaled \$1,620,000.
- **We Aspire** is a training program for DC residents who were incarcerated and/or justice involved (parole or probation) and seeking to build or launch a business. In FYs 2021 and 2022, We Aspire awards totaled \$379,400.¹⁴

¹² DEP'T OF SMALL AND LOCAL BUSINESS DEV., Clean Teams, <https://dslbdc.gov/service/clean-teams> (last visited April 15, 2024).

¹³ Open Data DC, DC Main Streets Business Sub Grants, <https://opendata.dc.gov/datasets/DCGIS::dc-main-streets-business-sub-grants/about> (last visited Mar. 12, 2024).

¹⁴ DSLBD provided the grant program data, with the exceptions of CBE Equity Impact, Clean Teams, and Main Streets.

FINDINGS AND RECOMMENDATIONS

FINDING 1 – DEFICIENT PRACTICES LEAVE GRANT FUNDS SUSCEPTIBLE TO FRAUD, WASTE, AND MISMANAGEMENT.

The OIG found that DSBLD and DMPED were unable to detect and prevent fraudulent or wasteful activity within grant programs. Some grant eligibility requirements prohibit repeated grants to previously-awarded-businesses and double-dipping, however the agencies provided no documentation that reflected measures to detect or mitigate these actions. A lack of alignment between grant systems and the absence of regular and recurring information-sharing of the agencies' grant award data limited visibility of District-wide economic development program expenditures.

The Citywide Grants Manual and Sourcebook states that "[a] coordinated, consistent approach should help to target scarce resources to areas of greatest need, obtain better information from the grant-making and monitoring process and reduce required audit costs."¹⁵ Additionally, a grant applicant's statement of certification requires "that the applicant has the financial resources and technical expertise necessary for the production, construction, equipment and facilities adequate to perform the grant or subgrant, or the ability to obtain them[.]"¹⁶ Lastly, the GAO Green Book provides that management should use and communicate quality information internally and externally to achieve agency objectives.¹⁷

While not necessarily examples of fraud or mismanagement, grant data revealed the following, which are indicative of the need for more oversight because of the potential for fraud, waste, and abuse:

- multiple awards of the same grant and/or loans to the same recipient in the same or consecutive fiscal years,
- multiple awards of the same grant to the same business address in the same or consecutive fiscal years,
- funds awarded to grantees for different grants in the same or consecutive fiscal years.

Figure 1, on the following page, illustrates the programmatic and geographic overlap of multiple grant programs managed by DMPED and DSLBD. The degree of overlap in program purpose, location, target audience, and eligibility requirements created the potential for duplication of grant awarding. Based on interviews with staff and review of grant application documents, applicants were not required to report

¹⁵ SOURCEBOOK *supra* note 5, § 2.0 Background, <https://is.dc.gov/book/citywide-grants-manual-and-sourcebook/20-background> (last visited Mar. 13, 2024).

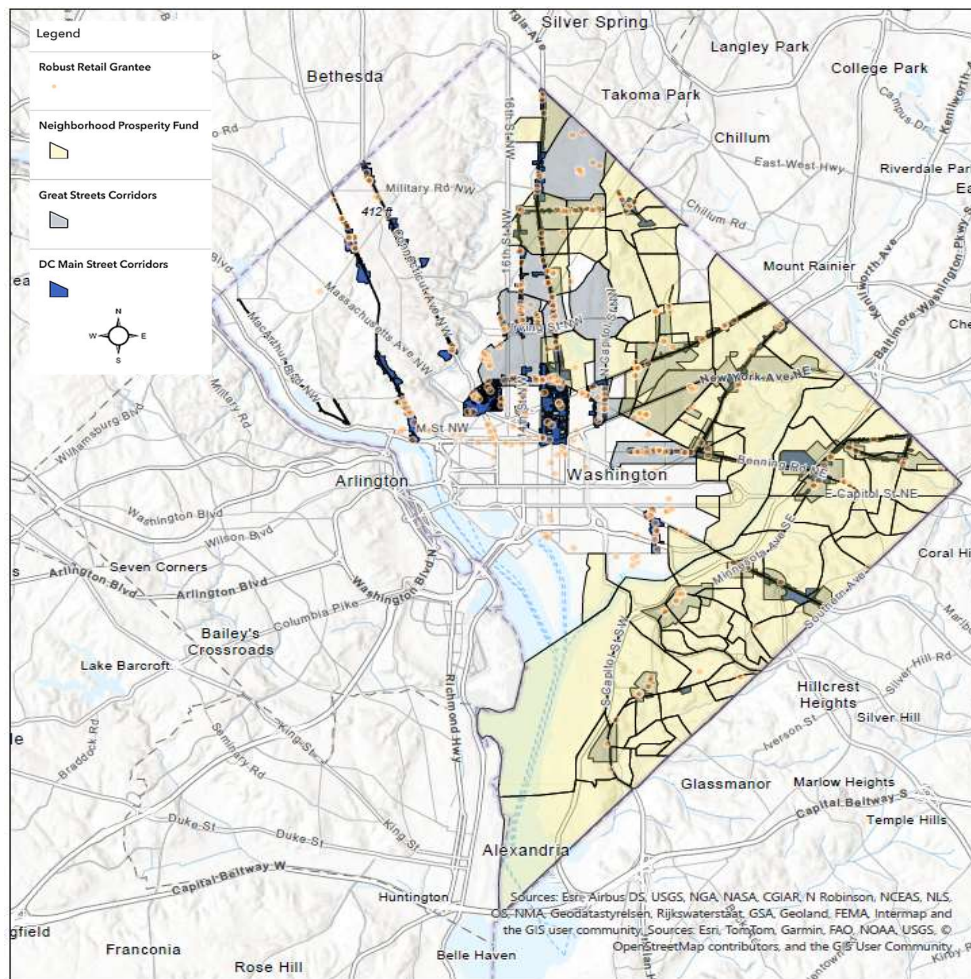
¹⁶ *Id.* § 7.0 NOFA and the Application Process, <https://is.dc.gov/book/citywide-grants-manual-and-sourcebook/70-nofa-and-application-process> (last visited Mar. 18, 2024).

¹⁷ GAO GREEN BOOK, *supra* note 2, Principles 13.01, 14.01, and 15.01.

previous grant award information when they applied for a new grant. Without the collection of additional data, such as previous grant funds received, the extent of award duplication is unknown.

While there is no legal requirement for DMPED and DSLBD to share grant award and recipient data, the lack of inter- and intra-agency collaboration leaves the District vulnerable to duplicative grant programs and double-dipping by grant recipients, and may create inequities in grant awarding.¹⁸ Increasing transparency and collaboration will enable the agencies to mitigate the risks associated with unintended duplication resulting from existing programmatic and geographic overlap.

Figure 1: Locations of economic development grant programs with similar focus areas¹⁹



¹⁸ A grantee could double-dip by submitting the same invoice for reimbursement to two separate grant programs.

¹⁹ Open Data DC, Data Catalog, <https://opendata.dc.gov/> (last visited Feb. 27, 2024); for a larger image, see Appendix F: Locations of economic development grant programs with similar focus areas.

Recommendations

To increase transparency and minimize the risks of grant funding fraud, waste, and mismanagement, the OIG recommends the Directors of DSLBD and DMPED:

1. Develop a formal communication process, including recurring information-sharing between agencies, to ensure grant award and recipient data are accessible for grant programs under their purview.

Management's Responses:

DMPED agrees with the OIG's recommendation.

DMPED will publish all [grant] awardees and award amounts on its website as grant awards are finalized and announced. DMPED will work with DSLBD to create a repository with grantee award information for the various grant programs under our purview. The portal will include grantee name, address, Ward, grant program, award amount, award FY, and a copy of the executed grant agreement. The centralized data repository will be made accessible to authorized personnel from DMPED and DSLBD. DMPED will work with OCTO personnel to ensure robust security measures are in place to protect sensitive grant-related information stored in the repository.

DMPED will meet with DSLBD at the beginning of each fiscal year to share the grant programs that DMPED will release, including timeline, purpose, eligibility, and use of funds.

Target dates for completing planned actions include:

- FY24 and ongoing: Publish grant award information on public website
- FY25: Create repository of grant information to share with DSLBD
- FY25 and ongoing: Meet with DSLBD at the beginning of each fiscal year to review grant program plan for that year.

DSLBD agrees with the OIG's recommendation.

DSLBD is exploring and assessing different options, including, but not limited to, creating and publishing certain open datasets for intra- and inter-agency and public sharing and any utilitarian implications related to grant administration logistics and practicality.

This work is in the research stage and the target date for completing the planned action is FY 2026.

2. Develop controls that help to detect ineligible grant awards and reimbursements.

Management's Responses:

DMPED agrees with the OIG's recommendation.

DMPED issues a Request for Applications (RFA) for competitive grant programs that clearly identifies eligibility criteria for applicants, ineligible applicant types, eligible uses of funds, and ineligible uses of funds. DMPED's Contracts, Procurement, and Grants (CPG) Team screens applications using the criteria in the RFA to identify ineligible applicants. Once conditional awards are made, awardees are required to submit updated project budgets and DMPED Grant Administrators verify the eligible uses of funds, and the approved budget is included as part of the executed grant agreement. Grant Administrators review awardees' Monthly Expense Reports and Quarterly Narrative Reports to verify that awardees are spending grant funds on eligible costs. DMPED's grant agreement sets forth processes for audits of a grantee's use of funds and disallowances of the use of grant funds.

DSLBD agrees with the OIG's recommendation.

DSLBD is exploring the development of internal processes related to information sharing across all divisions on awardee data and any utilitarian implications related to grant administration logistics and practicality. Further, DSLBD acknowledges that, given Recommendation #1, other agencies will have to implement certain protocols for a broader (e.g., citywide) effort to take effect.

This work is in the research stage and the target date for completing the planned action is FY 2026.

OIG Comment:

While we recognize each agency has internal control practices in place, the OIG observed the need for stronger intra- and interagency efforts to reduce the District's exposure to the risk of awarding grants to individuals who may be ineligible due to having previously received similar grants from another agency.

FINDING 2 – A CONFLICTS OF INTEREST (COI) POLICY SHOULD BE IMPLEMENTED.

Interviews and documentation reviews revealed that DMPED and DSLBD did not have an effective method for identifying conflicts of interest (COI) with agency staff or grant applicants. Observations and analysis revealed:

- There is a need to define what constitutes a COI for the grant programs and how disclosure and resolution of potential conflicts will be handled. Agencies should evaluate if having previously received a District grant constitutes a COI.
- There was no agency policy or procedure to ensure the proper collection and retention of COI documentation from staff and grant applicants.
- There was no agency policy or procedure that required staff involved in managing grant programs, except for grant review panelists, to complete or submit COI forms (outside of BEGA requirements).
- Grant applications do not require an applicant to state whether they previously applied for or received any grants from DMPED or DSLBD.
- The grant applications do not request COI disclosure by grant applicants.

The Sourcebook, Chapter 5 provides that agencies must avoid the appearance of a conflict of interest when assembling grant review panels. Further, the grantmaking officer must analyze grant/subgrant processes to identify potential grantee conflicts of interest and avoid or mitigate such conflicts in advance of the solicitation; and must refer to District ethics counsel to develop and implement precautionary measures for inclusion in approved grant agreements.²⁰

When asked about potential conflicts of interest, interviewee responses indicated that ensuring the receipt of COI forms from applicants was not necessary or a matter of concern.

Not requesting information regarding potential conflicts of interest increases the risk of awarding grants to individuals who have previously received the same or similar grants or have a potential conflict with DMPED/DSLBD. This undermines the District's ability to broaden opportunities to as many eligible applicants as possible and creates a potential risk for waste, fraud, and abuse. Although the Sourcebook does not require COI disclosure for grant applicants, there is no guidance prohibiting the agencies from collecting this information.

The practice of disclosing potential conflicts of interest and previous grant awards received serves to minimize bias in sourcing grantees, reduce the opportunity for

²⁰ SOURCEBOOK, *supra* note 5, § 5.4 Appearance of a Conflict of Interest, <https://is.dc.gov/book/citywide-grants-manual-and-sourcebook/50-grantmaking-agency> (last visited Mar. 18, 2024).

fraud, and ensure widespread access to grant funds. Although there is no known District guidance prohibiting DSLBD or DMPED from awarding a grant to the same recipient multiple times, we recognize that this may create inequity in the distribution of grant funds.

Recommendations

To better identify and mitigate the risks of conflicts, the OIG recommends the Directors of DMPED and DSLBD:

3. Consult BEGA for COI definition, implementation, and enforcement guidance specific to the issues and circumstances of grant administration.²¹

Management's Responses:

DMPED agrees with the OIG's recommendation.

DMPED's Office of General Counsel (OGC) will consult with BEGA regarding COI policies related to grant administration.

DMPED, like all District agencies, participates in the District's financial disclosure process, D.C. Code §1-1162.24-25, whereby highly paid persons are public filers and others participating in grants administration are confidential filers. Yearly, employees disclose their ownership interests and outside income, and employees are required to file a formal recusal from participating in any matters in which they or they have a financial interest.

The target date for completing the planned action is in FY 2024

DSLBD agrees with the OIG's recommendation.

DSLBD will explore the inclusion of language into DSLBD's Grants Policies & Procedures Manual to outline agency policy and procedures for engaging BEGA for guidance and consultation when a suspected conflict of interest may arise.

We are aware of the obligation to report credible violations of the Code of Conduct to appropriate authorities, DPM § 1800.3(k), and have done so when potential violations are discovered or brought to our attention.

This work is in the planning stage and the target date for completing the planned action is FY 2025.

²¹ Due to a clerical adjustment, the recommendation numbers in the report do not align with the agencies' responses. See Appendix C for verbatim responses.

4. Implement agency policy and procedures for disclosing, preventing, and addressing COIs for each grant administered.

Management's Responses:

DMPED agrees with the OIG's recommendation.

Grant applicant reviewers must complete and submit conflict of interest and disclosure forms. This action will be extended to the grant program administrator. Based on guidance from BEGA received as part of the consultation in Recommendation #4, DMPED will update, if necessary, its existing grant forms.

The target date for this planned action is FY 2025.

DSLBD agrees with the OIG's recommendation.

DSLBD will include in its agency policy what is current practice as it relates to promoting the prompt involvement of BEGA for potential conflicts of interest. Accordingly, DSLBD will explore the inclusion of language into DSLBD's Grants Policies & Procedures Manual that outlines agency policy and procedures related to disclosing and addressing all conflicts of interest for grant administrators across divisions. Such policy can reinforce prevention measures outlined in the District Code of Conduct and reinforce BEGA's role as consultant and guide for such matters.

This work is in the planning stage and the target date for completing the planned action is FY 2025.

5. Update grant applications to require the disclosure of potential COIs by applicants.

Management's Responses:

DMPED agrees with the OIG's recommendation.

Based on guidance from BEGA received as part of the consultation in Recommendation #4, DMPED will update, if necessary, its existing grant forms.

The target date for this planned action is FY 2025.

DSLBD agrees with the OIG's recommendation.

DSLBD is exploring the inclusion of language in future grant applications requiring applicants to disclose known conflicts of interest.

This work is in the planning stage and the target date for completing the planned action is FY 2025.

FINDING 3 – ENSURING EQUITY IN GRANT-MAKING AND AWARDING PROCESSES MAY BE AN OVERLOOKED PRACTICE.

The OIG found that DSBLD and DMPED were unable to provide reasonable assurance that grant funds were equitably distributed across the District; or that equitable grantmaking is adequately implemented to meet the needs of District businesses and residents.

The Sourcebook provides that

Grant-making agencies "shall have written policies establishing procedures for administering and monitoring grants and subgrants."²² Furthermore, "[the] grantmaking Agency, in accordance with the minimum requirements established herein, shall prescribe and implement grant or sub-granting procedures by written policy or, where applicable, formal rulemaking, to ensure fiscal accountability and prevent waste, fraud, and abuse in programs administered pursuant to this Order."²³

Furthermore, the GAO Green Book states that management should establish an effective system of controls. This includes assessing the risks an entity may face in achieving its objectives and developing and employing control activities to achieve objectives and mitigate identified risks.²⁴

DSLBD's *Grants Policies & Procedures Manual* identifies some of the elements of equitable grantmaking including prioritizing equitable access to its resources and business opportunities. However, the version provided to the OIG was only in draft form and was not yet shared across the agency or on its website.

²² *Id.* § 5.3 Agency Procedures, <https://is.dc.gov/book/citywide-grants-manual-and-sourcebook/50-grantmaking-agency> (last visited April 18, 2024).

²³ *Id.* § 11.1 Management <https://is.dc.gov/book/citywide-grants-manual-and-sourcebook/110-post-award-requirements> (last visited Apr. 23, 2024).

²⁴ GAO Green Book, *supra* note 2, § 7.01 and 10.01.

DMPED's *Grants Manual* did not describe processes and procedures to ensure its grant programs and resources are managed and distributed equitably. However, District of Columbia Code § 1-328.04 (d)(4)(A) states that DMPED's grant-making authority includes providing "funds to equity impact enterprises operating in Ward 5, 7, or 8 to increase economic or community development in an underserved area of the District[.]"

In May 2021, the District contracted for a Disparity Study²⁵ to be completed to assess whether there were disparities between the contract/procurement dollars awarded to minority- and women-owned businesses and the percentage of contract/procurement dollars expected to be awarded to minority and woman-owned businesses based on their availability to perform. While the District "has higher than average contracting with [people of color] POC- and women-owned firms, substantial disparities in contracting persist."²⁶ The study findings demonstrate substantial disparities between utilization and availability amongst all relevant racial/ethnic and gender groups. An interagency working group coordinated by the Office of the City Administrator (OCA) was founded to assess the recommendations in the Disparity Study and was tasked with producing an Equitable Procurement Action Plan by March 31, 2024. The action plan has not been published as of the date of this report.

During the agency's FY 2021 Performance Oversight Hearing:²⁷

- In response to a question from the Council regarding "three areas, programs, or initiatives where you saw the most opportunity for your Office to address racial inequity":
 - DMPED listed business development as an area of opportunity and stated that those disproportionately impacted by COVID and pre-existing structural barriers to be a top priority.
- In response to a question from the Council regarding collecting, tracking, and evaluating demographic data, particularly on race and geographic area:
 - DMPED stated that "The most significant ongoing source of data collection at DMPED occurs through grant solicitations" and that the "DMPED-funded disparity study will evaluate whether minority- and woman-owned businesses, specifically, face any barriers in DC Government's locally funded contracting and procurement." DMPED

²⁵ The cost of the study in FY 21 was \$750,000 and \$400,000 in FY 22.

²⁶ DMPED, *Government of the District of Columbia Disparity Study: Final Report*, https://dmped.dc.gov/sites/default/files/dc/sites/dmped/page_content/attachments/Government%20of%20the%20District%20of%20Columbia%20Disparity%20Study.pdf (last visited Apr. 19, 2024).

²⁷ PERFORMANCE OVERSIGHT HEARING: BEFORE THE D.C. COUNCIL COMM. ON BUSINESS AND ECONOMIC DEV. (Feb. 3, 2022) (DMPED Responses to FY 2021-2022 Performance Oversight Questions), <https://dccouncil.gov/wp-content/uploads/2022/03/dmped.pdf>.

also revealed that in FYs 21 and 22, "geographic and race data was critical in shaping new programs funded by the American Rescue Plan Act (ARPA)."

- In response to a question from the Council regarding the Disparity Study, to evaluate whether minority- and woman-owned businesses faced barriers in the District's locally funded contracting and procurement:
 - DMPED stated "the team has conducted extensive data collection and analysis, as well as community engagement with local business leaders and advocates. Additional analysis of prime and subcontracting data is currently underway, as well as further engagement to capture qualitative insights from the local business community."²⁸
- In response to a question from the Council regarding grant awards by Ward (for 2,515 grantees):

Table 1: DMPED-provided award statistics for FY 2020

Ward	Number of Awards	Percentage of Awards
Ward 1	348	13.8%
Ward 2	922	36.7%
Ward 3	222	8.8%
Ward 4	193	7.6%
Ward 5	213	8.5%
Ward 6	389	15.5%
Ward 7	103	4.1%
Ward 8	125	5.0%

Using agency-supplied information and data available on Open Data DC, our analysis indicates DMPED and DSLBD have more work to do to ensure the District's grant programs and funds are equitably distributed across the businesses and communities that need them. Specifically, data showed a potential area for attention to be the Ward(s) trailing in terms of the number and value of grants awarded. For example, Figures 2 and 3 on the following page demonstrate that Ward 8 trailed behind all other Wards in terms of the number of Main Street businesses awarded grants and the total value of grant awards, respectively.

²⁸ *Id.* at 6.

Figure 2: Number of grantees in each ward in Main Streets FY 2020

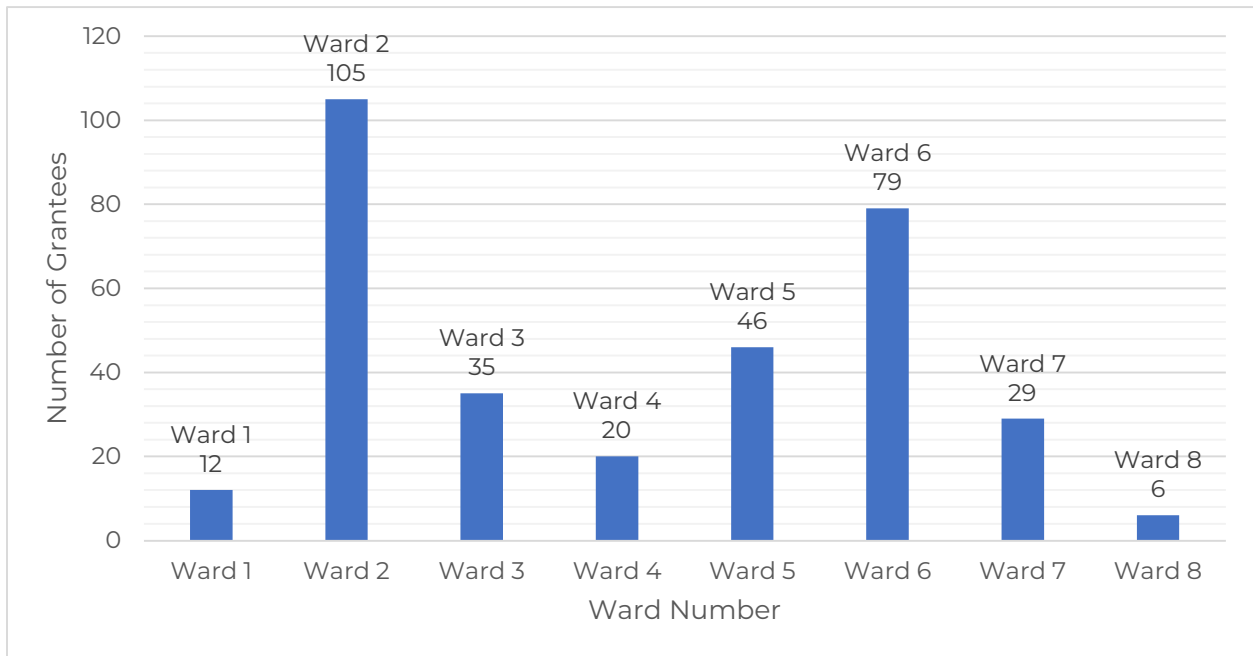
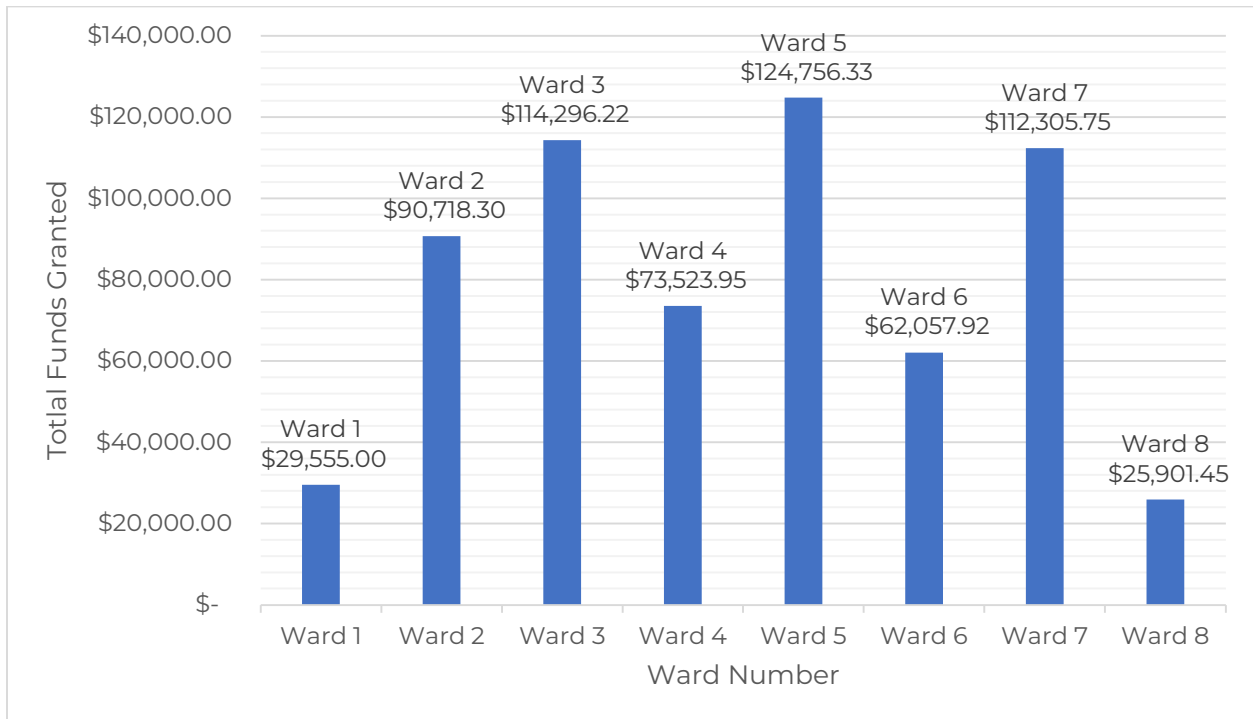


Figure 3: Total grant funds in each ward in Main Streets FY 2020



Recommendations

To facilitate dialogue and understanding of equitable grantmaking and risks associated with grant administration inequities:

The Director of DMPED should:

6. Update and implement agency policy to establish procedures for ensuring equity in grantmaking and awarding processes.

Management's Responses:

DMPED agrees with the OIG's recommendation.

DMPED's primary neighborhood investment grant programs, evaluated by this Report, have defined eligible geographic boundaries that are designed to support small business investments in emerging neighborhood corridors and underinvested communities. These programs are designed to support businesses in neighborhoods that receive less private investment than other neighborhoods.

In addition, DMPED is in the process of developing a Racial Equity Action Plan, which will serve as our agency's roadmap for addressing racial and other inequities within the District. As part of this process, we are developing strategies to help advance equity through our grantmaking and awarding programs.

This work is ongoing and the target date for completing the planned action is FY 2025.

The Director of DSLBD should:

7. Finalize and implement agency policy to establish procedures for ensuring equity in grantmaking and awarding processes.

Management's Responses:

DSLBD agrees with the OIG's recommendation.

DSLBD is actively working to fine-tune and finalize draft policies included in DSLBD's Grants Policies & Procedures Manual.

This work is in progress and the target date for completing the planned action is CY 2024.

To enable the identification of potential gaps in grant administration practices, the OIG recommends that the Directors of DMPED and DSLBD:

8. Develop a systematic method for collecting, using, and sharing grant program, applicant, and award data.

Management's Responses:

DMPED agrees with the OIG's recommendation.

Much is already in place. DMPED publishes notices of funding availability, requests for applications (RFAs), and pre-bidders meetings on the Citywide Grants Clearinghouse, in the *D.C. Register*, and on DMPED's website. See, <https://dmped.dc.gov/service/grant-opportunities>. Many grants are publicized through press events or through outreach supplemental to the baseline public notices as well.

Furthermore, DMPED publishes award information in its annual Performance Oversight responses available to the

The target date for completing the planned action is FY 2025.

DSLBD agrees with the OIG's recommendation.

DSLBD already shares grant opportunities widely and in accord with law. Opportunities are posted on DSLBD's website <https://dslbd.dc.gov/service/current-funding-opportunities>, as well as in the *D.C. Register* and through the Citywide Grants Clearinghouse. Further, DSLBD grant administrators work closely with communications staff across government to ensure opportunities are broadcasted on social media channels, shared with community stakeholders and partners, and sent via distribution lists.

DSLBD is exploring and assessing different options, including the creating and publishing of certain open datasets for intra-agency and public sharing and any utilitarian implications related to logistics and practicality.

This work is in progress and the target date for completing the planned action is FY 2026.

Opportunity for Improvement

Implement processes and practices as they pertain to Sourcebook Sections 5.3 and 11.1 to ensure grant programs and resources are made available to the communities and residents in need of those resources.

CONCLUSION

DSLBD and DMPED have helped numerous small businesses grow the District's economy by creating jobs and business opportunities through economic development program grants. Although the grant programs provided millions of dollars to the District's economic development, these programs had internal control weaknesses in grant administration and oversight practices. The OIG identified vulnerabilities to fraud, waste, and mismanagement because of a lack of communication and effective monitoring. Fraud, waste, or mismanagement of grant funding hampers the District's ability to assist as many eligible grant applicants as possible and maximize good stewardship of its resources.

Although this report is unable to reliably relay the full extent to which there may be potential duplication of grants, conflicts of interest, and inequities in grant programs and awards, the report highlights an absence of internal controls to ensure agency stewardship of District resources and equitable grant opportunities for District businesses and residents.

Agencies can use criteria provided in the GAO Green Book to implement an effective internal control system that empowers them to adapt to changing environments, demands, risks, and priorities while maintaining adequate oversight and management of public programs and services. Strengthening grant administration policies, procedures, and controls will help ensure the District receives the best value for its dollars spent on programs and services intended to serve its residents and will mitigate opportunities for fraud, waste, and mismanagement of government resources.

The District government maintains an interest in ensuring the funds provided to grant recipients are used appropriately and performance goals are met. Agencies must employ tools to ensure grantees fulfill grant program responsibilities. However, agencies have the flexibility to employ a variety of methods to oversee grant program compliance and evaluate grantee performance. Ultimately, they must determine the most effective strategies to fulfill their mission and serve District residents.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

OBJECTIVES

Our objective for this project was to review economic development programs, with a focus on the processes that minimize opportunities for fraud and redundancies among programs and maximize program effectiveness.

SCOPE

Between November 2022 and June 2023, we reviewed agency and grant program documentation and expenditure data; conducted interviews with program managers and staff (mid- to high-level officials); and studied additional agency-provided information pertaining to grant program goals.

METHODOLOGY

We conducted this evaluation in accordance with the [*Quality Standards for Inspection and Evaluation*](#) issued by the Council of the Inspectors General on Integrity and Efficiency (CIGIE) and the [*Standards for Internal Control in the Federal Government*](#) (the Green Book) issued by the U.S. Government Accountability Office (GAO). The Green Book sets the internal control standards for federal entities and may be adopted by state and local entities as an internal control system framework.

To ensure an understanding of grant governance, the team reviewed the Code of the District of Columbia, the [*Citywide Grants Manual and Sourcebook*](#) (Sourcebook), the Code of Federal Regulations' Uniform Grants Guidance,²⁹ agency guidelines and program-specific rules, as well as recommended/best practices for administering, overseeing, and managing economic development grants.

We further examined the key controls that DMPED and DSLBD relied on to oversee and manage their respective grant programs as well as grant award and recipient data provided by the agencies and retrieved from [Open Data DC](#).

²⁹ U.S. DEPT. OF LABOR, UNIFORM GUIDANCE FOR FEDERAL AWARDS, <https://www.dol.gov/agencies/eta/grants/resources/uniform-guidance> (last visited Mar. 13, 2024).

APPENDIX B: TABLE OF RECOMMENDATIONS

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
DMPED and DSLBD	1. Develop a formal communication process, including recurring information-sharing between agencies, to ensure grant award and recipient data are accessible for grant programs under their purview.	-	<p>DMPED agrees with the OIG's recommendation.</p> <p>DMPED will publish all grantee awardees and award amounts on its website as grant awards are finalized and announced. DMPED will work with DSLBD to create a repository with grantee award information for the various grant programs under our purview. The portal will include grantee name, address, Ward, grant program, award amount, award FY, and a copy of the executed grant agreement. The centralized data repository will be made accessible to authorized personnel from DMPED and DSLBD. DMPED will work with OCTO personnel to ensure robust security measures are in place to protect sensitive grant-related information stored in the repository.</p> <p>DMPED will meet with DSLBD at the beginning of each fiscal year to share the grant programs that DMPED will release, including timeline, purpose, eligibility, and use of funds.</p> <p>Target dates for completing planned actions include:</p> <ul style="list-style-type: none"> FY24 and ongoing: Publish grant award information on public website FY25: Create repository of grant information to share with DSLBD FY25 and ongoing: Meet with DSLBD at the beginning of each fiscal year to review grant program plan for that year.

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
			<p>DSLBD agrees with the OIG's recommendation.</p> <p>DSLBD is exploring and assessing different options, including, but not limited to, creating and publishing certain open datasets for intra- and inter-agency and public sharing and any utilitarian implications related to grant administration logistics and practicality.</p> <p>This work is in the research stage and the target date for completing the planned action is FY 2026.</p>
DMPED and DSLBD	2. Develop controls that help to detect ineligible grant awards and reimbursements.	-	<p>DMPED agrees with the OIG's recommendation.</p> <p>DMPED issues a Request for Applications (RFA) for competitive grant programs that clearly identifies eligibility criteria for applicants, ineligible applicant types, eligible uses of funds, and ineligible uses of funds. DMPED's Contracts, Procurement, and Grants (CPG) Team screens applications using the criteria in the RFA to identify ineligible applicants. Once conditional awards are made, awardees are required to submit updated project budgets and DMPED Grant Administrators verify the eligible uses of funds, and the approved budget is included as part of the executed grant agreement. Grant Administrators review awardees' Monthly Expense Reports and Quarterly Narrative Reports to verify that awardees are spending grant funds on eligible costs. DMPED's grant agreement sets forth processes for audits of a grantee's use of funds and disallowances of the use of grant funds.</p>

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
			<p>DSLBD agrees with the OIG's recommendation.</p> <p>DSLBD is exploring the development of internal processes related to information sharing across all divisions on awardee data and any utilitarian implications related to grant administration logistics and practicality. Further, DSLBD acknowledges that, given Recommendation #1, other agencies will have to implement certain protocols for a broader (e.g., citywide) effort to take effect.</p> <p>This work is in the research stage and the target date for completing the planned action is FY 2026.</p>
DMPED and DSLBD	3. Consult BEGA for COI definition, implementation, and enforcement guidance specific to the issues and circumstances of grant administration.	-	<p>DMPED agrees with the OIG's recommendation.</p> <p>DMPED's Office of General Counsel (OGC) will consult with BEGA regarding COI policies related to grant administration.</p> <p>DMPED, like all District agencies, participates in the District's financial disclosure process, D.C. Code §1-1162.24-25, whereby highly paid persons are public filers and others participating in grants administration are confidential filers. Yearly, employees disclose their ownership interests and outside income, and employees are required to file a formal recusal from participating in any matters in which they or they have a financial interest.</p> <p>The target date for completing the planned action is in FY 2024.</p>

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
			<p>DSLBD agrees with the OIG's recommendation.</p> <p>DSLBD will explore the inclusion of language into DSLBD's Grants Policies & Procedures Manual to outline agency policy and procedures for engaging BEGA for guidance and consultation when a suspected conflict of interest may arise.</p> <p>We are aware of the obligation to report credible violations of the Code of Conduct to appropriate authorities, DPM § 1800.3(k), and have done so when potential violations are discovered or brought to our attention.</p> <p>This work is in the planning stage and the target date for completing the planned action is FY 2025.</p>
DMPED and DSLBD	4. Implement agency policy and procedures for disclosing, preventing, and addressing COIs for each grant administered.	-	<p>DMPED agrees with the OIG's recommendation.</p> <p>Grant applicant reviewers must complete and submit conflict of interest and disclosure forms. This action will be extended to the grant program administrator. Based on guidance from BEGA received as part of the consultation in Recommendation #4, DMPED will update, if necessary, its existing grant forms.</p> <p>The target date for this planned action is FY 2025.</p>

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
			<p>DSLBD agrees with the OIG's recommendation.</p> <p>DSLBD will include in its agency policy what is current practice as it relates to promoting the prompt involvement of BEGA for potential conflicts of interest. Accordingly, DSLBD will explore the inclusion of language into DSLBD's Grants Policies & Procedures Manual that outlines agency policy and procedures related to disclosing and addressing all conflicts of interest for grant administrators across divisions. Such policy can reinforce prevention measures outlined in the District Code of Conduct and reinforce BEGA's role as consultant and guide for such matters.</p> <p>This work is in the planning stage and the target date for completing the planned action is FY 2025.</p>
DMPED and DSLBD	5. Update grant applications to require the disclosure of potential COIs by applicants.	-	<p>DMPED agrees with the OIG's recommendation.</p> <p>Based on guidance from BEGA received as part of the consultation in Recommendation #4, DMPED will update, if necessary, its existing grant forms.</p> <p>The target date for this planned action is FY 2025.</p>

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
			<p>DSLBD agrees with the OIG's recommendation.</p> <p>DSLBD is exploring the inclusion of language in future grant applications requiring applicants to disclose known conflicts of interest.</p> <p>This work is in the planning stage and the target date for completing the planned action is FY 2025.</p>
DMPED	6. Update and implement agency policy to establish procedures for ensuring equity in grantmaking and awarding processes	-	<p>DMPED agrees with the OIG's recommendation.</p> <p>DMPED's primary neighborhood investment grant programs, evaluated by this Report, have defined eligible geographic boundaries that are designed to support small business investments in emerging neighborhood corridors and underinvested communities. These programs are designed to support businesses in neighborhoods that receive less private investment than other neighborhoods.</p> <p>In addition, DMPED is in the process of developing a Racial Equity Action Plan, which will serve as our agency's roadmap for addressing racial and other inequities within the District. As part of this process, we are developing strategies to help advance equity through our grantmaking and awarding programs.</p> <p>This work is ongoing and the target date for completing the planned action is FY 2025.</p>

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
DSLBD	7. Finalize and implement agency policy to establish procedures for ensuring equity in grantmaking and awarding processes.	-	<p>DSLBD agrees with the OIG's recommendation.</p> <p>DSLBD is actively working to fine-tune and finalize draft policies included in DSLBD's Grants Policies & Procedures Manual.</p> <p>This work is in progress and the target date for completing the planned action is CY 2024.</p>
DMPED and DSLBD	8. Develop a systematic method for collecting, using, and sharing grant program, applicant, and award data.	-	<p>DMPED agrees with the OIG's recommendation.</p> <p>Much is already in place. DMPED publishes notices of funding availability, requests for applications (RFAs), and pre-bidders meetings on the Citywide Grants Clearinghouse, in the <i>D.C. Register</i>, and on DMPED's website. See, https://dmped.dc.gov/service/grant-opportunities. Many grants are publicized through press events or through outreach supplemental to the baseline public notices as well.</p> <p>Furthermore, DMPED publishes award information in its annual Performance Oversight responses available to the</p> <p>The target date for completing the planned action is FY 2025.</p>

Responsible Agency	Recommendations	Potential Monetary Benefits	Agency Response
			<p>DSLBD agrees with the OIG's recommendation.</p> <p>DSLBD already shares grant opportunities widely and in accord with law. Opportunities are posted on DSLBD's website https://dslbd.dc.gov/service/current-funding-opportunities, as well as in the <i>D.C. Register</i> and through the Citywide Grants Clearinghouse. Further, DSLBD grant administrators work closely with communications staff across government to ensure opportunities are broadcasted on social media channels, shared with community stakeholders and partners, and sent via distribution lists.</p> <p>DSLBD is exploring and assessing different options, including the creating and publishing of certain open datasets for intra-agency and public sharing and any utilitarian implications related to logistics and practicality.</p> <p>This work is in progress and the target date for completing the planned action is FY 2026.</p>

APPENDIX C: DMPED AND DSLBD'S RESPONSES TO THE DRAFT REPORT'S FINDINGS AND RECOMMENDATIONS



GOVERNMENT OF THE DISTRICT OF COLUMBIA
Executive Office of the Mayor
Office of the Deputy Mayor for Planning and Economic Development



MEMORANDUM

To: Yulanda Gaither, Assistant Inspector General for Inspections and Evaluations

From: *NMA*
Nina Albert, Deputy Mayor for Planning and Economic Development
Rosemary Suggs-Evans, Department of Small and Local Business Development

CC: Kevin Donahue, City Administrator (OCA); Betsy Cavendish, General Counsel (EOM); Susan Longstreet, General Counsel (DMPED), Lorenzo McRae, General Counsel (DSLBD); Adrea Turner, Chief of Staff (DMPED), and Robert Dorsey, Chief of Staff (DSLBD)

Date: July 5, 2024

Re: Response to the Office of the Inspector General's *Draft Economic Development Programs Evaluation* (OIG Project No. 23-E-06-EB0(m))

On May 31, 2024, the District of Columbia ("District") Office of the Inspector General's ("OIG") Inspection and Evaluation Unit provided the Office of the Deputy Mayor for Planning and Economic Development ("DMPED" or "Office") and the Department of Small and Local Business Development ("DSLBD" or "Department") with its *Draft Economic Development Programs Evaluation* (OIG Project No. 23-E-06-EB0(m)) ("Evaluation"). The Evaluation contained nine (9) total recommendations (one recommendation being a duplicate) concerning grant programs administered by DMPED and DSLBD between fiscal years 2020 and 2023. OIG asked DMPED and DSLBD to review and respond to these recommendations no later than July 5, 2024.

In response, DMPED and DSLBD have included charts below for each respective agency that include: (1) each recommendation; (2) the Office's or Department's agreement or disagreement with the relevant recommendation; (3) the Office's or Department's actions taken or planned related to the recommendation; (4) target dates for completing planned actions, if applicable; and (5) any additional context or relevant notes that expound upon the Office's or Department's position.

The review period of this Project covered the COVID-19 pandemic years, and DMPED and DSLBD are proud of the work conducted on rapid timelines to keep the District economy afloat and people employed, and to spend available federal and local dollars effectively and equitably during trying circumstances. As part of its robust response, the Mayoral Administration understood that prioritizing the sustainability of local businesses was critical and that when our businesses succeed, so do our communities, neighborhoods, and residents.

During the review period, DMPED launched pandemic response grant programs totaling approximately \$185 million, including a \$30 million microgrant program that awarded grants to more than 7,000 local businesses, a \$100 million Bridge Fund to support businesses and workers in the hospitality, entertainment, and retail sectors, and \$56 million to 974 small businesses and art venues that had been disproportionately impacted by the pandemic, across all eight wards.

DSLBD continued its support during the pandemic of the District's vital economic corridors through 28 Main Streets and 40 Clean Teams grants annually, over 150 equity impact grants to small, disadvantaged, and resident-owned businesses totaling over \$1.5 million, and approximately 350 Robust Retail grants awarded to retailers totaling over \$2 million. DSLBD also provided cohort-based training to 160 microbusiness owners and returning citizen entrepreneurs in Wards 7 and 8 and to strengthen their business acumen.

We note that the Report did not identify any actual fraud. It uses the term "conflict of interest" frequently and finds vulnerabilities to conflicts, but if a business entity applied for and used two different grant programs to fund the same expenses, then it would be committing fraud. Similarly, if it sought funds, for, say, torchieres for a streatory in one year, and then sought funds for the same torchieres (not the fuel, which is a recurring expense) the following year, without buying any new torchieres, it would be fraud. Some expenses may legitimately be split among two grants, so long as they are not double-billed. That is, if a company that had not had a delivery service sought money for technology to establish a web-based order system, it could split the expense between two grants, each of which might fund part of its tech costs, without there being any "conflict of interest" or fraud. All that said, we accept the point that more transparency and formal communication and coordination between DMPED and its constituent agency, DSLBD, is desirable.

DMPED and DSLBD remain committed to accountability, integrity, professionalism, transparency, equity, continued growth, improvement, and overall excellence in service to District residents and the local business community.

Please do not hesitate to contact Deputy Mayor Nina Albert at nina.albert@dc.gov or Director Rosemary Suggs-Evans at rosemary.suggs-evans@dc.gov with questions concerning the below responses.

DMPED'S RESPONSES to OIG'S RECOMMENDATIONS REGARDING its ECONOMIC DEVELOPMENT PROGRAMS EVALUATION				
Recommendation	Agree/ Disagree	Actions Taken or Planned Actions	Status/Target Date for Completing Planned Action	Reasons for Agreement or Disagreement and/ or Relevant Notes
Recommendation #1. Develop a formal communication process, including recurring information sharing between agencies, to ensure grant award and recipient data are accessible for grant programs under their purview.	Agree	DMPED will publish all grantee awardees and award amounts on its website as grant awards are finalized and announced. DMPED will work with DSLBD to create a repository with grantee award information for the various grant programs under our purview. The portal will include grantee name, address, Ward, grant program, award amount, award FY, and a copy of the executed grant agreement. The centralized data repository will be made accessible to authorized personnel from DMPED and DSLBD. DMPED will work with OCTO personnel to ensure robust security measures are in place to protect sensitive grant-related information stored in the repository. DMPED will meet with DSLBD at the beginning of each fiscal year to share the grant programs that DMPED will release, including timeline, purpose, eligibility, and use of funds.	FY24 and ongoing: Publish grant award information on public website FY25: Create repository of grant information to share with DSLBD FY25 and ongoing: Meet with DSLBD at the beginning of each fiscal year to review grant program plan for that year.	DMPED is committed to publicly providing information about grant awards and investments in small businesses and communities across the District and to interagency communication and coordination. Within DMPED, all grant administrators have access to our grant management system, GrantVantage, so grants administrators are more easily able to verify certifications that grantees are not improperly applying for duplicative programs, or double-billing.
Recommendation #2. Develop controls that help to detect ineligible grant awards and reimbursements.	Agree <i>(referenced as recommendation #3 in chart)</i>	DMPED issues a Request for Applications (RFA) for competitive grant programs that clearly identifies eligibility criteria for applicants, ineligible applicant types, eligible uses of funds, and ineligible uses of funds. DMPED's	Ongoing practice	DMPED already has processes in place to detect ineligible grant awards and ineligible uses of funds.

		<p>Contracts, Procurement, and Grants (CPG) Team screens applications using the criteria in the RFA to identify ineligible applicants. Once conditional awards are made, awardees are required to submit updated project budgets and DMPED Grant</p> <p>Administrators verify the eligible uses of funds, and the approved budget is included as part of the executed grant agreement. Grant Administrators review awardees' Monthly Expense Reports and Quarterly Narrative Reports to verify that awardees are spending grant funds on eligible costs. DMPED's grant agreement sets forth processes for audits of a grantee's use of funds and disallowances of the use of grant funds.</p>		
<p>Recommendation #4. Consult BEGA for COI definition, implementation, and enforcement guidance specific to the issues and circumstances of grant administration.</p>	<p>Agree</p>	<p>DMPED's Office of General Counsel (OGC) will consult with BEGA regarding COI policies related to grant administration.</p> <p>DMPED, like all District agencies, participates in the District's financial disclosure process, D.C. Code §1-1162.24-25, whereby highly paid persons are public filers and others participating in grants administration are confidential filers. Yearly, employees disclose their ownership interests and outside income, and employees are required to file a formal recusal from participating in any matters in which they or they have a financial interest.</p>	<p>Consult with BEGA in FY24</p>	<p>DMPED is committed to avoiding conflicts of interest and the appearance of conflicts of interest in the administration and awarding of grant programs.</p>

		DMPED is aware of and trained on the federal criminal statute prohibiting conflicts of interest, 18 U.S.C. § 208, as well as District law.		
Recommendation #5. Implement agency policy and procedures for disclosing, preventing, and addressing COIs for each grant administered.	Agree	Grant applicant reviewers must complete and submit conflict of interest and disclosure forms. This action will be extended to the grant program administrator. Based on guidance from BEGA received as part of the consultation in Recommendation #4, DMPED will update, if necessary, its existing grant forms.	FY25	DMPED already requires all individuals who will review and provide scores for grant applications to sign a Conflict of Interest Affidavit. DMPED will extend this requirement to include grant program administrators. In addition, DMPED requires each grantee, as a condition of a grant award, to sign a Statement of Certification that addresses, among other items, conflicts of interest.
Recommendation #6. Update grant applications to require the disclosure of potential COIs by applicants.	Agree	Based on guidance from BEGA received as part of the consultation in Recommendation #4, DMPED will update, if necessary, its existing grant forms.	FY25	DMPED already requires applicants to submit a signed Statement of Certification as part of their grant award compliance documents asserting the applicant has not engaged in activities that would create a conflict of interest.
Recommendation #7. Update and implement agency policy to establish procedures for ensuring equity in grantmaking and awarding processes.	Agree	DMPED's primary neighborhood investment grant programs, evaluated by this Report, have defined eligible geographic boundaries that are designed to support small business investments in emerging neighborhood corridors and underinvested communities. These programs are designed to support businesses in neighborhoods that receive less private investment than other neighborhoods. In addition, DMPED is in the process of developing a Racial Equity Action Plan, which will serve as our	FY25 and ongoing	The majority of Great Streets corridors, which are statutorily defined, are located in Wards 1, 4, 5, 7, and 8, and the majority of NPF-eligible census tracts are located in Wards 5, 7, and 8. DMPED is committed to ensuring that its grant programs support small business owners that traditionally lack access to capital or are located in neighborhoods that have received less private investment. The Report cites award data by Ward from 2020 as a demonstration of the high

		<p>agency’s roadmap for addressing racial and other inequities within the District. As part of this process, we are developing strategies to help advance equity through our grantmaking and awarding programs.</p>		<p>concentration of grant awards made to businesses in Ward 2 relative to other wards. This data, however, include economic relief grants to businesses to support recovery from the COVID-19 pandemic, and are separate from the grant programs evaluated by the Report. Given the greater concentration of businesses in Ward 2 and the unprecedented circumstances of the pandemic, the distribution of grants by Ward in FY20 cited in the Report is not representative of the typical distribution of awards from neighborhood investment grant programs.</p> <p>In FY19, the year before for the pandemic, Great Streets awards by Ward were as follows:</p> <p>Ward 1: 17 Ward 2: 1 Ward 3: 0 Ward 4: 12 Ward 5: 8 Ward 6: 1 Ward 7: 0 Ward 8: 6</p> <p>In FY19, Neighborhood Prosperity Fund awards by Ward were as follows:</p> <p>Ward 1: 0 Ward 2: 0 Ward 3: 0 Ward 4: 2 Ward 5: 0 Ward 6: 0 Ward 7: 2 Ward 8: 1</p>
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				<p>Locally Made and Small Medium Business Fund were not active programs in FY19.</p> <p>In FY23, Great Streets awards by Ward were as follows: Ward 1: 7 Ward 2: 5 Ward 3: 6 Ward 4: 9 Ward 5: 6 Ward 6: 2 Ward 7: 7 Ward 8: 6</p> <p>In FY23, DMPED made four awards through Locally Made, one each to businesses in Wards 1, 4, 5, and 6.</p> <p>In FY23, DMPED made one award through the Neighborhood Prosperity Fund, to a business in Ward 8.</p>
<p>Recommendation #9. Develop a systematic method for collecting, using, and sharing grant program, applicant, and award data.</p>	Agree	<p>Much is already in place. DMPED publishes notices of funding availability, requests for applications (RFAs), and pre-bidders meetings on the Citywide Grants Clearinghouse, in the <i>D.C. Register</i>, and on DMPED's website. See, https://dmped.dc.gov/service/grant-opportunities. Many grants are publicized through press events or through outreach supplemental to the baseline public notices as well.</p> <p>Furthermore, DMPED publishes award information in its annual Performance Oversight responses available to the</p>	FY25	<p>DMPED is committed to establishing and implementing robust mechanisms that will assist the agency in accountability, improved decision-making, impact, and improvement. This commitment ensures a bright future for our initiatives and the community we serve.</p>

		public, including grant program, awardee, award amount, and Ward. Starting in FY24, DMPED will publish this information on its website as grant awards are finalized and announced for each grant program.		
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DSLBD’S RESPONSES to OIG’S RECOMMENDATIONS REGARDING its ECONOMIC DEVELOPMENT PROGRAMS EVALUATION				
Recommendation	Agree/ Disagree	Actions Taken or Planned Actions	Status/ Target Date for Completing Planned Action	Reasons for Agreement or Disagreement and/ or Relevant Notes
Recommendation #1. Develop a formal communication process, including recurring information sharing between agencies, to ensure grant award and recipient data are accessible for grant programs under their purview.	Agree	DSLBD is exploring and assessing different options, including, but not limited to, creating and publishing certain open datasets for intra- and inter-agency and public sharing and any utilitarian implications related to grant administration logistics and practicality.	Researching; FY2026	DSLBD is committed to transparency in government and agrees that internal and cross-agency information-sharing and communication should comport with best practices. DSLBD also agrees with OIG’s assertion that a grantee’s receipt of multiple awards does not necessarily indicate fraud or mismanagement.
Recommendation #2. Develop controls that help to detect ineligible grant awards and reimbursements.	Agree <i>(referenced as recommendation #3 in chart)</i>	DSLBD is exploring the development of internal processes related to information sharing across all divisions on awardee data and any utilitarian implications related to grant administration logistics and practicality. Further, DSLBD acknowledges that, given Recommendation #1, other agencies will have to implement certain protocols for a broader	Researching; FY2026	As DSLBD explores actions related to this recommendation, it should be noted that the recommendation, which stems from OIG concerns about grantees receiving multiple awards and potential expense “double-dipping,” should have caveats. For instance, the recommendation does not apply to some of the evaluated programs, including DSLBD’s Dream and Aspire programs, which consist of a one-time, non-cost reimbursement, cohort-based training grant.

		(e.g., citywide) effort to take effect.		
Recommendation #4. Consult BEGA for COI definition, implementation, and enforcement guidance specific to the issues and circumstances of grant administration.	Agree	<p>DSLBD will explore the inclusion of language into DSLBD's Grants Policies & Procedures Manual to outline agency policy and procedures for engaging BEGA for guidance and consultation when a suspected conflict of interest may arise.</p> <p>We are aware of the obligation to report credible violations of the Code of Conduct to appropriate authorities, DPM § 1800.3(k), and have done so when potential violations are discovered or brought to our attention.</p>	Planning; FY2025	DSLBD mandates that employees follow District Government requirements, including the requirement that applicable staff attend BEGA Code of Conduct training which covers conflict of interest topics.
Recommendation #5. Implement agency policy and procedures for disclosing, preventing, and addressing COIs for each grant administered.	Agree	<p>DSLBD will include in its agency policy what is current practice as it relates to promoting the prompt involvement of BEGA for potential conflicts of interest. Accordingly, DSLBD will explore the inclusion of language into DSLBD's Grants Policies & Procedures Manual that outlines agency policy and procedures related to disclosing and addressing all conflicts of interest for grant administrators across divisions. Such policy can reinforce prevention measures outlined in the District Code of Conduct and reinforce BEGA's role as</p>	Planning; FY2025	DSLBD mandates that employees follow District Government requirements – including the requirement that applicable staff attend BEGA Code of Conduct training yearly. It covers conflicts of interest.

		consultant and guide for such matters.		
Recommendation #6. Update grant applications to require the disclosure of potential COIs by applicants.	Agree	DSLBD is exploring the inclusion of language in future grant applications requiring applicants to disclose known conflicts of interest.	Planning; FY2025	DSLBD is committed to ensuring that conflicts of interests are handled in accordance with District laws, regulations, and policies.
Recommendation #8. Finalize and implement agency policy to establish procedures for ensuring equity in grantmaking and awarding processes.	Agree	DSLBD is actively working to fine-tune and finalize draft policies included in DSLBD's Grants Policies & Procedures Manual.	In progress; CY2024	As highlighted in OIG's Draft Report, DSLBD's Grants Policies & Procedures Manual already incorporates equitable grantmaking elements demonstrating our commitment to prioritizing equitable access to its resources and business opportunities.
Recommendation #9. Develop a systematic method for collecting, using, and sharing grant program, applicant, and award data.	Agree	<p>DSLBD already shares grant opportunities widely and in accord with law. Opportunities are posted on DSLBD's website https://dslbd.dc.gov/service/current-funding-opportunities, as well as in the <i>D.C. Register</i> and through the Citywide Grants Clearinghouse. Further, DSLBD grant administrators work closely with communications staff across government to ensure opportunities are broadcasted on social media channels, shared with community stakeholders and partners, and sent via distribution lists.</p> <p>DSLBD is exploring and assessing different options, including the creating and publishing of certain open datasets for intra-agency and public sharing and any utilitarian implications</p>	In progress; FY2026	This recommendation relates to OIG's concerns of potential equity gaps in grantmaking with examples highlighting the varied number of grants by Ward. DSLBD fulfills the obligations of its grant making authority by aligning the stated purpose and requirements of any specific funding allocations with the agency's overall mission and purpose. In this Evaluation, OIG notes that in FY2020, businesses in Ward 8 received fewer Main Streets grants/dollar amounts; however, OIG does not acknowledge that fewer Main Streets are designated in Ward 8, and Council drives the process of designating Main Streets. More specifically, Main Streets (and Clean Team) grants are location specific/boundary-based with amounts allocated by Council as part of the annual District budget process. Other DSLBD grants, such as Dream, while ward-specific, actually close equity gaps by providing financial assistance and resources to communities located in Wards 7 and 8, traditionally-underserved

		related to logistics and practicality.		communities. Furthermore, DSLBD has created citywide grant programs with equity top of mind, including the Equity Impact Enterprise grant. This grant is a game-changer, directly addressing and closing gaps to opportunities for business that meet all the following criteria: local, small, resident-owned, and disadvantaged. In addition, by way of process, DSLBD has made intentional changes to reduce application complexity and length in order to expand the reach of its grant dollars. Robust Retail is one example. Lastly, as outlined in DSLBD's Racial Equity Action Plan, DLSBD is committed to equitable grantmaking including the enhancement of access (including language access) in its procedures.
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APPENDIX D: DMPED GRANT DATA

The following grant data was provided by DMPED in November 2022, and grantee names were removed to protect privacy. Business Improvement District grants were not included in the scope of this evaluation.

FY	Grant ID	Grant Program Name	Award Amount
2020	BD-20-2600	Great Streets	\$2,200,000.00
2020	GS-20-25706	Great Streets	\$50,000.00
2020	GS-20-26761	Great Streets	\$50,000.00
2020	GS-20-26766	Great Streets	\$50,000.00
2020	GS-20-26792	Great Streets	\$50,000.00
2020	GS-20-26802	Great Streets	\$50,000.00
2020	GS-20-26821	Great Streets	\$50,000.00
2020	GS-20-26822	Great Streets	\$50,000.00
2020	GS-20-26825	Great Streets	\$32,758.43
2020	GS-20-26832	Great Streets	\$50,000.00
2020	GS-20-26836	Great Streets	\$46,803.15
2020	GS-20-26869	Great Streets	\$50,000.00
2020	GS-20-26874	Great Streets	\$50,000.00
2020	GS-20-26878	Great Streets	\$50,000.00
2020	GS-20-26884	Great Streets	\$50,000.00
2020	GS-20-26902	Great Streets	\$50,000.00
2020	GS-20-26917	Great Streets	\$50,000.00
2020	GS-20-26934	Great Streets	\$50,000.00
2020	GS-20-26942	Great Streets	\$50,000.00
2020	GS-20-26946	Great Streets	\$50,000.00
2020	GS-20-26948	Great Streets	\$50,000.00
2020	GS-20-26956	Great Streets	\$50,000.00
2020	GS-20-26957	Great Streets	\$50,000.00
2020	GS-20-26959	Great Streets	\$50,000.00
2020	GS-20-26963	Great Streets	\$50,000.00
2020	GS-20-26964	Great Streets	\$50,000.00
2020	GS-20-26965	Great Streets	\$50,000.00
2020	GS-20-26968	Great Streets	\$50,000.00
2020	GS-20-26983	Great Streets	\$50,000.00
2020	GS-20-26986	Great Streets	\$50,000.00
2020	GS-20-26998	Great Streets	\$50,000.00
2020	GS-20-26999	Great Streets	\$50,000.00
2020	GS-20-27000	Great Streets	\$50,000.00
2020	GS-20-27025	Great Streets	\$50,000.00

2020	GS-20-27026	Great Streets	\$47,317.00
2020	GS-20-27045	Great Streets	\$50,000.00
2020	GS-20-27065	Great Streets	\$50,000.00
2020	GS-20-27079	Great Streets	\$48,000.97
2020	GS-20-27091	Great Streets	\$50,000.00
2020	GS-20-27126	Great Streets	\$32,130.00
2020	GS-20-27203	Great Streets	\$50,000.00
2020	GS-20-27207	Great Streets	\$50,000.00
2020	GS-20-27234	Great Streets	\$29,450.00
2020	GS-20-27235	Great Streets	\$50,000.00
2020	GS-20-27255	Great Streets	\$50,000.00
2020	GS-20-27271	Great Streets	\$50,000.00
2020	GS-20-27275	Great Streets	\$49,810.19
2020	GS-20-27302	Great Streets	\$50,000.00
2020	GS-20-27381	Great Streets	\$50,000.00
2020	GS-20-27406	Great Streets	\$50,000.00
2020	GS-20-27461	Great Streets	\$20,400.00
2020	GS-20-27481	Great Streets	\$50,000.00
2020	GS-20-27510	Great Streets	\$50,000.00
2020	NPF-020-25990	Neighborhood Property Fund	\$600,000.00
2020	NPF-020-25991	Neighborhood Property Fund	\$100,000.00
2020	NPF-020-25992	Neighborhood Property Fund	\$1,700,000.00
2020	NPF-020-25993	Neighborhood Property Fund	\$600,000.00
Subtotal FY2020			
Grants		57 Grants	\$7,706,669.74

FY	Grant ID	Grant Program Name	Award Amount
2021	GS-021-8246	Great Streets	\$50,000.00
2021	GS-021-8247	Great Streets	\$50,000.00
2021	GS-021-8249	Great Streets	\$50,000.00
2021	GS-021-8250	Great Streets	\$50,000.00
2021	GS-021-8256	Great Streets	\$50,000.00
2021	GS-021-8258	Great Streets	\$40,000.00
2021	GS-021-8260	Great Streets	\$50,000.00
2021	GS-021-8261	Great Streets	\$50,000.00
2021	GS-021-8264	Great Streets	\$50,000.00
2021	GS-021-8270	Great Streets	\$50,000.00
2021	GS-021-8271	Great Streets	\$31,425.00
2021	GS-021-8279	Great Streets	\$10,000.00
2021	GS-021-8280	Great Streets	\$48,900.00
2021	GS-021-8283	Great Streets	\$50,000.00
2021	GS-021-8285	Great Streets	\$31,898.44
2021	GS-021-8292	Great Streets	\$50,000.00
2021	GS-021-8303	Great Streets	\$50,000.00
2021	GS-021-8305	Great Streets	\$36,000.00
2021	GS-021-8306	Great Streets	\$50,000.00
2021	GS-021-8308	Great Streets	\$41,283.00
2021	GS-021-8312	Great Streets	\$50,000.00
2021	GS-021-8319	Great Streets	\$50,000.00
2021	GS-021-8321	Great Streets	\$50,000.00
2021	GS-021-8322	Great Streets	\$40,600.00
2021	GS-021-8323	Great Streets	\$50,000.00
2021	GS-021-8325	Great Streets	\$50,000.00
2021	GS-021-8326	Great Streets	\$50,000.00
2021	GS-021-8330	Great Streets	\$50,000.00
2021	GS-021-8332	Great Streets	\$48,321.58
2021	GS-021-8334	Great Streets	\$10,000.00
2021	GS-021-8335	Great Streets	\$50,000.00
2021	GS-21- 27255	Great Streets	\$50,000.00
2021	GS-21-8245	Great Streets	\$50,000.00
2021	GS-21-8248	Great Streets	\$50,000.00
2021	GS-21-8263	Great Streets	\$25,000.00
2021	GS-21-8267	Great Streets	\$50,000.00
2021	GS-21-8268	Great Streets	\$50,000.00
2021	GS-21-8269	Great Streets	\$50,000.00
2021	GS-21-8278	Great Streets	\$39,990.00

2021	GS-21-8294	Great Streets	\$50,000.00
2021	GS-21-8295	Great Streets	\$50,000.00
2021	GS-21-8297	Great Streets	\$50,000.00
2021	GS-21-8299	Great Streets	\$50,000.00
2021	GS-21-8307	Great Streets	\$50,000.00
2021	GS-21-8314	Great Streets	\$50,000.00
2021	GS-21-8324	Great Streets	\$18,000.00
2021	GS-21-8328	Great Streets	\$50,000.00
2021	GS-21-8336	Great Streets	\$50,000.00
2021	GS-21-8338	Great Streets	\$50,000.00
2021	LMM-021-8342	Locally Made	\$95,000.00
2021	LMM-21-8340	Locally Made	\$120,000.00
2021	LMM-21-8341	Locally Made	\$145,000.00
2021	LMM-21-8351	Locally Made	\$640,000.00
2021	NPF-021-8364	Neighborhood Prosperity Fund	\$340,000.00
2021	NPF-021-8365	Neighborhood Prosperity Fund	\$250,000.00
2021	NPF-021-8369	Neighborhood Prosperity Fund	\$300,000.00
2021	NPF-021-8370	Neighborhood Prosperity Fund	\$500,000.00
2021	NPF-21-8362	Neighborhood Prosperity Fund	\$1,000,000.00
2021	NPF-21-8363	Neighborhood Prosperity Fund	\$145,000.00
2021	NPF-21-8367	Neighborhood Prosperity Fund	\$250,000.00
2021	NPF-21-8371	Neighborhood Prosperity Fund	\$400,000.00
Subtotal FY2021			
Grants		61 Grants	\$6,406,418.02

FY	Grant ID	Grant Program Name	Award Amount
2022	ABID-22-2022	Business Improvement District*	\$3,765,459.61
2022	GS-22-1025	Great Streets	\$50,000.00
2022	GS-22-1111	Great Streets	\$50,000.00
2022	GS-22-1120	Great Streets	\$50,000.00
2022	GS-22-1228	Great Streets	\$50,000.00
2022	GS-22-1270	Great Streets	\$50,000.00
2022	GS-22-1301	Great Streets	\$50,000.00
2022	GS-22-1311	Great Streets	\$42,600.00
2022	GS-22-1333	Great Streets	\$50,000.00
2022	GS-22-1333	Great Streets	\$20,400.00
2022	GS-22-1350	Great Streets	\$267,935.00
2022	GS-22-1390	Great Streets	\$50,000.00
2022	GS-22-1407	Great Streets	\$27,110.00
2022	GS-22-1426	Great Streets	\$50,000.00
2022	GS-22-1523	Great Streets	\$50,000.00
2022	GS-22-1607	Great Streets	\$50,000.00
2022	GS-22-1645	Great Streets	\$50,000.00
2022	GS-22-1724	Great Streets	\$50,000.00
2022	GS-22-1790	Great Streets	\$50,000.00
2022	GS-22-1803	Great Streets	\$50,000.00
2022	GS-22-1811	Great Streets	\$50,000.00
2022	GS-22-1830	Great Streets	\$50,000.00
2022	GS-22-1900	Great Streets	\$41,500.00
2022	GS-22-1910	Great Streets	\$50,000.00
2022	GS-22-1918	Great Streets	\$42,000.00
2022	GS-22-2000	Great Streets	\$32,214.32
2022	GS-22-2001	Great Streets	\$50,000.00
2022	GS-22-2020	Great Streets	\$47,802.00
2022	GS-22-2020	Great Streets	\$50,000.00
2022	GS-22-2208	Great Streets	\$35,000.00
2022	GS-22-2727	Great Streets	\$50,000.00
2022	GS-22-3100	Great Streets	\$50,000.00
2022	GS-22-3330	Great Streets	\$50,000.00
2022	GS-22-3334	Great Streets	\$50,000.00
2022	GS-22-3407	Great Streets	\$31,651.00
2022	GS-22-4309	Great Streets	\$50,000.00
2022	GS-22-4418	Great Streets	\$50,000.00
2022	GS-22-4483	Great Streets	\$7,000.00
2022	GS-22-4724	Great Streets	\$50,000.00

2022	GS-22-4907	Great Streets	\$50,000.00
2022	GS-22-5320	Great Streets	\$50,000.00
2022	GS-22-5327	Great Streets	\$50,000.00
2022	GS-22-6201	Great Streets	\$50,000.00
2022	GS-22-6231	Great Streets	\$50,000.00
2022	GS-22-6390	Great Streets	\$12,688.00
2022	GS-22-6508	Great Streets	\$50,000.00
2022	GS-22-6540	Great Streets	\$50,000.00
2022	GS-22-7000	Great Streets	\$50,000.00
2022	GS-22-7317	Great Streets	\$50,000.00
2022	GS-22-7327	Great Streets	\$50,000.00
2022	GS-22-7410	Great Streets	\$50,000.00
2022	GS-22-7770	Great Streets	\$50,000.00
2022	GS-22-7846	Great Streets	\$50,000.00
2022	GS-22-9306	Great Streets	\$50,000.00
2022	GTBID-22-2022	Business Improvement District*	\$1,992,306.67
2022	LMM-22-1330	Locally Made	\$100,000.00
2022	LMM-22-4828	Locally Made	\$100,000.00
2022	LMM-22-5117	Locally Made	\$99,800.00
2022	LMM-22-9130	Locally Made	\$17,500.00
2022	NPF-022-4917	Neighborhood Prosperity Fund	\$401,425.00
2022	NPF-22-1231	Neighborhood Prosperity Fund	\$499,383.77
2022	NPF-22-2201	Neighborhood Prosperity Fund	\$600,000.00
2022	NPF-22-2228	Neighborhood Prosperity Fund	\$850,000.00
2022	NPF-22-4315	Neighborhood Prosperity Fund	\$549,191.23
2022	NPF-22-5335	Neighborhood Prosperity Fund	\$750,000.00
2022	SMBF-22-2022	Small Medium Business Growth Fund	\$5,381,318.72
2022	SWBID-22-2022	Business Improvement District*	\$2,988,460.00
Subtotal FY2022			
Grants		67 Grants	\$20,752,745.32

APPENDIX E: DSLBD GRANT DATA

DSLBD provided this grant data in November 2022. The following tables include the totality of DSLBD grant awards in FYs 2020 – 2022. However, not all grant programs were included in the scope of this evaluation.

Fiscal Year	Grant Program	Number of Grants Awarded
2020	Main Streets (DCMS)	24
2020	Main Streets Art All Night	9
2020	Main Streets Art All Night	1
2020	New Main Streets training	1
2020	New Main Streets training	1
2020	New Main Streets training	1
2020	New Main Streets training	1
2020	Clean Teams	33
2020	Robust Retail Citywide	106
2020	Dream Grants	20
2020	Loan Loss Reserve	1
2020	Capital Connector Grant	1
Subtotal FY2020		199

Fiscal Year	Grant Program	Number of Grants Awarded
2021	Main Streets (DCMS)	26
2021	Main Streets Art All Night	16
2021	Main Streets Art All Night	2
2021	New Main Streets training	1
2021	New Main Streets training	1
2021	Clean Teams	36
2021	Robust Retail Citywide	106
2021	Aspire Pitch	2
2021	Dream Grants	20
2021	Made in DC Market Access	31
2021	Loan Loss Reserve	1
2021	Just Cannabusiness	1
2021	Commercial Property Acquisition	1
2021	Kiva Hub	1
2021	Capital Connector Grant	1
Subtotal FY2021		246

Fiscal Year	Grant Program	Number of Grants Awarded
2022	Main Streets	28
2022	Main Streets Art All Night	22
2022	Main Streets Art All Night	2
2022	Columbia Heights Civic Plaza	1
2022	Friendship Heights Alliance	1
2022	Takoma Park	1
2022	New Main Streets training	1
2022	Restroom Pilot Grant	1
2022	Clean Teams	40
2022	Robust Retail Citywide	134
2022	Aspire Pitch	2
2022	Dream Pitch	2
2022	Food Waste Innovation	24
2022	CBE Green	4
2022	Made in the DMV	1
2022	DMV Black Restaurant Week	1
2022	Loan Loss Reserve	1
2022	Ward 8 Community Investment Fund	1
2022	Sports Wagering Grants	14
2022	Equity Impact Enterprise (EIE)	259
2022	Commercial Property Acquisition	1
2022	Kiva Hub	1
Subtotal FY2022		542

APPENDIX F: LOCATIONS OF ECONOMIC DEVELOPMENT
GRANT PROGRAMS WITH SIMILAR FOCUS AREAS

