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Preliminary Review Report

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Prepared for: The Office of the City Administrator (OCA)

Prepared by: The Office of Risk Management (ORM)

Subject Agency: Office of Neighborhood Safety and Engagement (ONSE)

Review Period: October 2017 through Present

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I. The Assignment

On August 27, 2024, the City Administrator initiated a review of the award and administration of violence intervention (VI)¹ contracts and grants by the Office of Neighborhood Safety and Engagement (ONSE). This review is strictly limited to examining whether the VI contracts and grants were properly awarded and monitored under District laws, regulations, and policy.²

II. Introduction

This Preliminary Review Report by the Office of Risk Management (ORM) documents the initial findings and assessments of ONSE's violence intervention contracts and grants, and ONSE's process for awarding and monitoring those contracts and grants. The principal findings and assessments focus on whether the process complied with the policy, law and best practices of the District of Columbia in its award and monitoring of contracts and grants. ORM based its initial findings on its interviews of current and past ONSE staff, support from agency experts in procurements and grants, and records produced by ONSE and other agencies in response to ORM's document requests.

III. Summary of Preliminary Findings and Recommendations

(a) Despite concerns highlighted in this report, at this time, ORM could not establish willful wrongdoing by any ONSE employees.

(b) The agency's early shortcomings in process should not negate all the efforts made by dedicated ONSE employees who work to improve the lives of District residents given its ever-changing landscape of legislation, staff, and emergent needs to respond to spikes in violent crime.

(c) Under its current leadership, ONSE implemented better protocols for managing grants and contracts with the adoption of new grants policies and an improved procurement process.

(d) The Office of Contracting and Procurement (OCP) saw clear progress in ONSE's current contracting process over the past eighteen months. Current contracting documents are easily identifiable and accessible in current contracts. OCP reports that it has an established structure in place that oversees ONSE procurement related actions.

¹ The Violence Intervention (VI) Program works with community-based organizations through the use of violence interrupters to reduce violent crime in the District. The program uses tactics to address potential conflicts, stabilize communities after a violent conflict, and provide support to individuals at high risk of being directly involved in violence.

² ORM did not conduct a review to determine criminality or other personnel related issues.

(e) As to existing contracts, based on OCP's limited review of a small sample of VI contracts, OCP found missing records and inconsistencies in prior contracting documents and suggested the possibility of a more thorough audit of all VI contracts awarded by ONSE.

(f) The ONSE's initial decision to transition from contracts to violence intervention grants appears to have been driven by significant contracting challenges ONSE faced with a limited market of community-based vendors, who lacked the ability to adhere to procurement rules. Use of grants for this purpose is not the most effective vehicle for these services. Grants are conditional gifts made to facilitate a public purpose. Unlike contracts, grants do not involve an exchange of consideration for services or something in return. In this case, grants were used to secure some services that the Agency itself is statutorily required to provide or procure by contract.

(g) The typical procurement process makes it extremely difficult to secure some of ONSE's mandated services. The direct voucher process, as authorized in its establishment act, may be a reasonable solution for ONSE. ONSE should consider acquiring violence intervention services through the procurement process or pay for violence interventions through direct vouchers. Direct vouchers provide ONSE the flexibility to work with community-based organizations that do not have the infrastructure or capital in place to contract with the District. Use of direct voucher payments will necessitate more direct involvement by ONSE staff, and payments will likely need to be directed to specific interventions.

(h) Building a grant program to promote and support the start-up of community-based organizations specifically dedicated to non-profit violence intervention could assist in certifying more local businesses to meet the District's procurement and contracting framework. Moreover, a Grants Office under the Office of the City Administrator could be developed to better manage grant programs.

(i) Grants may be a vehicle option to encourage community-based organizations to develop and implement violence intervention measures. ONSE's current Grants Manual, while it may be improved, presents a detailed and comprehensive guide aimed at effective management of competitive application processes and oversight of grant funds. The document covers the life cycle of the grant-making and grant-monitoring processes. Improvements, however, should be made by (1) aligning it to 2 CFR 200 Uniform Administrative Requirements, (2) incorporating more direction on subcontracting by grantees, (3) integrating the new FY25 DC statute on termination of grants, and (4) discussing federal reporting requirements mandated by the Federal Funding Accountability and Transparency Act (FFATA). The Manual would also benefit by including a section describing the distinctions between a grant and a procurement, and when one or the other is the appropriate vehicle to use.

IV. Background

a. Legislative History

The Council first establishes ONSE under the “Neighborhood Engagement Achieves Results Amendment Act of 2016” (hereinafter “NEAR Act”).³ The NEAR Act tasks ONSE, through its Executive Director, with two principal areas of responsibility: (1) to identify and engage 50 “high risk” individuals on a quarterly basis and recruit them to participate in diversion programs or mental health counseling; and (2) to develop a stipend program for active participants in such programs.⁴ The NEAR Act also directs ONSE to make periodic reports to Council relating to both these responsibilities, all while ensuring that participants’ identities remain confidential.⁵

The law also creates a non-lapsing Neighborhood Safety and Engagement Fund, which is available to fund ONSE’s operations and activities, including overhead and administrative expenses and the provision of stipends to eligible program participants.⁶ The Fund permits ONSE to apply for and receive grants in addition to private donations.⁷ Both the Chief Financial Officer and Chief Procurement Officer are charged with providing ONSE with financial and contracting/procurement support services and oversight, respectively.⁸

In the Fiscal Year 2018 Budget Support Act of 2017 (“2018 BSA”),⁹ Council augmented ONSE’s duties and responsibilities in connection with the “Safer, Stronger DC” initiative, adding two additional programs under ONSE’s purview: (1) The Community Stabilization Program; and (2) the Safer, Stronger DC Community Partnerships Program.¹⁰ This change significantly expanded ONSE’s programmatic mandate, including, among other responsibilities, (1) identifying areas of high crime and connecting residents in those areas to public services; and (2) developing positive relationships with youth and young adults through recreation and positive reinforcement.¹¹ The 2018 BSA for the first time authorizes ONSE to issue grants, “for the

³ D.C. Law 21-125 Sec 101, 63 DCR 4659 (June 30, 2016).

⁴ *Id.* at § 102.

⁵ *Id.*

⁶ *Id.* at § 103.

⁷ *Id.*

⁸ *Id.* at § 102.

⁹ DC Law 22-33 § 3032, 64 DCR 4652 (Dec. 13, 2017). The Introduction to the 2018 BSA discloses a significant expansion of the ONSE’s budget to accompany the increase in the agency’s authority: “The FY 2020 budget includes ... [\$2.5 million for community-based grants for violence interruption that will expand and deepen current services and \$1.6 million to build three pilot sites for place-based trauma-informed care services, offering accessible therapeutic and referral services in target neighborhoods] ... to further our commitment to a safer, stronger DC....” B23-0209, Introduction, 3.

¹⁰ D.C. Law 22-33, § 3032.

¹¹ *Id.* More specifically, the expansion of responsibilities includes the following:

purpose of providing funds that seek to reduce and prevent violent crimes[.]”¹² The 2018 BSA also repeals the ONSE stipend program for participants and replaces it with a general authorization to provide “financial incentives to eligible participants....”¹³

The 2018 BSA represents only the beginning of the expansion of ONSE’s authority and responsibilities. Next, Council adds a portion of the Roving Leaders Program to ONSE’s list of programs and expanded its reporting requirements.¹⁴ In 2019, Council transfers the Family and Survivor Support Services Program to ONSE, adding an additional reporting requirement on “whether any participant has been arrested or convicted during or following their participation, and for what offense or offenses.” The same amendment expands ONSE’s authority to use funds to purchase food and non-alcoholic beverages for program participants and activities, “including violence prevention programs, short-term assistance programs, retreats, community outreach activities and events, individual outreach activities such as program recruitment, and training and education activities for community members, *where the purchase is reasonably necessary to assist ONSE in the effective achievement of a statutory goal, objective, or responsibility.*”¹⁵ Counter to the expansion trend, the 2019 legislation also repeals ONSE’s Neighborhood Safety and Engagement Fund, the non-lapsing fund available to provide financial incentives to eligible participants.¹⁶ But the fund is soon revived in the FY 2020 Budget Support Clarification Amendment Act of 2019 with even broader authority “to support the duties of the [ONSE].”¹⁷

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- (1) Coordinating the District's overall violence prevention strategy and programs, with a focus on utilizing public health approaches to respond to and prevent violence;
 - (2) Identifying, recruiting, and engaging individuals determined to be at high risk of participating in, or being a victim of, violent crime;
 - (3) Collaborating with other District agencies and nonprofit organizations to provide immediate wrap-around services to victims and families affected by violent crime;
 - (4) Identifying priority neighborhoods and Metropolitan Police Department Police Service Areas ("PSAs") with high trends of violent crime and connecting residents in those neighborhoods and PSAs to services through a streamlined approach;
 - (5) Developing positive relationships with youth and young adults using recreational and other positive behavior reinforcement activities; and
 - (6) Coordinating with District agencies and community-based organizations to develop programs that focus on employment and job-training opportunities for individuals residing in priority neighborhoods or PSAs or who are most at risk of participating in, or being a victim of, violent crime, including through the use of financial incentives for participation.

¹² *Id.*

¹³ *Id.*

¹⁴ D.C. Law 22-168, Sec. 3032(a), 65 DCR 9388 (Oct. 30, 2018). The mission of the Roving Leaders Program is to prevent, neutralize, and control hostile behavior in youth and youth groups through the development of positive relationships between teens/youth and outreach workers. Roving Leaders utilize recreation and leisure time activities as the intervening vehicles for redirecting antisocial and aggressive behaviors.

¹⁵ D.C. Law 23-16, Sec. 3042(a), 66 DCR 8621 (Sept. 11, 2019) (emphasis added).

¹⁶ *Id.*

¹⁷ D.C. Law 23-68, § 6, 67 DCR 743 (Mar. 19, 2020).

Later in 2020, Council adds a new program to ONES' operations, the Restorative Justice Collaborative, a centralized hub to coordinate and foster restorative justice programming and practices within District government and in partnership with non-profits.¹⁸ ONSE's new responsibilities include: coordinating and fostering "restorative justice programs and practices within the District government" in partnership with non-profits "with a focus on individuals 18- to 35-year-old population."¹⁹

Another expansion of ONSE's authority is enacted in 2021, when Council authorizes ONSE to support its initiatives on violence prevention and permitted payments *by direct vouchers*. Specifically, direct vouchers are permitted for provision of financial payments to individuals participating in or eligible to participate in violence interruption programs and provision of social, economic, health and other services to support violence prevention.²⁰

The final legislative change appears in the FY 2024 Budget Support Act of 2023, by which ONSE is directed to make a grant seemingly tailored to a specific recipient, albeit on a "competitive basis" --

award a grant, on a competitive basis, in an amount not to exceed \$150,000, to a nonprofit organization or community-based organization that satisfies each of the following conditions:

- (1) The organization was incorporated in 2020;
- (2) The organization was founded by a graduate of a high school in Ward 7; and
- (3) The organization's mission is to reduce gun violence in communities of color by changing norms and narratives and working with youth.²¹

The grant generated from the final piece of legislation received no responses. The eight-year legislative history reflects nearly constant expansion of ONSE's authority and responsibilities.

b. ONSE's Current Programs

When it was first established, ONSE's budget was just \$2.1 million. As its duties and responsibilities grew, so too did its budget. With its growing list of programs, ONSE's budget expanded to \$10.4 million in FY 2021.²² By the next fiscal year, the budget had almost tripled to \$28.7 million.²³

¹⁸ D.C. Law 23-149, § 3012(a), 67 DCR 10493 (Dec. 3, 2020).

¹⁹ *Id.*

²⁰ DC Law 24-45, § 3033 (2021).

²¹ DC Law 25-50, § 3024 (Sept. 6, 2023). No grant per this directive was ever issued.

²² Office of the District of Columbia Auditor. [2022] *NEAR Act Violence Prevention and Interruption Efforts: Opportunities to Strengthen New Program Models*, page 4.

²³ *Id.*

At present, ONSE administers six programs:

1. Pathways: A nine-month transitional employment program for “high risk” participants between the ages of 20 to 35. Pathways provides participants with “life skills training, mentoring, case management, and six months of subsidized employment designed to lead to permanent, unsubsidized employment.”²⁴
2. Violence Intervention (VI): A program that works with community-based organizations to “intervene in the lives of high-risk individuals to disrupt the cycle of violence and provide supports and services to those individuals and their families.”²⁵
3. Family and Survivor Support (FSS): A program that “contacts families after a homicide, a shooting, or stabbing that involves a juvenile or is believed to be gang-related, to provide support services such as burial assistance and grief counseling.”²⁶
4. ONSE Leadership Academy (OLA): A program that “works with students facing behavioral and academic challenges by monitoring their attendance, providing supports and services, and ensuring safe passages to and from school.”²⁷ However, starting October 1, 2024 (FY 25), OLA transitioned to the Office of the Deputy Mayor for Public Safety and Justice.²⁸
5. People of Promise: An interagency initiative that connects “high risk” individuals (identified by partner agencies such as the Department of Corrections) with accelerated supportive services delivery in seven domains: (1) mental/behavioral health, (2) physical wellness, (3) education/employment, (4) financial, (5) family, (6) legal, and (7) community/creativity.²⁹
6. Restorative Justice Program: This program aims to provide supportive and healing services to those impacted by violence, address self-discipline, empathy and accountability with those responsible for perpetuating harm or violence, and enhance community dialogue, cohesion, reconciliation, and empowerment.³⁰

Of the six programs, VI and People of Promise are each geared toward violence intervention, and they are the only programs that provide programmatic services through issuance of grants. Services through its other programs are either directly performed by ONSE staff or obtained by contracts.

²⁴ *Id.* at 5.

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

²⁸ Snead, Kwelli. 21 May 2024. *ONSE Fiscal Year 2025 Budget Oversight Hearing*, page 6.

https://onse.dc.gov/sites/default/files/dc/sites/onse/release_content/attachments/FY25_Budget_Hearing-ONSE_Testimony_FINAL.pdf

²⁹ *Id.*

³⁰ *Id.*

c. Violence Intervention Program (VI)

The ONSE VI Program works with community-based organizations to reduce violent crime in the District.³¹ The program “uses tactics to address potential conflicts, stabilize communities after a violent conflict, and provide support to individuals at high risk of being directly involved in violence.”³² This program addresses ONSE’s legislative mandate both to identify “high risk” individuals and recruit those individuals to participate in programs designed to discourage violent crimes as well as to identify “priority neighborhoods and Metropolitan Police Department Police Service Areas (PSAs) with high trends of violent crime and connecting residents in those neighborhoods and PSAs to services through a streamlined approach.”³³

ONSE’s VI Program relies “on the street smarts, cultural sensitivity, and credibility of frontline workers to foster success for its program.”³⁴ These frontline workers (credible messengers and violence interrupters) are “pivotal in linking high-risk individuals to wraparound services such as childcare, housing assistance, job training, and mental health.”³⁵ Violence interrupters (VIs) build the trust and credibility needed to help “high risk” individuals work through their difficult circumstances because the VIs often “come from the communities where they work and have had previous involvement in violent crime before turning their lives around.”³⁶ For example, if “violence occurs, the violence interrupters are expected to organize triage meetings within 24 hours, identify factors that led to the crime, assess the possibility of retaliation, and try to calm the community.”³⁷ A violence interrupter’s role in this situation can also mean intercepting/engaging an individual who is planning to retaliate with violence and diverting them from responding with violence. And “[e]ven if a violence interrupter is focusing on 5 to 10 high-risk individuals in a community, he or she is also responsible for helping individuals and their families with support services, monitoring social media and other sources to learn about and dampen conflicts, writing up daily notes, and planning community events or outings.”³⁸ The special skills and community specific relationships required to provide effective VI services creates a limited pool of qualified VI’s available to ONSE and its initial contractors. Within the limited pool, VIs with the necessary skills and community relationships often lack the ability to comply with the requirements of VI contracts. Which created a hardship for both ONSE and its contractors, and made (and continues to make) it extremely difficult for ONSE to meet its VI mandates through procurement. The cumulative effects of procurement challenges led to a risk in

³¹ Snead, Kwelli. 21 May 2024. *ONSE Fiscal Year 2025 Budget Oversight Hearing*, page 5. https://onse.dc.gov/sites/default/files/dc/sites/onse/release_content/attachments/FY25_Budget_Hearing-ONSE_Testimony_FINAL.pdf.

³² *Id.*

³³ D.C. Code § 7-2411.

³⁴ Office of the District of Columbia Auditor. [2022] *NEAR Act Violence Prevention and Interruption Efforts: Opportunities to Strengthen New Program Models*. Page 11.

³⁵ *Id.*

³⁶ Office of the District of Columbia Auditor. [2022] *NEAR Act Violence Prevention and Interruption Efforts: Opportunities to Strengthen New Program Models*. Page 23.

³⁷ *Id.*

³⁸ *Id.* at 26.

lapse of VI services and drove ONSE to seek alternative solutions for acquiring VI services to meet its mandates in the form of grants. This solution, while necessary under the circumstances, may be at odds the District's grants and procurement policies for reasons explained below.

Unfortunately for ONSE staff, the challenges were not limited to procurement. Current and former ONSE employees explained that they sometimes had to deal with stressful situations and consistent challenges related to VI work. The stressful situations conveyed include but are not limited to -- safety concerns, and the consistent trauma of hearing, seeing, and addressing violent crime in the community. Every former ONSE member interviewed presented a thorough understanding of the needs of the agency with genuine passion, enthusiasm and dedication to ONSE's cause and mission. However, the difficulty of their work was evident in every interview.

V. Methodology

The review team is comprised of ORM staff, grants management experts from the Department of Health (DC Health) and the Homeland Security and Emergency Management Agency (HSEMA), and contracting experts from the Office of Contracting and Procurement (OCP).

To understand ONSE's mission and operations, ORM reviewed ONSE's legislative history, issued document requests to ONSE and the Office of the Chief Financial Officer (OCFO), reviewed ONSE's requisition history in PASS, and conducted interviews. Some of the grants and contracts documents received were incomplete and missing documents that were incorporated by reference into its contracts and grants due to historic challenges in document management.

This preliminary report relies on a review of the ONSE's establishment act, documents produced by, and electronic sources published by ONSE and its partner agencies, an audit report of the NEAR Act published by the D.C. Auditor on June 7, 2022, and interviews of 25 current and former ONSE staff and partner agencies.³⁹ Staff interviews were integral to understanding ONSE policies, practices, and operations from ONSE's inception through present. Interviewees included ONSE's current Director, a former Director, Chief of Staff, Chief Operating Officer, General Counsel, Deputy Director, Grants Managers, Contract Administrator, Contract Specialists, Contracting Officers from OCP, Office Manager, and ONSE's budget support personnel from the OCFO.

ORM convened a Grants Management Team to review ONSE grants and its process for awarding and monitoring grants. The Grants Management Team's review focused on the steps ONSE recently took to improve its grants management practices to assess whether the agency's current grants management policy and processes are consistent with applicable District laws and the District's Citywide Grants Manual and Sourcebook. The Grants Team did not conduct a

³⁹ Office of the District of Columbia Auditor. [2022] *NEAR Act Violence Prevention and Interruption Efforts: Opportunities to Strengthen New Program Models*.

comprehensive review of past grant awards to identify deficiencies or material weaknesses because such a review would require a full forensic audit.

The OCP Team assessed whether Contracting Officers and designated Contract Administrators followed all of the District’s procurement laws, policies and procedures when awarding and monitoring competitive and non-competitive contracts and small purchases. For this preliminary review, OCP limited its scope to a small sample of specific contracts ONSE issued to Life Deeds, Inc., dating back to 2022, with the intent of evaluating whether ONSE’s procurement processes improved over time.

ORM requested all pertinent emails from past and current employees in decision-making roles in leadership at ONSE. For this preliminary report, there are additional data sets that have not been reviewed given volume and time constraints. By way of example, ORM did not review all the emails belonging to a former ONSE Chief of Staff because the employee’s email box contains 11,866 emails. In all such cases, discrete, targeted searches were employed to identify relevant material—but it is doubtful that all relevant material was identified.

The preliminary findings below are based on the methodology described here.

VI. Preliminary Findings

ONSE was established in response to a growing recognition that traditional policing alone was insufficient to address the root causes of violence, particularly in underserved communities. ONSE fulfills its important mission by focusing on community-based strategies to identify and engage with individuals who are most likely to be involved in gun violence while providing them with an alternative to crime through conflict-resolution and other forms of support. In interviews with ORM, current and former ONSE staff and its OCP counterpart remarked on the founding staff’s knowledge and skills in the field of violence intervention. Programmatically, the staff were well qualified to lead the agency in its mission. However, the capable staff lacked government operations acumen in areas such as procurement and acquisitions planning. Which created a challenge for ONSE at the outset, despite their qualifications to perform the agency’s substantive work. Additionally, ONSE did not have a Chief Operating Officer or General Counsel at the time of its founding. Deficiencies in District government procurement laws and staffing, coupled with the unusual and unique needs of ONSE’s programs, presented very real challenges in the agency’s ability to properly administer contracts. Layered onto the agency’s lack of experience was OCP’s assignment of two Contracting Officers (COs) with limited District government contracting experience to “support” the fledgling agency.

To effectively perform on the violence intervention contracts, ONSE’s contractors brought in Violence Interrupters (VIs). This created challenges because the individuals lacked the ability to meet the contractor’s administrative responsibilities under the contract on basic operational tasks such as generating reports and invoicing. Improper and delayed invoicing caused delays in payment. Which created a strain between ONSE and its contractors, and resulting in a need for

advancements on the contracts to enable its contractors to perform and is disfavored in contracting and creates a risk for the government.

In FY 2021, ONSÉ transitioned from using contracts to grants to procure VI program services, seemingly to address challenges it faced with the contracting process. Based on interviews with former staff, all three VI service providers declined to renew their grants with ONSÉ. According to ONSÉ's former Deputy Director of Programs, the VI service providers – Far Southeast, Training Grounds, and CSC – frequently complained about delays in payment, even though they received advances and the delays were often caused by the contractors' failure to timely submit invoices.

According to ONSÉ Deputy Director, former Deputy Mayor Chris Geldart, on advice of the Director of the Office of Victim Services and Justice Grants (OVSJG), directed the agency to issue a sole source grant⁴⁰ to Progressive Life Centers (PLC) to serve as a fiduciary and quality assurance partner. PLC issues subgrants so that the subcontractors of ONSÉ's former vendors could be brought on board to provide VI services. Those groups were needed to ensure continuity of services and to maintain the progress established through successful community projects. The Deputy Director explained that the agency had to issue a grant to PLC to serve as a Quality Assurance (QA) partner because the subcontractors lacked the capital and infrastructure for ONSÉ to issue a direct grant to them. For example, many of the vendors were paying their VI staff and subcontractors through Cash App. Therefore, a payment fiduciary (in this case, PLC) was required to award the subgrants and issue payments to the smaller vendors.

Through PLC, ONSÉ issued subgrants to multiple subgrantees, including Life Deeds (whose employees formerly staffed the CSC contract), Together We Rise (which formerly staffed Training Grounds), and the "gun snatching" team, J & J Monitoring Solutions (which formerly staffed Far Southeast). In addition to PLC, ONSÉ also awarded sole source grants to Life Deeds⁴¹ for VI floating teams and Dramatic Solutions Inc. (DSI) for VI case management and engagement services. While ONSÉ's former Deputy Director provided verbal accounts for the agency's choices, no documents were provided to explain the decision-making process behind the switch to grants or decisions to justify issuance of a sole source grant.⁴² Notably, by this time, ONSÉ's statute had been amended to give the agency wider latitude on spending to support its violence intervention initiatives.

⁴⁰ Although the District Citywide Grants Manual and Sourcebook, Sec. 6.0. provides for a "sole source" exception to the award of grants, ORM believes the phrase "sole source" applies uniquely to procurements and questions its applicability to grants.

⁴¹ Life Deeds was separately awarded a sole-source contract for mediation services in a specific community. In a Determinations and Findings (D&F) dated June 1, 2022 on a contract to Life Deeds, ONSÉ found Life Deeds demonstrated success at implementing ongoing mediation strategies and intricately responsible for the establishment and maintenance of peace agreements between the two feuding communities, which had lasted over 8 months as of the date of the D&F.

⁴² The Manual addresses sole sourcing by stating that "grants of \$50,000 or more must be awarded on a competitive basis," though there are several exceptions to this policy, and much discretion is given to the Executive Director. The Manual also permits awarding grants to unsolicited proposals under certain conditions.

Having received ARPA⁴³ funds in early 2022, ONSE worked quickly to issue those multiple sole source grants for VI work by March 2022. Because ONSE's most effective VI teams would have difficulty receiving direct grants from the District, ONSE issued a grant to PLC to issue subgrants to the VI teams and serve as their payment fiduciary and ONSE's quality assurance partner. ONSE issued several direct grants and subgrants through PLC for VI services, case management, and acquisition of items to support its programs. Its former Deputy Director recalled needing to spend down the money by the end of the FY 2022. As a result, ONSE enlisted one of its subgrantees to purchase a large list of items which was meant to support communities in need and help "bring people through the door" as part of the intervention process.⁴⁴ Items purchased included clothes, health care supplies, Christmas trees, diapers, perishable food items, and more.

The following year, ONSE's budget grew to \$35.2 million for FY 2023. At around this time, ONSE experienced a change in administration, when the Mayor appointed Linda Harllee Harper as the Executive Director of ONSE on February 9, 2023. Prior to and during the transition, ONSE received many boxes of items it ordered from the end of FY 2022. According to the account of the current team and some former ONSE employees, the items were not properly inventoried when received or when distributed. This account, however, was disputed by the former Deputy Director of Programs. The new Chief of Staff at the time, upon learning of these issues, worked to properly inventory and manage the items which have since been distributed.

In addition, Director Harllee Harper also discovered that ONSE had a large sum of gift cards on ONSE's premises. The large sums of gift cards created safety concerns for ONSE and its staff and the agency initially lacked significant controls to properly track the authorized distribution of the gift cards. The new administration then worked with the OCFO to create protocols for locking up and managing the gift cards.

Sadly, several months after the transition in February of 2023, ONSE's newly appointed Director passed away, which resulted in ONSE undergoing another change in leadership. Under its current leadership, ONSE has demonstrated continued improvements in its overall operations. For example, ONSE's early challenges in procurement were not limited to its contracts for program services. According to former OCP staff, in its initial year, the agency attempted to make prohibited purchases on its P-Card. Another OCP employee described the agency's procurement process as being more reactive than proactive, noting that ONSE had inadequate

⁴³ American Rescue Plan Act of 2021, Pub. Law. 117-2, tit ___, 135 Stat. 4 (2021), also called the COVID-19 Stimulus Package or American Rescue Plan, is a US\$1.9 trillion economic stimulus bill passed by Congress and signed into law on March 11, 2021, to speed up the country's recovery from the economic and health effects of the COVID-19 pandemic and recession.

⁴⁴ The identity of the vendor was not readily identifiable in the grants and subgrants provided for review given the language used to describe its requirements. Efforts to identify and confirm the vendor would have required a review of emails, which has not been conducted due to time constraints. But according to a former ONSE employee, the vendor selected raised concerns involving conflicts that was reviewed by Board of Ethics and Government Accountability and the Office of the Inspector General.

acquisition planning. In January 2022, ONSE had no blanket purchase agreements for purchases under \$100,000, meaning that everything went out for a bid as needs arose. According to its Contracting Officer, ONSE's procurement staff lacked market research training and a clear understanding of the difference between sole source contracts and other procurement options. ONSE's challenges and problems are understandable and unsurprising given the agency's unique mission and learning curve that comes with establishing a new agency. A review of the agency's more recent procurement history suggests that many of these problems have been corrected.

Procedurally, at the time the foregoing grants were issued, ONSE had a grants manual that was based on OVSJG's grants manual. However, it is unclear whether the manual was ever adopted by the agency. The ONSE grants specialist purports to have prepared and issued grants in accordance with the Citywide Grants Manual and Sourcebook, in addition to the OVSJG Grants Manual. As of September 26, 2024, ONSE adopted "the ONSE Grants Management Manual" (hereinafter "Manual") which it already applied to mini grants⁴⁵ issued by the agency and plans to apply as a part of a new competitive process for the VI Program. This Manual seems much more robust and meets many of the obligations of agencies that are administering grants.

VII. Preliminary Conclusions

a. Contracts

1. *Observations on ONSE Prior Contracting Process*

The OCP Team reviewed a sample of contracts and a small purchase. It found several required documents were missing from the contract and purchase files, including critical business decision documents like the Business Clearance Memorandum (BCM). This memorandum is required for certain procurements exceeding \$100,000, as it records the relevant phases of a proposed contract action; reflects the business decision process; demonstrates that the contract aligns with District procurement laws and regulations; and documents sound business judgment based on a fair and reasonable price. In some instances, Determinations and Findings (D&F) documents, which are necessary to justify certain contract decisions, were also missing from the files. The lack of records prevented the OCP team from assessing whether awarding the contracts to Life Deeds was in the District's best interest, whether the vendor's pricing was fair and reasonable, or if other contractors were available to provide the required violence intervention, case mediation, and other services for ONSE.

The OCP team also found discrepancies in the vendor's submitted documents. For example, in the sole source contract to Life Deeds, CW99021, the contract file lacked sufficient

⁴⁵ In March 2024, ONSE issued a Notice of Award (NOFA) aimed at supporting community initiatives by funding forty-eight (48) grantees \$5,000 each in funding to facilitate and enhance local projects and initiatives for Gun Violence Prevention. Funding for the initiative was allocated pursuant to D.C. Code § 7- 2411(f).

documentation to determine whether the CO was aware that the District had terminated a contract with Life Deeds before issuing the award.⁴⁶ In a subsequent discussion with ORM, the CO advised that she knew Life Deeds had previously been terminated from another government contract. She explained that it did not impact the award decision because: (1) the ONSE contract was different and (2) she recalled Life Deeds had adequately explained why they should be found to be responsible despite the previous contract's termination. Additionally, the OCP team found that some of the actions did not include the required contractor performance evaluations, nor could the evaluations be accessed in the Contractor Performance Evaluation System (CPES), making it difficult to verify whether the Contract Administrator (CA) ensured that the vendor delivered the required services to the District as stipulated in the contract.

In addition to the concerns highlighted by OCP, ORM identified additional areas of concern. ONSE's requisition history consists of several purchase orders for small purchases issued for community specific VI services that exceed \$100,000. This may violate D.C. Code §2-354.07, which limits small purchases to \$100,000. Contracts appear to have violated the general prohibition against advance payments.⁴⁷ The motivation for advancing payments before performance appears to have been made to facilitate the vendors' ability to fulfill contract requirements. Such a practice is not permitted under current procurement law. The inability to perform contract requirements without advance payment calls into question the vendor's responsibility to perform the scope of work in the first instance.⁴⁸

2. Observations on ONSE Current Contracting Process

The OCP team sees clear progress in ONSE's contracting process over the past year and a half under Director Sneed and the ONSE's Leadership Team. In other contracts, documents are easily identifiable and accessible. OCP has an established structure in place that oversees the strategic and tactical actions for ONSE's procurement related actions. OCP staff now have a better agency

⁴⁶ Gathright, Jenny. Feb. 26 2019. "D.C. Shelter Provider Terminated Due To 'Problems With Documentation.'" <https://wamu.org/story/19/02/26/d-c-shelter-provider-terminated-due-to-problems-with-documentation/>

⁴⁷ See 27 DCMR § 3205

⁴⁸ See PPRA § 2-353.02 and 27 DCMR § 2200, providing as follows:

To be determined responsible, a prospective contractor shall meet all of the following requirements:

- (a) Financial resources adequate to perform the contract or the ability to obtain them;
- (b) Ability to comply with the required or proposed delivery or performance schedule, taking into consideration all existing commercial and governmental business commitments;
- (c) A satisfactory performance record;
- (d) A satisfactory record of integrity and business ethics;
- (e) The necessary organization, experience, accounting and operational controls, and technical skills or the ability to obtain them;
- (f) Compliance with the applicable District licensing and tax laws and regulations;
- (g) The necessary production, construction, and technical equipment and facilities or the ability to obtain them; and
- (h) Other qualifications and eligibility criteria necessary to receive an award under applicable laws and regulations."

relationship that allows for proper contract formation and award in accordance with District procurement law.

b. Grants

1. ORM’s Observations – Administration of Existing Grants

According to ONSE’s establishment act, “The ONSE shall have grant-making authority for the purpose of providing funds that seek to reduce and prevent violent crime. Grants made pursuant to this subsection shall be administered pursuant to the requirements set forth in ...” the Grants Administration Act of 2013 (hereinafter “the Grants Act”). Section 2812 of the Grants Act provides that “Notwithstanding any other provision of law, and except where the law establishing authority for the grant exempts or modifies the requirements of this part by specific reference, any grant-making or grant-issuing authority established by District law shall be administered pursuant to the requirements of this subchapter.”⁴⁹ Section 2813(a) to (c) requires

(a) Any grant of \$50,000 or more that is made pursuant to an authority described in § 1-328.12 ... be awarded on a competitive basis and solely for the purpose or purposes identified in the statute establishing the grant-making or grant-issuing authority, unless a non-District entity that provides funds to the District to award as grants has rules or requirements that prohibit or otherwise limit competition.”

(b) Before providing notice of the availability of grant funds as required by subsection (c) of this section, a grantor shall establish criteria or standards for the selection of a grantee or grantees under the grant program, and shall set priorities among those criteria or standards.

(c) A grantor shall publish notice in the District of Columbia Register for a minimum of 14 days in advance of making or issuing a grant of the following....⁵⁰

ONSE began issuing some grants in FY 2020 through OVSJG. Through several Memorandum of Understandings (MOUs), OVSJG served as the administrative and fiscal agent of the ONSE’s CBCR grant from the U.S. Department of Justice (DOJ), Bureau of Justice Assistance, while ONSE carried out the programmatic roles. Under the MOU, OVSJG was also responsible for “submitting reports and any documentation required by CBCR to the ... [DOJ]..., provide project guidance and facilitate engagement with the CBCR national technical assistance provider, participate in the hiring of the staff funded by the grant, and provide support for subgrant administration.” Consistent with the requirements of the Grants Act and the District Citywide Grants Manual and Sourcebook (hereinafter “Sourcebook”), ONSE published its Notice of Funding Availability (NOFA) in the D.C. Register⁵¹ and the RFA requested for

⁴⁹ D.C. Code Sec. 1-328.12

⁵⁰ D.C. Code Sec. 1-328.13

⁵¹ 71 D.C. Reg. 012933 (October 25, 2024)

proposals that would be subject to evaluation and scoring. According to the MOUs, ONSE was responsible for among other things, conducting the selection process and issuing funds.

While grants issued through OVSJG appeared to comply with the Grants Act and Sourcebook, other grants issued did not appear to comply. Other grants issued by ONSE, such as the GEER grant, did not appear to have NOFAs published in the D.C. Register. Although documents provided to ORM contained documents that were titled NOFA and seem to support a competitive process, ORM was unable to independently confirm whether the agency complied with posting requirements.

The grants issued by ONSE between FY 2022 and FY 2024 did not appear to comply with the requirements of the Grants Act. During this period, the ONSE issued several grants over \$50,000 as sole source grants. ONSE's grant's specialists explained that the agency relied on Section 6.0 of the District Citywide Grants Manual and Sourcebook to justify its issuance of a "sole source" grant. Section 6.0 of the District Citywide Grants Manual and Sourcebook provides

An Agency may make an award on a sole source basis in appropriate circumstances. These circumstances include, but are not limited to, situations where:

- (1) the authorization for the award designates the grantee,
- (2) the applicable law defines eligibility in such a way that there is only one eligible applicant,
- (3) there is a recognized coalition of service providers through which the broadest community participation may be obtained in serving the targeted clientele, or
- (4) when the services required by the Agency are available from only one source and no other type of services will satisfy Agency requirements."

However, the Grants Act provides that grants over \$50,000 must be competed, "unless a non-District entity that provides funds to the District to award as grants has rules or requirements that prohibit or otherwise limit competition." No explanation was provided for how or why ONSE's prior employees concluded that the grants were exempt from the competition requirements of the Grants Act beyond citing to the provisions of the Sourcebook. ARPA, the funding source, does not appear to have rules or requirements that prohibit or otherwise limit competition.

In the last fiscal year, FY 2024, under current leadership, it appears that ONSE has complied with the requirements of the Grants Act and the District Citywide Grants Manual and the Sourcebook in its issuance and award of its FY 24 Gun Violence Prevention Mini-Grants insofar as publishing its Notice of Funding Availability (NOFA) in the D.C. Register and its website, followed by a request for applications (RFA). Its RFAs also appear to adhere to the requirements of the Grants Act and Sourcebook.

2. ORM's Observations - Appropriateness of Grants

The Agency's issuance of grants to obtain violence intervention, quality assurance and case management services appear to be at odds with the District's procurement laws and grants policy.⁵² Unlike a contract, a "grant is a gift or gratuity which the government bestows upon a person or entity to accomplish some public purpose defined by law."⁵³ In fact, "the government's determination of how and to whom grant funds are to be allocated has been held to be a governmental act from which no contractual liability arises."⁵⁴ Also distinct from contracts, in a grant, "more of the responsibility for carrying out ... the grant is left to the discretion of the grantee subject to the applicable terms and conditions of the grant."⁵⁵ Contracts specifically define the manner in which services and goods are provided and how performance is measured.

Considering the foregoing, ONSE VI services should either be brought in-house or procured through a contract or through direct vouchers. ONSE may, however, continue to issue grants to encourage public benefits consistent with the agency's purposes, such as job training, mentoring or other supportive services to support its program participants.

3. Grants Management Team Observations

a. ONSE Current Grants Process

Strictly from a process perspective, the Grants Team found that, although there is always room for improvement, ONSE's current Grants Manual serves as a detailed and comprehensive guide aimed at ensuring effective management of competitive application processes and oversight of grant funds in accordance with regulatory requirements. It also addresses several recurring themes from the interviews. However, the key challenge lies in how well the guidelines will be followed and implemented. The document itself is comprehensive and covers the life cycle of the grant-making and grant-monitoring processes.

b. Internal Controls

⁵² See District Citywide Grants Manual and Sourcebook, Sec. 4.0 requiring the principal purpose of a grant be "the transfer of money, property, services, or anything of value to the subgrantee to accomplish a public purpose of support and stimulation authorized by statute, rather than an acquisition of goods or services for the direct benefit of the District government."

⁵³ Nickles, Peter J. Memorandum to Mayor Adrian M. Fenty. 2008 "Are Grants in Excess of \$1 Million During a 12-Month Period Subject to Council Review Pursuant to Section 451(b)(1) of the Home Rule Act?" at 5; see also *Dano Res. Recovery, Inc. v. District of Columbia*, 620 A2d 1346, 1351 (D.C. 1993) ("District contracting law parallels federal government contract law." Courts can apply federal law and relevant federal decisions "with particular expertise in this area.")

⁵⁴ Nickles at 5 (citing *City of Manassas Park v. United States*, 224 Ct. Cl. 515, 633 Fed 181, 184, *cert denied*, 449 U.S. 1035 (1980)).

⁵⁵ *Id.* (citing *Matter of National Highway Traffic Safety Administration*, 62 Comp. Gen. 531 (1983)).

The Manual thoroughly outlines the grant life cycle, covering everything from the RFA process and application reviews to post-award requirements and compliance. However, there could be more detailed guidance on the agency’s internal processes, including:

- a. *Award files.* What documents must ONSE maintain on file, where should they be stored, and for how long?
- b. *Review and approval.* How is the review and approval of applications, budgets, adjustments, reports, reimbursement requests, and monitoring documented? What exactly is the process and what are the criteria? Should a second level of review and approval be introduced, particularly for reimbursement requests?
- c. *Compliance assurance.* How does ONSE ensure it complies with its own requirements?
- d. *Annual risk assessments.* How will ONSE conduct annual risk assessments of recipients, and what criteria will be used?

c. Subrecipient Monitoring

The District’s FY 2023 single audit, finding 2023-015, recommended that agencies, including ONSE, “maintain sufficient documentation to evidence its internal controls over the risk assessment and monitoring of subrecipients, and to adhere to instituted policies and procedures to ensure the accuracy of the SEFA.” In FY 2023, ONSE conducted on-site monitoring visits, followed by desk reviews in FY 2024. The process is outlined in the Manual. In late FY 24, ONSE began building capacity for its monitoring services via a compliance arm. This includes increased compliance staff, who have been undertaking vigorous quality assurance training.

VIII. Recommendations

a. Direct Voucher Authority

One of the reasons that many former ONSE employees provided for the Agency’s decision to switch from contracts to grants to obtain VI services was the flexibility of grants and the vendors’ inability to qualify or comply with the District’s procurement laws. Suitable community-based organizations that can perform quality VI-work often lack capital and operational infrastructure to adhere to OCP requirements for invoicing, payment or cost-reimbursement requirements.

As an alternative to contracts, ONSE’s may consider establishing a system of acquiring its VI services or goods through direct vouchers. For example, it may consider paying its violence interrupters, and many other engagement services, such as temporary housing, or purchase of personal hygiene goods through direct vouchers. According to ONSE’s establishment act, “[p]ayments made for services and supports under subsection (a)(4) and (5) of this section may be made by direct voucher.” Subsection (a)(4) and (5) provide as follows:

(4) Provide social, economic, educational, health, and other services and supports for the purposes of violence prevention, violence interruption, violence response, and victim services to individuals participating in or eligible to participate in a violence prevention, violence interruption, violence response, or victim services program. Services and supports provided pursuant to this paragraph may include:

- (A) Transportation, including transportation to government offices and non-governmental service providers and transportation of public-school students in safe passage areas;
- (B) Housing relocation costs, including moving costs and the costs of establishing a new household;
- (C) Tests and test preparation;
- (D) Post office boxes;
- (E) Secure document storage;
- (F) Cell phones and cell phone service; and
- (G) Driver education;

(5) Provide financial payments to individuals participating in or potentially eligible to participate in a violence prevention, violence interruption, or violence response program to incentive such individuals to apply for, participate in, or continue to participate in, such programs.⁵⁶

To implement payment for these services, ONSE should submit a request “to the Deputy Chief Financial Officer for the Office of Financial Operations and Systems (“OFOS”) for consideration and approval in accordance with the policies and procedures set forth for direct voucher payment review and consideration by OFOS.”⁵⁷ Use of direct vouchers would likely require greater ONSE staff involvement with violence interrupters. Also, direct voucher payments would necessarily be made on a much smaller scale, such as one VI service at a time, than grant or contract payments. A detailed plan is required—a plan that entails not only the specific authorized uses for direct vouchers, but also the personnel and activities required to facilitate the services and payments.

Another solution to the challenges posed by the shortcomings of the community-based organizations is building a grant program to establish new community-based organizations and support existing community-based organizations specifically dedicated to non-profit violence intervention. Such measures could assist in certifying more community-based organizations to meet the District’s procurement and contracting framework. Additionally, a District-wide Grants Office under the Office of the City Administrator could be developed to better manage grant programs.

⁵⁶ D.C. Code Sec. 7-2415

⁵⁷ DeWitt, Jeffrey S. OCFO Financial Management and Control Order No. 07-004A Rev. September 6, 2018 (2018) providing for expenditure types that are exempt from the District’s System of Accounting and Reporting (“SOAR”) or its successor.

b. Contracts

Based on its findings, the OCP team noted it could conduct a more thorough audit of the entire set of contracts awarded to Life Deeds, which could not be completed at this time for lack of a forensic auditing team and the significant time required to do so. A deeper review would help determine whether the contractor delivered all required services to the District, as stated in the contract, and whether the contractor complied with all the necessary reporting requirements. This would also allow the District to assess if the program effectively met the needs of its participants.

c. Grants

These preliminary recommendations focus on the steps the agency has recently taken to improve its grant management practices. A first step could be the development of a Grants Office under the Office of the City Administrator in order to assist in the overall support of ONSE and other agencies. Below are some recommendations for improvements to ONSE's grants management via its new Manual:

1. Alignment to 2 CFR 200 Uniform Administrative Requirements. ONSE staff confirmed it is staying up to date with changes to federal regulations and District requirements. However, the Manual would benefit from more consistent citations and references to these sources, particularly the most current versions of 2 CFR 200. ONSE could also consider adopting more federal pass-through entity requirements, such as information required in award letters (§200.332) and terminology updates (e.g., recipient/subrecipient instead of grantee/subgrantee).
2. The Manual should include more direction on subcontracting by grantees, especially pertaining to subrecipient eligibility requirements, the selection process, and monitoring protocols.
3. The Manual must integrate new FY25 DC statute on termination of grants. (D.C. Law 25-517/D.C. Official Code § 1-328.15a)
4. The Manual should include a federal reporting element. The Manual currently does not mention federal requirements for progress or financial reporting, including those mandated by the Federal Funding Accountability and Transparency Act (FFATA).
5. The Manual should more clearly specify distinctions between grants and contracts and the circumstances where the former does not apply and the latter must be used.
6. A section should be added specifying how often the Manual will be reviewed and include a log of revisions in future versions.
7. The Manual would benefit from including a section describing the distinctions between a grant and procurement and when one or the other is the appropriate vehicle to use.

IX. References

D.C. Code 7-2411 Office of Neighborhood Safety and Engagement

D.C. Code 1-328.11 *et seq.* Grant Administration

D.C. Code § 1-204.51 Charter requirement for Council approval of certain contracts

PPRA and Regulations regarding General Prohibition Against Advance Payments and Responsibility Determinations.

DeWitt, Jeffrey S. OCFO Financial Management and Control Order No. 07-004A Rev. September 6, 2018 (2018) providing for expenditure types that are exempt from the District's System of Accounting and Reporting ("SOAR") or its successor

District Citywide Grants Manual and Sourcebook

Neighborhood Engagement Achieves Results Amendment Act of 2016, June 30, 2016, D.C. Law 21-125 Sec 101, 63 DCR 4659

Office of the District of Columbia Auditor. [2022] *NEAR Act Violence Prevention and Interruption Efforts: Opportunities to Strengthen New Program Models*, page 4.

APPENDIX ONE – SUMMARY OF ONSSE CONTRACTS⁵⁸

At its inception, ONSSE awarded three firm fixed-price letter contracts for violence intervention services through solicitation to three community-based organizations:

1. Collaborative Solutions for Communities (hereinafter “CSC”), under contract no. CW 61570 to serve Wards 1-5;
2. The Far Southeast Family Strengthening Collaborative (hereinafter “Far Southeast”), under contract no. CW61568 to serve Ward 8; and
3. Training Grounds, Inc. under contract no. CW 61401 to serve Wards 6 and 7.

The contracts require these vendors “to hire and supervise [violence interrupters] and other program staff, and to develop and implement neighborhood plans that are tailored to the strengths and needs of each community.”⁵⁹ Although the ONSSE opened its doors on October 25, 2017, the solicitations for its VI contracts did not close until March 31, 2018, and contracts were not awarded until a few months from the end of the fiscal year. ONSSE issued three VI letter contracts on May 30-31, 2018. The contracts were definitized on October 15, 2018. The base year for each contract provides for one contract line item number (CLIN) for Violence Intervention services at a unit price of \$41,695.00 per month for approximately four months. It also provided for undefined “flex funds” not-to-exceed (NTE) \$14,000.00 and operational supplies, resources, and overtime, NTE \$69,460.00, with a total NTE \$250,000 for the base year.

The three contracts require each contractor to maintain nine (9) essential staff to establish a substantial presence in all priority communities identified and approved by ONSSE. Contractors were to establish and maintain a minimum of 10 partnerships within each priority community, successfully facilitate ceasefires, mediations, and one retreat. The contractors are required to service all families and individuals referred to it by ONSSE and help enroll them in services and support. Contractors are to respond to critical incidents and facilitate triage meetings, and hospitals and home visits within 24 hours of a critical incident. Each of the three contracts require the vendor to attend weekly meetings coordinated by ONSSE and to submit monthly and annual reports to ONSSE.⁶⁰

In November 2018, for each of the three contracts, ONSSE exercises Option Year One extensions, while contemporaneously executing with the contractors a modification, M001, increasing the total estimated price for Option Year One from \$264,000 to \$600,000 for the period of October 1, 2018, to September 30, 2019. In February 2019, the parties to each of the three contracts sign a second bilateral modification, M002, incorporating a revised price schedule,

⁵⁸ This review captures most of the VI contracts issued by ONSSE.

⁵⁹ Office of the District of Columbia Auditor. [2022] *NEAR Act Violence Prevention and Interruption Efforts: Opportunities to Strengthen New Program Models*. Page 23.

⁶⁰ The contracts require its contractors to work with families, which suggests that contractors may have to work with children or youth. As such, under D.C. Code Sec. 1-620.36, the contract should either have included a requirement for the contractor to obtain criminal background and traffic record checks.

specifications/work statement, deliverables and contract administration. This modification also adds a CLIN for Advanced Funds NTE \$75,000 for all option years.⁶¹ The bilateral modifications permits the contractors to receive an advance of \$25,000 every quarter with each option year to assist with expenses related to community engagement, relationship building, ceasefires, mediations, and program salaries.

These bilateral modifications purporting to permit advance payments may have been made in response to complaints from the contractors. According to the CO who awarded the initial contracts, after the contracts were awarded, the contractors asked the CO to provide payment well before the work began. The CO recalled in his interview with ORM having to explain to each contractor that work had to be performed and invoiced to the government for the contractors to be paid. Thereafter, the contractors set out to perform the work. However, according to other ONSE staff, after work began, the contractors began complaining about lacking the capital to pay their staff.

In June 2019, ONSE increased funding to CSC by \$340,000 for additional services for a specific community in Ward 4. This brought the total value of CSC's contract for Option Year One to \$940,000. On September 16, 2019, ONSE issued a contract to CSC in the amount of \$65,874.26 to hire seasonal VI workers. While this may have caused the overall contracting dollars to exceed \$1 million to one vendor, because the services were categorized differently, the awards were likely permissible under OCP rules. As for its other two contractors – Training Grounds and Far Southeast – ONSE enhanced their contracts for seasonal VI work in the amounts of \$54,884.32 and \$63,320, respectively.

On September 26, 2020, the parties signed a fifth modification, M005⁶², when ONSE exercised Option Year 2 of the contracts for an amount NTE \$600,000 for the period of October 1, 2019 – September 30, 2020. On February 28, 2020, the ONSE VI Program Analyst issued a memo to ONSE's Administrative Officer, recommending the increase of the advanced funds for each of the vendors to \$399,000 and adding this sum to the overall contract to “assist with covering the salaries and fringe benefits of Violence Intervention Specialists and Case Managers, stipends for Community Navigators, community engagement events and activities, placed based services, and meeting/retreat expenses related to ceasefires and mediations.”⁶³ The memo is followed by a sixth contract bilateral modification, M006, signed on March 10, 2020, increasing the contract price by \$399,000 and modifying the CLIN for Advanced Funds to reflect this increase. According to these modifications, the funds are meant to assist with covering all programmatic and operation expenses, including, but not limited to, salaries and fringe benefits of VI

⁶¹ 27 DCMR §3205 provides seven criteria that must be met before a CO can authorize the use of advance payments. No documents have been produced to explain how the CO determined the contractors met the stringent requirements for receiving advance payments on these contracts.

⁶² ORM never received the third and fourth modifications to the contract, assuming that such modifications occurred.

⁶³ February 28, 2020, Memos from Nkenge Garrett to Michelle Dunn RE: Advance Fund Increase.

specialists, case managers, stipends, community engagements, retreats, etc. The total price for Option Year Two is increased to an amount not to exceed \$999,999.

On April 23, 2020, ONSE awarded CSC another contract, CW 83186, for five months of COVID VI services in Wards 1-5 in the amount of \$450,000.00. As part of the award, the CO issued a Determinations and Findings (D&F) for Price Reasonableness and a D&F for Contractor Responsibility, finding the pricing to be reasonable and CSC to be responsible. However, it is unclear whether the CO issued any solicitation prior to awarding this contract. It is also unclear whether any market research was performed to substantiate the findings in the D&Fs.

On September 28, 2020, ONSE exercised Option Year Three at a price NTE \$999,999 on each of the initial contracts for the period of October 1, 2020, through September 30, 2021.⁶⁴ Contemporaneous with the extension, the parties exercise a bilateral modification, M008,⁶⁵ to remove Ward 5 from CSC's service area.

On December 9, 2020, ONSE issues a Purchase Order (PO)⁶⁶ to Far Southeast to "continue" violence intervention work in Ward 5 for three months based on an undated and unsigned document titled Scope of Work setting forth two CLINS – one CLIN for VI services in Ward 5 at an estimated price of \$49,416 per month for 3 months and another CLIN for Flex Funds in an amount NTE \$1,750, for a total amount NTE \$150,000.

On April 15, 2021, ONSE issued two letter contracts for VI services in an amount NTE \$500,000 to Far Southeast (CW 91029) and Training Grounds (CW91027). Both contracts are for an amount NTE \$1,000,000.00 for the period of April 15, 2021, through September 30, 2021. The letter contract allows for advanced funds NTE \$350,000, to be distributed in two installments of \$175,000. It is unclear whether the CO procured these contracts through solicitation or sole source. The letter contracts also do not appear to have been definitized or submitted to Council for review in apparent violation of law. Notably, these contracts were issued through a CO described as having very little District government contracting experience. According to the undated and unsigned Scopes of Work that was uploaded into the Procurement Automated Support System (PASS),⁶⁷ both contracts appear to overlap in scope and performance period

⁶⁴ D.C. Code Sec. § 2–352.02. “(a)(1) Pursuant to § 1-204.51, before the award of a multiyear contract or a contract in excess of \$1 million during a 12-month period, the Mayor or executive independent agency or instrumentality shall submit the proposed contract to the Council for review and approval in accordance with the criteria established in this section.”

⁶⁵ To the extent the parties executed a seventh modification, it was never provided to ORM for review.

⁶⁶ Issued under requisition number, RK166242-V3.

⁶⁷ See Schutter, George A. (2022) *Responses to Fiscal Year 2022 Performance Oversight Questions*. District of Columbia Office of Contracting and Procurement. <https://dccouncil.gov/wp-content/uploads/2023/02/Office-of-Contracting-and-Procurement-CY2023-Performance-Oversight-Pre-Hearing-Responses.pdf#:~:text=The%20division%20is%20responsible%20for%20managing.%20OCP's,Office%20of%20the%20General%20Counsel%20provides%20legal>. Page 21. (“Procurement Automated Support System (PASS) - PASS is OCP's primary system of record for the District's procurements. The system stores information including,

with ONSE's Option Year 3 contract with Far Southeast for VI services in Ward 8 and Training Grounds for Wards 6 and 7.

In July 2021, ONSE issues small purchase POs to its existing vendors for summer enhancement VI services. ONSE awards CSC, Training Grounds and Far Southeast contracts in the amount of \$60,000 each to provide Summer Enhancement VI services in specific communities within the wards they serve. The undated and unsigned Scope of Work attached to the POs provides that the "Award, if made, will be to a single bidder...." However, it is unclear whether any bids were solicited or offered.

Thereafter, ONSE made several small purchases and issues Notices to Proceed (NOPs) to continue "collective mediation strategies for the existing Contractor in the Stoddert Terrace and Benning Terrace communities to address the ongoing conflict and instances of violence occurring between both communities." The scope of work for these contracts reads very similar to ONSE's other VI contracts, save that they are specific to a community rather than a ward or wards. On July 26, 2021, NOPs issue to:

1. J & J Monitoring Solutions, LLC, for \$40,000, providing for \$10,000 in advanced funds;
2. Life Deeds for \$70,000 to instruct a course in the entrepreneurship process for at-risk individuals receiving stipends, providing for \$10,000.00 in advanced funds;
3. Training Grounds, for \$10,000 to plan retreats for the Stoddert and Benning communities, providing for \$5,000 in advanced funds; and
4. Father Factor, Inc., for \$30,000 to provide quality programming for at-risk individuals at Benning Terrace, providing \$10,000 in advanced funds.

In August 2021, ONSE issues a small purchase PO in the amount of \$10,000 on what appears to be a contract with the Alliance of Concerned Men for a retreat for at-risk young people ages 18-26 from the Saratoga Community. In November 2021, ONSE issues a small purchase PO in the amount of \$9,500 to Dramatic Solutions (DSI) for healing retreats.

On April 5, 2022, ONSE issues a sole source procurement, CW99021, to Life Deeds in the amount of \$300,000 for Mediation and Case Management Services. Attached to the requisition is a D&F for a Sole Source Procurement, dated April 1, 2022, citing to Life Deeds's success at implementing ongoing mediation strategies in the Benning/Stoddard communities and maintenance of peace agreements that lasted over 8 months.

In June 2022, ONSE submits a requisition, RK203172-V2, on a small purchase for \$34,425 for J & J Monitoring Solutions to implement collective mediation strategies on a VI contract with an

but not limited to: vendor registration and supporting information, invoices, receiving information, requestors, approvers, and approval workflows. Contracts, including amendments and exercise of options, are filed with supported documents in a contract workspace. The sourcing module in PASS stores statements of works, responses to Request for Proposals (RFPs), Request for Quotes (RFQs), Requests for Information (RFIs), determination and findings, awards, market research, and bid evaluations.")

amount NTE \$100,000. The remaining balance is submitted via a separate requisition, RK 214548, in the same month.

On September 12, 2022, ONSE submits a requisition, RK 199445-V2, for \$98,821.58 on a contract with Life Deeds for mediation and case management to the Benning/Stoddard community. Attached to this requisition is a scope of work to a contract with Life Deeds for \$100,000.

On September 28, 2022, ONSE exercises Option Year One with Life Deeds, CW99021, in the amount of \$312,000 for the period of October 1, 2022, through September 30, 2023. Attached to RK227202 for this contract is a D&F for Contractor Responsibility finding Life Deeds to be responsible. During this period, ONSE has a “Floating Team” grant with Life Deeds to perform VI services throughout the District worth \$1,178,960.00.

At present, ONSE has Blanket Purchase Agreements for goods and services with twelve vendors for supplies and services, ranging from office supplies to catering services and funeral flowers. It also has contracts with 13 vendors for goods and services, including copier services, event planning, job readiness training and vocational training. At this time, it has no contracts for VI services.

APPENDIX TWO – SUMMARY OF ONSE GRANTS

1. *Existing Violence Intervention Grants*⁶⁸

i) FY 2020

According to its requisition history in PASS, ONSE begins issuing its grants through OVSJG around November 26, 2019, when it awards Far Southeast the Byrne Community-based Crime Reduction Grant for the period of October 1, 2019 – November 30, 2020, in the amount of \$471,083. The grant is for crime reduction work specific to Buena Vista Terrace and Woodland Terrace Cluster.

On November 27, 2019, ONSE also awards, through OVSJG, a separate Byrne Community-based Crime Reduction Grant for the period of October 1, 2019 – September 30, 2020, to the Exodos Center for Prevention, Conflict Resolution and Empowerment in the amount of \$166,491, as well as for crime reduction work in the Woodland Terrace Cluster. On April 28, 2020, this grant is increased to \$214,678 for additional clinical and project support. On August 26, 2020, this amount is then reduced to \$202,210.05. The unspent balance was de-obligated because the grantee did not adequately spend down the budget. On September 25, 2020, this grant is extended for another fiscal year, from October 1, 2020, to September 30, 2021, for \$23,649.29.

ii) FY 2021

On April 21, 2021, ONSE awards Saving Our Next Generation a grant, ONSE-GEER-2021-02A, in the amount of \$276,374.67, from the ONSE Governor’s Emergency Education Relief (GEER) fund. For the grant period of October 1, 2020, to September 30, 2021, the grantee is responsible for implementing programs to improve prosocial behaviors, reduce crimes and recidivism at target schools and communities under project title, SONG Community Canvas Initiative. On the same day, another grant under the same grant number, ONSE-GEER-2021-02A, is issued to CSC in the amount of \$138,187.33 to engage in similar work at Paul Public Charter School.

On June 11, 2021, ONSE issues two grants for the period of May 1, 2021, to September 30, 2021. It awards Manpower DC a grant in the amount of \$65,000 for a project entitled Manpower Gun Violence Prevention to identify and fund projects aimed at reducing violent crime in the Woodland Terrace Cluster and Buena Vista Terrace Community. ONSE additionally awards a grant to SMART from the Start in the amount of \$15,210.00 for similar work focused on the Woodland Terrace Cluster.

⁶⁸ The following is a chronological history of key grants issued by ONSE and may not be an exhaustive list of all ONSE grants and subgrants.

iii) FY 2022

On October 1, 2021, ONSE awards CSC a second GEER grant for “Safe Passage Paul Public Charter School” in the amount of \$138,187.33. This grant is for the same work as the previous grant, but for fiscal year 2022. This grant contains special conditions that the grantee had to comply with, including taking attendance, submitting monthly reports, and developing a data metric system to demonstrate measurable goals.

On October 18, 2021, ONSE (through OVSJG)⁶⁹ awarded Training Grounds a grant for violence intervention work through OVSJG (OVSJG Grant Number 2022-TGI-02) for the grant period of October 1, 2021, to December 31, 2021, in the amount of \$448,782.54. The Grant Award included an Approved Budget as Attachment 1, which outlined the budget for expenditures related to the grant for the award period, outlining costs for items such as personnel, fringe benefits, travel and training, supplies, equipment, contracts, flex funds, operating costs, etc.

On November 16, 2021, and December 8, 2021, ONSE awards similar grants for the identical grant period to CSC (OVSJG Grant Number 2022-CSC-02) and Far Southeast (OVSJG Grant Number 2022-FSFSC-02), respectively. CSC and Far Southeast receive \$518,830.70 and \$445,442.72 respectively. Like the grant issued to Training Grounds, both grants include approved budgets outlining costs for similar expenditures with a brief explanation of the budgeted items.

On December 28, 2021, ONSE (through OVSJG) issues a Grants Adjustment Notice to Training Grounds to extend the grant for another quarter for \$481,892.23. The Grant Adjustment Notice also includes a section for an “Approved Budget” for expenditures for the same line items from the original grant. On January 6, 2022, ONSE (through OVSJG) similarly issues a Grants Adjustment Notice to CSC to adjust the budget from \$518,804.00 to \$1,046,538.00 and extend the project dates to cover January 1, 2022, to March 31, 2022. The Grant Adjustment Notice included an Approved Budget for expenditures for the same line items from the original grant. An extension appears to have been issued to Far Southeast as well, but the electronic copy of the document appears to have been corrupted and could not be opened for review.

On March 10, 2022, ONSE issues a sole source grant (ONSE Grant Number 2022-PLC-01) to Progressive Life Centers (PLC) in the amount of \$5,090.867.00 “to provide Quality Assurance (QA) services and supports for all grants under the ONSE Violence Intervention (VI) Initiative.” The grant provides for one advancement in the amount of \$2,545,433.50 to initiate services. Unlike the grants issued by OVSJG, the PLC grant incorporates a “ONSE Grant Terms and Special Conditions” that delineated the requirements of the grants. Under the “ONSE Grant Terms and Special Conditions,” PLC is to provide quality assurance (QA) services “which include performance monitoring, training/team building, events/activities planning, and provisions for emergency needs.” PLC was required to “provide services to persons residing in

⁶⁹ At the time that ONSE transitioned from contracts to grants OVSJG put together the grants and awarded the grants on ONSE’s behalf.



the 24 ONSE priority communities located in Wards 1,4,5,6,7 and 8 that are most at-risk of being perpetrators or victims of violence, individuals who are connected to activities or individuals in the community that cause a disruption of peace and safety and individuals who have relationships and influence over the activities and individuals impacted by violence.” PLC was also required to “provide fiscal management and oversight of awarded funding for programming,” which included overseeing “all fiscal and financial processes related to payment of funds to ONSE Violence Intervention provider, ONSE Case Management provider, and ONSE Pathways Transformative Mentoring provider.”

On March 11, 2022, ONSE issues a sole source grant with ARPA funds to Life Deeds, Inc., in the amount of \$1,178,960.00, to serve as a District-wide floating VI partner.⁷⁰ According to the Grant Award, the grant's goal is “to provide community engagement, high-risk individual engagement, individual enrollment in supports and services, violence prevention, violence intervention, critical incident response, prevention, and intervention planning while reporting to ONSE for all supervision needs within the District of Columbia, targeting at-risk individuals who are intensely involved in community conflicts.”⁷¹ The grant period begins on March 1, 2022, and continues through September 30, 2022. The grant incorporates a 34-page “ONSE Grant Terms and Special Conditions” that reads like a scope of work in a procurement contract. The provisions are highly descriptive, mandatory, and contain specific minimum requirements for its grantee. For example, the grant requires Life Deeds to provide services to 24 ONSE priority communities, with a minimum of 40 hours per week for each community. The services Life Deeds has to provide include “Community Service & Resource Connection, Community Partnerships, Neighborhood Planning, Community Events, and Community Activities.”⁷² Life Deeds is also required to identify “high risk” individuals in each community. The grant requires Life Deeds to have at least four (4), but no more than 10 high risk individuals, in its case load and to spend at least 10 hours per month working with those individuals.

On July 29, 2022, ONSE issues an addendum grant (2022-PLC-01B) with ARPA funds to increase its original grant to PLC by \$2.35 million dollars. Consistent with the original grant, PLC is required to provide “oversight of performance and spending to assure quality services for customers,” ensure “services, events, and activities provided by Grantee meet ONSE requirements and benefit the intended community,” and “provide crisis support to families and individuals experiencing trauma, housing emergencies, safety needs, nutritional needs, clothing & hygiene needs, and other self-care needs.” Like the OVSJG grants, this grant contains an approved itemized budget. This addendum grant also resembles the original PLC grant, because it also incorporates requirements that read similarly to provisions normally found in procurement contracts. For example, the addendum provides that “PLC shall oversee contractor compliance with ONSE's scope of work, “PLC shall review the budget and spend plans for events & activities for ONSE contractors provided by ONSE,” “PLC shall support individual or family

⁷⁰ The “floating VI team” provides VI services through the District without Ward restrictions. They report where they are needed.

⁷¹ ONSE Grant No. 2022-PLC-01

⁷² *Id.*

crisis needs as they arise (i.e., housing, employment, hygiene, health, personal items, recreational items, etc.),” “PLC shall provide technical assistance with budgeting and spend down plans,” etc. On August 18, 2022, ONSE authorizes the issuance of advanced funds in the amount of \$2,545,433.50 to PLC under the grant.

While not clearly stated in PLC’s original grant or in the addendum, based on interviews with ONSE staff, PLC was required to issue solicitations for Violence Intervention Work and award subgrants to community-based organizations to perform violence intervention work. These subgrantees needed PLC to serve as a payment agent because they often lacked the financial infrastructure to receive direct grants from ONSE. PLC has traditionally served a payment agent for the District in a similar capacity for other District agencies in the past. However, unlike PLC’s work with other District agencies, under this grant, PLC is also required to monitor the subgrantees and review and reconcile invoices submitted by the subgrantees for quality assurance before submission to ONSE for approval. PLC is also required to perform site visits as part of its QA responsibilities. According to ONSE staff, PLC did not properly perform this latter function. PLC’s failures necessitated an audit of expenditures by ONSE program staff and disallowance of many expenditures that were erroneously approved by PLC. PLC was later required to reimburse the District for some of the disallowed expenditure at the end of the audit.

Consistent with the accounts of ONSE staff, PLC issued three subgrants on behalf of ONSE as follows:

1. On June 25, 2022, PLC issues a subgrant (1CM-PLC/ICCDC-22) to InnerCity Collaborative Community Development Corporation in the amount of \$304,648.30 for District-wide case management services for “high risk” individuals from June 1, 2022, to September 30, 2022.
2. On June 28, 2022, PLC issues a subgrant (4VI-PLC/DSM-22) to District Services Management in the amount of \$1,003,242.00 for violence intervention services for Ward 5 from June 1, 2022 – September 30, 2022.
3. On July 28, 2022, PLC issues a subgrant (5VI-PLC/JJMS-22) to J & J Monitoring Solutions for up to \$268,000 for violence intervention services for Ward 8 from June 1, 2022 – September 30, 2022,

On April 11, 2022, ONSE issues a sole source grant (2022-PLC-01) with ARPA funds in the amount of \$800,000 to Dramatic Solutions, Inc. (DSI) for “Quality Assurance” services for the period of March 1, 2022, to September 30, 2022. The grant requires DSI to perform monitoring, training, team building, events and activities planning, and provide emergency services to Congress Park residents and workers. Similar to the Life Deeds grant, this grant also incorporates a highly detailed “ONSE Grant Terms and Special Conditions,” which contains provisions that read like a scope of work in a contract. The Terms and Special Conditions include requirements that read “DSI shall provide services to persons residing or working in Congress Park in Ward 8, Southeast, Washington, DC,” “DSI shall implement performance monitoring tools monthly and report to the ONSE Program Analyst by the specified date outlined in the Grant Award,” “DSI

shall have the capacity to collect demographic data and outcomes of events and activities monthly,” “DSI shall work directly with ONSE to identify plans and strategies to resolve the crisis needs of ONSE priority communities or individuals. Crisis needs include emergencies related to housing, vital records, education, employment, self-care, community conflict, medical, or after-life needs,” etc.

iv) FY 2023

On October 18, 2022, ONSE issues a second sole source grant (2023-PLC-01B) to PLC in the amount of \$9,945,569.03 with ARPA funding to serve as a Quality Assurance Partner for the period of October 17, 2022, to September 30, 2023. The grant authorizes two advances in the total amount of \$9,945,569.03. Under this grant, PLC issues additional subgrants, as follows:

1. On October 5, 2022, PLC extends its subgrant (4VI-PLC/DSM-22) for the same services with District Management Services for \$1.7 million for the period of October 1, 2022 to September 30, 2023.
2. On October 25, 2022, PLC issues a subgrant (4VI-PLC/DSM-23) to District Management Services for violence intervention services in Ward 5 for \$1.7 million for the period of October 1, 2022, to September 30, 2023.
3. On October 25, 2022, PLC issues a subgrant (4VI-PLC/LD2-23) to Life Deeds for an amount up to \$1.7 million to provide District-wide VI services for the period of October 1, 2022, to September 30, 2023.
4. On October 26, 2022, PLC issues a subgrant (4VI-PLC/TWAR-23) to Together We All Rise in an amount up to \$850,000 for Violence Intervention services for Wards 6 and 7 for the period of October 1, 2022, to March 31, 2023.
5. On October 28, 2022, PLC issues a subgrant (4VI-PLC/ICCCDC-23) to Inner City Collaborative Community Development Corporation (ICCCDC) in an amount up to \$900,000.00 to provide District-wide case management services for the period of October 1, 2022, to September 30, 2023. According to the attached Standard Operating Procedure to the subgrant, “the goal of ONSE Case Management Services is to increase the attachment of high-risk individuals to services, resources and supports as well as identify individual needs and develop plans to meet individual needs.”
6. On November 1, 2022, PLC issues a subgrant (4VI-PLC/JJMS-23) to J & J Monitoring Solutions in an amount up to \$1.7 million for violence intervention services for Ward 8 for the period of October 1, 2022, to September 30, 2023.
7. On April 16, 2023, PLC issues a subgrant (4VI-PLC/LD3-23) to Life Deeds in the amount of \$650,000 for violence intervention services for Wards 1 and 4 for the period of April 1, 2023, to September 30, 2023.

Many of the subgrants issued by PLC contain provisions that read like previous ONSE VI contracts. For example, the subgrants require the subgrantees to always maintain “two (2) solely dedicated Violence Intervention Specialists per Community,” and “At least one (1) Violence Intervention Specialists must be full-time [and] Maintain at least two lead Floaters (2) per

provider.” The subgrants also include a “Deliverables” section containing CLINs. Akin to a contract, the Deliverables section further provides, “The Contractor shall perform the activities required to successfully complete the District’s requirements and submit each deliverable to the Contract Administrator (CA) identified in section G.9....” The terms of these subgrants were consistent with what ONSE’s former Deputy Director shared in her interview with ORM – that the agency took language from its existing violence interruption contracts and inserted it into its grants.

On October 27, 2022, ONSE issues a second sole source grant (2023-DSI-01) with ARPA funding to DSI in the amount of \$800,000 for Quality Assurance work in the Congress Park community for the period of October 26, 2022, to September 30, 2023. The grant award allows for an advance payment of \$400,000. Under this grant, DSI executes “MOUs” with different organizations to service the Congress Park community, as follows:

1. On November 30, 2022, DSI enters into an MOU with D.I.V.A.S. In Sistahood for the amount of \$35,000 to deliver weekly workshops to community youths for the period of November 21, 2022 – September 30, 2023.
2. On December 1, 2022, DSI enters into an MOU with Barbering at Tonsorial Tech, LLC for the amount of \$35,000 to deliver weekly workshops to community youths for the period of November 21, 2022 – September 30, 2023.
3. On December 1, 2022, DSI enters into an MOU with Wilson’s Moving Hauling and Demolition for the amount of \$100,000 to deliver mentoring to community youths for the period of November 21, 2022 – September 30, 2023.
4. On December 1, 2022, DSI enters into an MOU with Girls First Youth Mentoring Organization for the amount of \$100,000 to deliver weekly workshops to community residents for the period of November 21, 2022 – September 30, 2023.
5. On December 5, 2022, DSI enters into an MOU with King Dude The Artist, LLC, for the amount of \$60,000 to deliver weekly workshops to community youths for the period of November 21, 2022 – September 30, 2023.
6. On March 1, 2023, DSI enters into an MOU with Badazz Clothing Co. for the amount of \$35,000 to deliver weekly T-shirt design workshops to community youths for the period of November 21, 2022 – September 30, 2023.

Under these MOUs, DSI, like PLC, acts as a payment agent and QA partner for the organizations.

On January 20, 2023, ONSE issues a sole source grant (2023-LDI-01B) to Life Deeds, Inc. (LDI), in the amount of \$500,000 “to provide quality assurance, compliance, and fiscal management for ONSE Violence Intervention Floating Team under the ONSE Violence Intervention Program.” Under this grant, Life Deeds is responsible for:

1. Providing oversight of performance and spending to assure quality services for customers;

2. Ensuring services, events and activities provided by Contractor meet ONSE requirements and benefit the intended community;
3. Providing crisis support to families and individuals experiencing trauma, housing; and
4. Providing for emergencies, safety needs, nutritional needs, clothing & hygiene needs, and other self-care needs.

This grant, like the subgrants issued by PLC, contains terms that resemble those found in contracts, including CLINs listed in the “Deliverables” section. While the grant contains a list of approved items for the budget, it does not include a description or explanation of what the budget line items entail. The grant references an attachment titled “FY 23 ONSE GRANT TERMS & SPECIAL CONDITIONS.” But this attachment was not provided to ORM for review.

v) **FY 2024**

On November 20, 2023, ONSE issues a sole source grant to Life Deeds in the amount of \$250,000 “to provide quality assurance, compliance, and fiscal management for ONSE Violence Intervention Floating Team” for the period of October 1, 2023, to September 30, 2024. This grant largely tracks the prior grant issued to Life Deeds in FY 2023, excepting any approved budget. Under this grant, ONSE does not approve any expenditures in the category of Travel/Training and Contracts/Consultants. The budget is restricted to activities/client funds and indirect costs. This grant also references an attachment titled “FY 24 ONSE GRANT TERMS & SPECIAL CONDITIONS.” However, this attachment was not provided to ORM for review.

During FY 2024, ONSE issued 2 quarterly and 1 bi-annual sole source grants to DSI for “the provision of Violence Intervention (VI) Quality Assurance (QA) Partner services for the Congress Park Community by providing Quality Assurance services, including performance monitoring, training, team building, events and activities planning, and emergency provisions needed through a partnership with DSI.” The grants issued to DSI are as follows:

1. On November 3, 2023, ONSE issues DSI a sole source grant (2024-01) for the foregoing terms in the amount of \$200,000 for the period of October 1, 2023, to December 31, 2023.
2. On January 4, 2024, ONSE issues DSI a sole source grant (2024-01) for the foregoing terms in the amount of \$200,000 for the period of January 1, 2024, to March 31, 2024.
3. On March 13, 2024, ONSE issues DSI a sole source grant (2024-01) for the foregoing terms in the amount of \$400,000 for the period of April 1, 2024, to September 30, 2024.

Like FY 2023, DSI signed MOUs with twelve organizations to provide services to the Congress Park community and youth population under similar processes and terms.

ONSE similarly issued 2 quarterly followed by 1 bi-annual sole source grants (2024-PLC-01) to PLC for FY 2024 to “provide quality assurance, compliance, and fiscal management for all

subgrants under the ONSE Violence Intervention Program in addition to the Quality Assurance (QA) services and supports for all grants under the ONSE Violence Intervention (VI) Initiative.” The grants were issued as follows:

1. On November 2, 2023, ONSE issues PLC a sole source grant in the amount of \$2.2 million for the period of October 1, 2023, to December 31, 2023.
2. On January 25, 2024, ONSE issues PLC a sole source grant in the amount of \$3,377,768.60 for the period of January 1, 2024, to March 31, 2024.
3. On March 6, 2024, ONSE issues PLC a sole source grant in the amount of \$5,125,177 for the period of April 1, 2024, to September 30, 2024.

As in FY 2023, PLC issues subgrants to 6 organizations for all four quarters to provide violence intervention services. The subgrantees include ICCCDC, DSM, J & J Monitoring Services, Life Deeds, and Together We All Rise. Life Deeds was issued two subgrants – one for a Floating team and another for violence intervention work in Wards 1 and 4.

2. Prospective VI Grants

The agency’s current plan was to extend the Quality Assurance Grant to PLC for an additional 90 days from the start of FY25 under the existing model while preparing a new request for applications (RFA) under a different model for direct awards to service providers, and possibly a payment agent. The anticipated RFA will transition VI grants from a community-based model to a ward-based model. The agency’s current administrative partner grant to Life Deeds may be extended to 30 days. The future of the grant with Life Deeds is under review.