

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



**Executive Summary Concerning the Results
of an Office of the Inspector General Investigation
Into Standards of Conduct Violations by Employees of the
District of Columbia Child and Family Services Agency**

Investigation 2008-0482 (S)

INVESTIGATIVE SYNOPSIS

The District of Columbia Office of the Inspector General (OIG) initiated an investigation in July 2008 into allegations that a former Acting Program Manager,¹ Contracts and Procurement Administration, Child and Family Services Agency (CFSA), had forged the signature of the former CFSA Agency Chief Contracting Officer (ACCO) on fiscal year 2006 funding documents, which were submitted to the CFSA Deputy Director for Program Operations and the CFSA Agency Fiscal Officer to authorize vendor payments for services provided pursuant to a District contract.

The OIG investigation revealed that the former Acting Program Manager forged the signature of the former ACCO on eight funding documents in pencil and photocopied them so they would appear to have been signed in ink. Two other CFSA employees, a Quality Assurance Specialist and a Contract Specialist, observed the former Acting Program Manager practicing the former ACCO's signature and then observed her forge his signature on the funding documents. The former Acting Program manager then instructed the Quality Assurance Specialist to shred the documents that had been signed in pencil. The former Acting Program Manager's conduct violated three sections of the DPM.² By failing to report the former Acting Program Manager's conduct, the Quality Assurance Specialist and the Contract Specialist each violated one section of the DPM.³

When interviewed by OIG investigators, the former Acting Program Manager explained that in February 2008 she was elevated to the position of Acting Program Manager in the

¹ The former Acting Program Manager is still employed with CFSA. Her current title is Supervisory Management Services Liaison.

² DPM § 1803 (Responsibilities of Employees) provides, in pertinent part, that District government employees shall avoid conduct which might result in or create the appearance of: (a)(3) Impeding government efficiency or economy; (a)(5) Making a government decision outside official channels; or (a)(6) Affecting adversely the confidence of the public in the integrity of government.

³ DPM § 1803.8 requires employees to report directly and without undue delay to his or her agency head and to the OIG any information concerning conduct which he or she knows, or should reasonably know, involves corrupt or other criminal activity, or conflict of interest on the part of another District employee, which concerns that person's employment or office.

CFSA Contracts and Procurement Administration to prepare for an upcoming audit.⁴ At that time, she noticed that CFSA's contract files were incomplete in that they were missing required documents and contained unsigned agency funding documents that the former ACCO should have signed before he left CFSA in December 2007. A CFSA Contracts Compliance Officer also told OIG investigators that CFSA's contract files were incomplete. The former Acting Program Manager was supposed to correct these deficiencies in the contract files before the upcoming audit.

The former Acting Program Manager admitted to OIG investigators that she was unable to locate eight funding documents in CFSA's files so she re-created them and signed the former ACCO's name on them in pencil. The former Acting Program Manager also told OIG investigators that she forged the former ACCO's signature because it was late in the evening and the audit was scheduled to begin the following morning. She told OIG investigators that she had placed a slash symbol after the former ACCO's name and added either her initials or her own first initial and last name. When the former Acting Program Manager was shown the original documents during her OIG interview, she acknowledged that they do not reflect her initials/name and stated that her initials/name must have been erased. An examination of the original documents by OIG investigators reveals no indication that something had been written in next to or after the former ACCO's name and erased.

The Quality Assurance Specialist and the Contract Specialist both told OIG investigators that, on June 5, 2008, they had observed the former Acting Program Manager practice signing the former ACCO's name on pieces of paper and then forge the former ACCO's signature, in pencil, on funding documents. The Quality Assurance Specialist said that the documents were then photocopied so the pencil signature would appear to have been signed in ink. The former Acting Program Manager then instructed the Quality Assurance Specialist to shred the documents she had signed in pencil. Instead, the Quality Assurance Specialist kept the documents until approximately 1 to 2 weeks later, when she gave them to the Contracts Compliance Officer for safekeeping because he had a private office.⁵ The Quality Assurance Specialist subsequently informed the Contract Specialist that she gave the documents to the Contracts Compliance Officer for safekeeping. Ultimately, those documents were turned over to OIG investigators.

OIG investigators verified with the CFSA Agency Fiscal Officer that payments to the vendor were made based on the eight forged funding documents. The former CFSA Deputy Director for Program Operations confirmed to OIG investigators that the vendors listed on the eight forged funding documents were valid CFSA vendors entitled to the payments they received.

This matter was referred to the United States Attorney's Office, which declined prosecution.

⁴ The Notification of Personnel Action (Standard Form 50) shows that her title was changed to Contract Manager and the promotion was effective April 13, 2008.

⁵ The Quality Assurance Specialist did not give the documents to the Contracts Compliance Officer for 1 to 2 weeks because he was on annual leave during that time.

ANALYSIS AND CONCLUSIONS

The former Acting Program Manager violated District standards of conduct by forging the former ACCO's signature on official government documents. Both the Quality Assurance Specialist and the Contract Specialist violated District standards of conduct by failing to report the former Acting Program Manager's conduct to the Office of the Inspector General.

Therefore, the issue of whether the former Acting Program Manager violated DPM §§ 1803.1 (a)(3) (Impeding government efficiency or economy); 1803.1 (a)(5) (Making a government decision outside official channels); and 1803.1 (a)(6) (Affecting adversely the confidence of the public in the integrity of government) is **SUBSTANTIATED**.

In addition, the issue of whether the Quality Assurance Specialist violated DPM § 1803.8 (Responsibilities of Employees) is **SUBSTANTIATED**.

Finally, the issue of whether the Contract Specialist violated DPM § 1803.8 (Responsibilities of Employees) is **SUBSTANTIATED**.

RECOMMENDATIONS

Based on the results of this investigation, the OIG recommends that CFSA address:

- the conduct of the former Acting Program Manager with appropriate administrative action;
- the conduct of the Quality Assurance Specialist with appropriate administrative action;
- the conduct of the Contract Specialist with appropriate administrative action; and
- the issues raised in this Report of Investigation by reminding all CFSA employees of their responsibilities to report all information regarding waste, fraud, and abuse to the OIG.

February 17, 2010