

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL**

**ALCOHOLIC BEVERAGE
REGULATION ADMINISTRATION
REPORT OF SPECIAL EVALUATION
March 2010**



**CHARLES J. WILLOUGHBY
INSPECTOR GENERAL**

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



March 18, 2010

Fred P. Moosally
Director
Alcoholic Beverage Regulation Administration
1250 U Street, N.W., 3rd Floor
Washington, D.C. 20009

Dear Mr. Moosally:

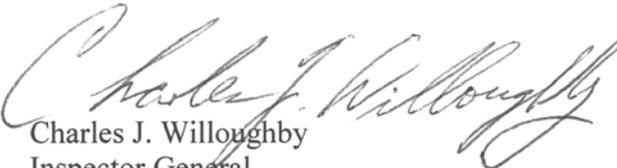
Enclosed is our *Report of Special Evaluation of the Alcoholic Beverage Regulation Administration* (OIG No. 10-I-0034LQ). Written comments from ABRA on the special evaluation team's nine findings and eight recommendations are included in the report.

In addition, we have enclosed a *Compliance Form* for each recommendation. After reviewing the comments and supporting documents that you submitted in response to the draft report, we recognize that ABRA has already taken numerous corrective actions. Therefore, for any recommendation for which you believe ABRA has fully complied, please indicate such on the corresponding *Compliance Form* and return the completed form to our Office.

If you believe additional corrective actions are warranted for any recommendations, we request that you and your staff establish target response dates and inform us so that we can enter them on our copy of the *Compliance Form*. Please ensure that these *Compliance Forms* are then returned to the OIG by the response date, and that reports of "Agency Action Taken" reflect actual completion, in whole or in part, of a recommended action rather than "planned" action.

We appreciate the cooperation shown by you and your employees during the special evaluation. If you have questions or comments concerning this report or other matters related to the special evaluation, please contact me or Alvin Wright Jr., Assistant Inspector General for Inspection and Evaluations, at (202) 727-2540.

Sincerely,


Charles J. Willoughby
Inspector General

CJW/ebs

Enclosure

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Letter to Fred P. Moosally
March 18, 2010
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Inspections and Evaluations Division
Mission Statement

The Inspections and Evaluations (I&E) Division of the Office of the Inspector General is dedicated to providing District of Columbia (D.C.) government decision makers with objective, thorough, and timely evaluations and recommendations that will assist them in achieving efficiency, effectiveness, and economy in operations and programs. I&E goals are to help ensure compliance with applicable laws, regulations, and policies, to identify accountability, recognize excellence, and promote continuous improvement in the delivery of services to D.C. residents and others who have a vested interest in the success of the city.

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ACRONYMS

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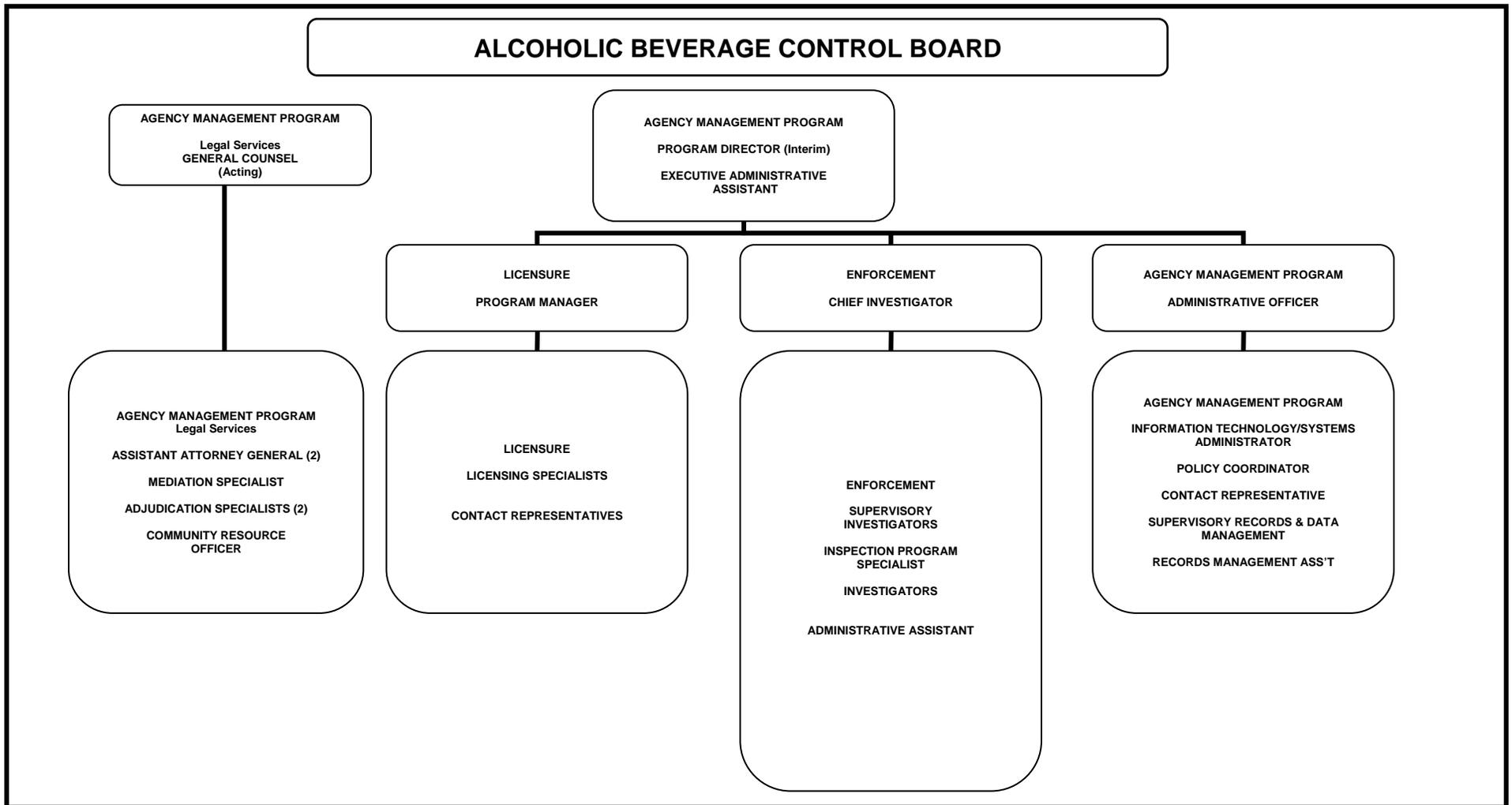
ABC	Alcoholic Beverage Control
ABRA	Alcoholic Beverage Regulation Administration
C of O	Certificate of Occupancy
D.C.	District of Columbia
DCHR	D.C. Department of Human Resources
DCMR	District of Columbia Municipal Regulations
DCRA	Department of Consumer and Regulatory Affairs
DPM	District Personnel Manual
DRES	Department of Real Estate Services (previously known as the Office of Property Management)
EEO	Equal Employment Opportunity
FY	Fiscal Year
GAO	U.S. Government Accountability Office (previously known as the General Accounting Office)
I&E	Inspections and Evaluations
MAR	Management Alert Report
MOU	Memorandum of Understanding
MPD	Metropolitan Police Department
OAG	Office of the Attorney General
OCA	Office of the City Administrator
OCFO	Office of the Chief Financial Officer
OHR	Office of Human Rights
OIG	Office of the Inspector General
SOP	Standard Operating Procedure

ORGANIZATION CHART

ORGANIZATION CHART

ORGANIZATION CHART

ORGANIZATION CHART



Source: ABRA chart provided April 27, 2009, with minor adjustments to avoid acronyms.

ORGANIZATION CHART

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

OVERVIEW

The Inspections and Evaluations (I&E) Division of the D.C. Office of the Inspector General (OIG) conducted a special evaluation of the Alcoholic Beverage Regulation Administration (ABRA) from June 2008 to April 2009. This was conducted at the request of ABRA's former Director in March 2008. As an independent District government agency, ABRA licenses qualified applicants to serve or sell alcoholic beverages, works to prevent the sale of alcoholic beverages to underage individuals, and takes appropriate enforcement action when a business violates District alcoholic beverage law. Prior to May 2001, ABRA was a division within the D.C. Department of Consumer and Regulatory Affairs (DCRA).

ABRA operates under the authority of a seven-member Alcoholic Beverage Control Board (ABC Board or Board) that sets policy for ABRA. The members are appointed by the Mayor and confirmed by the D.C. Council.¹ The ABC Board is responsible for overseeing ABRA, including the hiring of ABRA's Director, and for defining the license application and adjudication processes. In December 2008, ABRA's Director resigned and an Interim Director was appointed. In July 2009, the Interim Director became Director of the agency.

According to ABRA's website,

ABRA's foremost function is to issue licenses that enable qualified businesses to serve or sell alcoholic beverages. ABRA monitors compliance with ABC laws and takes appropriate enforcement action when a business violates these laws. ABRA enacts new laws regulating the manufacture, distribution, and sale of alcoholic beverages in the District. ABRA also implements education and enforcement programs that help prevent the sale of alcoholic beverages to underage individuals.”²

Scope and Methodology

OIG inspections comply with standards established by the Council of Inspectors General on Integrity and Efficiency, and pay particular attention to the quality of internal control.³ The special evaluation assessed ABRA procedures, organizational performance, human resource management, workforce development, and customer service.

¹ [Http://abra.dc.gov/abra/cwp/view,a,3,q,565344,abraNav_GID,1594,abraNav,%7C32260%7C,.asp](http://abra.dc.gov/abra/cwp/view,a,3,q,565344,abraNav_GID,1594,abraNav,%7C32260%7C,.asp) (last visited October 16, 2009).

² *Id.*

³ “Internal control” is synonymous with “management control” and is defined by the Government Accountability Office as comprising “the plans, methods, and procedures used to meet missions, goals, and objectives and, in doing so, supports performance-based management. Internal control also serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud.” STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, Introduction at 4 (Nov. 1999).

EXECUTIVE SUMMARY

The I&E team conducted 59 interviews, reviewed files and documents, issued an anonymous survey to ABRA employees, and observed key work processes. A list of the report's nine findings and eight recommendations is at Appendix 1. The team issued three Management Alert Reports (MARs) during the special evaluation: 1) MAR 08-I-008 regarding sensitive information not being secured and investigators' identities not being sufficiently protected; 2) MAR 09-I-004 regarding ABRA's lack of investigative policies and procedures to avoid conflicts with Metropolitan Police Department (MPD) criminal investigations; and 3) MAR 09-I-007 regarding ABRA not requiring license applicants to undergo national criminal background checks or fingerprinting.

Management Alert Reports

Sensitive information was not properly secured and the identities of ABRA's investigators were not sufficiently protected (Page 12). Our inspection revealed that ABRA did not secure all sensitive information from unauthorized access. Our inspector observed approximately 100 boxes of official documents stored openly in ABRA hallways. Several of these boxes contained sensitive applicant and other information. For instance, in one box, the inspector observed a completed application for an alcoholic beverage license that contained the applicant's home address, social security number, date of birth, and results of criminal history record checks. In another box, the inspector saw photocopies of District learner's driver permits. Another box held reports of Board hearings and testimony. In addition, the inspector learned that ABRA's space configuration did not protect the identities of undercover investigators from ABRA customers. Senior managers stated that ABRA's investigative staff offices were located in close proximity to the hearing room, a conference room, and common areas that are frequented by customers.

ABRA lacked investigative policies and procedures to avoid conflicts with criminal investigations (Page 12). Following a criminal incident related to or occurring within an establishment that possesses an alcoholic beverage license, ABRA conducts an investigation that may run concurrently with an MPD criminal investigation. ABRA investigators gather evidence to determine if the establishment violated license requirements and whether ABRA should present the case to the ABC Board, which may issue sanctions against the establishment. Interviewees from MPD and ABRA stated that ABRA's investigative practices and the information it obtains, if not properly coordinated with MPD, have the potential to conflict with criminal investigations. This may result in contradictory statements from witnesses, which may undermine criminal cases. ABRA did not have written policies and procedures or a written agreement with MPD regarding ABRA's practices in instances where MPD is conducting a criminal investigation.

ABRA does not require ABC license applicants to undergo national criminal background checks (Page 13). ABRA requires license applicants to obtain police clearances from MPD and an applicant's home jurisdiction if the applicant is a non-District resident. However, ABRA does not require national criminal background checks or fingerprinting, which hinders the agency's ability to detect applicants with criminal histories in other cities and states.

EXECUTIVE SUMMARY

Findings

This report also presents findings in the following areas:

- ABRA lacks human resource policies. It has not decided whether it will officially adopt the District Personnel Manual or develop and publish its own human resource policies.
- ABRA has not developed and implemented policies and procedures to direct licensing specialists in processing liquor license applications.
- ABRA has not developed and published policies for its monetary incentive award program.
- ABRA has a need to develop and implement strategies to improve employee morale.
- ABRA does not have access to a DCRA database to verify licensee information.

During fieldwork, the team became concerned about possible deficiencies in internal fiscal controls at ABRA. For instance, ABRA cashiers responsible for handling monetary receipts were not bonded; there was a lack of official written procedures for coordinating receipt activities; and cashiers were not reconciling receipts with funds deposited by the Office of the Chief Financial Officer (OCFO). In March 2009, ABRA's Interim Director informed the OIG of various corrective actions taken or planned to resolve these deficiencies. As a result, the OIG did not issue a finding on this matter. The corrective actions included the issuance of a Standard Operating Procedure (SOP) regarding the collection and depositing of funds received from licensing and adjudicatory functions. ABRA was also working to have its cashiers and supervisor bonded by May 2009. Lastly, ABRA reached an agreement through which the OCFO would produce a weekly reconciliation report that ABRA would verify with its internal receipts.

ABRA's January 2010 Response, as Received:

Comments: ABRA has taken steps to ensure that all of its cashiers and supervisors have received training prior to using the inovah cashiering system. ABRA has also put internal controls in place to assist with ensuring that the agency does not have any mismanagement of its cash receipts. First, ABRA has an audit point with its Operations Manager who reviews ABRA's receipts daily to verify that the monies processed by the cashiers are consistent with what was received in the inovah cashiering system. ABRA has a backup trained supervisor in place in the event that the Operations Manager is absent. Additionally, the receipts are scrutinized by the Office of the Chief Financial Officer once they are submitted for revenue posting. The weekly reconciliation report referenced above from the OCFO now occurs on a daily basis. ABRA is still in the process of obtaining bonding insurance to guard against any losses that may occur and anticipates resolving the bonding issue by March 2010.

ABRA reviewed the draft of this report prior to publication, and its comments in their entirety follow each OIG recommendation. ABRA submitted documents to the OIG and referenced them in several responses. Due to the quantity of information provided, these documents could not be published as part of the report. The OIG can furnish them upon request.

EXECUTIVE SUMMARY

Note: The OIG does not correct an agency's grammatical or spelling errors, but does format an agency's responses in order to maintain readability of OIG reports. Such formatting is limited to font size, type, and color, with the following exception: if an agency bolds or underlines text within its response, the OIG preserves these elements of format.

Compliance and Follow-Up

The OIG inspection process includes follow-up with inspected agencies. Compliance forms listing findings and recommendations were sent to ABRA along with this report of inspection. The I&E Division will coordinate with ABRA on verifying compliance with recommendations in this report over an established period. In some instances, follow-up inspection activities and additional reports may be required.

EXECUTIVE SUMMARY

EMPLOYEE SURVEY

EMPLOYEE SURVEY

EMPLOYEE SURVEY

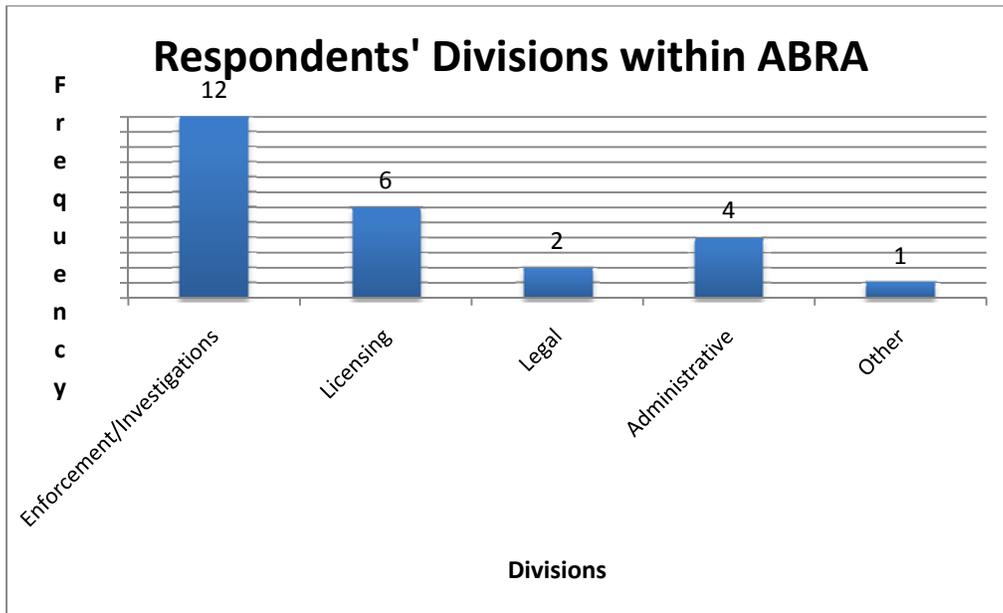
Survey Methodology

On December 29, 2008, the team issued 33 confidential, Internet-based surveys to ABRA employees.⁴ Twenty-five responses (75.8%) were analyzed out of 26 received.⁵

In addition to gathering demographic information from respondents, the survey consisted of two types of questions. First, employees responded to closed-ended statements by selecting from a Likert scale of Strongly Agree, Agree, Disagree, Strongly Disagree, and Not Applicable. In the following table of survey results, the Agree column represents the combined responses for the Agree and Strongly Agree answers, while the Disagree column represents the combined responses for the Disagree and Strongly Disagree answers. The following table also lists the percent and frequency of Agree and Disagree responses as well as the frequency of Not Applicable/Skipped responses. The percent of Agree and Disagree responses are based on the total number of Agree and Disagree responses, excluding Not Applicable/Skipped responses. The second type of questions was open-ended questions to solicit employees' narrative feedback.

Results from Closed-Ended Questions

At the time of the survey, only 2 of the 25 respondents were officially supervising ABRA employees. The chart below reflects the respondents' divisions within ABRA:



⁴ The OIG analyzed the responses received as of February 10, 2009. The survey was not emailed to ABRA senior management or auditors employed by another agency who are stationed at ABRA.

⁵ One survey was excluded from analysis because two copies of a survey were submitted with identical lengthy text for the open-ended questions. Some of the Likert scale questions had different answers on these two surveys. The team analyzed the results of the most recently received survey and excluded the other from analysis.

EMPLOYEE SURVEY

Employee Survey—Responses to Closed-Ended Questions			
Item	Percent and Frequency		Frequency
	Agree	Disagree	Not Applicable/ Skipped
1. I am treated respectfully by senior agency management.	70.8% 17	29.2% 7	(1)
2. Senior agency management welcomes my opinions and suggestions.	59.1% 13	40.9% 9	(3)
3. My direct supervisor welcomes my opinions and suggestions.	82.6% 19	17.4% 4	(2)
4. Management consistently speaks to me in a professional manner.	72.7% 16	27.3% 6	(3)
5. I can disagree with management without fear of retribution.	43.5% 10	56.5% 13	(2)
6. My direct supervisor provides me with useful and constructive feedback when reviewing my work.	69.6% 16	30.4% 7	(2)
7. My direct supervisor discusses my performance with me periodically throughout the year.	54.5% 12	45.5% 10	(3)
8. Morale is positive at ABRA.	16.7% 4	83.3% 20	(1)
9. My division has adequate staff to complete work timely.	66.7% 16	33.3% 8	(1)
10. I have a clear understanding of my duties and responsibilities.	70.8% 17	29.2% 7	(1)
11. There are written policies and procedures to cover all key aspects of my duties and responsibilities.	16.7% 4	83.3% 20	(1)
12. My job description adequately reflects what I do on a daily basis.	65.2% 15	34.8% 8	(2)
13. I have received my performance standards in the last 12 months.	71.4% 15	28.6% 6	(4)
14. I have received a performance evaluation from my supervisor in the last 12 months.	66.7% 14	33.3% 7	(4)
15. My most recent performance evaluation accurately and fairly stated my strengths and areas for improvement with my position at ABRA.	66.7% 12	33.3% 6	(7)

EMPLOYEE SURVEY

Employee Survey—Responses to Closed-Ended Questions			
Item	Percent and Frequency		Frequency
	Agree	Disagree	Not Applicable/ Skipped
16. For those areas identified as needing improvement per my performance evaluation, I have received guidance from my supervisor and managers to improve in this (these) area(s).	80.0% 12	20.0% 3	(10)
17. I receive recognition (i.e., acknowledgements, bonuses, etc.) when my performance exceeds management’s expectations.	59.1% 13	40.9% 9	(3)
18. There are training opportunities available to support my professional development.	50.0% 12	50.0% 12	(1)
19. ABRA ensures that employees are adequately trained to perform their duties and responsibilities.	37.5% 9	62.5% 15	(1)
20. Incentive awards are fairly distributed at ABRA.	21.7% 5	78.3% 18	(2)
21. I feel there is room for career growth within ABRA.	37.5% 9	62.5% 15	(1)

Open-Ended Questions

ABRA employees were asked to respond to open-ended questions. In reply to a question regarding what ABRA does well, answers commonly included providing customer service and licensing functions. Frequent responses regarding what ABRA does not do well focused on inadequate or inconsistent policies or procedures, management’s treatment of staff, a lack of recognition or rewards for employees, inconsistent regulatory enforcement regarding licensed establishments, and inconsistent treatment of applicants. Common responses regarding recommendations to improve ABRA’s efficiency and effectiveness included rewarding or recognizing employees, developing policies or procedures, and improving treatment of employees by some managers.

**Findings and
Recommendations:**

**SUMMARIES OF
MANAGEMENT ALERT REPORTS**

SUMMARIES OF MANAGEMENT ALERT REPORTS

1. **Sensitive information was not properly secured and investigators' identities were not sufficiently protected.**

According to ABRA's Ethics Policy (April 27, 2005), "Maintaining accurate and secure records is crucial to the accomplishment of the agency's mission and to maintaining the trust of members of the public and government to whom ABRA is responsible." Through onsite observations, our inspector learned that ABRA did not secure all sensitive information from unauthorized access. The inspector observed approximately 100 boxes, some containing sensitive applicant and other information, stored openly in ABRA hallways. For instance, in one box, the inspector observed a completed application for an alcoholic beverage license that contained the applicant's home address, social security number, date of birth, and results of criminal history record checks. In another box, the inspector saw photocopies of District learner's driver permits. Another box held reports of ABC Board⁶ hearings and testimony. The inspector observed many of these boxes in hallways used by DCRA employees. In addition, cleaning staff enter ABRA's offices unescorted.

Our inspector learned through interviews and observations that ABRA's current space configuration did not protect the identities of undercover investigators from ABRA customers. Senior managers stated that ABRA's investigative staff offices were located in close proximity to the hearing room, a conference room, and common areas that are frequented by customers. They cited a need for a secure location so that investigators' identities could be protected. ABRA has been working with the Department of Real Estate Services (DRES), which, until July 2009, was named the Office of Property Management, to find new office space since 2002, and has communicated these needs to the Office of the City Administrator (OCA). ABRA planned to move to a new office location in 2005, 2006, and 2007; consequently, ABRA management was reluctant to spend funds to reconfigure its existing office space.

On August 29, 2008, the OIG issued MAR 08-I-008 to ABRA and DRES regarding the unsecured, sensitive information, and the need for an office space configuration that sufficiently protects investigators' identities. In September 2008, ABRA's former Director responded that ABRA had removed all boxes containing sensitive and confidential information that were previously located in the hallways and other open spaces. In October 2008, ABRA published a written policy on the treatment and security of confidential information by ABRA employees. In July 2009, ABRA's Interim Director informed the OIG that ABRA had relocated its investigators to a secure location to protect their identities. The complete MAR and its recommendations as well as ABRA's response may be accessed via the OIG's website.⁷

2. **ABRA lacked investigative policies and procedures to avoid conflicts with MPD criminal investigations.**

Following a criminal incident related to or occurring within an establishment that possesses an alcoholic beverage license, ABRA conducts an investigation that may run

⁶ The Alcoholic Beverage Control Board is an independent adjudicatory body responsible for overseeing ABRA.

⁷ See

<http://oig.dc.gov/news/view2.asp?url=release08%2FALCOHO%2Epdf&mode=iande&archived=0&month=20089>.

SUMMARIES OF MANAGEMENT ALERT REPORTS

concurrently with a MPD criminal investigation. ABRA investigators gather evidence to determine if the establishment violated license requirements and whether ABRA should present the case to the ABC Board, which may issue penalties against the establishment.

Interviewees from MPD and ABRA stated that ABRA's investigative practices and the information it obtains, if not properly coordinated with MPD, have the potential to conflict with criminal investigations. For example, ABRA investigators go to the scenes of violent crimes and interview individuals MPD has interviewed or plans to interview. This may result in conflicting statements from witnesses, which have the potential to undermine criminal cases. ABRA did not have written policies and procedures or a written agreement with MPD regarding ABRA's practices in instances where the MPD is conducting a criminal investigation.

On February 20, 2009, the OIG issued MAR 09-I-004 to ABRA and MPD regarding the lack of policies and procedures to avoid conflict with criminal investigations. On March 12, 2009, ABRA responded to the MAR, and in March 2009, MPD agreed with ABRA's response. On April 17, 2009, ABRA provided the OIG with its SOP for coordinating and sharing information with MPD on related investigations and an MOU between MPD and ABRA that had been implemented in response to the issues raised in the MAR. The complete MAR and its recommendations, as well as ABRA's response, may be found at the OIG website.⁸

3. ABRA does not require ABC license applicants to undergo national criminal background checks.

D.C. Code § 25-301(a) (Supp. 2008) states that before the ABC Board may issue a license, it shall determine that “[t]he applicant has not been convicted of any felony in the 10 years before filing the application. . . [and] has not been convicted of any misdemeanor bearing on fitness for licensure in the 5 years before filing the application.” Title 23, District of Columbia Municipal Regulations (DCMR) §§ 502.1 and 502.5 require an applicant to “obtain a police clearance from the Metropolitan Police Department” as well as from his/her state of residence if the applicant is not a District resident. In comparison, jurisdictions such as Virginia and Montgomery County, Maryland, require alcohol license applicants to undergo national criminal background checks. In addition, other state and local jurisdictions use fingerprint-based criminal background checks as part of their professional/occupational licensing processes. One of the primary advantages of a fingerprint-based check is that it can definitively identify and link a person to his/her criminal record.

According to interviewees, ABRA requires local police clearances from MPD and an applicant's home jurisdiction, but does not require national criminal background checks. In addition, ABRA does not require fingerprinting of applicants. These two deficiencies prevent ABRA from determining whether an applicant committed a crime elsewhere in the country that would disqualify him/her from receiving a license.

⁸ See

<http://oig.dc.gov/news/view2.asp?url=release09%2FAlcoholic%2DBeverage%2DRegulation%2DAdministration0309%2Epdf&mode=iande&archived=0&month=20092>.

SUMMARIES OF MANAGEMENT ALERT REPORTS

On May 15, 2009, the OIG issued MAR 09-I-007 to ABRA and MPD regarding deficiencies in criminal background checks for license applicants. ABRA responded on June 4, 2009, that it has been working with MPD on a draft MOU to establish national criminal background checks. ABRA also determined that rulemaking is necessary to establish national criminal background checks and planned to publish a draft rulemaking by August 21, 2009. According to ABRA's Director, on October 14, 2009, the ABC Board submitted draft legislation to the Executive Office of the Mayor for submission to the Council that would provide the ABC Board with the legal authority necessary to conduct national criminal background checks. The complete MAR and ABRA's response are provided on the OIG website.⁹

New Recommendation:

That the Director/ABRA periodically update the Inspector General on the status of the MOU with MPD and its progress in establishing national criminal background checks.

Agree X Disagree _____

ABRA's January 2010 Response, as Received:

Comments: ABRA and the ABC Board support conducting national criminal background checks provided the necessary statutory authority is obtained from the Council of the District of Columbia to implement this change. Specifically, a May 28, 2009 legal opinion from the Office of the Attorney General (copy attached) questioned whether ABRA and the ABC Board currently possess the statutory authority to conduct expanded national criminal background checks. On December 15, 2009, Bill 18-595, the "Neighborhood Victims Rights Amendment Act of 2009" was introduced in the Council. This legislation would provide ABRA and the ABC Board with the necessary statutory authority to conduct expanded national criminal background checks. ABRA agrees to periodically update the Inspector General on this issue and will enter into an MOU with MPD should legislation be adopted by the Council.

⁹ See <http://oig.dc.gov/news/view2.asp?url=release09%2FMAR%2D09%2DI%2D007%2Ddistribution%2Dletter%2Epdf&mode=iande&archived=0&month=20095>.

**Findings and
Recommendations**

FINDINGS AND RECOMMENDATIONS

ABRA issues various types of alcoholic beverage licenses to retailers, restaurants, hotels, and other establishments that manufacture, sell, or serve alcoholic beverages. ABRA is an authorized cashiering site to collect licensing fees. Fees assessed for alcoholic beverage licenses vary based on the type of license acquired.

The ABC Board administers and enforces regulations issued under Title 25 of the D.C. Code. The Board has general oversight of ABRA, including ABRA's receipt and evaluation of applications for alcoholic beverage licenses, and inspections of licensees' premises and records for legal compliance. It establishes procedures to receive and respond timely to complaints from persons alleging licensee violations of Title 25. The Board also monitors investigations conducted by ABRA and suspends or revokes licenses.

ABRA's Director works under the general supervision of the ABC Board and independently develops work plans and methods to accomplish assignments. The Director keeps the ABC Board informed of progress and/or problems. The Director's performance is evaluated based on overall effectiveness in assisting the ABC Board with achieving its desired objectives. Within broad guidelines established by the ABC Board, the Director is responsible for determining and recommending policies; setting goals; organizing and/or realigning the agency; determining courses of action; committing resources; coordinating programs/projects; and representing the agency. In December 2008, ABRA's Director resigned, and an Interim Director was appointed; the Interim Director was confirmed by the D.C. Council and became Director in July 2009.

1. **ABRA lacks written human resource policies.**

According to the U.S. Government Accountability Office (GAO):

Appropriate policies, procedures, techniques, and mechanisms should exist with respect to each of the agency's activities. Written documentation [should] . . . exist[] covering the agency's internal control structure and for all significant transactions and events.¹⁰

The D.C. Department of Human Resources (DCHR) and ABRA executed an MOU for DCHR to provide ABRA with human resources-related services during fiscal year (FY) 2007. Because the agencies did not execute a similar MOU for FY 2008, DCHR absorbed the costs for providing these services during that year. In May 2009, DCHR and ABRA executed an MOU for DCHR to provide ABRA with services for FY 2009. The services provided by DCHR included employment and staffing services, such as recruitment and processing personnel actions; position classification services; retirement counseling and processing; and advice on corrective and adverse actions.

¹⁰ GENERAL ACCOUNTING OFFICE, INTERNAL CONTROL MANAGEMENT AND EVALUATION TOOL, GAO-01-1008G, 34 and 43 (Aug. 2001).

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During various interviews, seven ABRA employees/managers stated that they had not received or did not recall receiving personnel policies. Two interviewees stated that they refer to policies from DCHR or to the District Personnel Manual (DPM). One ABRA manager distributed internal time and attendance procedures to subordinates while an agency-wide policy was being drafted. One employee recalled receiving an ABRA policy on dress codes. In February 2009, an ABRA official responsible for ABRA's human resources activities stated that no one had provided him/her with ABRA's personnel policies. This official added, to the best of his/her knowledge, ABRA human resources policies did not exist beyond using the DPM.

In addition, ABRA employees demonstrated a lack of knowledge on how to handle personnel matters. For instance, one employee expressed uncertainty on how to file a grievance. Another employee said he/she had not received performance standards and that policies are lacking or unclear with regard to performance standards, the incentive awards program, and personnel actions.

A senior DCHR compensation and classification specialist stated that ABRA is required to follow the DPM and there are no known exemptions for ABRA. In December 2008, however, ABRA's former Director stated that ABRA had not officially decided which DPM policies to adopt. She opined that ABRA and DCHR do not know what an independent agency can and cannot do and that there has been debate regarding ABRA's independent authority and following the DPM. She recommended that ABRA either go independent or follow the DPM. This official stated that as an independent agency, ABRA could adopt some of the established human resource procedures from the DPM as well as procedures from other agencies, such as OCFO. When asked which human resource procedures employees follow, the official responded that they are instructed to follow the DPM. The inspector, however, found no evidence that the staff were instructed to follow the DPM. The former Director stated that an attorney at ABRA was assigned to determine an independent agency's authority but this task was not accomplished. The former Director worked at ABRA for 6 years. Given that length of time, it was unclear to the OIG why ABRA has not yet officially determined whether to adopt the DPM or sections of the DPM.

After the completion of the fieldwork in April 2009 and while writing this report, (in September 2009), ABRA's Director provided the OIG with a list of Standard Operating Procedures that were issued at ABRA in 2009 (see Appendix 2). While the OIG did not receive or review many of these policies, as they were provided after fieldwork was completed, several appear to pertain to human resource matters, such as the policy on requesting overtime and the procedure for time and attendance.

Recommendations:

- (1) That the Director/ABRA should determine whether the agency is required to follow the DPM. If not, the Director/ABRA needs to ensure that ABRA implements alternative policies and procedures for human resource matters.

Agree X Disagree _____

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ABRA's January 2010 Response, as Received:

Comments: The position of the current ABRA Director is that the agency is required to follow the policies and procedures set forth in the DPM. Attached is a copy of the policy implementing this position that was issued to ABRA staff on January 12, 2010.

- (2) That the Director/ABRA issue an instruction to its employees clarifying the source of ABRA's human resource policies.

Agree _____ **X** _____ Disagree _____

ABRA's January 2010 Response, as Received:

Comments: ABRA agrees that it would be helpful to provide a written policy to staff indicating that they are required to follow the DPM. Attached is a copy of the policy issued to ABRA staff on January 12, 2010. ABRA has made a concerted effort to issue several human resources policies in 2009. These included standard operating procedures on: (1) time and attendance, (2) requesting overtime and compensatory time, (3) reporting corruption, (4) the agency's code of conduct, and (5) incentive awards. ABRA has also completed a draft detailed employee handbook (copy attached), which was submitted to the union for review and consideration on Tuesday, January 12, 2010. ABRA also hired a new training coordinator in 2009 to increase the amount of training offered to ABRA staff.

OIG Response: The OIG reviewed ABRA's policy notifying ABRA staff of the adoption of the electronic DPM as well as its draft Employee Handbook. These actions appear to meet the intent of this finding's recommendations.

2. Licensing specialists lack written operational procedures.

The GAO states that appropriate policies, procedures, techniques, and mechanisms should exist with respect to each of an agency's activities,¹¹ and written documentation should exist covering the agency's internal control structure and for all significant transactions and events.¹²

During interviews, several licensing specialists said that they lack written policies and procedures for their duties and responsibilities. One employee added that there were no procedures beyond his/her position description.

In December 2008, ABRA's former Director stated that new Licensing Division Standard Operating Procedures (SOPs) were in draft format. The existing SOPs were outdated and focused on processing ABRA's 2005 liquor license application. She added that a Licensing

¹¹ GENERAL ACCOUNTING OFFICE, INTERNAL CONTROL MANAGEMENT AND EVALUATION TOOL, GAO-01-1008G, 34 (Aug. 2001).

¹² *Id.* at 43.

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Division manager was working on new SOPs to align manual processes with ABRA's new automated processes.

The licensing specialist manager who is drafting the SOPs stated the lack of SOPs has led to: 1) process inconsistencies and errors; 2) debates on proper actions to take; 3) the need to consult with various staffers to reach a consensus on agreed upon actions; and 4) tension between staff and clients. The manager added that in the absence of SOPs, the primary mechanism to acquire licensing specialist skills is on-the-job training. One licensing specialist stated that not having written SOPs causes problems when senior managers make verbal procedural changes. The lack of written procedures could result in inconsistencies in processes and employees' knowledge of how things should be done, and the perception that some applicants receive preferential treatment.

Recommendation:

That the Director/ABRA develop and implement policies and procedures to direct Licensing Division processes.

Agree **X** Disagree _____

ABRA's January 2010 Response, as Received:

Comments: ABRA was proactive between January 2009 and January 2010 drafting approximately fifty (50) standard operating procedures. This included developing and implementing fifteen (15) policies and procedures that were specific to the Licensing Division. ABRA management also worked to make the Licensing Division familiar with fifteen written implemented procedures by holding two training sessions with the Licensing Division. Specifically, on September 3, 2009, ABRA management held a training session where ten (10) written and implemented Licensing Division processes were reviewed with staff. (copy attached). Additionally, on January 12, 2010, ABRA management held a training session where five (5) written and implemented Licensing Division processes were reviewed with staff. (copy attached). ABRA management will be having two additional training sessions in 2010 to review newly issued procedures with the Licensing Division staff.

3. Prior to September 2009, ABRA incentive award policies had not been established.

The GAO *Internal Control Management and Evaluation Tool* includes best practices for increasing employee competence. It recommends that:

[p]olicies and procedures are in place for hiring, orienting, training, evaluating, counseling, promoting, compensating, disciplining, and terminating employees Promotion, compensation, and rotation of employees are based on periodic performance appraisals. Performance appraisals are linked to the goals and

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objectives included in the agency's strategic plan. The importance of integrity and ethical values is reflected in performance appraisal criteria.¹³

The DPM sets forth rules governing incentive awards for certain District government employees. DPM § 1907.1 states, "Each personnel authority may establish procedures for approval of monetary awards consistent with these regulations, and may approve such awards." In addition, DPM § 1907.4 states, "Each personnel authority shall ensure the quality and integrity in the operation of its incentive awards program, and approve incentive awards as specified in this chapter." DPM § 1907.6 placed the following duties upon agency heads with regard to incentive awards:

Agency heads shall be responsible for ensuring that the criteria for granting awards are consistent with the mission and programmatic goals of their agency, for allocating adequate funds to support the incentive awards program in their agency, for paying the costs of incentive awards (including certificates and tangible items) from such funds, and for approving incentive awards as specified in this chapter.

Further, DPM § 1903.2(2) states that monetary awards based on exemplary performance during the previous year will be distributed after the formation and decision of the Agency Incentive Awards Committee. DPM § 1907.2 provides that any award submission by the agency over \$5,000 for all eligible employees, excluding agency heads, is to be sent to the City Administrator or designee for approval.

However, in accordance with DPM § 1901.1(d), DPM Chapter 19 does not apply to ABRA employees because ABRA is an agency with rule-making authority. In December 2008, ABRA's former Director stated that ABRA had no written guidelines for awarding monetary incentive awards or career ladder increases. However, she added that at staff meetings, she discussed the process of issuing the awards. The official stated that incentive awards were granted to employees who earned a high score on their performance evaluations and had not received a career ladder increase. The official noted that the awards were not processed through an agency incentive awards committee.

In January 2009, ABRA's Interim Director stated that "ABRA does not have a specific written agreement with DCHR to follow Chapter 19 of the DPM. At this time, ABRA follows Chapter 19 of the DPM as it has not established written procedures to the contrary." The Interim Director stated that it is important for ABRA to have approved written procedures to clarify ABRA's incentive awards policy, and that ABRA will not approve any additional incentive awards until an approved policy is in place.

According to the OIG Employee Survey results, only 21.7% of ABRA employees believed incentive awards are fairly distributed at ABRA. From August 2006 to August 2007,

¹³ *Id.* at 18.

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six ABRA employees/managers received incentive awards; each award exceeded \$5,000. Two of these awards went to ABRA's former Director in the amounts of \$12,532.80 and \$14,396.00, for 2006 and 2007 respectively. According to a manager from the Office of Pay and Retirement Services, these award nominations were not sent with letters to the City Administrator for approval. The manager was unaware that a review by the City Administrator was required for awards exceeding \$5,000.

ABRA's former Director was a contract employee for the District government. According to her employment letter from July 2002 and her 4-year term contract awarded in April 2006, she could receive an annual performance bonus of up to 10% of salary based upon the successful attainment of goals and performance measures contained in a performance contract that would be negotiated with the ABC Board. In October 2008, the team requested the performance contracts for the former Director. We received and reviewed the former Director's goals as stated in her performance contracts labeled "Performance Contract and Evaluation Criteria," for FYs 2003 through 2007. We did not receive any documents reflecting that the goals and performance measures were established at the beginning of each rating period. We found that the contracts for FYs 2004, 2006, and 2007 did not show when the goals were established; the FY 2003 contract was signed in early FY 2004; and the FY 2005 contract was signed in early FY 2006.

In September 2009, after fieldwork was completed and this report was being written, ABRA's Director informed the OIG that an incentive awards policy was implemented at ABRA. The policy outlines the creation and function of an Incentive Awards Committee. It also states that a Sustained Superior Performance Award shall not exceed a maximum of 10 percent of an employee's rate of annual pay or \$5,000, whichever is greater.

Recommendations:

- (1) That the Director/ABRA ensure that ABRA enforces its incentive awards policy.

Agree _____ **X** _____ Disagree _____

ABRA's January 2010 Response, as Received:

Comments: ABRA is committed to following its incentive awards policy dated September 18, 2009.

- (2) That contract employees' permitted bonus awards be based on performance goals that are clearly articulated and dated at the start of the review period.

Agree _____ **X** _____ Disagree _____

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ABRA's January 2010 Response, as Received:

Comments: The ABC Board and the ABRA Director are in agreement that neither the ABRA Director nor a contract employee shall be entitled to a monetary bonus award unless they have signed and dated written performance goals in place by October 1, the start of the review period. Attached is a written standard operating procedure adopted by the Board on Wednesday, January 13, 2010, which reflects this position.

OIG Response: The OIG reviewed ABRA's SOP on contract employee performance plan requirements for monetary bonus award eligibility. The policy appears to meet the intent of this recommendation.

4. Employees expressed dissatisfaction with some working conditions and management behavior.

According to DCHR's performance planning form for FY 2009, one mandatory competency for District supervisors includes motivating and inspiring others to ensure that goals are met. Our employee survey at ABRA revealed that 70.8% of respondents agreed that they were treated respectfully by senior agency management. However, 8 out of 24 respondents disagreed and 12 respondents highly disagreed with the statement that "morale is positive at ABRA." Another survey respondent wrote that when ABRA management creates friction among employees, it contributes to low morale. A respondent stated that there is the "constant threat of job loss against employees." A survey respondent also stated that ABRA should recognize and reward the excellent performance of many of its employees.

During an interview, an ABRA employee said that managers speak unprofessionally to employees. A manager stated that employees are frustrated and generally unhappy. Another employee stated that employees believe they are used as pawns to force certain establishments to comply with D.C. regulations, but are restricted from forcing politically-connected establishments to comply.

In December 2008, ABRA's former Director admitted that morale was low and wanted to bolster it. The former Director added that non-monetary incentive awards and administrative time off for special projects were being used to address low morale at ABRA. For example, the Enforcement Division issued an investigator of the month award on a plaque. The former Director stated that she was personally funding team building sessions twice a year. Because the ABC Board wanted these sessions held quarterly, she stopped sponsoring them.

In February 2009, ABRA's Interim Director stated that morale had improved since the beginning of his tenure in January 2009. Employees are providing positive feedback and sharing information. The Interim Director stated that he had held five to six staff meetings since January 2009 and employees are being recognized.

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Another senior manager stated that morale is good although some employees are discontented. This manager added that one division recognizes an “employee of the month” and that investigators with excellent performance outcomes are sent to conferences.

An Equal Employment Opportunity (EEO) Officer for ABRA stated that ABRA’s former Director was the target of complaints in EEO filings and that the former Director resolved them at the informal stage. The official stated that two to three EEO complaints were formal complaints and were filed with the Office of Human Rights (OHR) in 2008. The official stated that in 2008, the types of complaints filed with OHR related to discrimination based on personal appearance, harassment, hostile environment, and failure to accommodate a disability.

Recommendation:

That the Director/ABRA convene a regular committee of managers, employees, and union representatives to discuss work processes, employee relations, and suggestions for improving agency functions.

Agree X Disagree _____

ABRA’s January 2010 Response, as Received:

Comments: ABRA is in agreement with this recommendation. ABRA management has already previously met with union representatives and employees in 2009 to successfully resolve several employee relation issues. ABRA has contacted union representatives to hold the first of these meetings in February 2010. ABRA has taken several steps over the past year to improve the morale of staff and address their concerns. Some of the morale boosting events have been holding quarterly potlucks, an annual retreat, implementing procedures and offering training sessions that clarify and provide staff with policy guidance, resolving sensitive personnel issues, and appointing a contact for union members to discuss concerns with ABRA management. ABRA management has also boosted morale by empowering and involving employees on important issues through the creation of committees consisting of both ABRA management and ABRA staff. ABRA’s recent move in December 2009 to 1250 U Street, NW, and ABRA winning the “2009 Innovative Liquor Law Enforcement Program of the Year Award” have also improved the morale of the agency. ABRA looks to continue to boost morale in FY 2010 by adding to this list of teambuilding activities as well as ensuring an ideal environment for all employees to be heard. ABRA management recognizes that morale was low at the Agency when the employee survey was sent out in December 2008. However, ABRA management believes that morale at the agency has dramatically increased over the past year. To measure this improvement, ABRA will be sending out the same survey again in June 2010, which will assist the agency in identifying any areas it still needs to improve. Finally, the position of ABRA management is to enforce the laws and regulations on all establishments equally. Attached is Policy No. 2010-005 that was issued to remove any possible confusion or concern on this issue.

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5. **Inability to access DCRA database prevents verification of licensee documents authenticity.**

DCRA issues documents, such as a Certificate of Occupancy (C of O), to restaurants and establishments that may also apply for an ABC liquor license. According to ABRA's instructions for filing license applications, an applicant who already possesses a C of O for their establishment should submit it to ABRA with their application for a liquor license.¹⁴ ABC license applicants may be required to present their C of O to ABRA for review. An applicant must certify under penalty of perjury that information contained in the application is true and correct. The applicant authorizes the ABC Board or its employees to investigate any and all of the information provided by the applicant for a license.

According to an ABRA manager, ABRA has not established an agreement with DCRA to share information and verify documents issued by DCRA to alcoholic beverage applicants. This manager added that ABRA is working with DCRA to gain access to a DCRA database that would enable ABRA to independently verify documents issued by DCRA to alcoholic beverage applicants. The manager stated that ABRA and DCRA representatives met in December 2008 to improve information-sharing between the two agencies. They discussed establishing a process for verifying documents that applicants claim are from DCRA so that fraudulent documents can be detected. According to the manager, he/she was unaware of any instances in which ABRA approved and issued a liquor license to an applicant based on fraudulent documents allegedly issued by DCRA. He/she added that although there were two instances in November and December 2008 in which liquor license applicants presented fraudulent C of O documents allegedly issued by DCRA, ABRA did not issue a license to these applicants. The manager stated that DCRA notified ABRA that fraudulent C of Os exist and that DCRA brought forth this information based upon DCRA's internal investigations.

Recommendation:

That the Director/ABRA establish an MOU with DCRA to formalize the sharing of license, C of O, and other regulatory information.

Agree _____ Disagree _____ **X** _____

ABRA's January 2010 Response, as Received:

Comments: ABRA believes that this recommendation is no longer needed and should be removed from the report as ABRA currently has access to this information, including through our new web-based computer system (Accela). ABRA Licensing Specialists can currently access a DCRA database to verify the authenticity of Certificates of Occupancy. This DCRA database currently allows ABRA Licensing Specialists to verify that an establishment has a Certificate of Occupancy or has applied for a Certificate of Occupancy. It also further allows ABRA Licensing Specialists to compare what a licensee may have provided to ABRA against what DCRA has

¹⁴ If a C of O has not been issued for an establishment, the applicant should apply for a Zoning Certificate and submit a letter requesting approval of the license.

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issued. Licensing Specialists can access this information either through Accela or a web site provided by DCRA and enter the address of the establishment to verify either the existence of or application for the Certificate of Occupancy. ABRA recognizes that at the time this special evaluation was conducted some ABRA staff were unaware of their ability to verify this information through a DCRA database. On December 29, 2009, ABRA issued Policy No. 46 that relates to certificates of occupancy and sets forth the process for ABRA licensing staff verifying the authenticity of a certificate of occupancy. Finally, ABRA and DCRA already entered into a memoranda of understanding on the certificate of occupancy issue in November 2009 (copy attached). This MOU took effect on January 1, 2010 and requires DCRA to make available to ABRA a database that identifies all issued certificates of occupancy for review and research.

OIG Response: The OIG reviewed ABRA's Policy No. 46 and the MOU between ABRA and DCRA. ABRA's actions appear to meet the intent of this recommendation.

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- Appendix 1:** List of Findings and Recommendations
- Appendix 2:** List of ABRA Standard Operating Procedures and ABC Board Policies Issued in 2009
- Appendix 3:** List of Documents Provided by ABRA in Response to the Draft Report of Special Evaluation

APPENDICES

APPENDIX 1

APPENDICES

List of Findings and Recommendations

Summaries of Management Alert Reports:

1. **a. Sensitive information was not properly secured.**
b. Investigators' identities were not sufficiently protected.
2. **ABRA lacked investigative policies and procedures to avoid conflicts with MPD criminal investigations.**
3. **ABRA does not require Alcoholic Beverage Control (ABC) license applicants to undergo national criminal background checks.**

That the Director/ABRA periodically update the Inspector General on the status of the MOU with MPD and its progress in establishing national criminal background checks.

Findings and Recommendations:

1. **ABRA lacks written human resource policies.**
 - (1) That the Director/ABRA should determine whether the agency is required to follow the DPM. If not, the Director/ABRA needs to ensure that ABRA implements alternative policies and procedures for human resource matters.
 - (2) That the Director/ABRA issue an instruction to its employees clarifying the source of ABRA's human resource policies.
2. **Licensing specialists lack written operational procedures.**

That the Director/ABRA develop and implement policies and procedures to direct Licensing Division processes.
3. **Prior to September 2009, ABRA incentive award policies had not been established.**
 - (1) That the Director/ABRA ensure that ABRA enforces its incentive awards policy.
 - (2) That contract employees' permitted bonus awards be based on performance goals that are clearly articulated and dated at the start of the review period.
4. **Employees expressed dissatisfaction with some working conditions and management behavior.**

That the Director/ABRA convene a regular committee of managers, employees, and union representatives to discuss work processes, employee relations, and suggestions for improving agency functions.

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5. **Inability to access DCRA database prevents verification of licensee documents authenticity.**

That the Director/ABRA establish an MOU with DCRA to formalize the sharing of license, C of O, and other regulatory information.

APPENDICES

APPENDIX 2

APPENDICES



***ABRA
STANDARD OPERATING
PROCEDURES
AND
ABC BOARD POLICIES***



Standard Operating Procedures and ABC Board Policies Table of Contents

Standard Operating Procedure Regarding Deadlines for Submission of Temporary License and One Day Substantial Change Applications	Issued January 9, 2009	Policy Number 2009-001
Standard Operating Procedure for Clean Hands Certification	Issued January 30, 2009	Policy Number 2009-002
Standard Operating Procedure for The Display of Badges by Investigators	Re-issued February 3, 2009	Policy Number 2009-003
Standard Operating Procedure for Protest Investigations	Issued February 9, 2009	Policy Number 2009-004
Standard Operating Procedure for Approved One-Day Substantial Change and Temporary License Pick-Up	Issued February 10, 2009	Policy Number 2009-005
Standard Operating Procedure for The Renewal Process – License Classes A-D	Revised February 17, 2009	Policy Number 2009-006

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Alcoholic Beverage Control Board Policy for Settlement Conferences for Violations of the Inaugural Celebration Act of 2009	Issued February 25, 2009	Policy Number 2009-007
Alcoholic Beverage Control Board Policy on Enforcement of Closing Hours	Issued February 25, 2009	Policy Number 2009-008
Alcoholic Beverage Control Board Policy for Settlement Conferences for Violations of the Single Sales Ban	Issued March 11, 2009	Policy Number 2009-009
Standard Operating Procedure for The Collection and Depositing of Monies	Issued March 17, 2009	Policy Number 2009-010
Alcoholic Beverage Regulation Administration Internal Procedure for Handling Policy Clearances	Issued March 20, 2009	Policy Number 2009-011
Standard Operating Procedures for Coordinating Activities and Sharing Information with the Metropolitan Police Department During Related Investigations	Issued April 17, 2009	Policy Number 2009-012
Alcoholic Beverage Control Board Policy on Press Relations	Issued May 20, 2009	Policy Number 2009-013
Standard Operating Procedure for 90 Day Service of Notice	Issued June 26, 2009	Policy Number 2009-014
Alcoholic Beverage Control Board Policy for the Conduct of Protest Proceedings	Issued July 29, 2009	Policy Number 2009-015
Alcoholic Beverage Regulation Administration Policy Regarding the Posting of ANC Notifications on the Agency Website	Issued September 24, 2009	Policy Number 2009-016

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Alcoholic Beverage Control Board Policy on Show Cause and Summary Suspension Proceedings	Issued January 9, 2009	Policy Number 2009-017
		Policy Number 2009-018
Standard Operating Procedure for Implementing Board Summary Suspension Decisions	Issued July 20, 2009	Policy Number 2009-019
Standard Operating Procedures for Verifying Measurements on License Applications and Checking for Moratoriums (Revised)	Issued September 2, 2009	Policy Number 2009-020
Alcoholic Beverage Regulation Administration Policy Regarding Internal Audit of Grants	Issued August 13, 2009	Policy Number 2009-021
Standard Operating Procedures for E-Mail Notification to Advisory Neighborhood Commissions of Placarded License Applications	Issued August 26, 2009	Policy Number 2009-022
Alcoholic Beverage Regulation Administration Policy Internal Procedure for Requesting and Obtaining Approval to Work Overtime or Compensatory Time	Issued September 2, 2009	Policy Number 2009-023
Standard Operating Procedure for Handling Case Assignment	Issued September 2, 2009	Policy Number 2009-024
		Policy Number 2009-025
		Policy Number 2009-026
Alcoholic Beverage Regulation Administration Policy on the Refund of Application Fees	Issued September 9, 2009	Policy Number 2009-027
Alcoholic Beverage Regulation Administration Internal Procedure for Time and Attendance	Issued September 22, 2009	Policy Number 2009-028

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Alcoholic Beverage Regulation Administration Incentive Awards Policy	Issued September 18, 2009	Policy Number 2009-029
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APPENDICES

APPENDIX 3

APPENDICES

List of Documents Provided by ABRA on January 13, 2010, in Response to Draft Report of Special Evaluation

1. Memorandum of Legal Advice Regarding Rulemaking for Additional Background Check Requirements for License Applicants, dated May 28, 2009
2. Standard Operating Procedure Notifying ABRA Staff of the Adoption of the Electronic District Personnel Manual (E-DPM) (2010-002), dated January 12, 2010
3. Alcoholic Beverage Regulation Administration Employee Handbook (Draft)
4. Licensing Division Agenda Signature Sheet, dated September 3, 2009
5. Standard Operating Procedure for E-mail Notification to Advisory Neighborhood Commissions of Placarded License Applications (2009-022), dated August 26, 2009
6. Revised Standard Operating Procedure for Verifying Measurements on License Application and Checking for Moratoriums (2009-020), dated September 2, 2009
7. Standard Operating Procedure Regarding Deadlines for Submission of Temporary License and One-Day Substantial Change Applications (2009-001), dated January 9, 2009
8. Alcoholic Beverage Regulation Administration Internal Procedure for Requesting and Obtaining Approval to Work Overtime or Compensatory Time (2009-023), dated September 2, 2009
9. Standard Operating Procedure for Clean Hands Certification (2009-002), dated January 30, 2009
10. Standard Operating Procedure for Approved One-Day Substantial Change and Temporary License Pick-Up (2009-005), dated February 10, 2009
11. Standard Operating Procedure for the Renewal Process – License Classes A - D (2009-006), dated February 17, 2009
12. Standard Operating Procedure for the Collection and Depositing of Monies (2009-010), dated March 17, 2009
13. Alcoholic Beverage Regulation Administration Internal Procedure for Handling Police Clearances (2009-011), dated March 20, 2009
14. Standard Operating Procedure for Handling Case Assignments (2009-024), dated September 2, 2009

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15. Licensing Division Signature Sheet for Review and Discussion of Existing ABRA Procedures, dated January 12, 2010
16. Standard Operation Procedure for Collecting and Processing License Application Information Regarding an Applicant's Maximum Number of Seats and Total Occupancy Load (2009-046), dated December 29, 2009
17. Alcoholic Beverage Control Board Policy on the Refund of Application Fees (2009-027), dated September 9, 2009
18. Standard Operating Procedure for Placing and Maintaining Licenses in Safekeeping (2009-031), dated September 28, 2009
19. Standard Operating Procedure for Checking for Pending Adjudicatory Matters and Outstanding Fines on Transfer of Ownership Applications (2009-033), dated September 29, 2009
20. Standard Operating Procedure for Pro-Rating License Fees for Licenses Issued for a Period of Less than One Year (2010-01), dated January 11, 2010
21. Standard Operating Procedure on the Performance Plan Requirement of Contract Employees to be Eligible for Monetary Bonus Awards (2010-003), dated January 13, 2010
22. Standard Operating Procedure on Enforcement and Implementation of Title 25 of the DC Code (2010-005), dated January 13, 2010
23. Memorandum of Agreement Between the Department of Consumer and Regulatory Affairs and the Alcoholic Beverage Regulation Administration, dated November 13, 2009
24. List of ABRA Standard Operating Procedures and ABC Board Policies Issued from January 9, 2009 through January 13, 2010