FOIA & OMA Transparency Audit

Office of Open Government | District of Columbia

Prepared for internal review

Overall Compliance Findings

Executive Summary

The Office of Open Government (OOG)conducted a compliance audit of DC Government's websites in FY18-FY19 to evaluate whether DC agencies and public bodies maintain publicly accessible websites that comply with the transparency requirements of the District's Freedom of Information Act and Open Meetings Act. OOG also reviewed its Central Meeting Calendar (CMC).

The audit assesses whether the required information is available and accessible. It also identifies common deficiencies and opportunities to improve.

OOG's staff reviewed websites during the last quarter of FY18 through FY19. The data from the audit is posted on OOG's website here: https://www.open-dc.gov/documents/foia-and-oma-audit-results

FINDINGS:
- FY18–FY19 OMA compliance: Notice 81.3%, Agenda 70.0%, Minutes 66.8%, Full 51.4%.
- Minutes continue to be weakest transparency element.
- Frequent issues: no quorum, cancelled meetings, closed-session citation errors, link/CMC failures.
- Top missing-minutes bodies: Public Charter School Credit Enhancement Committee, OVA, Re-Entry Commission.
- FOIA website review shows multiple agencies with 5–6 deficiencies, including OCTO/DC-Net and DC Lottery.
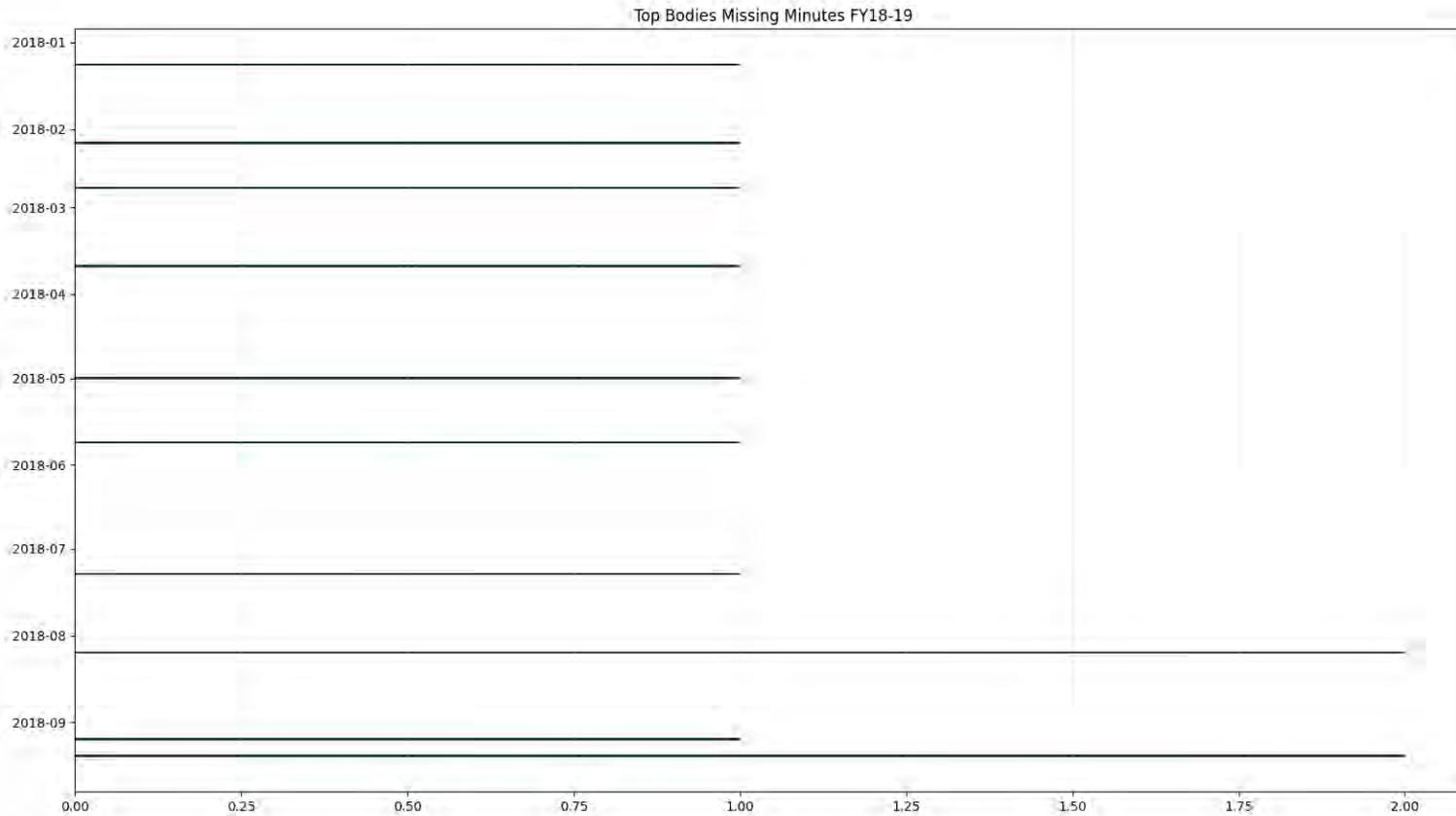
Overall Transparency Compliance (OMA)

Overall Compliance FY18-19
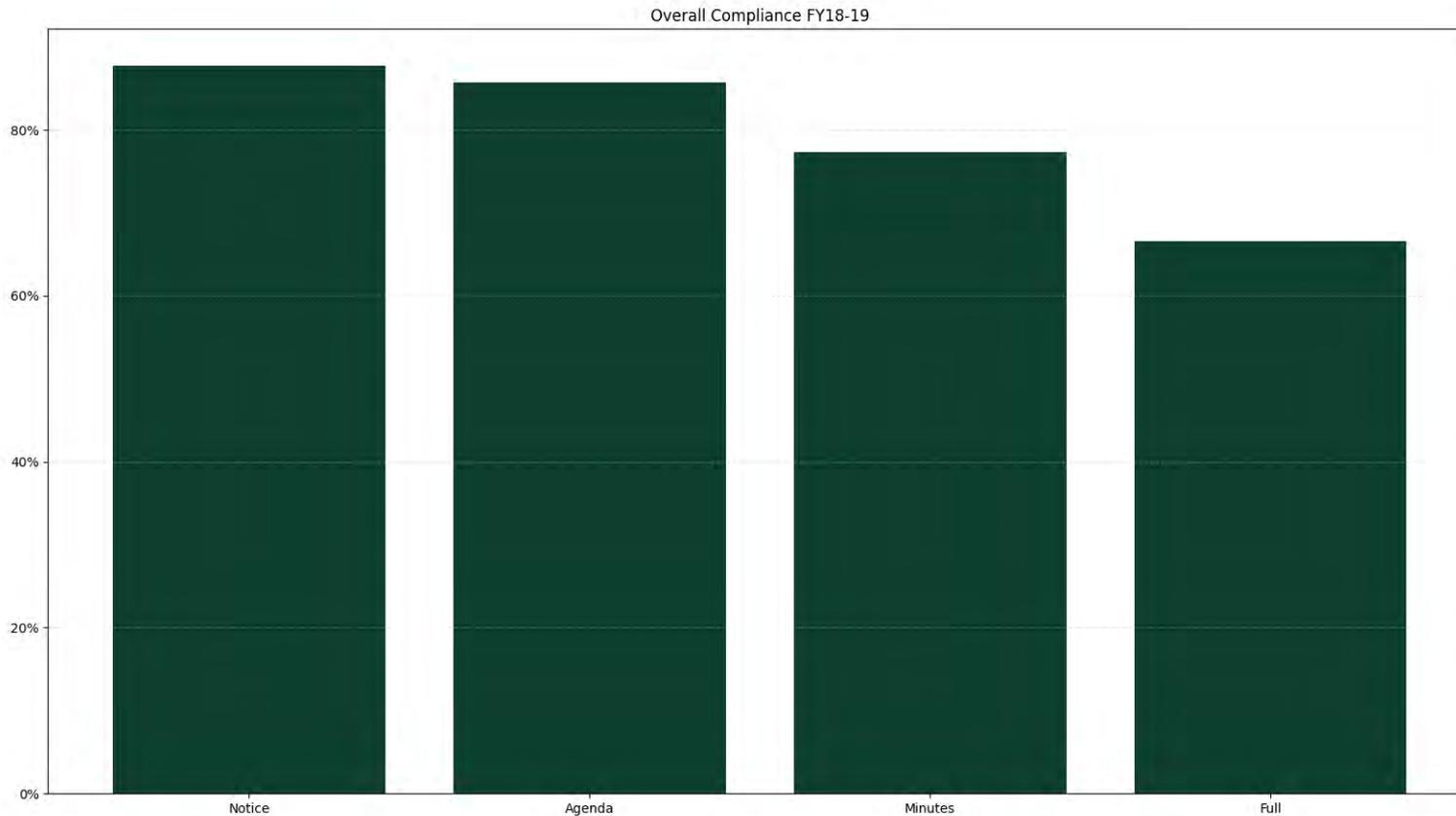
- Notice: high compliance
- Agenda: slightly lower
- Minutes: lowest compliance category
- Full compliance significantly lower

Top 10 Public Bodies With Missing Minutes

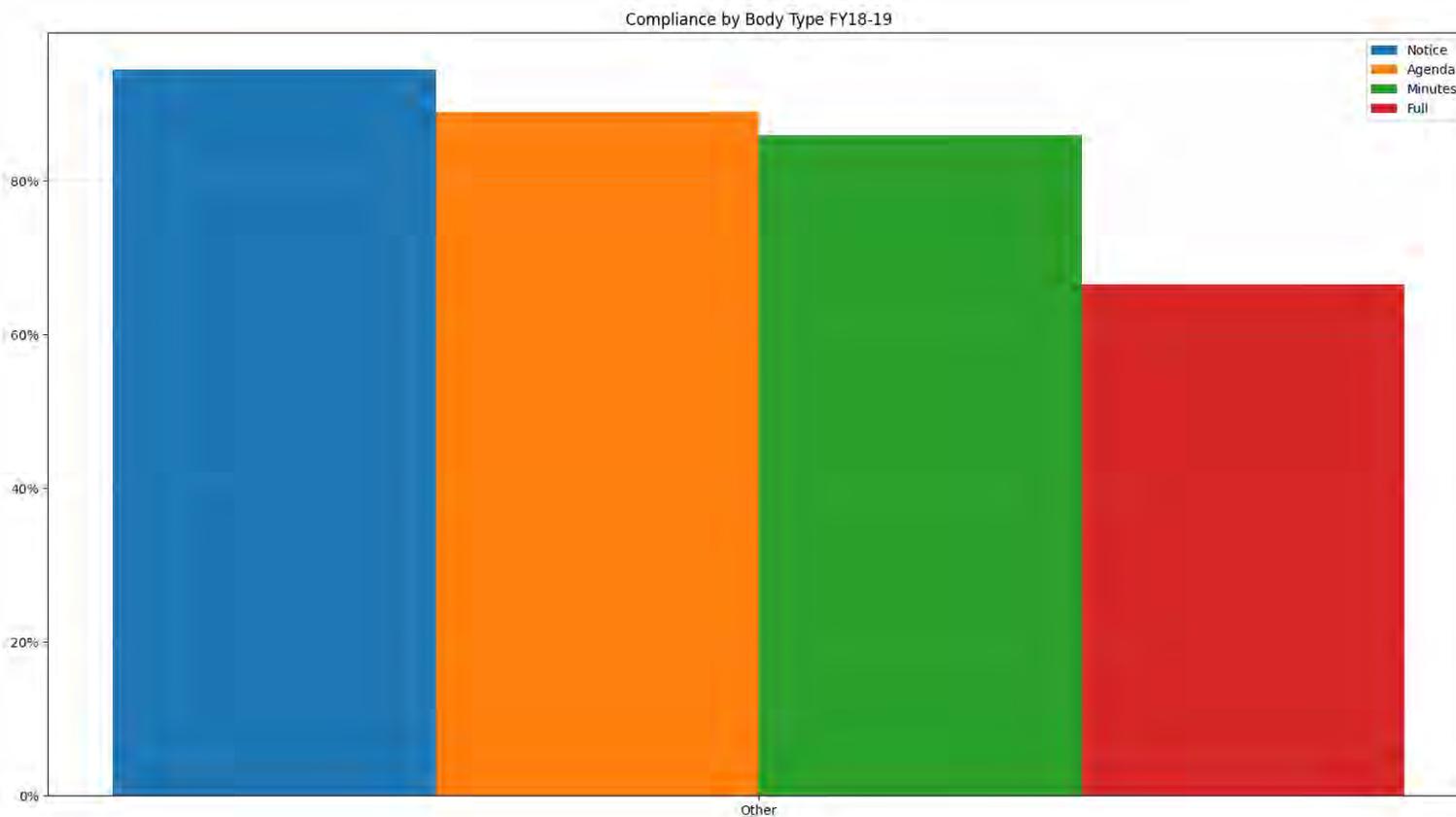Top Bodies Missing Minutes FY18-19

Incidences of how many times the top 10 public bodies without meeting minutes failed to post them:

- Bodies posting notice + agenda but missing minutes
- Key transparency gap indicator
- OOG to Highlight top entities for remediation
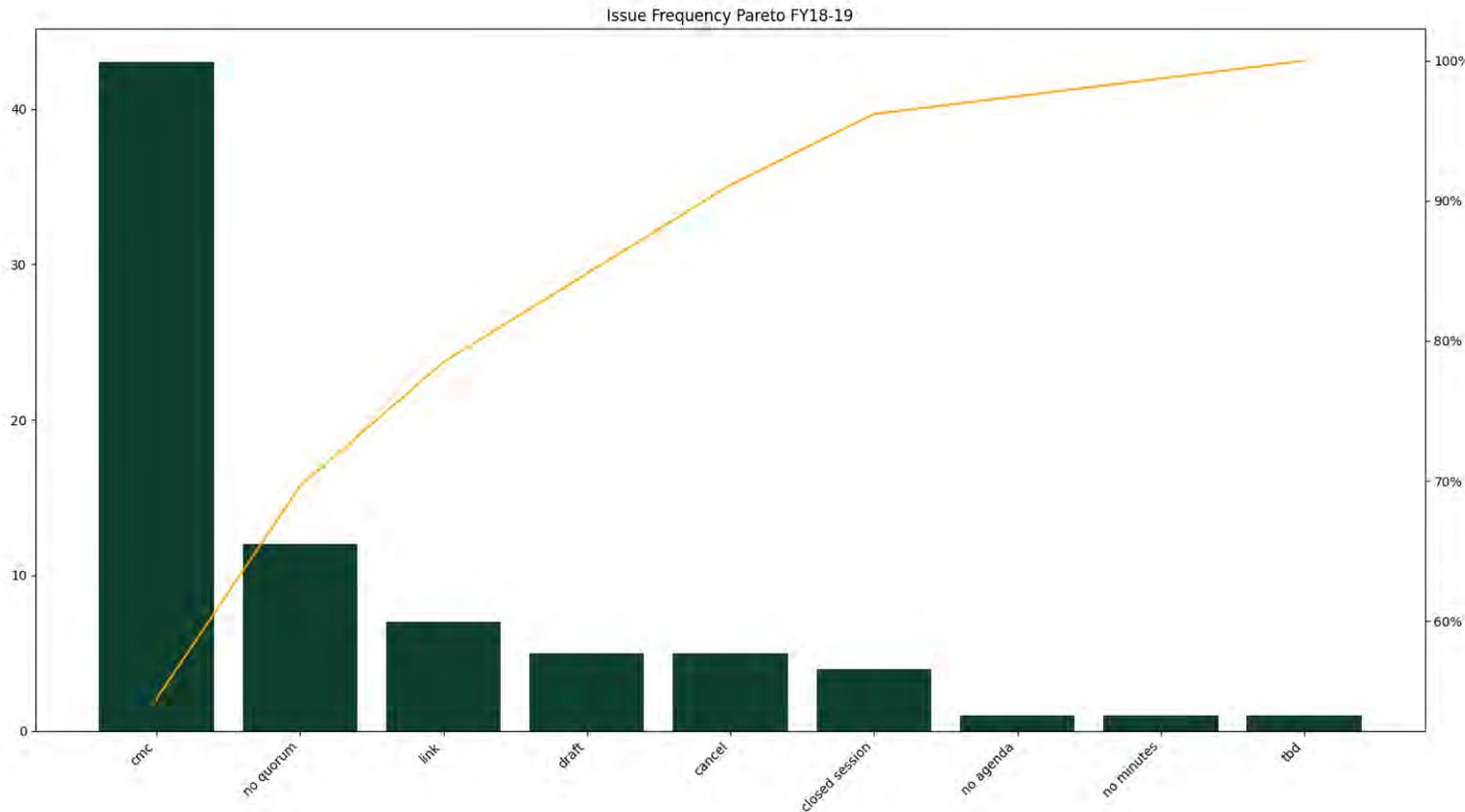
Transparency Issue Patterns

Compliance by Body Type

Compliance by Body Type FY18-19

Boards show largest activity variation
Commissions and committees similar patterns
Minutes weakest element

# Issue Frequency Pareto

Issue Frequency Pareto FY18-19

The Pareto principle (often called the 80/20 rule) is the idea that a small portion of causes often produces the majority of results.

- Closed-session citation issues frequent
- Link/CMC access problems affect usability
- Minutes quality concerns recurring

FOIA Website Findings

FOIA Website Deficiencies

FOIA Website: Top Agencies by Deficiency Count
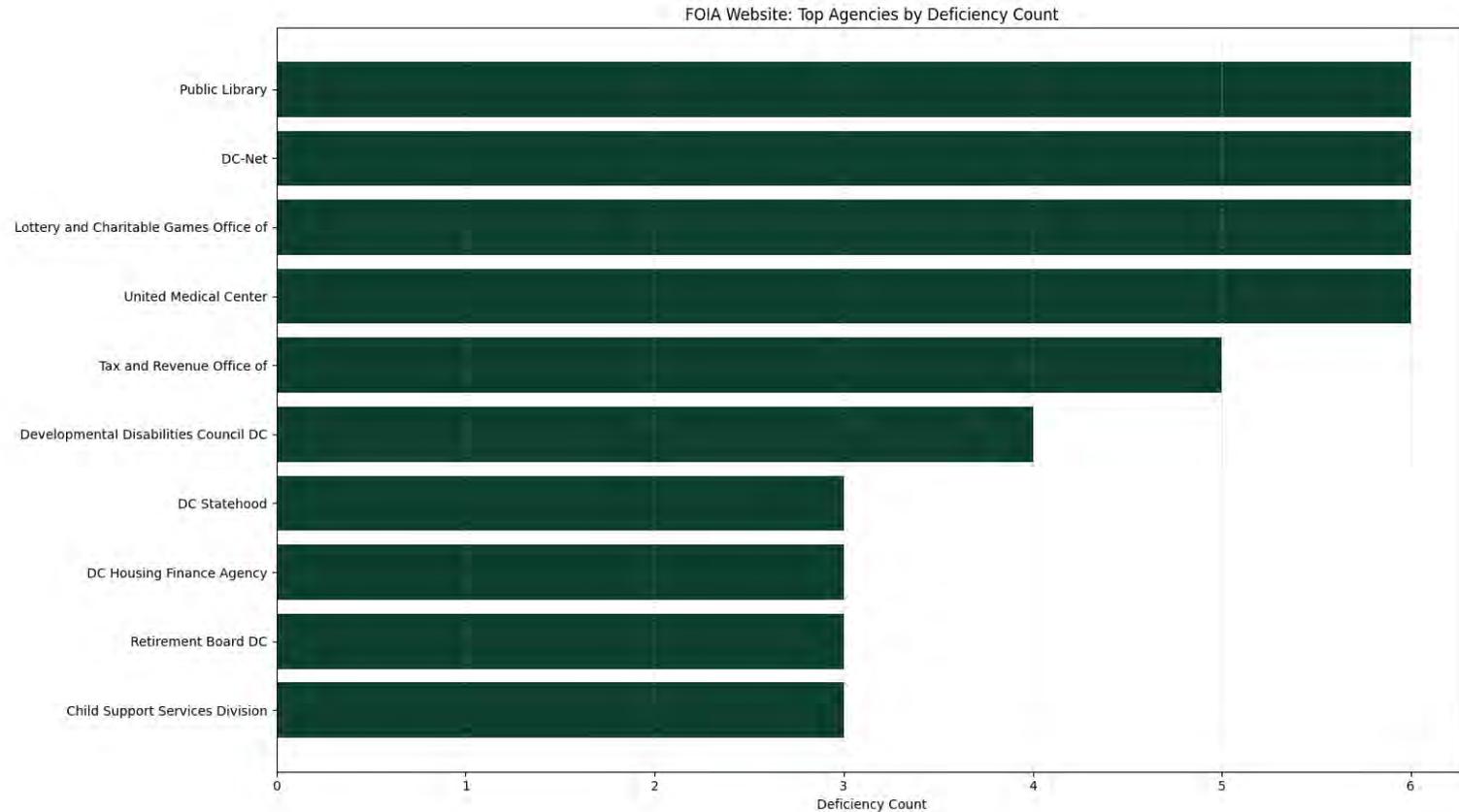
Agencies with highest deficiency counts
Outdated or missing financial info
Entity listing inconsistencies

Recommendations

Standardization

OOG recommends the creation and application of consistent rules, methods, formats, and procedures so websites are updated in the same manner.

- Adopt common templates
- Closed-session citation format compliance
- Posting deadlines for minutes
- Improve link reliability
- Adopt standardized templates with required citation blocks and set a 1-business-day minutes-posting deadline.
- Prioritize remediation for top boards/commissions repeatedly missing minutes.

Transparency Infrastructure

Ensure there are public information systems and technical platforms available to ensure compliance.

- Centralized posting system
- Archive index by FY and body
- Machine-readable formats
- Quarterly transparency scorecard
- Create centralized repository to improve link integrity and ensure currency of financial disclosures.
- Publish quarterly transparency scorecards tracking full compliance.

Training & Governance

- Staff training on OMA and FOIA requirements.
- Monthly link integrity checks.
- Escalation process for repeated deficiencies.
- Provide recurring OMA training focused on minutes quality and closed-session citation accuracy.
- Implement escalation protocol for repeated non-compliance cases.
- Provide FOIA training that includes information that should be available on agency's websites.

Appendices

Methodology

Audit Objective

The objective of this audit is to evaluate whether District of Columbia government agencies and public bodies maintain publicly accessible websites that comply with the transparency requirements of the District's Freedom of Information Act (FOIA) and Open Meetings Act (OMA). The audit assesses whether required information is:

Publicly available

Easily accessible

Posted in a timely manner

Complete and accurate

The audit also identifies common deficiencies and opportunities to improve government transparency infrastructure.

Manual Review of Websites by OOG Staff on a Rolling Basis

Full Audit Results Posted on open-dc.gov in excel spreadsheet in FY19:

Meeting-level compliance analysis

FOIA website compliance matrix

OMA website compliance matrix

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