

Lottery Made Summer Camp More Equitable

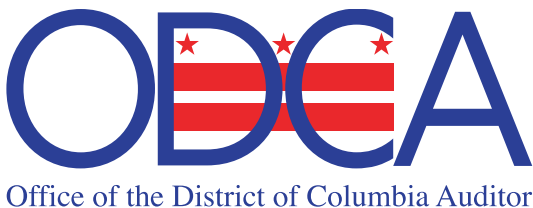
August 15, 2025

A report by the Office of the District of Columbia Auditor



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Lottery Made Summer Camp More Equitable

ODCA conducted this discretionary audit to determine if the Department of Parks and Recreation (DPR) effectively implemented the 2023 and 2024 summer camp registration lotteries. Findings include that:

- DPR made progress on its goal of using the lottery to create a more fair and equitable summer camp registration system.
- DPR continued to improve the ease of camp registration in 2024.

We also found that:

- DPR allowed manual camp registrations outside the automated lottery and waitlist process and allowed its employees to register for camp slots outside the lottery, and in 2024, before the waitlist opened.
- DPR did not detect instances of multiple lottery entries for the same child, which diminished fairness.
- DPR's residency forms lacked required regulatory stringency and the sworn residency statement.
- DPR did not verify residency for all lottery participants as required by D.C. Code.
- DPR's reduced rate income eligibility levels complied with regulations, but DPR did not ensure that all applicants submitted proof of qualifying income and received the correct discount, nor were the discounts always accurately calculated.

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15%

Increase in kids enrolled
(2022 to 2024)

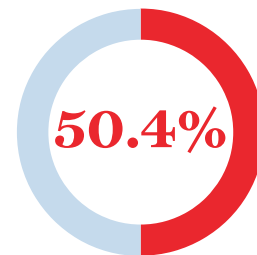
4%

Increase in slots available
(2022 to 2024)

15%

Increase in reduced rate
households in camp (2023 to 2024)

Kids applying that
received no slots in 2024



Total summer camp lottery slots

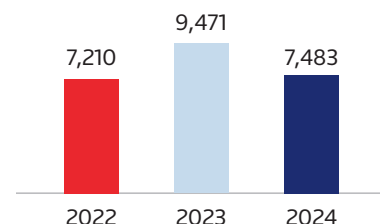


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Executive Summary

Why ODCA Did This Audit

ODCA conducted this discretionary audit to determine if the Department of Parks and Recreation (DPR) effectively implemented the 2023 and 2024 summer camp registration lotteries.

What ODCA Found

- DPR made progress on its goal of using the lottery to create a more fair and equitable summer camp registration system. In 2024, DPR continued to improve the ease of camp registration.
- DPR allowed manual camp registrations outside the automated lottery and waitlist process and allowed its employees to register for camp slots outside the lottery, and in 2024, before the waitlist opened.
- DPR did not detect instances of multiple lottery entries for the same child, which diminished fairness.
- DPR's residency forms lacked required regulatory stringency and the sworn residency statement.
- DPR did not verify residency for all lottery participants as required by D.C. Code.
- DPR's reduced rate income eligibility levels complied with regulations, but DPR did not ensure that all applicants submitted proof of qualifying income and received the correct discount, nor were the discounts always accurately calculated.

What ODCA Recommends

- DPR should develop and implement camp registration policies and procedures that include a requirement to document reasons in DPR's registration system (RecTrac) for manual registrations and supervisory review of the process.
- DPR should require employees to follow the same lottery registration process as the public and include that statement in the camp registration policies and procedures.
- DPR should add to camp registration materials language that prohibits multiple account holders from entering the same child in the lottery.
- DPR should develop and implement residency verification policies and procedures to prevent non-residents from entering the lottery and to detect any false residency documentation.
- DPR should revise its regulations to reflect the mandatory nature of proving residency if a preference is requested, as stated in D.C. Code and DPR's residency verification policies and procedures should require verification of all lottery participant households for each enrollment period.
- DPR should develop and implement reduced rate program policies and procedures that detail the collection, storage, and supervisory review of documentation that proves qualifying income and household size.

Background

The District Department of Parks and Recreation (DPR) offers summer camp for children aged three to 13, with four two-week sessions. DPR camp types and themes include:

- Two signature day camps (Little Explorers and Discovery Camp).
- Several sports and swimming camps.
- Various specialty camps with a focus on performing arts, STEAM (science, tech, engineering, arts, and mathematics), and culinary arts.¹

Research shows that participating in quality afterschool and summer programs benefits children and youth in terms of “academic performance, social and emotional learning, and health and wellness.”² But summer camp is also a crucial source of childcare for many working parents once school is out for the summer. DPR’s summer camps are a popular and affordable option. Prices range from \$135 to \$325 per two-week session. Additionally, DPR offers a reduced rate to assist D.C. residents with fee assistance, based on income and household size.

Why DPR moved to a lottery

Community input gathered to develop DPR’s 20-year strategic plan showed “residents expressed a strong desire for ... summer camp” and that a top barrier to participation was that DPR programming fills up too quickly.³

In 2022 prior to the lottery, online camp registration was on a first-come, first-served basis, and slots would sell out in minutes. Local media described the process as “high-stress,” “a brutal scramble,” like “the Hunger Games” or akin to securing hard-to-get concert tickets. DPR staff described a high level of stress as they received calls and visits from frustrated customers.

The D.C. Council committee with DPR oversight recommended in 2022 that “DPR develop an equitable process for registration for camps and programs to include outreach efforts and strategies that allow participation from residents from all wards” and repeated the recommendation in 2023.⁴

DPR’s pre-lottery registration website had difficulty handling the large volume of visitors and, before the pandemic, staff proactively began researching new options for summer camp registration, according to DPR staff. DPR reported that it conducted comprehensive research in collaboration with the District’s

1 Boost Camps with a stronger educational component were available through the lottery in 2023 and then moved outside the lottery process in 2024. Camps such as Therapeutic Camps (open to youth with developmental disabilities) did not use lottery registration. For 2023 and 2024, this report presents participation data for camps that were in the lottery.

2 Learn 24, “About Learn 24,” <https://learn24.dc.gov/node/1301921>.

3 DPR, Ready2Play, 2023, https://s3-us-west-1.amazonaws.com/ehq-production-us-california/9de39b60d8e3049a3ba095be7fb7d-7b815591eff/original/1710447897/0f66cf95ce075326c6f25e60f925e080_DC_DPR_Ready2Play_Master_Plan.pdf?1710447897, p. 38.

4 “Report and Recommendations of the Committee on RYLA on the FY23 Budget for Agencies under Its Purview,” April 20, 2022, p. 34, <https://dccouncil.gov/wp-content/uploads/2022/04/RYLA-Draft-Budget-Report-FY23-4-20-22.pdf>; and “Report and Recommendations of the Committee on RYLA on the FY24 Budget Agencies under Its Purview,” April 26, 2023, p. 37, https://dccouncil.gov/wp-content/uploads/2023/05/FY24-RYLA-Committee-_DRAFT.2-for-merge.pdf. Formerly the Committee on Recreation, Youth and Library Affairs (RYLA); DPR is under the Committee on Facilities for Council Period 26 (2025-2026).

Office of the Chief Technology Officer (OCTO) and several leading recreational management agencies across the county. This effort identified two options, a lottery or a waiting room, an option that randomizes everyone logged on at the same time, similar to methods used for high-demand ticket sales.⁵

DPR introduced a lottery registration for the summer camp enrollment process in 2023, “to create a more fair and equitable system to allocate the limited number of camp slots.”⁶ Agency staff described immediately planning for the 2024 lottery right after the 2023 lottery concluded.

Prioritizing racial equity

The D.C. government has made racial equity a stated priority since the Council passed the Racial Equity Achieves Results (REACH) Amendment Act of 2020.⁷ The Mayor and the Director of the Mayor’s Office of Racial Equity (ORE) in 2024 released the District’s first Racial Equity Action Plan (REAP), a three-year roadmap outlining actions the District will take to close racial equity gaps and measure progress toward a more equitable D.C.⁸

DPR was a member of the first Racial Equity Cohort, which met regularly to develop agency-level racial equity action plans. DPR’s Racial Equity Vision Statement notes that, “Park Equity means tailoring and targeting interventions and engagement to address and redress the injustices experienced by various communities and populations caused by institutional racism, disinvestment, and lack of representation” and this means “meeting people where they are ... to ensure they have the access, resources, and opportunities needed.”⁹

DPR’s equity statement envisions meeting people “where they are” and redressing past injustices and highlights a key distinction between the term “equality,” which means everyone receives the same treatment, and “equity” which means everyone receives the amount of treatment needed to obtain a desired outcome.¹⁰

Defining an agency or program’s equity goal is important for tracking performance as there are different ways to improve equity in government programs. It may include assessing equality of access, procedural fairness and equal treatment, causes of disparate outcomes, or distributional impacts.¹¹ It could also include focusing on inputs, outputs, processes, and/or outcomes, defined as follows.¹²

- Inputs: Do groups have equal access to benefits? Do groups have equitable access to benefits?
- Outputs: Are benefits distributed equitably?

5 DPR staff described using a waiting room for camp in 2022.

6 DPR Web Page, “FAQs for DPR Summer Camps,” <https://dpr.dc.gov/node/1455576>.

7 D.C. Law 23-181, effective March 16, 2021.

8 ORE, “Districtwide 2024 Racial Equity Action Plan,” 2024, https://ore.dc.gov/sites/default/files/dc/sites/ore/page_content/attachments/ORE-REAP-020124.pdf.

9 DPR, Ready2Play, p. 29.

10 General Services Administration (GSA) Office of Evaluation Services (OES), “Defining Equity in Federal Government Evaluations,” p. 1, accessed October 10, 2024; Government Alliance on Racial Equity (GARE), “Communications Guide,” May 2018, <https://ore.dc.gov/publication/gare-communications-guide>, p. 36.

11 Government Accountability Office, “GAGAS Performance Audits: Discussion of Concepts to Consider When Auditing Public Functions and Services,” <https://www.gao.gov/assets/2021-04/Performance-Audit-Discussion.pdf>.

12 GSA OES, p. 2.

- Processes: Are groups treated equitably in implementation?
- Outcomes: Do groups have different or similar outcomes?

Having reliable data is also key to assessing equity in recreation programs like camps, as it allows organizations to track the baseline of where they are now and then set targets of where they want to go.¹³ As the American Camp Association notes, “thriving communities are built on equitably inclusive experiences that both attract and celebrate diversity.”¹⁴ DPR’s draft Racial Equity Action Plan states a commitment to eliminating racial and ethnic inequities and seeks outcomes such as diverse programming, the evaluation of which relies on having complete demographic data. In an April 2024 DPR budget oversight hearing, a parent advocate testifying in support of adequately funding DPR noted that more specific data is needed about the demographics and geographic locations of youth and families being served by summer camp.

13 American Camp Association (ACA), “Easy as One, Two, Three: Using Data to Advance Equity at Your Camp,” July 1, 2022, <https://www.acacamps.org/article/camping-magazine/easy-one-two-three-using-data-advance-equity-your-camp>, pp. 2-3.

14 ACA, “Why Inclusion and Belonging Matter at Camp,” <https://www.acacamps.org/about/inclusion-belonging/why-it-matters>, p. 1.

Objective, Scope, and Methodology

Objective

To determine how effectively DPR implemented the 2023 and 2024 camp registration lotteries.

Scope

The audit scope was Fiscal Years 2023-2024 (October 1, 2022 – September 30, 2024).

Methodology

To conduct this review, we:

- Reviewed D.C. Code, District of Columbia Municipal Regulations (DCMR), internal DPR policies and reports on lottery registration administration, and DPR web pages for lottery and summer camp requirements and forms.
- Analyzed DPR budgets, Performance Accountability Reports (PARs), performance plans, the Ready2Play Strategic Plan, the draft Racial Equity Action Plan, Council performance oversight information, and relevant Council committee reports.
- Interviewed multiple DPR staff and managers who worked on and oversaw summer camp registration and lottery administration.
- Requested and assessed 2022 DPR summer camp enrollment data to determine the number of unique camp participants and households, total slots, and total camp sessions as a benchmark against which to compare 2023 and 2024 registration camp data.
- Requested and assessed 2023 and 2024 lottery participation and camp enrollment data to determine the number of unique lottery participants and households, and numbers of participants receiving no camp slots, as well as unique camp participants and households and total slots. Additionally, we analyzed:
 - Ethnicity, language, and gender fields for all three years to determine demographics of camp enrollees. Analyzed the demographics of those receiving slots compared to those not receiving slots, as well as conducting a similar demographic comparison for the most popular camps.
 - Instances of outliers, including lottery entries and camp enrollments for the same children in different DPR household accounts.
 - Reduced rate discounts, camp fees, and camp fees charged.
- Cross referenced 2023 and 2024 DPR employee data from the D.C. Department of Human Resources (DCHR) with DPR camp household data to determine whether DPR employees participated in the lottery and enrolled in camp slots for their children. Corroborated the list of DPR employees in the DPR camp data with DPR.
- Geocoded the DPR data using D.C.'s Master Address Repository (MAR) and analyzed the validity of the geocoded data.

- Assessed residency documentation for a random sample of 25 enrolled camp households and 25 enrolled reduced rate camp households to determine whether the documentation was sufficient and met DPR’s residency criteria. Assessed a judgmental sample of employee households’ residency documentation.
- Assessed sufficiency of proof of qualifying income for a random sample of 25 enrolled camp households receiving a reduced rate and whether households were eligible for the reduced rate they received. Assessed a judgmental sample of employee households for proof of qualifying income and reduced rate eligibility.
- Assessed the internal controls of DPR’s residency and income verification processes, specifically the control activities implemented to achieve objectives and respond to risks.
- Reviewed related advocacy publications and local news articles about summer camp, lottery registration, equity, and out of school time programs, as well as information on other jurisdictions’ camps, and feedback about the lotteries on the DC Urban Moms and Dads website.
- Reviewed Government Accountability Office (GAO) and other government sources for information on defining and assessing equity in performance audits.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Audit Results

We found DPR’s lottery implementation advanced its goal of a more fair and equitable registration system and after the lottery more children, households, and reduced rate households got a camp slot. We also found room for improvement, as some of DPR’s practices did not follow legal requirements and reduced fairness.

DPR’s summer camp lottery goals and its agency goals—both intended to increase equitable access—were aligned.

DPR published Mayor Bowser’s 2024 lottery announcement, noting, “[W]e implemented our summer camp lottery last year ... to make our registration system more inclusive and equitable.”¹⁵ DPR’s Summer Camp Frequently Asked Questions (FAQs) further stated that it “introduced lottery registration for summer camps in 2023 to create a more fair and equitable system to allocate the limited number of camp slots.”¹⁶

In terms of agency goals, DPR’s Mission was “to provide equitable access” to programs and a Strategic Objective was to “[E]nsure that all Residents of the District of Columbia have equal access to high quality, outcomes-based programs, facilities, and services.”¹⁷ DPR’s Ready2Play Master Plan 2023 had a goal to “provide more equitable access.”¹⁸ DPR’s 2023 draft Racial Equity Action Plan (REAP) committed to “ensure that all members of our community, regardless of their race or ethnicity, have equitable opportunities to access and enjoy the vast array of recreational programs, facilities, and natural spaces we offer.” DPR’s January 2024 performance oversight response to the Council explained that “the use of a lottery system helped to increase equity in accessing” summer camp, “one of the most in-demand DPR programs.” Figure 1 is a word cloud that highlights “equitable” and “access” appearing larger as the most frequently used words in DPR’s agency and lottery goals.

15 DPR web page, “Mayor Bowser Reminds Families to Register for DPR Summer Camp Lottery Starting on February 12,” <https://dpr.dc.gov/release/mayor-bowser-reminds-families-register-dpr-summer-camp-lottery-starting-february-12>.

16 DPR web page, “Frequently Asked Questions,” <https://dpr.dc.gov/node/1455576>.

17 DPR Performance Accountability Reports, FYs 2022 – 2024. Office of the City Administrator, <https://oca.dc.gov/node/160682/>

18 DPR, “Ready2Play,” p. 108.

Figure 1: Key Words Used in DPR Stated Goals



Source: DPR documents and ODCA use of WordClouds.com

We found DPR’s lottery goal of a more equitable system to allocate camp slots aligned with DPR’s agency goal of more equitable access to DPR offerings.¹⁹ DPR’s mission and goals showed the agency’s transition over several years from using the term “equal” access to “equitable” access,²⁰ reflecting that not all individuals start from the same place and some need additional support to succeed.²¹ Both DPR’s draft Racial Equity Action Plan, not publicly released during our scope, and its Ready2Play Strategic Plan also referred to “equitable” access.

DPR’s language describing the lottery implies it was focused on equity of access, or the input of the opportunity to try for a camp slot. This differs from focusing on the equity of outcomes of the lottery registration process, or who got the slots and how different groups fared with the new system.

Equity becoming central to DPR’s institutional goals was also evident in staff interviews. Agency officials and staff expressed the lottery goal of increasing equitable access, while management provided a more nuanced description of the goals and how to achieve them. Several staff described taking a customer service approach and trying to reduce barriers for residents to access camp, and a high-level official noted equity was intentionally providing opportunities for vulnerable populations.

While DPR’s agency goals did not mention fairness, its lottery goals sought to make camp registration fairer in terms of accessing camp. In 2022, before the lottery, online camp registration opened at a set time, and slots for the most popular camps sold out within minutes. This benefited those able to be at a computer and online at noon on the registration date. A high-level DPR official noted that DPR received a lot of complaints from parents, Advisory Neighborhood Commissions, and others that the prior camp registration system was not fair to those unable to access camp registration before the lottery, for reasons such as not being in front of a computer and needing to work during the registration time.

19 DPR’s lottery goals do not explicitly use the word “access” as do agency goals, however, the word is implied since it is about the “system to allocate slots.”

20 DPR was amidst this language shift as in the same document reflecting its updated Mission, its Strategic Objective still used “equal” access.

21 GARE, “Communications Guide,” May 2018, p. 36.

DPR made progress on its goal of using the lottery to create a more fair and equitable summer camp registration system.

DPR’s lottery was introduced to more fairly and equitably “allocate the limited number of camp slots,”²² and we found DPR designed the 2023 lottery registration process to increase equitable access to camp slots by taking the following actions:

- Established a multi-week window to make registration more convenient.
- Throughout the window, offered in-person registration assistance at multiple recreation centers and locations.
- Translated the summer camp website into Spanish, and camp information into Spanish and five other languages.

In 2024, the second year of the lottery, DPR continued making improvements to increase access, such as moving the registration period earlier—from mid-March in 2023 to mid-February in 2024—to assist families with planning.

Figure 2 shows the schedules for the lottery registration process.

Figure 2: D.C. Summer Camp Lottery Registration Timeline, 2023 and 2024

	2023	2024
Lottery Registration Opened	March 13 to April 5	February 12 to 26
Lottery ‘Spin’ (random participant selection)	April 18	February 28
Deadline to pay for slots won in Lottery	May 1	March 6
Remaining slots opened to Waitlist	May 10	March 21
Remaining slots opened to Non-residents	June 5	May 15

Source: ODCA compiled from DPR documentation.

DPR’s actions showed a responsiveness to public feedback, which is a practice for advancing equity.²³ For example, a 2023 comment posted on an online parenting forum described frustrations about the late start date of DPR’s first lottery and the difficulty of finding alternatives if a slot was not received.²⁴

In terms of creating a more fair and equitable system, DPR’s use of the lottery corresponded with more unique children and households enrolling in at least one slot.²⁵ While there was an increase in slots in 2023, a larger percentage of unique kids and households enrolled than the increase in slots. The increased enrollment was more pronounced between 2022 and 2024, when the increase in slots was only 4% but the increase in children enrolled was 15%, as seen in Figure 3.

22 DPR web page, “Frequently Asked Questions.”

23 NRPA, “Three Helpful Tips for Equitable Summer Programming,” February 23, 2023, <https://www.nrpa.org/parks-recreation-magazine/2023/march/three-helpful-tips-for-equitable-summer-programming/>. DPR already engaged in another practice for equitable summer programming, that of offering financial assistance to reduce barriers.

24 ODCA review of comments about the DPR lottery on DC Urban Moms and Dads Weblog (<https://www.dcurbanmom.com>).

25 Further data and analysis would be needed to prove the lottery caused the increase and measure the impact.

Figure 3: 2022–2024 D.C. Summer Camp Participation, by Slots, Children, and Households

	2022 (pre-lottery)	2023 (lottery)	% Increase 2022 to 2023	2024 (lottery)	% Increase 2022 to 2024
Slots Available	7,210	9,471	31%	7,483	4%
Children Enrolled	3,261	4,367	34%	3,746	15%
Households Enrolled	2,419	3,289	36%	2,795	16%

Source: ODCA analysis of DPR data. Note: One child may be enrolled in multiple slots. Kids enrolled by multiple households are double counted.

Additionally, DPR took steps to increase access for lower-income households. While reduced rate participants did not receive priority in the lottery, DPR:

- Informed reduced rate lottery participants of remaining slots in 2023 before other households (after slots were offered to the waitlist).
- Extended households’ 2023 reduced rate eligibility through the 2024 lottery season.
- Opened the 2024 Reduced Rate Application one month earlier than the 2023 Reduced Rate Application to give participants more time to sign up and staff more time to review applications.

There was a 15% increase in the number of reduced rate households enrolled in camp from 2023 to 2024, even as the number of slots decreased, based on our data analysis as shown in Figure 4.

Figure 4: Reduced Rate for D.C. Summer Camp Participants, 2023 and 2024

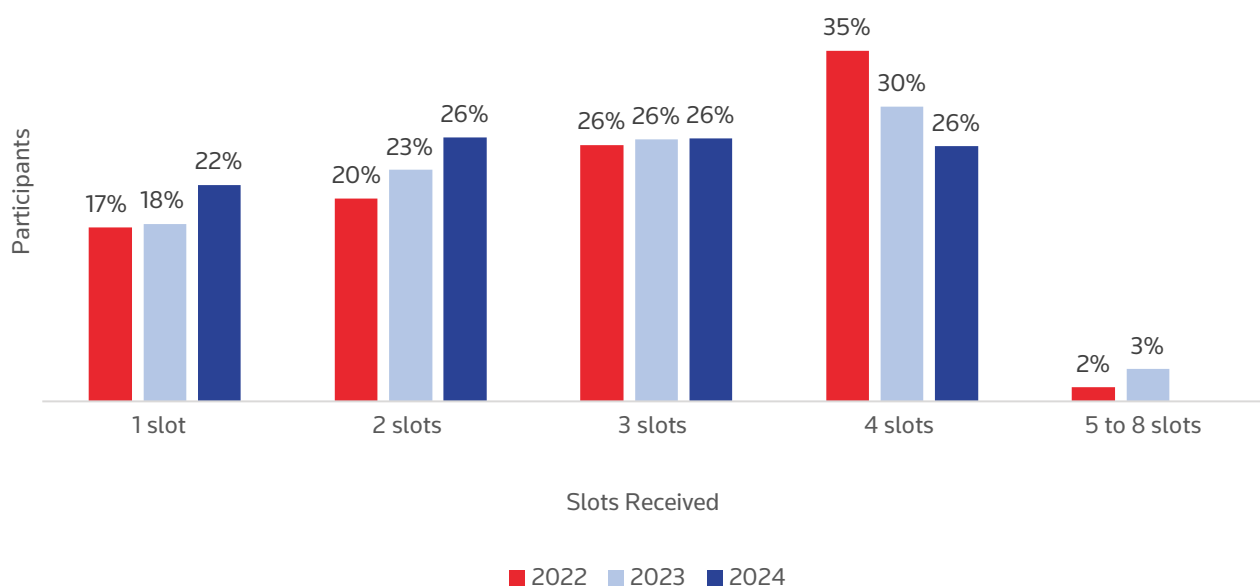
	2023	2024	% Change
Slots	1,993	1,831	-8%
Unique Kids	722	808	12%
Unique Households	490	564	15%

Source: ODCA analysis of DPR data.

Creating a more fair and equitable system and increasing the number of unique children and households who received at least one slot meant that fewer children got slots in all four sessions to cover the whole summer. Figure 5 below shows fewer children got four slots in 2023 and 2024, compared to 2022, before the lottery. This data point seemed to confirm a concern posted in an online parenting forum that this system would not work for younger kids who need the continuity of having the same camp location all summer, one potential negative by-product of the lottery changes.²⁶

26 ODCA review of comments about the DPR lottery on the DC Urban Moms and Dads Weblog (dcurbanmom.com).

Figure 5: Percentage of D.C. Summer Camp Participants Receiving 1–8 Slots, 2022–2024



Source: ODCA analysis of DPR data. **Note:** A small number of camps had between 5 and 8 sessions in 2022 and 2023.

More details on camp participation can be found in Appendix A, such as data visualizations of enrollments; slots available; and kids not receiving any slots; as well as a breakdown of how many slots kids received each year. Additional figures detail demographics of camp participants, including a breakdown of ethnicity, language spoken at home, and gender.

DPR improved the ease of camp registration in 2024 by making the sibling linking and waitlist processes more automated and user-friendly than in 2023.

DPR’s 2023 *Ready2Play Plan* committed to improve the ease of “program registration to enhance user experience.”²⁷

DPR improved users’ ease of camp registration by enhancing the sibling linking in 2024. DPR added features so that when one child won a slot in the lottery, their sibling, who was independently seeking a slot at the same camp, could be granted a registration preference. In 2023, DPR staff manually registered linked siblings using Excel spreadsheets, though its 2023 FAQs stated that preferences would “automatically be granted.” In 2024, DPR used automated features in its registration system, called RecTrac, if parents opted to link siblings.

DPR employed a RecTrac waitlist function in 2024 so that after the lottery randomly assigned a set number of slots, additional children were randomly assigned a spot on the waitlist so they could enroll if the kids who won the slot in the lottery did not enroll. In 2023, DPR managed the waitlist primarily using spreadsheets, which required staff to manually register children, and capped it at seven kids per camp. In 2024, the waitlist was automated and capped at 25 children.

²⁷ DPR, “Ready2Play,” p. 108.

DPR manually managed the sibling linking and waitlist processes in 2023 because the available RecTrac automated options were not user-friendly, and staff did not want to confuse users of the already-new registration process. After the 2023 lottery, DPR worked with its vendor to overhaul the 2024 RecTrac interface to make it more user-friendly.

According to DPR, the 2023 manual processes created additional work for staff and led to delays in communicating with customers. The 2024 RecTrac upgrades contributed to a drop in manual registrations—20% of enrollments in 2023 declined to 7% of enrollments in 2024. Automated sibling linking and waitlist processes are fairer as they are less subject to manipulation and error. The reception of DPR's improvements were reflected in a 2024 comment on an online parenting forum, noting "it already seems better than last year."²⁸

DPR allowed manual camp registrations outside the automated lottery and waitlist process in 2023 and 2024.

DPR's lottery commitment was "to create a more fair and equitable system" and DPR's FAQs further stated that after the lottery closed, rosters for each camp were randomly selected from those who were registered and that the random selection of camp slots was done "entirely and exclusively through our Recreational Management Software System." The 2024 FAQs additionally explained that "After the waitlist is exhausted ... available slots will immediately become available online for purchase on a first-come, first-served basis."

We found DPR staff made manual registrations outside the automated lottery and waitlist process, calling into question the fairness and random selection process to which DPR was committed. Our sample of manual registrations found there were no notes in RecTrac, staff could not remember why they were made, and some staff who entered these registrations were no longer employed at DPR.

DPR did not set up RecTrac to require staff to select a reason why a manual registration was necessary, nor was management approval required. Also, there were no written policies that detailed when it was appropriate to use manual registration, which could have helped ensure fairness and consistency for all households.

As a result, it was possible DPR staff gave participants slots that they did not win through the lottery or waitlist process. While there were legitimate reasons for staff to use manual registration, such as to help customers who made registration errors or missed a payment deadline, there was a risk that households with DPR employees' assistance went around the process, and management could not detect it.

Recommendation

1. DPR should develop and implement camp registration policies and procedures that include a requirement to document reasons in RecTrac for manual registrations and supervisory review of the process.

28 ODCA review of comments about the DPR lottery on DC Urban Moms and Dads Weblog (dcurbanmom.com).

DPR allowed its employees to register for camp slots outside the lottery in 2023 and 2024, and before the waitlist opened in 2024.

While the lottery was “to create a more fair and equitable system,” rosters for each camp were to be randomly selected, and available slots were to become immediately available online for purchase after the waitlist was exhausted, we found DPR also had a separate registration process and timeline for employees, though some DPR employees participated in the lottery and many received slots that way.

After the lottery ‘spin’ when participants were randomly selected, DPR management emailed its employees on May 18, 2023, and March 14, 2024, that DPR staff would assist other employees with camp registration and provided a link to gauge interest. In 2023, the email was sent after the waitlist opened, while in 2024, DPR sent the email before the waitlist opened, as shown in Figure 6.

Figure 6: Key D.C. Summer Camp Lottery Dates, 2023 & 2024

2023		2024	
Lottery Spin	April 18	Lottery Spin	February 28
Waitlist Open	May 10	Employee Email Sent	March 14
Employee Email Sent	May 18	Waitlist Open	March 21

Source: ODCA compiled from DPR documentation.

Further, staff described different employee registration processes for what was actually allowed, indicating a lack of clarity about the process and timeline.

We also found some DPR employees received slots that appeared to be outside of both the lottery and waitlist process, as well as the DPR employee process.

- In 2023, two DPR employees out of 34 receiving slots were manually registered for five slots and in 2024, there was an increase, as 10 employees out of 27 receiving slots were manually registered for 35 slots **before the waitlist opened.**
- In 2023, three employees were manually registered for six slots and in 2024, two employees were manually registered for six slots **before the employee email went out.**

Even after camp registration switched to a lottery from first-come, first-served—when DPR employees had to work instead of registering their own child—DPR continued its practice of allowing employees to register in a process separate from the public process. Also, there was no process to track manual registrations or supervisory monitoring to ensure employee registrations were fair and consistent with the established timelines.

This separate process reduced fairness as we saw a higher percentage of employees got at least one slot for their children than did non-employee households, as seen in Figure 7.

Figure 7: Employees and Non-Employee Households Getting D.C. Summer Camp Slots, 2023 and 2024

	2023	2024
Employees seeking camp slots	40	41
# of Employees getting at least one slot	34	27
% of Employees getting at least one slot	85%	66%
% of Non-Employee households getting at least one slot	62%	53%

Source: ODCA analysis of DPR data.

Additionally, by not making it public that employees would have a separate process, DPR reduced lottery and camp registration transparency. Further, some employees got preference over other employees as their registrations occurred before the DPR established timelines.

Recommendation

2. DPR should require employees to follow the same lottery registration process as the public and include that requirement in the camp registration policies and procedures.

DPR did not detect instances of multiple lottery entries for the same child, which diminished fairness.

As DPR’s lottery was “to create a more fair and equitable system,” in 2024 we found at least 34 children with the same name, date of birth, and address, were entered into the lottery multiple times under different household accounts, thereby increasing their chances of winning slots. Of these, at least five children (0.07% of total enrollments) were enrolled in slots with different household accounts, meaning they benefited from the multiple accounts.

Neither DPR’s application and residency verification forms, nor its lottery information pages prohibited multiple account holders for the same child. DPR did not monitor this type of duplicate lottery entry to identify how many instances there were of the same child enrolled by different households and whether the practice was increasing.

By not taking additional steps to prevent households from creating multiple lottery entries across different DPR accounts for what appeared to be the same child, DPR did not ensure each child got the same shot at winning a camp slot.

Recommendation

3. DPR should add to camp registration materials language that prohibits multiple account holders from entering the same child in the lottery and should conduct data analysis to prevent different household accounts from entering the same child in the lottery.

DPR’s residency forms lacked DCMR stringency.

DCMR listed documents that DPR “may” use to establish residency, and DPR’s Resident Verification and Reduced Rate Forms listed required documents, which are presented in Figure 8.

Figure 8: DCMR and DPR Criteria For Establishing Residency

DCMR “District residency may be established by one (1) of the following methods:” ²⁹	DPR D.C. Resident Verification Form (required a D.C. Driver’s License or D.C. Non-Driver Identification Card OR a document from both List A and List B)		DPR Reduced Rate Form (required one document from the list below)
	List A—Identity	List B—Residency	
Proof of payment of District personal income tax, for the tax period immediately preceding the time for consideration of District residency.			
A pay stub issued less than forty-five (45) days prior to consideration of residency that shows his or her District residency and evidence of the withholding of District income tax.		Pay stub (last 45 days)	Pay stub (issued within last 45 days)
Current documentation of financial assistance received from the District government including but not limited to Temporary Assistance for Needy Families (TANF), Medicaid, the State Child Health Insurance Program (SCHIP), Supplemental Security Income (SSI), housing assistance, or other government programs.		Current document with name and address from an official government agency (last 45 days)	

²⁹ 19 DCMR § 724.4.

DCMR “District residency may be established by one (1) of the following methods:”	DPR D.C. Resident Verification Form (required a D.C. Driver’s License or D.C. Non-Driver Identification Card OR a document from both List A and List B)		DPR Reduced Rate Form (required one document from the list below)
	List A—Identity	List B—Residency	
Confirmation, based upon completion and submission of a tax information authorization waiver by the District Office of Tax and Revenue of payment of District income taxes.			
Current official military housing orders showing residency in the District.			
A currently valid court order indicating the applicant or person seeking to participate is a ward of the District.			
Current Motor Vehicle Registration evidencing District residency.			Valid DC Motor Vehicle Registration
A valid unexpired lease or rental agreement and paid receipts or canceled checks (for a period within two (2) months immediately preceding consideration of residency) for payment of rent on a District residence.		Unexpired lease or rental agreement (last 12 months)	Valid lease or rental agreement

DCMR “District residency may be established by one (1) of the following methods:”	DPR D.C. Resident Verification Form (required a D.C. Driver’s License or D.C. Non-Driver Identification Card OR a document from both List A and List B)		DPR Reduced Rate Form (required one document from the list below)
	List A—Identity	List B—Residency	
A valid unexpired District motor vehicle operator’s permit or other official non-driver identification.	<ul style="list-style-type: none"> ■ ID card issued by a state or U.S. federal, state, or local agency ■ U.S. Passport ■ Permanent Resident Card or Alien Registration Receipt Card ■ Local University ID ■ US Department of State Driver’s License or Diplomatic ID Card ■ Valid Uniformed Services Military ID Card ■ Veteran’s Home ID Card ■ Letter or Card from Court Services, D.C. Department of Corrections, U.S. Government Probation Office, D.C. Social Services Agency 		Valid D.C. Government ID Card (2023)/ Valid D.C.-Government-issued photo (2024)
Utility bills (excluding telephone bills) and paid receipts or cancelled checks for payment of utility bills from a period within the two (2) months immediately preceding consideration of residency.		Utility bill (last 45 days)	Utility bill (within past 2 months)
		Bank Statement (last 45 days)	
		DC Property Tax Bill (last 12 months)	

DCMR “District residency may be established by one (1) of the following methods:”	DPR D.C. Resident Verification Form (required a D.C. Driver’s License or D.C. Non-Driver Identification Card OR a document from both List A and List B)		DPR Reduced Rate Form (required one document from the list below)
	List A—Identity	List B—Residency	
			Notarized letter signed by the person with whom you reside (Two pieces of mail with your current name, address, and date, must accompany the notarized letter)

Source: ODCA compilation of documents listed in 19 DCMR § 724.4 and DPR residency forms.

While DCMR did not require the use of the listed documents, as it used the term “may,” DPR’s Resident Verification Form requirements were even less stringent than DCMR by not requiring leases or utility bills to be submitted with paid receipts or canceled checks. The Form listed just seven of the 10 DCMR documents and included two not listed in DCMR: a bank statement and a D.C. property tax bill. The Form was more stringent than DCMR in that households that did not have a D.C. driver’s license were required to submit both an identity and a residency document.

DPR’s Reduced Rate Form listed six of the 10 DCMR documents and included one document not listed in DCMR. This form’s requirements were less stringent than DCMR by not requiring the submission of paid receipts or canceled checks to prove payment of a utility bill or lease. Examples of four other D.C. agencies’ residency documentation requirements are presented in Appendix B.

DPR noted that paid receipts and canceled checks contain sensitive information and collecting them could pose a risk to applicants and DPR, yet written policies and supervisory review were not in place to ensure sensitive information was protected.

By not following DCMR’s generally more stringent requirements, DPR increased the risk of non-residents falsifying residency documentation, such as leases and utility bills, to enroll in summer camp and to receive a reduced rate, which could decrease resident access to camp and/or misuse a discount reserved for residents.

Recommendation

4. DPR should develop and implement residency verification policies and procedures to prevent non-residents from entering the lottery and to detect any false residency documentation, such as exploring data sharing with other District agencies to verify residency or strengthening residency documentation requirements.

DPR’s residency forms lacked the DCMR sworn residency statement.

DCMR states that DPR requires “an applicant for a permitted use or a program registrant, or custodial parent or primary caregiver of a youth, who claims residency in the District” to “make a sworn written statement that they are in fact a District resident and meet the residency requirements in this chapter.”³⁰

DPR did not include the sworn statement on its 2023 or 2024 Residency Verification Forms, or the 2024 Reduced Rate Application. The statement was included in the 2023 Reduced Rate Application. DPR noted the omission of the sworn statement of residency was an oversight. Absence of this sworn statement removed a deterrent for non-residents to commit residency fraud.

Recommendation

5. DPR should update its Resident Verification Form and Reduced Rate Form to require participants’ written sworn statement of residency before entering the lottery.

DPR did not verify residency for all lottery participants as required by D.C. Code.

D.C. Code states “The Department shall give preference to residents for enrollment and participation slots in sports leagues, teams, games, programs, and camps managed or sponsored by the Department ... before offering participation slots to non-residents.”³¹ DPR’s website stated that “Lottery Registration is for DC Residents only.” DPR’s Reduced Rate Forms required applicants to be D.C. residents. As outlined above in Figure 8, DPR’s D.C. Resident Verification Forms and Reduced Rate Forms required specific documentation.

We found in both 2023 and 2024, more than 99% of lottery participants had D.C. addresses in RecTrac but DPR did not collect and verify residency documentation for all households before lottery participation.

We found insufficient residency documentation for:

- Fourteen of 25 households (56%) in our random sample that enrolled in camp. While DPR stated that it only collected and verified residency documentation for newly created accounts (after January 2023) and existing accounts that had a change of address, we found two of the five newly created accounts in our sample did not have residency documentation on file.
- Five of 25 households (20%) in our random sample that enrolled in the Reduced Rate Program. For three of the five there was no documentation and for the other two, DPR accepted documentation that did not meet its own criteria.
- Three of 10 households (30%) in our sample of DPR employees that enrolled in camp. Further, DPR did not detect that one of these employees with a non-D.C. address was manually registered as a resident, and received a reduced rate, which is only for residents.

³⁰ 19 DCMR § 724.5.

³¹ D.C. Official Code 10 § 302.03(a).

Factors relevant to these results:

- The Code requires that DPR give preference for enrollment and participation slots to residents.³² Therefore, for each summer camp lottery the residency must be confirmed.
- The DCMR is not explicit in making this a requirement. Rather, the regulations say that registrants for recreational activities may be asked to provide identity and residency prior to participation.³³
- Pursuant to the Code, each time a participant is enrolled in a DPR program and claims residency preference, they must provide proof of residency.
- DPR did not require households with existing accounts marked as residents in RecTrac to have their residency verified for each enrollment. Some of those households still provided residency documentation and DPR staff described a 2023 effort to have households submit their documentation voluntarily.
- Not all the new accounts and reduced rate households in our samples had residency verified because DPR did not have policies and procedures detailing requirements for documenting residency proof, maintaining those documents on file, or requiring supervisory review of the residency verification process.
- DPR noted that at times it verified residency in person and that it would not retain proof of residency in those cases.
- When DPR emailed agency employees about registering for camp in both 2023 and 2024, it did not mention the need for them to be residents.

While DPR described efforts in recent years to improve residency verification, its process did not preclude the risk of non-residents who were once residents but moved out of D.C. from entering the lottery and enrolling in camp nor preclude creation of resident accounts absent verification. This reduced camp availability for D.C. residents, and if non-residents were approved for the Reduced Rate Program, they would also receive subsidies to which they were not entitled.

Recommendations

6. DPR should revise its regulations (DCMR) consistent with D.C. Code to require proof of residency to gain a residency preference.
7. DPR should add to its policies and procedures a residency verification requirement for all lottery participant households at each enrollment period (including employees and reduced rate households), and describe the collection, storage, and supervisory review of residency documentation.

³² Ibid.

³³ 19 DCMR § 724.1.

DPR’s reduced rate income eligibility levels complied with DCMR, but DPR did not ensure that all applicants submitted proof of qualifying income and received the correct discount.

DCMR provides a definition for DPR to use in determining whether a reduced rate applicant is income-eligible. DCMR defines “Income Eligible” as “able to show evidence of the entitlement to public assistance or free or reduced-price school lunch.”³⁴

DPR’s Reduced Rate Forms required applicants to provide evidence to support income eligibility, per DCMR. Also, DPR’s income eligibility levels matched those for the U.S. Department of Agriculture’s (USDA) free- and reduced-price lunch program, which are detailed below.³⁵

Proof of qualifying income

DPR’s Reduced Rate Forms’ proof of qualifying income required one of the following:

- Most recently completed Tax Return (Required if employed) [A W-2 Form is not an accepted proof of qualifying income]
- Proof of Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI)
- Proof of participation in Temporary Assistance for Needy Families (TANF)
- A Retirement/Annuity Document
- Proof of Unemployment Benefits or Worker’s Compensation Disability
- A Child Support Statement

We found that six of 25 (24%) reduced rate households in our sample had insufficient proof of qualifying income. Two households did not have documentation, and the others did not fully comply with DPR requirements, such as not having a name or address on a TANF document or using a government document that was not on the list. In our sample of six DPR employees that received a reduced rate, we found four (67%) had insufficient proof of qualifying income.

50% and 75% reduced rate eligibility

DPR’s income levels for 50% and 75% reduced rate eligibility for 2023 and 2024 are presented in Figure 9.

34 19 DCMR § 799 <https://www.dcregs.dc.gov/Common/DCMR/SectionList.aspx?SectionNumber=19-720>.

35 USDA Food and Nutrition Service for Child Nutrition Programs: Federal Register, Vol. 87, No. 32, Wednesday, February 16, 2022, Notices, <https://www.govinfo.gov/content/pkg/FR-2022-02-16/pdf/2022-03261.pdf>; and Vol. 88, No. 27, Thursday February 9, 2023, Notices, <https://www.govinfo.gov/content/pkg/FR-2023-02-09/pdf/2023-02739.pdf>. DPR applied a 50% reduced rate for those households eligible for reduced-price meals and a 75% reduced rate for those households eligible for free meals.

Figure 9: DPR Income Levels for Reduced Rate Eligibility, 2023 and 2024

Household Size	2023		2024	
	50%	75%	50%	75%
1	\$25,142	\$17,667	\$26,973	\$18,954
2	\$33,874	\$23,803	\$36,482	\$25,636
3	\$42,606	\$29,939	\$45,991	\$32,318
4	\$51,338	\$36,075	\$55,500	\$39,000
5	\$60,070	\$42,211	\$65,009	\$45,682
6	\$68,802	\$48,347	\$74,518	\$52,364
7	\$77,534	\$54,483	\$84,027	\$59,046
8	\$86,266	\$60,619	\$93,536	\$65,728

Source: DPR Reduced Rate Forms.

Two of the 19 households in our sample with proof of qualifying income were not eligible for the reduced rate they received. One received a 50% reduced rate and should have received a 75% rate, and one received a 75% reduced rate and should have received a 50% rate. Two DPR employees in our sample with proof of qualifying income were eligible for the reduced rate they received (one received a 75% discount and one received a 50% discount).

DPR did not have policies and procedures for how staff were to review and retain proof of qualifying income, nor how to determine and document eligibility based on household size and income levels, such as a worksheet.³⁶ DPR’s process did not include supervisory review of staff approval of Reduced Rate Applications.

Providing a reduced rate to applicants without proving eligibility decreased fairness, as they paid less than someone who may have had the same or less income. Applicants who received less of a discount than they were eligible for were not treated fairly and faced a greater burden. For those who received a greater discount than they were eligible for, DPR lost revenue.

Recommendation

- DPR should develop and implement Reduced Rate Program policies and procedures that describe the collection, storage, and supervisory review of documentation that proves qualifying income and household size.

³⁶ Staff noted that any applicant receiving TANF was automatically eligible for a 75% reduced rate, which we verified by comparing TANF income levels to DPR’s Reduced Rate income levels for both years, but this was not documented in policies or worksheets.

DPR did not always accurately calculate reduced rate discounts.

As previously discussed, DPR's Reduced Rate Program offered 50% and 75% camp fee discounts.

We found that 85% of the 2023 reduced rate discounts given were 46% and 69% rather than 50% and 75%. We found that all 2024 discounts were 50% and 75%. We also found one household did not have a Reduced Rate Fee Code yet received a 100% discount for nine enrollments in 2023.

The lower-than-expected discounts in 2023 occurred because DPR mistakenly excluded a \$10 trip fee from the total camp fee. In 2024, DPR fixed the error and applied the discount to the total camp fee. Additionally, RecTrac's Fee Code field did not retain prior years' Fee Code and was not updated to show the most recent Fee Code. This made review and monitoring of appropriate discount amounts difficult and contributed to DPR not being able to report reduced rate camp participants by year and discount. For the household with nine enrollments at a 100% discount, DPR could not provide documentation for why the registration fees were waived.

DPR's reduced rate discounts were \$12,183 less than they should have been, specifically:

- 251 participants that should have received a 50% discount received \$5 less, totaling \$1,255.
- 1,457 participants that should have received a 75% discount received \$7.50 less, totaling \$10,928.

Recommendations

9. DPR's Reduced Rate Program policies and procedures should include a review prior to the lottery of RecTrac fields to ensure only allowable discounts are granted and discounts are consistently applied to the full camp fee.
10. DPR should analyze discounts given and apply any credits necessary to participants who did not receive the full discount to which they were entitled for the 2023 and 2024 summer camps.

DPR did not consistently update camp fee listings, track and report the camps participating in the lottery, or ensure it reported reliable geographic information.

DPR published the 2023 and 2024 Summer Camp Fees on its web page and in its Camp Handbooks.

We found camp fee listings were neither consistent nor complete:

- DPR's 2023 Camp Fees web page and 2023 Camp Handbook were not updated to reflect actual fees charged. For example, Boost camps had a lower fee that was not listed online or in the Handbooks.
- DPR's 2024 Camp Fees web pages listed a separate fee for Aqua Day Camps, and did not show Session 1 as having a lower fee, unlike the 2024 Camp Handbook, which did not include a separate fee for Aqua Day Camps but noted lower fees for Session 1.

As DPR did not have summer camp registration policies and procedures, it did not have a single document with fees for each year and procedures for when fees changed, so staff had to ensure they were listed consistently across DPR web pages and Handbooks.

Inconsistent camp fee listings hindered DPR's transparency to the public and made it difficult for DPR to ensure fees were charged consistently and correctly.

Weak tracking of lottery camps

DPR's Summer Camp FAQs stated that "DPR introduced lottery registration for summer camps in 2023 to create a more fair and equitable system to allocate the limited number of camp slots."

When we requested registration data for all camps in the lottery, DPR data included camps that were not part of the lottery. After cleaning the data, we found that in 2023 there were 387 camps in the lottery and in 2024 there were 401 lottery camps.

DPR did not have policies and procedures for the lottery implementation that included setting up its data system to facilitate lottery monitoring and reporting, such as a checkbox in RecTrac for whether a camp was in the lottery.

Not tracking lottery camps reduced the accuracy of DPR reporting. For example, DPR's 2023 "End of Summer Report" included statistics for all summer camps not just those in the lottery under the header "Summer Camp Lottery." In addition, not tracking lottery camps separately hindered DPR from assessing the impact of the lottery and other registration processes.

Geographic data not reliable

The GAO's "Standards for Internal Control in the Federal Government" contains a principle that "Management should obtain or generate relevant, quality information and use it to support the functioning of the internal control system."³⁷ This includes communicating quality information internally and externally.

DPR's geographic data of who participated in the lottery and enrolled in camp was incomplete and, in some cases, inaccurate:

- In both 2023 and 2024, more than 10% of lottery participant households did not provide their ward information.
- Our 2023 data analysis found 13% of household zip codes and 31% of wards were incorrect.
- Our 2024 data analysis found 15% of household zip codes and 26% of wards were incorrect.

Households filled out the account forms themselves and DPR staff noted that some households did not know the ward they lived in. Also, D.C. ward boundaries were last updated in 2022, possibly affecting some existing account holders' ward designations that were entered before 2022 and not updated.

Incomplete and inaccurate data limits its usefulness for DPR reporting and goal tracking. For example, DPR reported the 2023 ward and zip code information in its "End of Summer Report" that was distributed to the Deputy Mayor for Education. In another example, for its 2024 Performance Oversight testimony, DPR submitted 102 pages describing program enrollees by gender, age, age groups, and zip code.

³⁷ GAO, "Standards for Internal Control in the Federal Government," p. 82.

Recommendations

11. DPR should include in its camp registration policies and procedures the maintenance and review of an annual camp fee list, and a requirement to review the accuracy of participant address data before reporting it, which may include exploring RecTrac’s automated features and/or geocoding.
12. DPR should add a checkbox in RecTrac indicating whether a camp is in the lottery and ensure review prior to reporting data on camps in the lottery.

DPR did not consistently charge non-residents the higher fee amount specified in regulations.

D.C. Code states that DPR fees should have “a lower cost for residents.”³⁸ DCMR specifies “Fees for non-residents are an additional twenty-five percent (25%) of the cost of the admission or an activity in Table F in Subsection 716.7.”³⁹

DPR established lower fees for residents than non-residents, though non-resident fees were not listed in the published camp fees. DPR charged non-residents (those with a non-D.C. address) different fee amounts than established in DCMR:

- In 2023, 20 of the 30 non-resident enrollments were charged 50% more than the resident fee instead of 25% more (\$202.50 instead of \$168.75, and \$120 instead of \$100), while five were charged the resident fee of \$135, and five were charged less than the resident fee (between \$10 and \$41.25 instead of \$168.75).
- In 2024, all three non-resident enrollments (from one household) were charged 50% more than the resident fee instead of 25% more (\$202.50, instead of \$168.75).

DPR did not have camp policies and procedures documenting non-resident fees, nor supervisory review to ensure fees were correctly applied. This was important because new camps with different fees were added in 2024, and DPR said it “conflated” the non-resident fees with other rates. Camp policies and procedures are also important because DCMR referred to “weekly camps” and did not specify “summer camps” which were two-week sessions.

While the amounts were relatively small, it was unfair to non-resident households who were overcharged and to residents when DPR undercharged non-residents. In 2023, 20 enrollees paid a total of \$620 more than they should have and DPR did not collect \$678 it should have collected from non-residents. In 2024, three enrollees paid a total of \$101 more than they should have.

38 D.C. Official Code 10 § 307(b)(1)(G).

39 19 DCMR § 716.8. Subsection 716.7 and Table F correspond to charges for recreational activities and programs.

Recommendations

13. DPR should include non-resident fees in its annual list of camp fees, lock the fees and discounts in RecTrac, and review non-resident fees charged to ensure they follow DCMR.
14. DPR should apply credits to non-resident households who overpaid for 2023 and 2024 summer camps.

Conclusion

DPR provides recreation services and programs, and summer camp is a popular offering. In recent years DPR heard from both the public and the Council that summer camp should be more widely accessible. DPR made progress on its goal of using the lottery to create a more fair and equitable system to register for summer camp. Further, DPR improved the registration process in the lottery's second year. More children, households, and reduced rate households participated in summer camp after the introduction of the lottery.

DPR has processes in place to implement summer camp each year, such as verifying D.C. residency and income eligibility, and several staff we spoke with described a customer service approach and a desire to reduce barriers to camp, particularly for those who were not tech-savvy or had limited resources. We hope our recommendations will help DPR maintain this approach while improving fairness, upholding relevant laws and regulations, and providing accurate information to the public. Additional steps that would strengthen its internal systems include creating detailed policies and procedures, maintaining program documentation, and implementing supervisory review of processes. Improving data quality also will assist with goal setting, performance monitoring, and ensuring transparent and accurate reporting on program performance.

Summary of Report Recommendations

Our audit identified 14 recommendations that could improve lottery operations at the Department of Parks and Recreation (DPR).

Findings	Recommendations
DPR’s summer camp lottery goals and its agency goals—both intended to increase equitable access—were aligned.	There are no recommendations for this finding.
DPR made progress on its goal of using the lottery to create a more fair and equitable summer camp registration system.	There are no recommendations for this finding.
DPR improved the ease of camp registration in 2024 by making the sibling linking and waitlist processes more automated and user-friendly than in 2023.	There are no recommendations for this finding.
DPR allowed manual camp registrations outside the automated lottery and waitlist process in 2023 and 2024.	1. DPR should develop and implement camp registration policies and procedures that include a requirement to document reasons in RecTrac for manual registrations and supervisory review of the process.
DPR allowed its employees to register for camp slots outside the lottery in 2023 and 2024, and before the waitlist opened in 2024.	2. DPR should require employees to follow the same lottery registration process as the public and include that requirement in the camp registration policies and procedures.
DPR did not detect instances of multiple lottery entries for the same child, which diminished fairness.	3. DPR should add to camp registration materials language that prohibits multiple account holders from entering the same child in the lottery and should conduct data analysis to prevent different household accounts from entering the same child in the lottery.
DPR’s residency forms lacked DCMR stringency.	4. DPR should develop and implement residency verification policies and procedures to prevent non-residents from entering the lottery and to detect any false residency documentation, such as exploring data sharing with other District agencies to verify residency or strengthening residency documentation requirements.
DPR’s residency forms lacked the DCMR sworn residency statement.	5. DPR should update its Resident Verification Form and Reduced Rate Form to require participants’ written sworn statement of residency before entering the lottery.

DPR did not verify residency for all lottery participants as required by D.C. Code.

6. DPR should revise its regulations (DCMR) consistent with D.C. Code to require proof of residency to gain a residency preference.

7. DPR should add to its policies and procedures a residency verification requirement for all lottery participant households at each enrollment period (including employees and reduced rate households), and describe the collection, storage, and supervisory review of residency documentation.

DPR's reduced rate income eligibility levels complied with DCMR, but DPR did not ensure that all applicants submitted proof of qualifying income and received the correct discount.

8. DPR should develop and implement Reduced Rate Program policies and procedures that describe the collection, storage, and supervisory review of documentation that proves qualifying income and household size.

DPR did not always accurately calculate reduced rate discounts.

9. DPR's Reduced Rate Program policies and procedures should include a review prior to the lottery of RecTrac fields to ensure only allowable discounts are granted and discounts are consistently applied to the full camp fee.

10. DPR should analyze discounts given and apply any credits necessary to participants who did not receive the full discount to which they were entitled for the 2023 and 2024 summer camps.

DPR did not consistently update camp fee listings, track and report the camps participating in the lottery, or ensure it reported reliable geographic information.

11. DPR should include in its camp registration policies and procedures the maintenance and review of an annual camp fee list, and a requirement to review the accuracy of participant address data before reporting it, which may include exploring RecTrac's automated features and/or geocoding.

12. DPR should add a checkbox in RecTrac indicating whether a camp is in the lottery and ensure review prior to reporting data on camps in the lottery.

DPR did not consistently charge non-residents the higher fee amount specified in regulations.

13. DPR should include non-resident fees in its annual list of camp fees, lock the fees and discounts in RecTrac, and review non-resident fees charged to ensure they follow DCMR.

14. DPR should apply credits to non-resident households who overpaid for 2023 and 2024 summer camps.

Agency Comments

On July 1, 2025, we sent a draft copy of this report to the Department of Parks and Recreation (DPR) for review and written comment. DPR responded with comments on July 16, 2025. Agency comments are included here in their entirety.



Muriel Bowser
Mayor

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Parks and Recreation
Office of the Director



Thennie M. Freeman
Director

July 16, 2025

Kathleen Patterson
District of Columbia Auditor
1331 Pennsylvania Avenue, N.W. Suite 800 South
Washington, DC 20004

Dear Ms. Patterson:

The Department of Parks and Recreation (DPR) appreciates the opportunity to respond to the report made by your Office titled *Lottery Made Summer Camp More Equitable*, as a result of your Office's 2024-2025 discretionary audit. The report largely found that DPR's electronic summer camp lottery implementation advanced its goal of a more fair and equitable registration system, and after the lottery more children, households, and reduced rate households got a camp slot in alignment with various racial equity laws and Mayor's Racial Equity Action Plan. The audit report acknowledges the new registration approach, which is critically important to so many District families and reflects DPR's ongoing commitment to fairness, transparency, and continuous improvement.

Thank you for acknowledging DPR's good work. DPR is proud to be nationally accredited through the Commission for Accreditation of Park and Recreation Agencies (CAPRA), and we remain deeply committed to strengthening our operations through thoughtful review and evidence-based enhancements. This audit process has served as a valuable opportunity to assess the reach, effectiveness, and equity of our summer camp programs, while informing future improvements.

Each summer, DPR serves almost 4000 campers across almost 8000 total camp slots. Of those enrolled in 2024, approximately 60% were African American, 53% were male, 30% resided east of the Anacostia River, and 20% qualified for reduced rate tuition—populations that most benefit from our low-cost summer care offerings. These numbers reflect DPR's mission to make high-quality recreation accessible to all families, regardless of zip code or income level.

While we acknowledge the audit's methodology and findings, we also recognize that the nuances of administering an optional, community-focused service such as summer camp differ from those associated with mandatory services like public education. Nonetheless, as to the auditor's recommendations, DPR chooses to remain publicly accountable for the recommendations presented and we view them as constructive steps toward improving service delivery for District residents.

DPR continues to actively update agency-wide policies related to camp registration, residency verification, and reduced rate eligibility. As part of this effort, we will implement a pre-season lottery readiness checklist for the 2026 camp cycle to support oversight, consistency, and equitable access.

Many of the audit's recommendations have already been addressed in part or in full during the 2025 summer season, and our agency remains fully committed to refining these systems in service of our community.

Our detailed responses to each recommendation are provided below.

Recommendation 1: DPR should develop and implement camp registration policies and procedures that include a requirement to document reasons in RecTrac for manual registrations and supervisory review of the process.

DPR Response:

The Department of Parks and Recreation (DPR) concurs with this recommendation. Ahead of the 2025 summer camp season, DPR has already begun drafting enhanced written procedures for camp registration, with special attention to manual registration protocols. These updated procedures will:

- Require staff to document the reason for any manual registration directly within RecTrac's internal comment fields;
- Establish a tiered review process for manual entries, including supervisory approval;
- Define acceptable use cases for manual registration to ensure consistent application across all DPR sites;
- Incorporate monitoring protocols to detect anomalies and promote transparency.

DPR anticipates these revised policies and procedures will be finalized in full by Fall 2025, in advance of the 2026 summer camp planning cycle.

Recommendation 2: DPR should require employees to follow the same lottery registration process as the public and include that requirement in the camp registration policies and procedures.

DPR Response:

The Department of Parks and Recreation concurs with this recommendation and has already taken steps to align employee participation with public registration protocols.

Beginning with the 2025 summer camp cycle, DPR required all employees seeking to enroll their children in camp to participate through the standard public-facing lottery process. Residency and eligibility criteria were applied consistently across all applicants, and no internal staff registration pathway was utilized.

It is important to note that fewer than 45 of DPR's more than 1,000 employees participated in the summer camp registration process in 2023 and 2024, representing less than 1% of total enrollees. This demonstrates that employee participation did not materially impact camp availability or equitable access.

To ensure transparency and reinforce this practice, DPR has incorporated explicit language in both internal communications and formal camp registration policies, requiring employees to follow the same registration steps as the public. These updates will remain in effect and be reviewed annually.

Recommendation 3: DPR should add to camp registration materials language that prohibits multiple account holders from entering the same child in the lottery and should conduct data analysis to prevent different household accounts from entering the same child in the lottery.

DPR Response:

The Department of Parks and Recreation concurs with this recommendation. During the 2025 lottery cycle, DPR implemented enhanced manual review protocols to identify duplicate lottery entries across household accounts. This included cross-referencing participant name, date of birth, and address data for consistency and flagging potential duplication. Where appropriate, staff reached out to families to reconcile discrepancies prior to camp enrollment. In response to this recommendation, DPR will revise its summer camp registration materials—including the Frequently Asked Questions (FAQ) webpage and registration instructions—to include explicit language prohibiting multiple household entries for the same child. These updates will be in place prior to the start of the 2026 lottery registration cycle.

DPR will continue to work with system operators to refine detection tools to identify duplicate entries and may explore RecTrac enhancements to better flag or block these occurrences proactively.

Recommendation 4: DPR should develop and implement residency verification policies and procedures to prevent non-residents from entering the lottery and to detect any false residency documentation, such as exploring data sharing with other District agencies to verify residency or strengthening residency documentation requirements.

DPR Response:

The Department of Parks and Recreation acknowledges this recommendation. DPR recognizes the importance of maintaining the integrity of residency-based eligibility for summer camp registration. As part of our ongoing improvements, DPR will explore formalizing a data sharing agreement with relevant District agencies such as the District of Columbia Public Schools (DCPS) and the Department of Motor Vehicles (DMV) to enhance residency verification compliance and user experience. These partnerships would enable DPR to cross-reference existing government-verified residency records where appropriate and permissible, reducing opportunities for falsified documentation and improving service efficiency for

residents.

DPR will continue to strengthen its residency verification policies and procedures by aligning them with the current residency verification regulations (19 DCMR Section 724.4) that standardize documentation requirements and clarify review protocols across all applicable programs, including the summer camp lottery.

DPR anticipates completing this policy development phase and initiating interagency coordination ahead of the 2026 lottery cycle.

Recommendation 5: DPR should update its Resident Verification Form and Reduced Rate Form to require participants' written sworn statement of residency before entering the lottery.

DPR Response:

The Department of Parks and Recreation concurs with this recommendation.

To strengthen residency verification practices and align with DCMR requirements, DPR has taken initial action by incorporating a sworn statement of residency into the 2025 summer camp lottery acceptance process. This step ensures that families affirm their District residency status when accepting camp slots. This is also outlined in camp registration information sessions, webinars and during the active registration process.

DPR is currently updating both the Program Enrollment Form and the Reduced Rate Application Form to include a written sworn residency statement, which will be required at the point of lottery registration starting with the 2026 summer camp cycle. This will bring all registration-related documents into full compliance with the applicable regulations and reinforce DPR's commitment to equitable and transparent access for District residents.

These form updates are on track to be finalized by January 2026, in time for the next summer camp lottery registration cycle.

Recommendation 6: DPR should revise its regulations (DCMR) consistent with D.C. Code to require proof of residency to gain a residency preference.

DPR Response:

The Department of Parks and Recreation concurs with this recommendation.

DPR recognizes the importance of aligning its District of Columbia Municipal Regulations (DCMR) with the residency preference requirements outlined in the D.C. Code to ensure consistent application of policy and equitable access to services. To that end, DPR has initiated procedures to strictly align the DCMR to require proof of residency and sworn statement forms to enroll rather than in a discretionary manner. DPR anticipates a mandatory procedure in place before the 2026 Summer Camp Enrollment.

Recommendation 7: DPR should add to its policies and procedures a residency verification

requirement for all lottery participant households at each enrollment period (including employees and reduced rate households), and describe the collection, storage, and supervisory review of residency documentation.

DPR Response:

The Department of Parks and Recreation concurs with this recommendation.

As part of our ongoing commitment to equitable and transparent summer camp registration, DPR has implemented and is expanding the following residency verification efforts:

- As of the 2025 lottery cycle, DPR continues to manually verify all newly created household accounts to confirm valid residency documentation before registration.
- Beginning in 2026, DPR will require reverification of residency for any household accounts older than five years, with advance notification and support provided to account holders to ease the transition.
- DPR will implement a random sampling protocol to verify a portion of household accounts each year, regardless of account age. This approach will provide an additional level of oversight and help identify patterns or discrepancies proactively.
- All DPR program enrollment forms will be updated to include a residency attestation statement, reinforcing participants' accountability and aligning with District requirements.
- DPR will also increase public-facing messaging related to residency verification—especially during peak registration windows—to clearly communicate documentation standards and the importance of keeping RecTrac profiles up to date.
- These operational updates will be supported by newly developed internal guidance describing documentation review protocols, storage practices, and supervisory oversight procedures to ensure consistency across the department.

These updates are scheduled for formal implementation by February 2026 to ensure readiness for the 2026 camp registration cycle.

Recommendation 8: DPR should develop and implement Reduced Rate Program policies and procedures that describe the collection, storage, and supervisory review of documentation that proves qualifying income and household size.

DPR Response:

The Department of Parks and Recreation acknowledges this recommendation.

To strengthen the administration of its Reduced Rate Program and ensure fair and accurate application of income-based discounts, DPR will continue to improve and formalize program policies and procedures that cover the full lifecycle of income verification and eligibility determination. These procedures will include:

- Clearly defined guidelines on acceptable proof-of-income and documentation requirements;

- A standardized method for determining eligibility based on household size and income levels, including worksheet tools and training materials for staff;
- Secure protocols for the collection and storage of sensitive documentation;
- A supervisory review process to verify approval decisions and monitor for consistency and compliance.

These policies will apply uniformly across all applicants, including DPR employees and reduced rate participants in all DPR programs. DPR anticipates finalizing and implementing these procedures by February 2026 in time for the 2026 summer camp registration cycle.

Recommendation 9: DPR's Reduced Rate Program policies and procedures should include a review prior to the lottery of RecTrac fields to ensure only allowable discounts are granted and discounts are consistently applied to the full camp fee.

DPR Response:

The Department of Parks and Recreation concurs with this recommendation.

To ensure equitable and consistent application of Reduced Rate discounts, DPR will integrate a pre-lottery review process into its annual camp registration preparations. This process will include:

- A thorough audit of RecTrac fee codes and discount parameters to verify that only authorized discount tiers are active;
- Adjustments to system settings to ensure that discounts are applied to the total camp fee—including supplemental charges such as trip fees—to prevent under-discounting;
- Collaboration with the system vendor, where needed, to confirm that rate structures are accurately configured and retained across program years;
- Internal documentation of all active discount codes and test scenarios to validate accuracy before the lottery opens.

These procedural updates will be formally documented and in place prior to the start of the 2026 camp registration cycle.

Recommendation 10: DPR should analyze discounts given and apply any credits necessary to participants who did not receive the full discount to which they were entitled for the 2023 and 2024 summer camps.

DPR Response:

The Department of Parks and Recreation appreciates the Auditor's detailed review of the Reduced Rate Program calculations and concurs with the finding that certain discounts were under-applied during the 2023 and 2024 camp seasons due to how supplemental fees were factored into the discount formula.

While DPR acknowledges the accuracy of this observation, after careful consideration, the agency will not issue retroactive credits. This decision was made in light of several factors,

including the relatively small per-household amounts involved and the administrative complexity of issuing partial reimbursements across multiple years and accounts. Additionally, all participants in the Reduced Rate Program still received significant subsidies during those periods, and DPR has since corrected the underlying system configuration to ensure discounts are properly calculated moving forward.

DPR remains committed to the equitable administration of its programs and values the Auditor's recommendations as an important part of our continual improvement efforts. We will continue to monitor and refine the Reduced Rate Program to ensure it supports District families with fairness and clarity.

Recommendation 11: DPR should include in its camp registration policies and procedures maintenance of an annual camp fee list that is reviewed each year, and before reporting it, an assessment of participant address data, which may include exploring RecTrac's automated features and/or data geocoding.

DPR Response:

The Department of Parks and Recreation concurs with this recommendation.

DPR recognizes that maintaining accurate address data is vital to understanding program reach and evaluating equitable access across the District. To that end, DPR will incorporate an annual review of participant address data into its summer camp registration procedures. This review will occur prior to any public-facing reporting or analysis of program participation.

In addition, DPR will explore system upgrades and automation tools—either through RecTrac or compatible data platforms—that allow for improved address validation and ward geocoding at the point of registration. The goal is to reduce manual errors, align household records with current ward boundaries, and improve the quality of geographic data used to assess program performance and equity.

Concurrently, DPR will update its internal procedures to ensure that camp fee listings are reviewed, reconciled across all communication platforms, and archived annually to support consistency and transparency.

These efforts will be phased in during FY26 and fully incorporated into camp registration protocols for the 2026 program cycle.

Recommendation 12: DPR should add a checkbox in RecTrac indicating whether a camp is in the lottery and ensure review prior to reporting data on camps in the lottery.

DPR Response:

The Department of Parks and Recreation concurs with this recommendation and has already implemented the suggested improvement for the 2025 summer camp cycle.

Beginning with the 2025 camp season, DPR added a dedicated data field in RecTrac to identify

camps participating in the lottery process. This enhancement has improved data integrity and has allowed for more accurate tracking, reporting, and analysis of lottery-specific program performance.

DPR staff utilized this field during the 2025 lottery cycle to confirm camp eligibility for lottery assignment and to improve the consistency of data reporting. Moving forward, this feature will be reviewed and refreshed annually as part of DPR's pre-season lottery readiness checklist.

Recommendation 13: DPR should include non-resident fees in its annual list of camp fees, lock the fees and discounts in RecTrac, and review non-resident fees charged to ensure they follow DCMR.

DPR Response:

The Department of Parks and Recreation concurs with this recommendation.

DPR is committed to ensuring transparency and compliance with regulatory guidance regarding non-resident participation fees. In preparation for the 2026 summer camp cycle, DPR will:

- Integrate non-resident fee schedules into its annual camp fee listings and ensure they are clearly published across all platforms, including the website and camp handbooks;
- Conduct a pre-registration RecTrac configuration review to lock approved fees and validate discount applications for both resident and non-resident accounts;
- Establish a procedure for cross-checking non-resident enrollments against the approved fee structure, with supervisory review to ensure accuracy and alignment with DCMR;
- Where necessary, make RecTrac adjustments to apply the 25% additional fee as required under 19 DCMR § 716.8.

These updates will be implemented during FY26 and included as part of DPR's annual camp registration readiness process.

Recommendation 14: DPR should apply credits to non-resident households who overpaid for 2023 and 2024 summer camps.

DPR Response:

The Department of Parks and Recreation appreciates the Auditor's attention to fee accuracy and concurs with the underlying finding that a small number of non-resident households were charged more than the additional 25% permitted by regulation. We acknowledge this oversight and have taken corrective action to align RecTrac configurations with DCMR requirements going forward.

After careful review, DPR does not plan to issue retroactive refunds or credits for the 2023 and 2024 program years. The total overcharges involved are modest in scale and limited to a very small number of households. Given the administrative burden associated with issuing retroactive payments across program cycles and account types, DPR has determined that our resources are

better applied to strengthening forward-looking policies, system settings, and oversight to prevent future discrepancies.

Going forward, all non-resident fee structures will be included in DPR's published annual camp fee schedules and subject to review prior to each registration cycle. These practices will help ensure continued compliance, transparency, and fairness for all program participants.


Thank you again to the Office of the District of Columbia Auditor, especially you, Auditor Patterson, Deputy Auditor Ingrid Drake, and Audit Supervisor Lori Metcalf, for your thoughtful engagement and professionalism throughout this process. Although your office operates independently, this review reflected a true partnership between agencies, lasting nearly a year and grounded in a shared commitment to transparency and public service.

I am proud of the work DPR has undertaken to respond to this audit—not only through the formal recommendations, but through the meaningful changes already underway. I want to personally acknowledge the leadership and collaboration of Deputy Directors Ashley Williams and Marcus Coates, as well as key members of our internal response team: Hanna Baker, Christopher Tierney, Joseph McDermott, and LaShaun Basil. Their dedication, insight, and cross-functional coordination ensured that this process remained thoughtful, equitable, and community-focused from start to finish.

To every member of the DPR staff who supported this effort—whether by supplying data, updating systems, refining policy, or sharing frontline feedback—thank you. Your unwavering commitment to equity, inclusivity, and operational excellence continues to move our agency forward and deepen our impact on District residents.

We welcome continued dialogue and look forward to building on this momentum together.

Sincerely,



Thennie Freeman
Director

CC: Betsy Cavendish
General Counsel, Executive Office of the Mayor

ODCA Response to Agency Comments

We appreciate DPR's comments on the draft report and are pleased with DPR's concurrence with most of our recommendations. We are pleased that DPR has already implemented some of our recommendations to make meaningful changes to the summer camp process, and will be implementing most of the others for the next summer camp cycle.

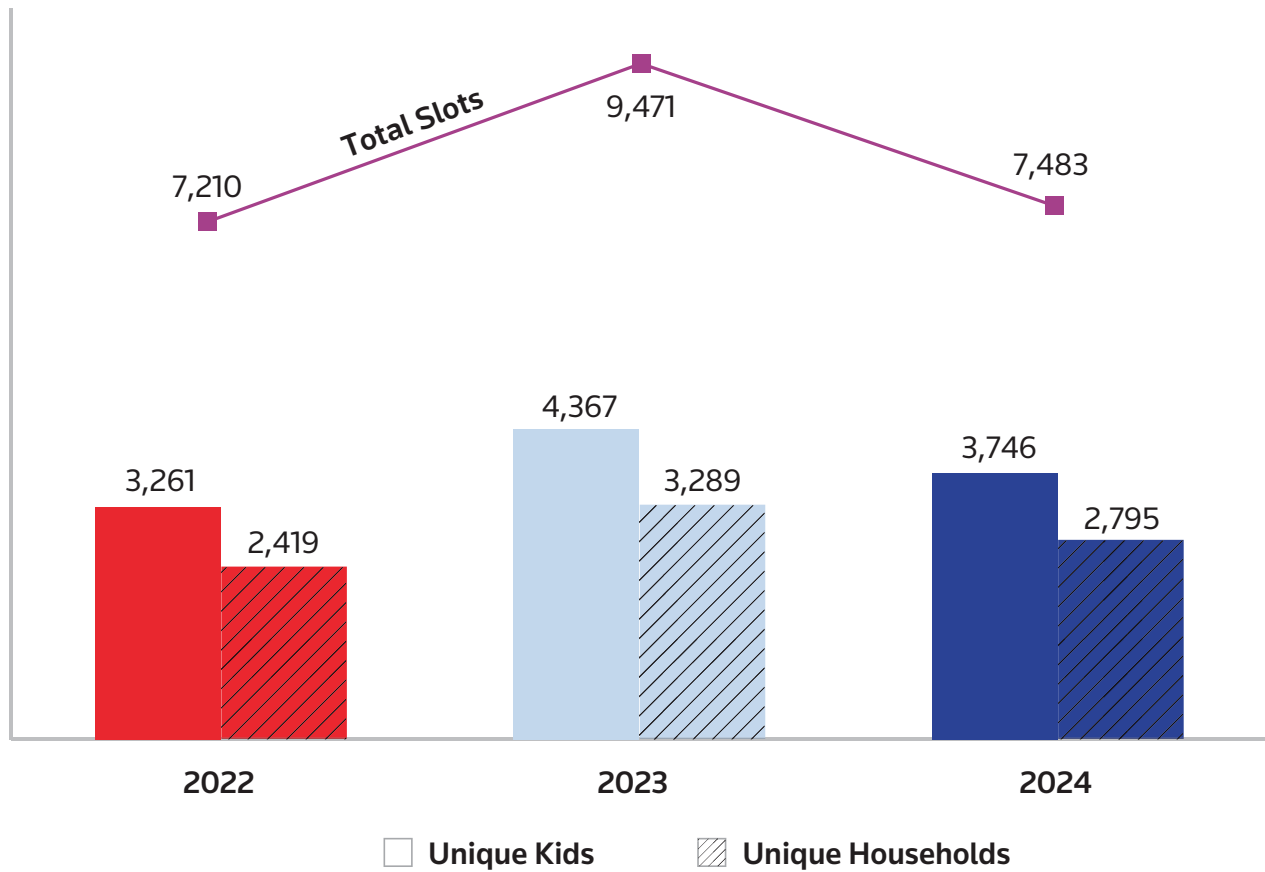
DPR notes it will not implement two recommendations, one to refund reduced rate participants who were not given the full discount in 2023 and one to refund non-resident participants who were overcharged in 2023 and 2024. DPR explained that distributing these refunds would require some administrative complexity for modest small per-household amounts. ODCA appreciates the agency's thoughtful examination of the recommendations and is encouraged that DPR is committed to ensuring the underlying issues are fixed moving forward.

We value the partnership with DPR throughout this audit and the efforts of all involved to continuously improve District of Columbia government and the valuable service to residents that DPR summer camp offers.

Appendix A

Enrollment and Demographic Data

Figure 10: Unique Kids and Households Enrolled in D.C. Summer Camps Compared to Total Slots, 2022-2024



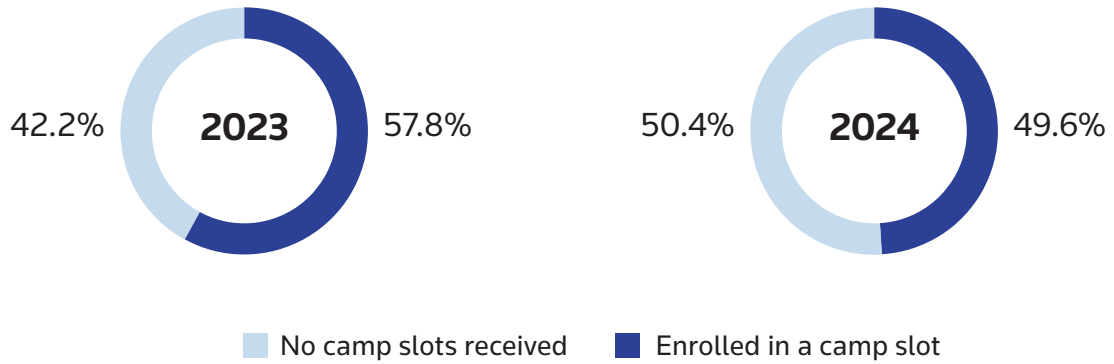
Source: ODCA analysis of DPR data.

Figure 11: Unique Kids Seeking and Enrolled in D.C. Summer Camp Slots, and not Receiving Slots, 2022-2024

Unique Kids	2022	2023	2024
Seeking Camp Slots	Unavailable	7,558	7,550
Enrolled in a Camp Slot	3,261	4,367	3,746
No Camp Slots Received	Unavailable	3,191	3,804

Source: ODCA analysis of DPR data. Note: DPR did not retain data on the number that tried to obtain camps slots in 2022.

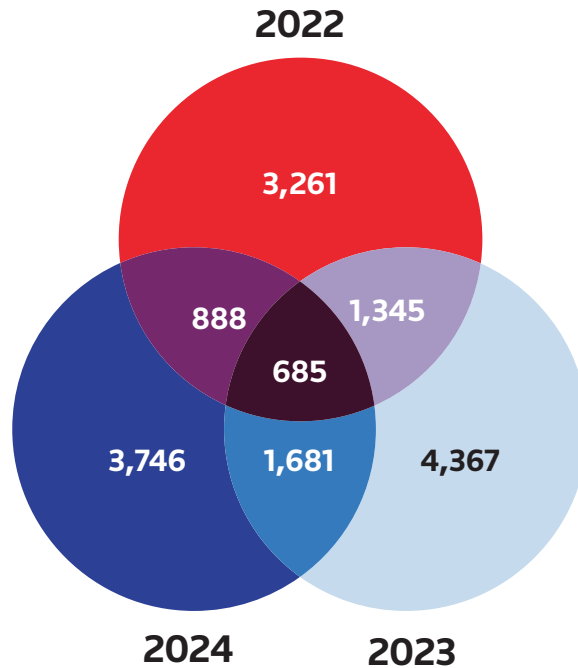
Figure 12: Percentage of Unique Kids Receiving D.C. Summer Camp Slots, 2023 and 2024



Source: ODCA analysis of DPR data.

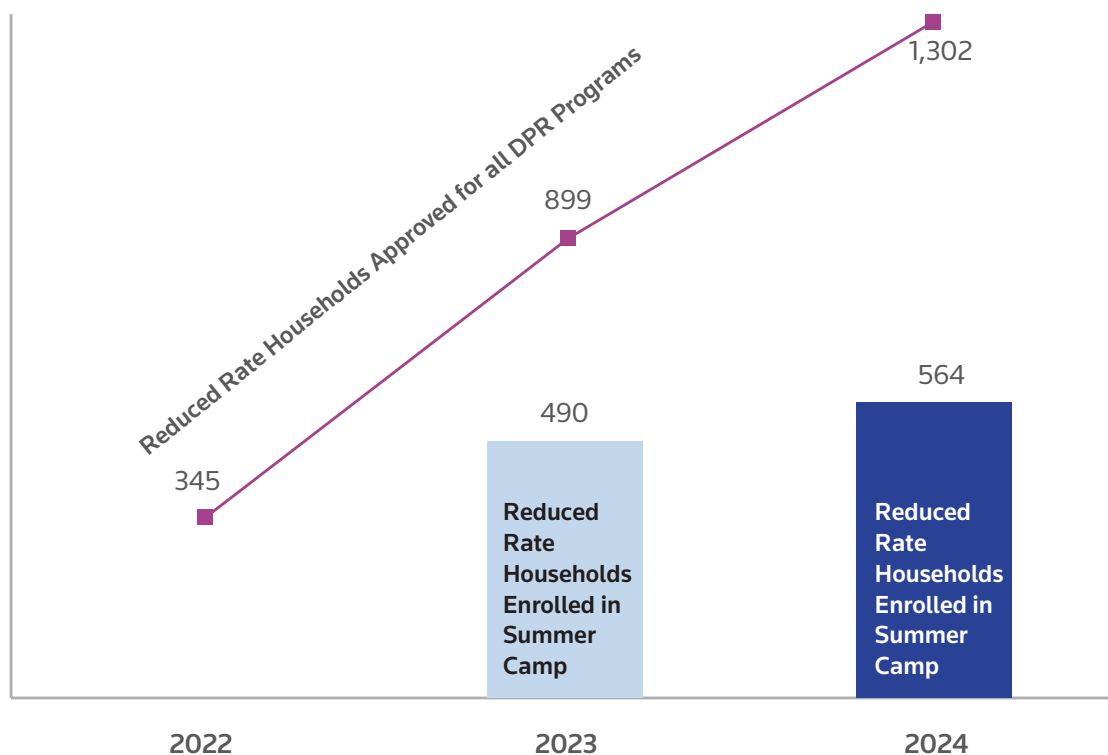
Data on unique kids enrolled in camp across multiple years shows that 1,345 kids enrolled in 2022 were also enrolled in 2023. A higher number of kids (1,681) were enrolled in both the first two years of the lottery (2023 and 2024). The number of kids enrolled in all three years was 685. See the Venn diagram in Figure 13.

Figure 13: Unique Kids Enrolled in D.C. Summer Camps Across Multiple Years, 2022–2024



Source: ODCA analysis of DPR data.

Figure 14: Increases in Reduced Rate Households: Approved for All DPR Programs (purple line) and Enrolled in D.C. Summer Camp (bars), 2022–2024



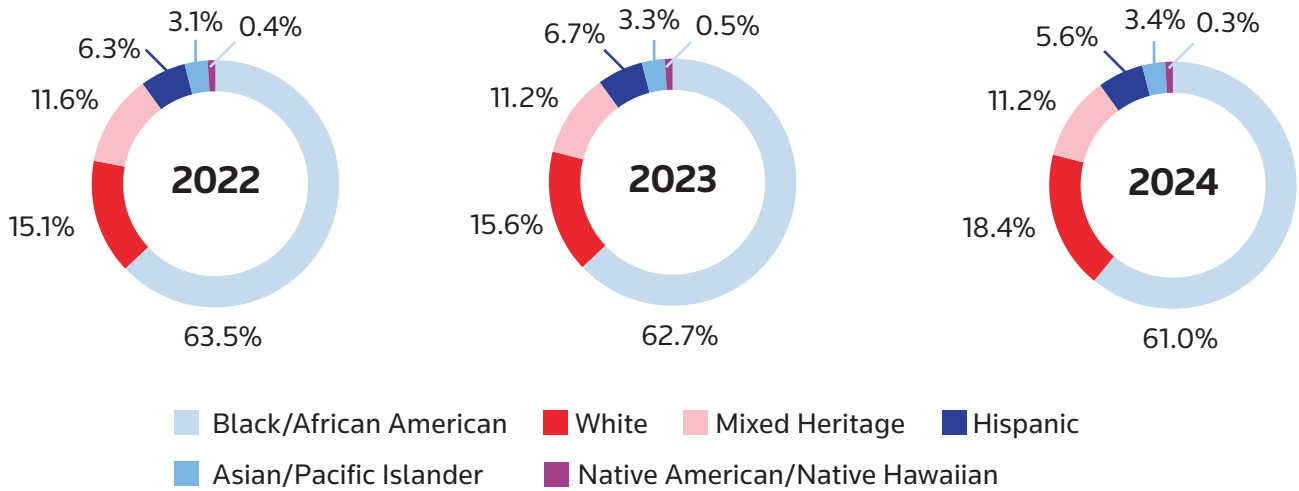
Source: ODCA analysis of DPR data, and DPR data for all DPR programs. Note: Reliable data not available for 2022 enrolled reduced rate households.

Figure 15: Number of Slots D.C. Summer Camp Participants’ Received and Average Slots Per Kid, 2022–2024

	2022	2023	2024
1 slot	1,258	1,684	1,622
2 slots	1,464	2,198	1,978
3 slots	1,851	2,484	1,971
4 slots	2,532	2,796	1,912
5 to 8 slots	105	309	0
Total Slots	7,210	9,471	7,483
Average	2.21	2.17	2.00

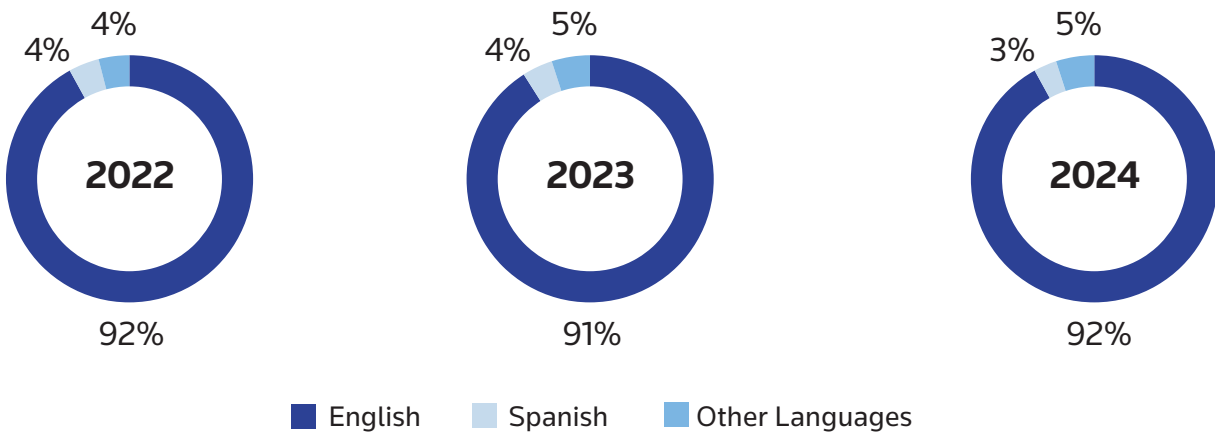
Source: ODCA analysis of DPR data. Note: A small number of camps had between 5 and 8 sessions in 2022 and 2023.

Figure 16: D.C. Summer Camp Participants' Reported Ethnicity, 2022–2024



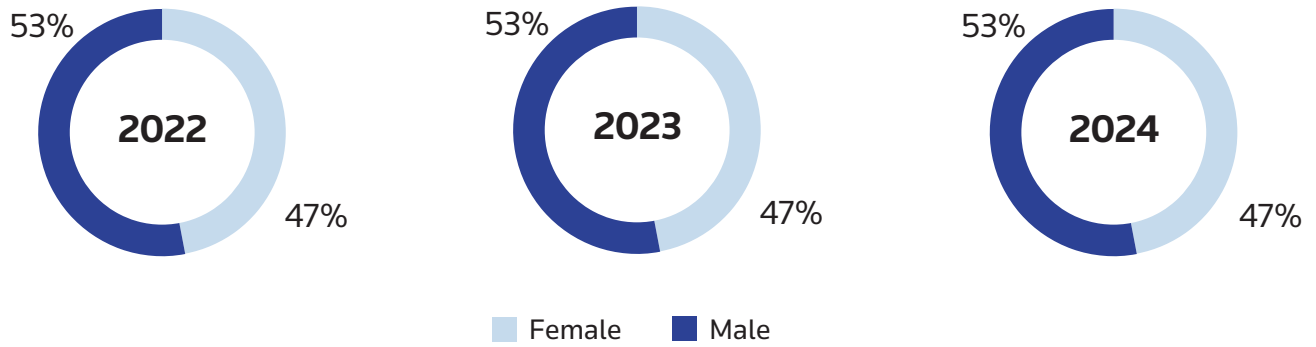
Source: ODCA analysis of DPR data. Note: Blank responses not included, which accounted for 12.0% of participants in 2022, 21.8% in 2023, and 20.0% in 2024.

Figure 17: D.C. Summer Camp Participants' Reported Language Spoken At Home, 2022–2024



Source: ODCA analysis of DPR data. Notes: Blank responses not included, which accounted for 2.6% of participants in 2022, 12.7% in 2023, and 11.3% in 2024. "Other languages" included 18+ languages in 2022; 26+ languages in 2023, and 24+ languages in 2024.

Figure 18: D.C. Summer Camp Participants' Reported Gender, 2022–2024



Source: ODCA analysis of DPR data. Note: Blank responses not included, which accounted for 0.5% of participants in 2022, 0.7% in 2023, and 0.5% in 2024.

Based on available data, there was little demographic variation (ethnicity, language, gender) between kids who did not get slots in the lottery and those who did.

Appendix B

Other D.C. Agencies' Residency Approval Requirements

ODCA reviewed other District government agency/program websites for the documentation they require as proof of District residency, including: 1) the Office of the State Superintendent of Education (OSSE); 2) the Department of Motor Vehicles (DMV); 3) D.C. Health Link (D.C.'s Health Benefit Exchange Program); and 4) the Department of Energy and Environment's (DOEE) Low Income Home Energy Assistance Program (LIHEAP).⁴⁰

1. The Office of the State Superintendent of Education (OSSE) proof of residency documentation for applying to public schools or public charter schools in the District.

"One of the following items is accepted to establish DC residency:

- A pay stub;
- Supplemental Security Income annual benefits notification;
- A copy of Form D40 certified by the DC Office of Tax and Revenue;
- Military Housing Order;
- An embassy letter;
- Proof that a child is a ward of the District of Columbia, in the form of a Court Order; and
- Proof of financial assistance from the DC Government, in the form of either a:
 - Temporary Assistance for Needy Families (TANF) verification of income notice or recertification approval letter;
 - Medicaid approval letter or recertification letter;
 - Housing assistance letter from a housing shelter, including contact name and phone number or a letter from the Housing Authority; or
 - Proof of receipt of financial assistance from another DC Government program.

If none of the above items are available to verify residency, two of the following items are required:

- Unexpired DC motor vehicle registration;
- Unexpired lease or rental agreement;
- Unexpired DC motor vehicle operator's permit or other official non-driver identification; and
- One utility bill (only gas, electric and water bills acceptable).⁴¹

2. The Department of Motor Vehicles (DMV) requires two documents to prove residency:

"Requires 1 primary proof of residency document:

- Unexpired Lease or Rental Agreement with the name of the certifier as a lessor, lessee, permitted resident or renter
- Unexpired Sublease accompanied by the original unexpired Lease with the name of the certifier as sub-lessor
- DC Property Tax Bill/Tax Assessment issued within the last 12 months
- Deed, Mortgage Statement, or Settlement Agreement issued within the last 60 days

⁴⁰ As of May 2025.

⁴¹ OSSE, "School Year Residency Verification," <https://osse.dc.gov/service/school-year-residency-verification>.

AND 1 secondary proof of residency document:

- Utility Bill (water, gas, electric, oil or cable) issued within the last 60 days
- Telephone Bill issued within the last 60 days
- Unexpired Homeowner’s or Renter’s Insurance Policy
- Official Mail – received within 60 days from ANY Government Agency, excluding mail from DC DMV (Change of Address Notifications from the Postal Service are NOT accepted)
- Home Security System Bill issued within the last 60 days
- Car/Personal Loan Statement issued within the last 60 days (coupon books or vouchers are NOT accepted)⁴²

3. DC Health Link implements a health care exchange program in D.C.

“Documents that prove someone is a DC resident can include any of the following that is in the person’s name:

- A copy of an active lease agreement, certified deed, or mortgage statement with DC address
- A phone or utility bill from within the past two months
- DC voter registration card
- A valid District of Columbia motor vehicle registration or DC DMV identification card
- Cancelled checks or receipts for mortgage or rental payments on a residential property within the past 2 months
- Utility bills with a DC address, and payment receipts within the past 2 months
- Proof of automobile insurance showing the person’s DC residency address
- A signed DC Department of Motor Vehicles proof of residency form from another District resident stating that the applicant lives at their address in the District
- Self-attestation of residency without paper documentation in exceptional circumstances, including homelessness and in cases of domestic violence.⁴³

4. DOEE’s Low Income Home Energy Assistance Program (LIHEAP)

“All residents seeking energy assistance will need to meet income guidelines (listed below) and provide the following documents when submitting their application:

- Government issued unexpired photo identification for the applicant
- Recent Washington Gas, PEPCO, and DC Water utility bills
- Proof of current income for all household members
- Social security cards for all household members
- Your service disconnection notice or a letter from the utility company that states the service has been disconnected (if applicable)*

*Residents seeking emergency electric or gas assistance must provide documentation from PEPCO and/or Washington Gas that states their service has been disconnected when applying for assistance.⁴⁴

42 DMV, “Proof of DC Residency Certification,” https://dmv.dc.gov/sites/default/files/dc/sites/dmv/page_content/attachments/DC_DMV_Proof_of_Residency_Certification_Form_August_2022.pdf.

43 DC Health Link, “DC Residency,” <https://www.dchealthlink.com/submit-docs/dc-residency>.

44 DOEE, “Receive Assistance With Your Utility Bills (LIHEAP),” <https://doee.dc.gov/liheap/>.

About ODCA

The mission of the Office of the District of Columbia Auditor (ODCA) is to support the Council of the District of Columbia by making sound recommendations that improve the effectiveness, efficiency, and accountability of the District government.

To fulfill our mission, we conduct performance audits, non-audit reviews, and revenue certifications. The residents of the District of Columbia are one of our primary customers and we strive to keep the residents of the District of Columbia informed on how their government is operating and how their tax money is being spent.

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