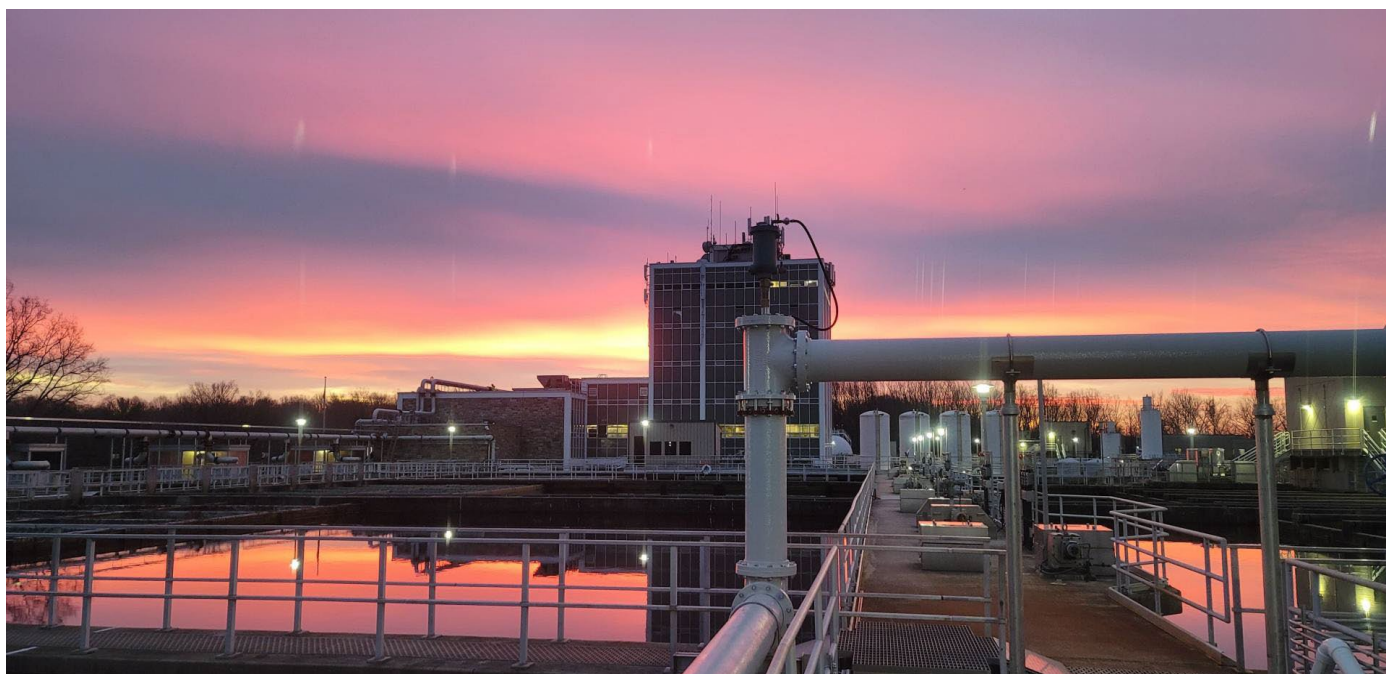




Office of the Inspector General

Investigative Report Case 389



Issued: September 2, 2026

Office of The Inspector General

Report of Investigation

Case 389

Jon T. Rymer
Inspector General



Issue Date: September 2, 2026

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Review of Hiring Practices and Compliance with Minimum Qualifications Requirements

Executive Summary

The Office of the Inspector General (OIG) was established in 2018 by Maryland law as an independent oversight entity within the Washington Suburban Sanitary Commission (WSSC). Pursuant to Maryland Code Annotated, Public Utilities Article (PUA), § 17-604 and Chapter 2.60 of the WSSC Code of Regulations, the OIG is authorized to prevent, detect, and investigate fraud, waste, and abuse; evaluate the adequacy and effectiveness of internal controls; report noncompliance with applicable laws, regulations, and Commission policies; and recommend corrective actions that strengthen accountability, integrity, and public trust. This investigation was also conducted in accordance with applicable *U.S. Government Accountability Office (GAO) Government Auditing Standards (Yellow Book)* and *Council of the Inspectors General on Integrity and Efficiency Quality Standards for Investigations (2020)*.

The OIG initiated this investigation after receiving an anonymous complaint alleging that WSSC appointed an executive employee who did not possess the active professional licensure required by the advertised minimum qualifications for the position.

The investigation *substantiated* that the selected candidate did not hold an active professional license required for the position at the time of the interview, selection, and appointment. The OIG found no evidence that the candidate misrepresented their qualifications or otherwise engaged in deceptive conduct. The evidence demonstrated that the candidate disclosed the status of their professional licensure during the recruitment process and that WSSC officials responsible for the hiring decision were aware of that information before the appointment. Accordingly, the OIG found no misconduct by the candidate.

The investigation also found no evidence of fraud, waste, or abuse as those terms are defined under the OIG's governing authorities. Rather, it identified a significant breakdown in WSSC's internal controls governing executive recruitment and selection. Specifically, WSSC did not consistently apply the advertised minimum qualification requirements prescribed by Chapter 9.180 of the WSSC Code of Regulations and advanced a candidate who did not satisfy those requirements without a documented waiver, authorized exception, or other formal process supporting the decision. Consistent with the *Yellow Book*, the OIG concluded that this constituted a significant internal control deficiency because the established control activities were not operating as intended.¹ The condition is also inconsistent with the *GAO Standards for Internal Control in the Federal Government (Green Book)*, which provide that management is responsible for implementing and monitoring internal controls to ensure organizational policies are consistently applied.²

The OIG concludes that there was a failure to adhere to established recruitment controls which weakened the effectiveness of WSSC's internal control system and resulted in inconsistent application of hiring requirements. Although Maryland law grants the Commission broad authority to hire and select employees, that authority must be exercised in accordance with applicable laws, regulations, policies, and internal controls. The inconsistent application of minimum qualification requirements, coupled with the absence of a documented exception process, created the appearance of preferential treatment and undermined the integrity, fairness, and transparency of the recruitment process. Consistent with its statutory authority to evaluate internal controls and report noncompliance, the OIG identified these deficiencies and recommended corrective action to strengthen future executive recruitment practices.

The OIG recommends strengthening executive hiring controls, ensuring the consistent verification and application of minimum qualification requirements, establishing a formal process for approving and documenting authorized exceptions, and enhancing oversight and accountability throughout the recruitment process. Management's response to the findings and recommendations are included in this report.

WSSC's Human Resources Office (HRO) concurred with all the OIG recommendations and committed to implementing corrective actions by December 31, 2026. HRO's corrective action plan includes strengthening the verification and documentation of minimum qualifications; formalizing the approval and documentation of exceptions; ensuring consistency among recruitment and employment documents; requiring resolution of material background-investigation discrepancies before appointment; implementing enhanced supervisory and

¹ U.S. Gov't Accountability Off., *Government Auditing Standards* (2024 Revision), GAO-24-106786, ¶¶ 8.60–8.81, 9.51–9.58 (Feb. 2024) (requiring auditors to obtain an understanding of and evaluate internal controls relevant to the audit objectives and to report significant internal control deficiencies identified during the engagement).

² U.S. Gov't Accountability Off., *Standards for Internal Control in the Federal Government*, GAO-14-704G, Principles 10, 12, and 16 (Sept. 2014).

quality-control reviews, including 100 percent review of executive, senior leadership, and other designated high-risk recruitments; and providing mandatory recruitment compliance training. HRO stated that these actions are intended to address the identified control deficiencies and establish a more consistent, transparent, and auditable recruitment and selection process.

The OIG will follow up with HRO after December 31, 2026, implementation date to verify that the corrective actions have been completed and adequately address the recommendations and identified control deficiencies.

This investigation was conducted by Daisy Qian, OIG Auditor, Certified Fraud Examiner and Certified Inspector General Investigator, and Tami L. Taylor, Esq., Assistant Inspector General for Investigations and Counsel, Certified Inspector General Counsel and Certified Inspector General. The OIG appreciates the complainant for bringing this matter forward and the Human Resources Office and other Commission personnel for their cooperation throughout the investigation.

Contact Information

The OIG welcomes comments and feedback on its reports and activities.

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Suspected instances of fraud, waste, or abuse can be reported to 1-877-WSSCFWA (1-877-977-2392) or www.reportlineweb.com/wssc.