



City of Cleveland

Justin M. Bibb, Mayor

Department of Finance
Bureau of Internal Audit
Natasha Brandt, Manager
www.cleveland-oh.gov

Date: March 31, 2025

To: Blaine Griffin
Council President
Cleveland City Council

From: Natasha Brandt
Manager of Internal Audit

RE: DigitalC Contract Compliance – 2024

Background

The Bureau of Internal Audit (IA) was asked to review and verify the 2024 household subscriptions and digital adoption service records submitted by DigitalC to ensure that they are in compliance with section 2.02 of the contract between the City of Cleveland and DigitalC, ST2024*0009 (Contract).

Section 2.02 of the Contract states that payments to DigitalC are conditioned upon DigitalC demonstrating that they met certain performance based requirements. For 2024, the following requirements were to be met:

- New Internet Household Subscriptions – subscribe 3,500 new internet households.
- New Digital Adoption Services – provide digital adoption services to 7,500 recipients.

DigitalC reported to Cleveland City Council that they had 2,802 installations and provided digital adoption services to 7,619 residents.

Testing

Internet Subscriptions – In order to verify that the list of 2,802 New Internet Household Subscriptions submitted by DigitalC included only City of Cleveland households, and that only one install per household was counted, IA performed the following:

- Verified that the addresses were within the City of Cleveland.
- Verified that each household installation was only counted once.

Digital Adoption Services – In order to verify that the list of 7,619 recipients of New Digital Adoption Services submitted by DigitalC included only City of Cleveland residents and that each recipient was only counted once, IA performed the following:

- Verified that the recipient addresses were within the City of Cleveland.
- Verified that each recipient was only counted once.

- Selected a sample of the records and verified that the participants reported were included on the sign-up sheets used to track attendance.

Results

Internet Subscriptions – IA confirmed that all 2,802 addresses on the 2024 subscriptions list were City of Cleveland addresses. However, IA identified one duplicate record* that was included in the 2024 subscription list, thus reducing the number of qualified 2024 subscriptions to 2,801.

** The duplicate record was due to a slight variation in the spelling of the customer name (it was hyphenated in the first record but not in the second record).*

Digital Adoption Services – IA identified 102 records that should be removed from the 2024 adoptions list provided by DigitalC. They include:

- Not City of Cleveland residents – 5 records.
- Not City of Cleveland addresses – 4 records.
- Duplicates (confirmed by DigitalC) – 15 records.
- Likely duplicates (not confirmed by DigitalC) – 78 records.

As a result of removing the 102 records, the 2024 adoptions list totals 7,517 eligible records from the 7,619 records submitted.

NOTE: IA did not observe any intentional manipulation of the data. All excluded records were due to errors related to the manually intensive and decentralized process for collecting the information from outside partners. Some observed causes were:

- Participant names spelled differently on sign-in sheets and/or in tracking spreadsheets.
- Participants provide different names and/or different addresses when attending different programs.
- General data entry errors when transferring information from paper to spreadsheet.
- There is no process to verify participant residency and at times participants are reluctant to provide personal information.

IA received a complaint from prior employees concerning the number of installations among other issues not related to this review. IA incorporated the issues raised in the complaint into our review concerning duplicate accounts for a single household and that certain multiple family locations had too many accounts. IA did not find any evidence of fraudulent installations in the data provided by DigitalC to verify the complaint.

CC: Brian Kazy, Cleveland City Council member, Chair of Utilities Committee
Paul Barrett, Director of Finance
Austin Davis, Senior Policy Advisor
Ricardo Reinoso, Digital Adoption Manager
Audit File