



CITY OF PHILADELPHIA

Office of Inspector General

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EXECUTIVE SUMMARY OF ELWYN INVESTIGATION

The City of Philadelphia (City) Office of Inspector General (OIG) investigated a complaint that Elwyn, a non-profit organization, failed to provide City Water Department customers with translated bills and overbilled the City for the translation work. Elwyn denied any wrongdoing but has nonetheless cooperated fully with the OIG investigation and agreed to a financial resolution described below.

From 2009 to 2016, Elwyn entered into various agreements with the City to translate, through a subcontractor, City Water Department bills for the City's visually impaired customers. These contracts required Elwyn and its subcontractor to convert information contained in the City's Water bill into braille or a large-font format and mail the translated bills to City customers. On average, these translation contracts cost the City approximately \$10,000 to \$15,000 per year.

At the request of the Revenue Department, the OIG initiated an investigation into Elwyn's translation services. Investigators placed decoy City employees on the list of customers that required translation services and found that those employees never received translated bills. Investigators also contacted City customers receiving the service and discovered some customers never received the translated bills. Additionally, investigators reviewed Elwyn invoices and confirmed that Elwyn charged the City for translated bills that the decoy employees and customers did not receive.

To settle these claims, Elwyn has agreed to the following terms:

1. Elwyn will pay the City \$38,400 and release the City from any outstanding payments that the City would or might owe to Elwyn for translation services provided in the last fiscal year. Elwyn estimated those payments total approximately \$12,000. Thus, the total settlement amount is approximately \$50,000.
2. Elwyn will enter into a corporate compliance program to protect against future shortages. The program will include designating an employee to ensure compliance on future City translation contracts and certifying all documents and invoices provided by Elwyn to the City.