



**AUDIT OF THE OFFICE ON VIOLENCE AGAINST
WOMEN AWARD TO THE INTERNATIONAL
ASSOCIATION OF FORENSIC NURSES
ELKRIDGE, MARYLAND**

U.S. Department of Justice
Office of the Inspector General
Audit Division

Audit Report GR-30-13-004
September 2013

AUDIT OF THE OFFICE ON VIOLENCE AGAINST WOMEN AWARD TO THE INTERNATIONAL ASSOCIATION OF FORENSIC NURSES ELKRIDGE, MARYLAND

EXECUTIVE SUMMARY

The Department of Justice (DOJ) Office of the Inspector General (OIG), completed an audit of Office on Violence Against Women (OVW) cooperative agreement number 2011-TA-AX-K021 totaling \$677,000 awarded to the International Association of Forensic Nurses (IAFN) in Elkridge, Maryland. The OVW funding was part of the OVW's Technical Assistance Program that provides OVW grantees with training, expertise, and problem-solving strategies to meet the challenges of addressing domestic violence, sexual assault, dating violence, and stalking.

The objective of our audit was to assess performance in the key areas of cooperative agreement management that are applicable and appropriate for the cooperative agreement under review. These areas include: (1) internal control environment; (2) federal financial reports and progress reports; (3) drawdowns; (4) budget management and control; (5) expenditures, including personnel and indirect costs; (6) monitoring of consultants; and (7) program performance and accomplishments.

Our audit found that the transactions were, in general, properly authorized, classified, supported, and charged to the cooperative agreement. However, during the audit, we found IAFN accounting records did not reconcile to the Federal Financial Reports (FFR), and, consequently, filed an inaccurate Federal Financial Report (FFR). We identified that IAFN failed to timely file final indirect cost rate proposals, which resulted in unsupported indirect cost charges totaling \$53,187. We also found IAFN did not use written contractual agreements between IAFN and its hired consultants and did not have a formal policy to select and monitor consultants.

Our report contains four recommendations. We discussed the results of our audit with IAFN officials and have included their comments in the report.

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INTRODUCTION

The Office of the Inspector General (OIG), completed an audit of Office on Violence Against Women (OVW) cooperative agreement number 2011-TA-AX-K021 totaling \$677,000 awarded to the International Association of Forensic Nurses (IAFN) in Elkridge, Maryland. The OVW funding was part of the OVW's Technical Assistance Program that provides OVW grantees with training, expertise, and problem-solving strategies to meet the challenges of addressing domestic violence, sexual assault, dating violence, and stalking. The primary purpose of the technical assistance program is to provide direct assistance to grantees and subgrantees to enhance the success of local projects that they implement with grant funds.

IAFN was awarded the cooperative agreement to fund its Sexual Assault Forensic Examiner Technical Assistance Project (SAFEta).¹ SAFEta's overarching goal is to deliver technical assistance and training on a national level to OVW grantees and potential grantees such as healthcare professionals, law enforcement officers, advocates, and prosecutors who provide care and respond to sexual assault victims throughout the United States and who are implementing the recommendation included within the most current version of the National Sexual Assault Forensic Examiner (SAFE) Protocol and/or the National Training Standards. As shown in Exhibit 1, IAFN was awarded a total of \$677,000 to implement the cooperative agreement.

Exhibit 1: Summary of Awards Audited

Awards	Type of Award	Award Period	Award Amount (\$)
2011-TA-AX-K021	Cooperative Agreement	5/09/2011-1/31/2012	150,000
2011-TA-AX-K021	Supplement	9/23/2011-1/31/2014	527,000
TOTAL			\$677,000

Source: OJP Grants Management System (GMS) award documentation

¹ The IAFN is a not-for-profit international membership organization; its primary mission is to provide leadership in forensic nursing practice by developing, promoting and disseminating information internationally about forensic nursing science.

Audit Approach

The purpose of this audit was to determine whether reimbursements claimed for costs under the cooperative agreement were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the cooperative agreement; and whether the awardee was meeting its program goals and objectives.

The objective of our audit was to assess performance in the key areas of cooperative agreement management that are applicable and appropriate for the cooperative agreement under review. These areas include: (1) internal control environment; (2) federal financial reports and progress reports; (3) drawdowns; (4) budget management and control; (5) expenditures, including personnel and indirect costs; (6) monitoring of consultants; and (7) program performance and accomplishments.

We tested compliance with what we considered the most important conditions of the cooperative agreement. Unless otherwise stated in the report, we used the 2012 OVW Financial Grants Management Guide (Financial Management Guide), and the award documents to assess IAFN's performance and compliance with the requirements of the cooperative agreement.² Specifically, we tested what we believed to be critical award requirements necessary to meet the objectives of the audit, including:

- **Internal Control Environment** to determine whether the internal controls in place for the processing and payment of funds were adequate to safeguard the funds awarded to IAFN and ensures compliance with the terms and conditions of the cooperative agreement.
- **Reporting** to determine if the required federal financial reports and progress reports were submitted timely and accurately reflect the activity of the cooperative agreement;
- **Drawdowns** to determine whether drawdowns were adequately supported and if the auditee was managing receipts in accordance with federal requirements;

² The OVW *Financial Grants Management Guide* serves as a reference of information to assist OVW award recipients in financial management and grants administration of OVW grant programs. OVW requires award recipients to abide by the requirements in conjunction with the provisions of OMB circulars and other government-wide common rules applicable to grants and cooperative agreements, program guidelines, special conditions, terms and conditions, and regulations and statutes.

- **Budget Management and Control** to ensure that IAFN appropriately tracked costs to approved budget categories;
- **Cooperative Agreement Expenditures** to determine the accuracy and allowability of costs charged to the cooperative agreement; and
- **Monitoring of Consultants** to determine whether IAFN was in compliance with monitoring its consultants; and
- **Program Performance and Accomplishments** to determine whether IAFN has met the cooperative agreement objectives;

The award did not include program income, matching costs, or property management. The results of our analysis are discussed in detail in the Findings and Recommendations section of the report. Appendix I contains additional information on our objective, scope, and methodology.

FINDINGS AND RECOMMENDATIONS

COMPLIANCE WITH ESSENTIAL AWARD REQUIREMENTS

Our audit found that the transactions were, in general, properly authorized, classified, supported, and charged to the cooperative agreement. However, during the audit, we found that information submitted for the Federal Financial Reports (FFR) were inconsistent with the information in the accounting records. We identified that IAFN failed to file timely final indirect cost rate proposals, which resulted in unsupported indirect cost charges totaling \$53,187. Finally, during our audit, we identified that IAFN did not use written contractual agreements with its hired consultants and did not have a formal policy to effectively monitor consultants.

Internal Control Environment

According to the Financial Management Guide, grant recipients are responsible for establishing and maintaining an adequate system of accounting and internal controls. An acceptable internal control system provides cost controls to ensure optimal use of funds. Grant recipients must adequately safeguard funds and ensure they are used solely for authorized purposes. While our audit did not assess IAFN's overall system of internal controls, we did review the internal controls of IAFN's financial management system specific to the administration of cooperative agreement funds during the period under review. Specifically, we interviewed pertinent IAFN officials, reviewed written policies and procedures that affect the OVW award, and reviewed the IAFN audit report.

Overall, we determined that there are adequate segregations of duties with respect to IAFN's process of requesting supplies and services through the payment of invoices. However, we identified that the IAFN did not have written contractual agreements for estimated services to be provided with its hired consultants. We discuss this exception later in the "Monitoring of Consultants" section of this report.

Reporting

The special conditions of the cooperative agreement require that IAFN comply with administrative and financial requirements outlined in the current edition of Financial Management Guide and the requirements of the Office of Management and Budget (OMB) Circular A-133, *Audits of States, Local Governments and Non-Profit Organizations* (OMB Circular A-133).³ The Financial Management Guide requires that award recipients submit both financial and program progress reports to inform awarding agencies on the status of each award. Federal Financial Reports (FFRs) should detail the actual expenditures incurred for each quarterly reporting period, while progress reports should be submitted semiannually and describe the performance activities and achievements of the project supported by each award.

Because accurate and timely FFRs and progress reports are necessary to ensure that DOJ awarding agencies can effectively monitor award activities and expenditures, we reviewed all of IAFN submitted reports for cooperative agreement number 2011-TA-AX-K021. As detailed in the following sections, IAFN generally submitted the required FFRs and progress reports in a timely manner. However, while we were able to verify that progress reports accurately reflected actual program accomplishments, FFRs did not accurately report cooperative agreement expenditures activity due to adjustments made in the accounting records after the FFRs were filed.

Federal Financial Reports

DOJ awarding agencies monitor the financial performance of each award via FFRs. According to the Financial Management Guide, FFRs should be submitted within 30 days of the end of each quarterly reporting period. Even when there have been no outlays of award funds, a report containing zeroes must be submitted. Awarding agencies may withhold funds or future awards if reports are submitted late, or not at all.

To verify the timeliness of the FFRs, we tested a total of nine reports submitted as of April 23, 2013, which included award activity to March 31, 2013. We compared the submission date of each report to the date each

³ OMB Circular A-133 requires non-federal entities that expend at least \$500,000 a year in federal awards to have a single audit conducted of its financial statements. The purpose of the single audit is to determine whether the financial statements and schedule of expenditures of federal awards are presented fairly in all material respects and in conformity with generally accepted accounting principles. Fiscal year 2012 was the first year that the IAFN was required to have a Single Audit conducted. The Single Audit was completed on June 4, 2013.

report was due, and found that eight of the nine FFRs were submitted on time. The first FFR was submitted 13 days late. We do not consider this late submission to be material, as it was the only exception.

The Financial Management Guide indicates that an awardee's accounting system for reporting must support all amounts reported on the FFRs. To verify the accuracy of the FFRs, we discussed the process for submitting FFRs with the responsible IAFN official and compared the amounts reported on the nine FFRs to expenditures recorded in the awardee's accounting records. Based on our testing, we found that expenditures reported on the FFRs did not reconcile to the official accounting records of the award.

IAFN uses QuickBooks online accounting software and an Excel spreadsheet to keep track of grant expenditures. During our testing, we found errors in the grant tracking spreadsheet that resulted in the accounting records not being reconciled with the awardee's monthly expenses reported on the FFRs. According to the grantee official, the difference between the accounting records and the FFRs relates to corrections made to the general ledger after the FFRs were filed. The grantee official told us that they were aware that the FFRs were not accurately reported and that now the IAFN's accountant is reviewing the FFRs before they are filed.

While the grant tracking spreadsheet is a valuable budgeting and accounting tool, we believe the awardee should reconcile the spreadsheet to the accounting records before the awardee files its FFRs. Because IAFN uses the spreadsheet as the basis to track grant expenditures, an error in an FFR will not only result in IAFN reporting the incorrect financial results for a period, but also drawing down an incorrect amount of federal funds. Therefore, we recommend that OVW require IAFN to develop and implement a policy to reconcile the cooperative agreement records to ensure accurate reporting on FFRs.

Progress Reports

While FFRs report an awards financial activity, progress reports describe the project status and accomplishments toward the objectives contained in the approved award application. Progress reports should also describe the status of the project and compare actual accomplishments to anticipated program objectives. According to the Financial Management Guide, award recipients are required to submit semi-annual or annual progress reports during the performance period of the award. Progress reports are due 30 days after the end of each semi-annual reporting period, June 30 and December 31.

To assess whether IAFN submitted progress reports on time, we reviewed four progress reports covering January 1, 2011, through December 31, 2012, and compared the submission dates to the due date for each progress report. All four progress reports were submitted on time.

We reviewed reported program achievements detailed in the progress reports and compared data to verify performance claims for the last year of the cooperative agreement were consistent with the program goals and objectives. In order to verify information in the progress reports, we selected a sample of three program accomplishments from the two most recent progress reports submitted for the cooperative agreement. We then traced the items to supporting documentation maintained by IAFN officials. We requested verification in the following areas: (1) maintenance of a website, including the site usage report detailing the number of site visits, average visits, and new visits; (2) on-site technical assistance, including the mode of communication; and (3) participation in OVW initiatives, meetings, and task forces, including training topics covered, planning/development meeting attendance, and the number of meetings held. IAFN officials provided sufficient source documentation to support the information reported to the OVW for all items in our sample.

Program Performance

To assess IFAN's achievements in meeting the goals and objectives for the cooperative agreement, we reviewed the OVW grant solicitation and documentation and interviewed IAFN officials and beneficiaries of the program. The grantee implemented training efforts, and maintained an interactive SAFEta website that promotes and disseminates the National SAFE Protocol on a national level to assist those who are working with sexual assault victims in communities throughout the United States and its territories. Based on the information we reviewed, it appears that IAFN has achieved or is on track to achieve the goals and objectives of the

cooperative agreement. We were able to corroborate that the services being provided were aligned with the cooperative agreement goals.

Drawdowns

To obtain DOJ award money, recipients must electronically request funds via drawdowns. According to the Financial Management Guide, award recipients should only request federal award funds when they incur or anticipate project costs. Therefore, recipients should time their requests for award funds to ensure they will have only the minimum federal cash on hand required to pay actual or anticipated costs within 10 days.

According to IAFN personnel, drawdown requests are based on reimbursements and they are electronically deposited into an approved financial institution account. IAFN confirmed that their policy is to request a drawdown based on the expenditures reported on the monthly expense report. To ensure that IAFN requested funds properly and kept minimum cash on hand, we analyzed its drawdowns to date and compared the overall amount to the cooperative agreement's accounting records. Overall, we found that the amounts drawn down did not exceed the expenditures in the accounting records.

Budget Management and Control

Awardees should expend funds according to the budget approved by the awarding agency and included in the final award. Approved award budgets document how much the recipient is authorized to spend in high-level budget categories, such as personnel, supplies, and contractors. The Financial Management Guide also states that award recipients may request a modification to approved award budgets to reallocate amounts between various budget categories within the same award. No prior approval is required if the reallocations between budget categories do not exceed 10 percent of the total award amount. We compared the actual amounts spent in each budget category to the budgeted amounts in the same categories. For cooperative agreement 2011-TA-AX-K021, IAFN adhered to the Financial Management Guide requirements.

Cooperative Agreement Expenditures

According to 2 C.F.R. § 230 *Cost Principles for Non-Profit Organizations*, costs are allowable if they are reasonable, consistently applied, adequately documented, comply with policies and procedures, and conform to any limitations or exclusions specified in applicable criteria. As of March 29, 2013, the awardee's accounting records reported \$408,341 in project costs associated with cooperative agreement number 2011-TA-AX-K021. We tested nearly \$112,600 (28 percent) in personnel, travel, supplies, consultants, and other costs charged to the cooperative agreement, and determined that the reviewed expenses were allowable.

Personnel and Fringe Benefits

According to its accounting records, IAFN spent about \$191,360 on employee salaries and \$20,020 on fringe benefits. To gain an understanding of the payroll process, we interviewed IAFN's CEO. IAFN payroll is processed bi-weekly by Adams Keegan, Inc., an online independent human resource services provider.⁴ The salary and fringe benefit payments for employees are automatically generated each pay period based on the employee's payroll and work project information entered into the system. Overtime pay is not authorized under cooperative agreement number 2011-TA-AX-K021.

We selected six nonconsecutive pay periods, totaling about \$20,140, for detailed testing to determine if salaries and fringe benefit charges were supported and allowable. For the sampled pay periods, we found that the approved employee timesheets supported the charges made to the cooperative agreement.

We reviewed the OVW-approved fringe benefit cost pool elements to determine whether the elements were reasonable and in accordance with the approved cooperative agreement budgets. We reviewed the fringe benefits charged to the cooperative agreement for the same six nonconsecutive pay periods as the personnel costs, totaling about \$2,130, and determined that the fringe benefit expenditures associated with the personnel costs were reasonable and properly charged to the cooperative agreement.

⁴ IAFN contracts with Adams Keegan, Inc. to administer a variety of Human Resource related functions, including processing payroll and guidance on human resource administration issues. The payroll system does not interface with the accounting system.

Travel, Supplies, Consultant, and Other Costs

We selected a judgmental sample of 61 transactions from the categories of Travel, Supplies, Consultant and Other Costs from cooperative agreement 2011-TA-AX-K021 totaling nearly \$90,330 to determine if the charges were allowable and allocable to the award. Based on our testing, we determined that the sampled transactions were generally supported with documentation, allowable, and allocated in accordance with the applicable cooperative agreement laws, regulations, and guidelines.

Indirect Costs

Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective such as a grant or contract. IAFN indicates that their indirect costs include administrative salaries and benefits, telephone, supplies, rent, and accounting.

According to the Financial Management Guide, grantees need to establish and seek approval for an indirect cost rate with their cognizant federal agency to receive reimbursement for indirect expenses. IAFN submitted an initial indirect cost proposal to the DOJ, and on January 9, 2012, was approved for a provisional indirect cost rate of 17.76 percent effective for the period January 1, 2011, through December 31, 2013. As summarized in Exhibit 2, IAFN has \$62,576 in indirect costs recorded on their general ledger for the period February 2011 – March 2013.

Exhibit 2: Summary of Indirect Costs

Fiscal Year (FY)	Indirect Costs
2011	\$19,575
2012	33,612
2013	9,389
Total	\$62,576

Source: IAFN general ledger

According to 2 C.F.R. Part 230, a provisional rate is a temporary billing rate used for reimbursements and reporting of indirect costs on awards for a specified period of time pending the establishment of a final indirect rate for the period. IAFN officials stated that the final indirect cost rate proposals for FYs 2011 and 2012 were submitted in August 2013, but IAFN has not received the final approval rates. Therefore, because IAFN

has not received its final indirect cost rate for FYs 2011 and 2012, we question FY 2011 - 2012 indirect costs totaling \$53,187 as unsupported.

Monitoring of Consultants

According to the Financial Management Guide, grantees should ensure that they monitor organizations under contract to them in a manner that ensures compliance with their own overall financial management requirements. IFAN had neither written contractual agreements with its consultants nor a formal policy for the selection and monitoring of consultants.

An IAFN official told us that they selected consultants based on recommendations from other individuals, and that the OVW grant manager responsible for overseeing the cooperative agreement approves the consultants prior to trainings. This IAFN official also stated that the consultants are monitored by IAFN employees attending training events led by the consultants. Further, the IAFN official told us that the terms and conditions of the cooperative agreement were agreed upon verbally with the consultants, and that dates and places of trainings were verified via-email. The grantee believed that since OVW approved the consultants in the grant award a contractual agreement was not necessary.

In determining the reasonableness of the professional service we considered the adequacy of the contractual agreement. An adequate contractual agreement includes the description of the service, estimate of time required, compensation amount, and termination provisions. The lack of a written agreement impairs the ability to assess the reasonableness of the contractor agreement or monitor the contractor's performance since no specific criteria has been formally agreed upon. Therefore, we recommend IAFN implement policies to ensure consultants are effectively selected and monitored. Additionally, we recommend OVW require that IAFN develop and implement a written contractual agreement that specifies the expected services, estimate of time required, compensation amount, and termination provisions.

Recommendations

We recommend that OVW:

1. Ensure IAFN implements a policy to reconcile the cooperative agreement records to ensure accurate reporting on FFRs.

2. Remedy the \$53,187 in unsupported indirect cost charges.
3. Ensure that IAFN implement policies for selecting and monitoring consultants.
4. Ensure that IAFN develop written contractual agreements with its consultants.

SCHEDULE OF DOLLAR-RELATED FINDINGS

QUESTIONED COSTS:⁵	AMOUNT	PAGE
	(\$)	
<u>Unsupported Indirect Costs</u>		
Indirect Costs	53,187	11
Total Unsupported Costs	\$53,187	
Total Questioned Costs	\$53,187	

⁵ Questioned costs are expenditures that do not comply with legal, regulatory or contractual requirements, or are not supported by adequate documentation at the time of the audit, or are unnecessary or unreasonable. Questioned costs may be remedied by offset, waiver, recovery of funds, or the provision of supporting documentation.

APPENDIX I

OBJECTIVES, SCOPE, AND METHODOLOGY

The purpose of this audit was to determine whether reimbursements claimed for costs under the cooperative agreement reviewed were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the cooperative agreement. The objective of our audit was to review performance in the following areas: (1) internal control environment; (2) federal financial reports and progress reports; (3) drawdowns; (4) budget management and control; (5) expenditures, including personnel and indirect costs; (6) monitoring of consultants; and (7) program performance and accomplishments.

We conducted this 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.

Our audit concentrated on cooperative agreement number 2011-TA-AX-K021 in the amount of \$677,000 to the International Association of Forensic Nurses (IAFN) awarded by the Office on Violence Against Women. We reviewed cooperative agreement activities and transactions beginning with inception of the award in February 2011, through the end of field work in April 2013. Specifically, we interviewed pertinent IAFN officials, and reviewed written policies and procedures that affect the OVW award, including procurement, receiving, and payment procedures; the payroll system; and monitoring of consultants to determine compliance with the terms and conditions of the cooperative agreement, and to assess risk. We found that IAFN had written policies and procedures to assist in the financial and accounting administration of the cooperative agreements. Also, IAFN utilizes a multi-layer approval process documenting the receipt of items purchased, and the payment of invoices. We reviewed the IAFN payroll procedures and determined that employees prepare and sign timesheets that are electronically submitted to the IAFN's Office Manager for review at the end of the pay period. The Office Manager sends the approved timesheets to IAFN's Chief Executive Officer, who reviews them for accuracy, and approves the timesheet if it is determined that the hours claimed are correct.

In conducting our audit, we performed sample testing in the following areas:

- **Drawdowns.** We analyzed IAFN's overall drawdowns of \$408,362 for the DOJ award from the date of award obligation, May 3, 2011, through April 11, 2013. The overall drawdowns did not exceed the total expenditures per the cooperative agreement's accounting records.
- **Payroll.** We interviewed IAFN grant management personnel regarding the charging of personnel and fringe benefits costs to the cooperative agreement. To determine whether the cooperative agreement's labor and fringe benefits costs were supported and allowed, we judgmentally selected employees to test from the six quarters of labor and fringe benefits charged to the award through the March 22, 2013 pay date. We tested personnel costs totaling \$20,136 out of \$191,362 charged to the cooperative agreement. There were no exception noted in our testing, and the labor and fringe benefits costs charged to the cooperative agreement were supported and allowable.
- **Transactions.** To test the cooperative agreement's transactions for authorizations, approvals, and sufficient supporting documentation, we judgmentally selected 61 non-payroll transactions totaling \$90,325 out of \$134,387 charged to the cooperative agreement. We analyzed the transactions to determine if the costs were properly authorized, classified, recorded, and supported.

In addition, we reviewed the timeliness and accuracy of financial status and progress reports and reviewed the internal controls of the financial management system specific to the administration of cooperative agreement funds during the period under review.

APPENDIX II

INTERNATIONAL ASSOCIATION OF FORENSIC NURSES RESPONSE TO THE DRAFT REPORT



International Association of Forensic Nurses

September 10, 2013

Troy M. Meyer
Regional Audit Manager Washington Regional Audit Office
Office of the Inspector General
U.S. Department of Justice
1300 N. 17th Street, Suite 3400
Arlington, VA 22209

RE: Response to Draft Audit Report dated August 23, 2013

Dear Mr. Meyer:

This letter is to address the recommendations included in the draft audit report of the Office of the Inspector General's (OIG) audit of the Office of Violence Against Women (OVW), Grant Number 2011-TA-AX-K021, awarded to the International Association of Forensic Nurses.

1. Ensure IAFN implements a policy to reconcile the cooperative agreement records to ensure accurate reporting on FFRs.

Forensic Nurses Response:

We have written a Federal Grants Management Policy that is now currently under review with the Board of Directors to document procedures to ensure accurate reporting on FFRs.

2. Remedy the \$53,187 in unsupported indirect cost charges.

Forensic Nurses Response:

The association was awarded a provisional 3-year indirect rate in December 2011 for the period of 2011-2013 from our cognizant agency, the National Institute of Justice. We have submitted subsequent final indirect rate proposals for both 2011 and 2012.

These were submitted in August of 2013. No response from NIJ has been received as of this date. Once final indirect rates for 2011 and 2012 are approved, any and all dollar related findings regarding unsupported indirect costs can be resolved.

3. Ensure that IAFN implement policies for selecting and monitoring consultants.

Forensic Nurses Response:

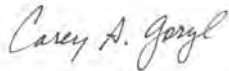
We have written a Federal Grants Management Policy that is now currently under review with the Board of Directors to document policies on selecting and monitoring consultants.

4. Ensure that IAFN develop written contractual agreements with its consultants.

Forensic Nurses Response:

We have written a Federal Grants Management Policy that is now currently under review with the Board of Directors to document policies on developing written contractual agreements with its consultants.

Sincerely,



Carey Goryl, MSW, CAE
Chief Executive Officer

APPENDIX III

OFFICE ON VIOLENCE AGAINST WOMEN RESPONSE TO THE DRAFT REPORT



U.S. Department of Justice
Office on Violence Against Women
Washington, D.C. 20530

September 20, 2013

MEMORANDUM

TO: Troy M. Meyer
Regional Audit Manager
Washington Regional Audit Office

FROM: Bea Hanson *TH*
Acting Director
Office on Violence Against Women

Rodney Samuels *RS*
Audit Liaison/Staff Accountant
Office on Violence Against Women

SUBJECT: Audit of the Office on Violence Against Women Grant Awarded to the
International Association of Forensic Nurses, Cooperative Agreement Number
2011-TA-AX-K021

This memorandum is in response to your correspondence dated August 23, 2013 transmitting the above Draft Audit Report for the International Association of Forensic Nurses (IAFN). We consider the subject report resolved and request written acceptance of this action from your office.

The report contains **four** recommendations, **\$53,187** in unsupported indirect cost charges. The Office on Violence Against Women is committed to working with the grantee to address each recommendation and bring them to a close as quickly as possible. The following is our analysis of the audit recommendations.

1) Ensure IAFN implements a policy to reconcile the cooperative agreement records to ensure accurate reporting on FFRs.

We agree with this recommendation. We will coordinate with IAFN to ensure that they implement a policy to reconcile the cooperative agreement records to ensure accurate reporting on FFRs.

2) Remedy the \$53,187 in unsupported indirect cost charges.

We agree with the recommendation. We will coordinate with IAFN to remedy the \$53,187 in unsupported indirect cost charges.

3) Ensure that IAFN implement policies for selecting and monitoring consultants.

We agree with the recommendation. We will coordinate with IAFN to ensure that they implement policies for selecting and monitoring consultants.

4) Ensure that IAFN develop written contractual agreements with its consultants.

We agree with the recommendation. We will coordinate with IAFN to ensure that they develop written contractual agreements with its consultants.

We appreciate the opportunity to review and comment on the draft report. If you have any questions or require additional information, please contact Rodney Samuels of my staff at (202) 514-9820.

cc Angela Wood
Accounting Officer
Office on Violence Against Women (OVW)

Louise M. Duhamel, Ph.D.
Acting Assistant Director
Audit Liaison Group
Justice Management Division

Debra Bright
Program Specialist
Office on Violence Against Women

APPENDIX IV

OFFICE OF THE INSPECTOR GENERAL ANALYSIS AND SUMMARY OF ACTIONS NECESSARY TO CLOSE THE REPORT

The Department of Justice (DOJ) Office of the Inspector General (OIG) provided a draft of this audit report to the International Association of Forensic Nurses (IAFN) and the Office on Violence Against Women (OVW). The responses are incorporated respectively as Appendices II and III of this final report. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendation Number:

- 1. Resolved.** The OVW concurred with our recommendation and stated it will coordinate with IAFN to implement a policy to reconcile the cooperative agreement records to ensure accurate reporting on FFRs. In its response to the draft report, IAFN stated that a written Federal Grants Management Policy that outlines the procedures to ensure accurate reporting on FFRs is under review with its Board of Directors. This recommendation can be closed when we receive documentation showing that IAFN has implemented a policy to reconcile the cooperative agreement records to ensure accurate reporting on FFRs.
- 2. Resolved.** The OVW concurred with our recommendation and stated it will coordinate with IAFN to remedy the \$53,187 in unsupported indirect cost charges. In its response to the draft report, IAFN stated that in August 2013, it submitted subsequent final indirect rate proposals for both 2011 and 2012, and once the final indirect rates are approved, any and all dollar-related findings regarding unsupported indirect costs will be resolved. This recommendation can be closed when we receive documentation that OVW has remedied the \$53,187 in unsupported indirect cost charges.
- 3. Resolved.** The OVW concurred with our recommendation and stated it will coordinate with IAFN to ensure that they implement policies for selecting and monitoring consultants. In its response to the draft report, IAFN stated that a written Federal Grants Management Policy is under review with its Board of Directors that outlines the policies on selecting and monitoring consultants. This recommendation can be closed when we receive documentation showing that IAFN has implemented policies for selecting and monitoring consultants.

4. **Resolved.** The OVW concurred with our recommendation and stated it will coordinate with IAFN to ensure that they develop written contractual agreements with its consultants. In its response to the draft report, IAFN stated that a written Federal Grants Management Policy is under review with its Board of Directors that outlines the policies on developing written contractual agreements with its consultants. This recommendation can be closed when we receive documentation showing that IAFN has developed and implemented written contractual agreements with its consultants.