



**AUDIT OF THE OFFICE ON VIOLENCE AGAINST
WOMEN RURAL DOMESTIC VIOLENCE, SEXUAL
ASSAULT, AND STALKING ASSISTANCE PROGRAM
GRANT AWARDED TO THE CRISIS CENTER FOR
DOMESTIC ABUSE AND SEXUAL ASSAULT
FREMONT, NEBRASKA**

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

Audit Report GR-60-14-011
May 2014

**AUDIT OF THE OFFICE ON VIOLENCE AGAINST WOMEN
RURAL DOMESTIC VIOLENCE, SEXUAL ASSAULT, AND
STALKING ASSISTANCE PROGRAM GRANT
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DOMESTIC ABUSE AND SEXUAL ASSAULT
FREMONT, NEBRASKA**

EXECUTIVE SUMMARY

The U.S. Department of Justice, Office of the Inspector General, Audit Division, has completed an audit of Grant No. 2009-WR-AX-0026 totaling \$1,750,000 awarded to the Crisis Center for Domestic Abuse and Sexual Assault (Crisis Center) by the Office on Violence Against Women (OVW).¹

Created in 1995, the OVW administers financial and technical assistance to communities across the country that are developing programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault, and stalking. According to its website, the Crisis Center provides services for individuals and families who experience domestic abuse, dating violence, and sexual assault. The Crisis Center is committed to the prevention and elimination of domestic violence and sexual assault as well as eliminating violence in the lives of women and children through empowerment, education, and social action.²

The objective of the audit was to assess performance in the key areas of grant management that are applicable and appropriate for the grant under review. These areas included: (1) internal control environment, (2) drawdowns, (3) grant expenditures, (4) monitoring of subgrantees and contractors, (5) budget management and control, (6) financial status and progress reports, (7) program performance and accomplishments, and (8) special grant requirements.

We tested compliance with what we consider to be the most important conditions of the grant. Unless otherwise stated in this report, the criteria we audit against are contained in the 2009 and 2011 OJP Financial Guides, the 2012 OVW Financial Grants Management Guide, and the award documentation.

We examined the Crisis Center's accounting records, financial and progress reports, and operating policies and procedures, and found the Crisis Center did not comply with essential grant conditions in the areas of internal controls, grant expenditures, and grant reporting. Specifically, the Crisis Center did not maintain timesheets for grant-funded personnel that showed the amount of time worked on the grant or documentation supporting the data reported in its progress reports.

¹ Grant No. 2009-WR-AX-0026 was awarded on September 28, 2009, and the grant ends on September 30, 2014.

² Statements of mission and intent regarding the OVW and the Crisis Center have been taken from the agencies' website directly (unaudited).

We also identified grant expenditures that were not supported by adequate documentation detailing the allocation of costs across multiple funding sources. Overall, we identified \$174,521 in questioned costs.

The report contains eight recommendations, which are detailed in the Findings and Recommendations section of the report. Our audit objective, scope, and methodology are discussed in Appendix I and our Schedule of Dollar-Related Findings appears in Appendix II.

We discussed the results of our audit with Crisis Center officials and have included their comments in the report, as applicable. In addition, we requested written responses to the draft audit report from the Crisis Center and the OVW, which are appended to this report in appendices III and IV, respectively. Our analysis of both responses, as well as a summary of actions necessary to close the recommendations can be found in Appendix V of this report.

TABLE OF CONTENTS

INTRODUCTION	1
Background.....	1
Our Audit Approach.....	2
FINDINGS AND RECOMMENDATIONS	4
Prior Audits.....	4
Internal Control Environment	4
Drawdowns.....	5
Expenditures.....	5
Crisis Center Personnel Costs	6
Crisis Center Other Direct Costs.....	6
Subgrantee Costs.....	7
Budget Management and Control	7
Reporting	7
Financial Reports	7
Progress Reports.....	8
Special Grant Requirements.....	10
Program Performance and Accomplishments	10
Conclusion.....	11
Recommendations	12
APPENDIX I - OBJECTIVE, SCOPE, AND METHODOLOGY	13
APPENXI II - SCHEDULE OF DOLLAR-RELATED FINDINGS	14
APPENDIX III - CRISIS CENTER FOR DOMESTIC ABUSE AND SEXUAL ASSAULT'S RESPONSE TO THE DRAFT AUDIT REPORT	15
APPENDIX IV - OFFICE ON VIOLENCE AGAINST WOMEN'S RESPONSE TO THE DRAFT AUDIT REPORT	22
APPENDIX V - OFFICE OF THE INSPECTOR GENERAL ANALYSIS AND SUMMARY OF ACTIONS NECESSARY TO CLOSE THE REPORT	25

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INTRODUCTION

The U.S. Department of Justice, Office of the Inspector General, Audit Division, has completed an audit of Grant No. 2009-WR-AX-0026 totaling \$1,750,000 awarded to the Crisis Center for Domestic Abuse and Sexual Assault (Crisis Center) by the Office on Violence Against Women (OVW).¹

Background

Created in 1995, the OVW administers financial and technical assistance to communities across the country that are developing programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault, and stalking. The OVW's mission is to provide federal leadership in developing the nation's capacity to reduce violence against women, and administer justice for and strengthen services to victims. Currently, the OVW administers 3 formula-based and 18 discretionary grant programs, established under the *Violence Against Women Act* and subsequent legislation.

According to its website, the Crisis Center provides services for individuals and families who experience domestic abuse, dating violence, and sexual assault in Burt, Cuming, Dodge, Saunders, and Washington counties, Nebraska. The Crisis Center is committed to the prevention and elimination of domestic violence and sexual assault as well as eliminating violence in the lives of women and children through empowerment, education, and social action.²

Grant No. 2009-WR-AX-0026 was awarded under the Rural Domestic Violence, Dating Violence, Sexual Assault, and Stalking Assistance Program (Rural Assistance Program) and is administered by the Crisis Center. The Rural Assistance Program enhances the safety of children, youth, and adults who are victims of domestic violence, dating violence, sexual assault, and stalking by supporting projects uniquely designed to address and prevent these crimes in rural jurisdictions. The Rural Assistance Program encourages collaboration between victim advocates, law enforcement officers, pre-trial service personnel, prosecutors, judges and other court personnel, probation and parole officers, and faith- and/or

¹ Grant No. 2009-WR-AX-0026 was awarded on September 28, 2009, and the grant ends on September 30, 2014.

² Statements of mission and intent regarding the OVW and the Crisis Center have been taken from the agencies' website directly (unaudited).

community-based leaders to overcome the problems of domestic violence, dating violence, sexual assault, and stalking and ensure that victim safety is paramount in providing services to victims and their children. According to grant documentation, the Crisis Center formed a partnership with five partner agencies to form the Southeast Nebraska Training, Response, and Outreach Consortium (SENTROC). The primary purpose of SENTROC is to increase the safety of victims of domestic violence, dating violence, sexual assault, and stalking.

Our Audit Approach

The objective of the audit was to assess performance in the key areas of grant management that are applicable and appropriate for the grant under review. These areas included: (1) internal control environment, (2) drawdowns, (3) grant expenditures, (4) monitoring of subgrantees and contractors, (5) budget management and control, (6) financial status and progress reports, (7) program performance and accomplishments, and (8) special grant requirements.

We tested compliance with what we consider to be the most important conditions of the grant. Unless otherwise stated in our report, the criteria we audit against are contained in the OJP Financial Guide, the 2012 OVW Financial Grants Management Guide, and the award documentation.³ We tested the Crisis Center's:

- **internal control environment** to determine whether the internal controls in place for the processing and payment of funds were adequate to safeguard award funds and ensure compliance with the terms and conditions of the awards;
- **drawdowns** to determine whether drawdowns were adequately supported and if the Crisis Center was managing award receipts in accordance with federal requirements;
- **award expenditures** to determine the accuracy and allowability of costs charged to the awards;
- **monitoring of subgrantees and contractors** to determine how the Crisis Center administered and monitored contracted funds;
- **budget management and control** to determine the Crisis Center's compliance with the costs approved in the award budgets;
- **Federal Financial Reports (FFR) and progress reports** to determine if the required reports were submitted in a timely manner and accurately reflect award activity;

³ In February 2012, the OVW issued the 2012 OVW Financial Grants Management Guide, which is applicable to the grant audited in this report. The 2011 OJP Financial Guide and the OJP Financial Guide, October 2009 are also applicable to the grant audited in this report.

- **program performance and accomplishments** to determine if the Crisis Center is capable of meeting the award objectives; and
- **Special Grant Requirements** – to determine whether the Crisis Center complied with award guidelines and special conditions.

Our audit objective, scope, and methodology are discussed in Appendix I.

FINDINGS AND RECOMMENDATIONS

We found that the Crisis Center did not comply with essential grant conditions in the areas of internal controls, grant expenditures, and grant reporting. Specifically, the Crisis Center did not maintain timesheets for grant-funded personnel that showed the amount of time worked on the grant or documentation supporting the data reported in its progress reports. We also identified grant expenditures that were not supported by adequate documentation detailing the allocation of costs across multiple funding sources. Overall, we identified \$174,521 in questioned costs. Based on our audit results, we make three recommendations to address dollar-related findings and five recommendations to improve the management of DOJ grants.

Prior Audits

The Office of Management and Budget (OMB) Circular A-133 requires that non-federal entities that expend \$500,000 or more per year in federal funding have a single audit performed annually. We reviewed the Crisis Center's single audits for FYs 2011 and 2012. We noted two findings in the reports relating to a lack of segregation of duties and duplication of subgrantee reimbursements. Due to the findings noted in the audits reviewed, we expanded our testing to include subgrantee reimbursements. For the results of our review of grant subgrantee reimbursements, see the Expenditures section of this report.

Internal Control Environment

We reviewed the Crisis Center's internal control environment, including procurement, receiving, and payment procedures; the payroll system; and monitoring of contractors and subgrantees to determine compliance with the terms and conditions of the grant and to assess risk.

A Crisis Center official stated that the Crisis Center has an off-site bookkeeper. If bills come in, the Executive Director will initial the invoice to approve them and then class and code them appropriately. The Executive Director then sends the invoices to the bookkeeper who enters the transactions into the accounting software, prints the checks and will then mail the checks to the Crisis Center Executive Director who will sign them. The Crisis Center official also commented that any check over \$500 requires a double signature that would include someone from the Board of Directors. Crisis Center officials also stated that the Board of Directors meets monthly and that the Board Treasurer reviews the records and will make any necessary recommendations.

According to Crisis Center financial policies, the Executive Director approves payroll and the bookkeeper creates payroll direct deposits on a bi-weekly basis. Employees will submit a timesheet to the Executive Director prior to receiving their check. A Crisis Center official explained that due to a limitation in the accounting

software, they did not initially know how to allocate salaries to the grant. Starting two months before our fieldwork, the Crisis Center started dividing employees' salaries by 12 months and then allocating a percentage to the grant as well as any other funding sources. Crisis Center officials also ensured that the time allocation matched the timesheets submitted by Crisis Center employees.

As shown in the Expenditures section of this report, during our testing, we noted that the timesheets for the Crisis Center provided details regarding the activities performed during each workday, but did not support the time charged to individual grants. Crisis Center officials explained to us that a lot of the grants that they receive are similar in nature (relating to goals, objectives, and activities). After our fieldwork, Crisis Center officials provided documentation indicating that they had changed their timesheet form and timesheet policies. The new timesheets provided additional detail indicating the time that the employee allocates to each grant for each workday. As a result, we do not make any recommendations regarding this issue.

Crisis Center officials stated that they worked with partner agencies that formed the SENTROC. SENTROC officials stated that all partner agencies have annual audits but they have not shared the audit reports in a formal way. SENTROC officials also stated that they have implemented a peer review process encompassing all SENTROC agencies. After fieldwork, Crisis Center officials implemented new policies for monitoring partner agencies as an amendment to the Memorandum of Understanding (MOU), allowing the Crisis Center to: (1) audit all financial books, records, and accounts of the partner agency pertaining to the Rural Assistance Grant; (2) inspect on site how the partner agency documents grant-related compensation, reimbursements, and activities; and (3) receive a single audit in conformance with OMB Circular A-133 from each partner agency. We determined that these new procedures were adequate and we do not make a recommendation regarding the monitoring of subgrantees.

Drawdowns

To determine the procedures for drawing down funds, we conducted interviews with Crisis Center officials and determined that the drawdowns are based on reimbursements. According to the OJP Financial Guide and 2012 OVW Financial Grants Management Guide, recipients should time their drawdown requests to ensure that federal cash on hand is the minimum needed for disbursements or reimbursements to be made immediately or within the next 10 days. We analyzed drawdowns to determine if the total actual costs recorded in the grant accounting records were equal to, or in excess of, the cumulative drawdowns as recorded by the OVW. Based on our review, we found that cumulative grant expenditures exceeded cumulative grant drawdowns.

Expenditures

According to the 2012 OVW Financial Management Guide, all recipients are required to establish and maintain accounting systems and financial records to

accurately account for funds awarded to them. As noted in the Prior Audits section of this report, we identified prior findings related to duplicate reimbursements to subgrantees. Therefore, we initially selected a sample of 35 transactions, totaling \$157,675; consisting of 25 Crisis Center transactions and 10 subgrantee reimbursement transactions to determine whether grant expenditures were allowable, reasonable, and in compliance with the terms and conditions of the awards.

Crisis Center Personnel Costs

We noted that the 11 Crisis Center transactions we reviewed for personnel costs were not adequately supported by timesheets. The timesheets provided for these transactions included a detailed account of the activities performed by each Crisis Center employee for each workday but did not contain information detailing the amount of time charged to the grant or other funding sources. According to the OJP Financial Guide and the OVW Grant Financial Management Guide, where grant recipients work on multiple grant programs or cost activities, a reasonable allocation of costs to each activity must be made based on time and/or effort reports (e.g., timesheets). As a result, we determined that the personnel costs charged to the grant totaling \$163,028, consisting of \$119,584 in salaries and \$43,445 in fringe benefits, were not supported.⁴ Therefore, we recommend that OVW remedy the \$163,028 in unsupported personnel costs.

In addition to questioning fringe benefits based on the issue identified above, we identified an additional problem with two Crisis Center fringe benefit transactions. We found that the Crisis Center did not have adequate documentation to support the allocation of health care costs. Crisis Center officials stated that the allocation made to health insurance was based on the amount that was in the OVW-approved budget. According to the approved grant budgets, the amount allocated should have been \$814 and \$694 per month. Instead, the amount allocated was \$2,353 and \$1,165. We also noted unemployment compensation charged to the grant that was not included as part of the budget, however, we determined that these costs were immaterial. Therefore, we recommend that the Crisis Center implement procedures to ensure that fringe benefit allocations are supported, reasonable, and allowable.

Crisis Center Other Direct Costs

During our review of other direct costs, we identified two credit card transactions totaling \$1,220 that were not supported. These transactions included baggage fees for which the Crisis Center officials did not maintain receipts as well as a contested credit card transaction that was refunded but was not credited back to the grant. Therefore, we recommend that OVW remedy the \$1,220 in unsupported other direct costs. Additionally, during our review of other direct

⁴ Throughout this report, differences in the total amounts are due to rounding. The sum of individual numbers prior to rounding may differ from the sum of the individual numbers rounded.

costs, we determined that Crisis Center officials inconsistently documented that expenditures were properly authorized by a grantee official with appropriate authority. Therefore, we recommend that the Crisis Center implement procedures to ensure that expenses are supported and properly authorized.

Subgrantee Costs

During our review of subgrantee reimbursements, similar to the Crisis Center, we identified three reimbursements for personnel costs for which the timesheets did not adequately support the personnel costs charged to the grant. As a result, we determined that the \$10,273 in reimbursements for subgrantee personnel costs were unsupported. According to the OJP Financial Guide and the OVW Grant Financial Management Guide, grant recipients are responsible for monitoring subgrantees and ascertaining that all fiscal and programmatic responsibilities are fulfilled. Therefore, we recommend that OVW remedy the \$10,273 in reimbursements for unsupported subgrantee personnel costs. We also recommend that the Crisis Center ensure that the subgrantees implement policies to ensure that timesheets adequately support the personnel costs charged to the grant.

Budget Management and Control

For Grant No. 2009-WR-AX-0026, the Crisis Center received an approved budget broken down by categories including Personnel, Fringe Benefits, Travel, Equipment, Supplies, Contractual, and Other. The OJP Financial Guide and the 2012 OVW Financial Grants Management Guide require that the recipient initiate a GAN for budget modification if the proposed cumulative change is greater than 10 percent of the total award amount. We conducted detailed analysis of expenditures by budget category and found that the Crisis Center expenditures were within the 10-percent threshold allowed.

Reporting

We reviewed the Federal Financial Reports (FFRs) and Categorical Assistance Progress Reports (progress reports) to determine if the required reports were accurate and submitted within the timeframes required by the OJP Financial Guide and the 2012 OVW Financial Grants Management Guide.

Financial Reports

The OJP Financial Guide and the 2012 OVW Financial Grants Management Guide require that grant recipients report expenditures online using the SF-425 FFR no later than 30 days after the end of each calendar quarter. The final report must be submitted no later than 90 days following the end of the grant period. We evaluated the timeliness of the four most recent FFRs as of the start of our fieldwork and determined that they were submitted in a timely manner.

We also evaluated the accuracy of FFRs for the last four quarters as of the start of our fieldwork and found that the quarterly expenditures reported in the FFRs were not supported by the general ledger. Crisis Center officials explained that the amount recorded is based on the sum of grant drawdowns made during the reporting period. According to the OJP Financial Guide and the OVW Financial Grants Management Guide, recipients shall report the actual expenditures and unliquidated obligations incurred for the reporting period on each financial report. We also determined that the cumulative expenditures for the FFRs reviewed were not supported by the general ledger, as shown in Exhibit 1. Therefore, we recommend that the Crisis Center implement procedures to ensure that FFRs are accurate.

**EXHIBIT 1: FEDERAL FINANCIAL REPORT ACCURACY FOR GRANT
2009-WR-AX-0026**

REPORT NUMBER	REPORT PERIOD FROM - TO DATES	CUMULATIVE EXPENDITURES PER FFR	CUMULATIVE EXPENDITURES PER ACCOUNTING RECORDS	CUMULATIVE DIFFERENCE BETWEEN FFRs & ACCOUNTING RECORDS
12	07/01/2012 – 09/30/2012	\$ 1,065,476	\$ 1,045,115	\$ 20,361
13	10/01/2012 - 12/31/2012	1,100,857	1,111,549	(10,692)
14	01/01/2013 - 03/31/2013	1,201,323	1,197,579	3,745
15	04/01/2013 - 06/30/2013	1,297,159	1,258,826	38,333

Source: Crisis Center accounting records and OJP's GMS

Progress Reports

According to the OJP Financial Guide and the 2012 OVW Financial Grants Management Guide, progress reports are due semiannually on January 30 and July 30 for the life of the award. To verify the timely submission of progress reports, we reviewed the last four progress reports as of the start of our fieldwork and determined that they were submitted in a timely manner.

Due to the nature of the procedures for compiling progress report data and narratives, we focused on evaluating the procedures used to verify, assess, and monitor the submission of progress report data by the partner agencies. Since we conducted fieldwork onsite with the Crisis Center, we also focused on verifying the information that the Crisis Center submitted for progress reports to supporting documentation maintained by Crisis Center officials.

An official from the Family Violence Council (FVC), one of the SENTROC partner agencies for the grant, stated that he created a spreadsheet containing the progress report questions and has the partner agencies use it to provide progress report information. The FVC official compiles the information submitted by the partner agencies and built formulas into the spreadsheet in order to check for errors and to follow up with the partner agencies. The FVC official also explained that they watch the partner agencies closely, but that they did not have any formal policies and procedures in place to evaluate their effectiveness at implementing the

assigned portions of the grant program. However, Crisis Center officials subsequently provided documentation relating to site visits conducted at the partner agencies, which occurred after our fieldwork. One of the measures of these site visits pertains to the partner agencies tracking and documenting statistics for rural services.

During our review we compared the information submitted by the Crisis Center as well as the partner agencies and compared that information to the spreadsheet that FVC used to compile the information used for the two most recent progress reports, for the periods ending December 31, 2012, and June 30, 2013. We determined that the progress report items for the period ending December 31, 2012, matched the supporting documentation submitted by the Crisis Center and the partner agencies. However, for the progress report for the period ending June 30, 2013, we identified four discrepancies between the information reported by the partner agencies and the spreadsheet maintained by FVC personnel as well as the progress report submitted to OVW. Two of the discrepancies were due to an error in the formulas on the spreadsheet maintained by FVC officials. The two remaining discrepancies were due to changing reported figures based on a phone conversation between FVC officials and a partner agency.

We also reviewed progress report information maintained by Crisis Center officials by comparing the information submitted to FVC officials to supporting documentation maintained by the Crisis Center. Crisis Center officials provided spreadsheets used to summarize information of activities performed during each progress report period, including training activities and services provided to victims. We reviewed a judgmental sample of training activities provided by Crisis Center officials and compared this information to the spreadsheets maintained by Crisis Center officials. We noted that although Crisis Center officials maintained information concerning the occurrence of training activities, they did not consistently maintain supporting documentation regarding the number of people trained. We also reviewed a judgmental sample of the services provided and reported by the Crisis Center and determined that generally the documentation maintained supported the spreadsheet used by Crisis Center officials for client services. However, when we compared the spreadsheets maintained by Crisis Center officials to the information reported to FVC officials for use in the progress reports, we noted that Crisis Center officials did not accurately transfer the totals listed in its spreadsheets to the spreadsheets that were submitted to FVC officials for inclusion in the progress reports. Therefore, we recommend that the Crisis Center ensure that the information submitted for the progress reports is supported and accurate.

Special Grant Requirements

We reviewed the Crisis Center’s compliance with additional grant requirements, such as the special conditions, and found that the grant contained typical standard language requirements for adherence to laws, regulations, and other guidelines. We also noted additional requirements regarding the activities performed under the grant. However, unless otherwise noted in this report, we did not note any instances where the Crisis Center did not comply with the grant’s special conditions.

Program Performance and Accomplishments

In order to assess program performance and accomplishments, we requested that the Crisis Center and its partner agencies provide evidence demonstrating that the goals and objectives of the awards had been met, or were sufficiently in progress. The goals and objectives of the grant, as stated in the grant documents and as described by grant officials, are outlined in Exhibit 2.

Exhibit 2: Goals and Objectives for Grant No. 2009-WR-AX-0026

2009-WR-AX-0026 (Original Award)
Goal 1: Establish and expand service delivery to better meet the safety needs of rural victims of domestic violence/dating violence/sexual assault/stalking in an 18-county area.
<ul style="list-style-type: none"> • Objective 1: Initiate project including identifying and hiring project staff. • Objective 2: Project directors will meet regularly. • Objective 3: Expand the availability of immediate shelter services and the flexibility in providing the services through the use of lodging at hotels/motels. • Objective 4: Improve ability to respond to transportation needs and other direct aid needs of victims.
Goal 2: Enhance the coordinate regional response in 18-county area
<ul style="list-style-type: none"> • Objective 1: Continue staff development days • Objective 2: Improve response to Latinas • Objective 3: Improve ability to understand and respond to the needs of clients with mental health needs • Objective 4: Continue to develop and implement training for first responders, expanding to additional targeted professionals; and increase public awareness activities • Objective 5: Improve their public awareness outreach
Goal 3: Develop a regional response to sexual assault/stalking
<ul style="list-style-type: none"> • Objective 1: Implement a needs assessment on sexual assault and stalking to determine staff development needs, community barriers, and resource needs • Objective 2: The Crisis Center, Hope Crisis Center, and Project Response will consult with Voices of Hope and Family Violence Council for technical assistance to implement needs assessment • Objective 3: Complete staff development on responding to sexual assault and stalking • Objective 4: Improve program resource materials
2009-WR-AX-0026 (Supplement 01)
Goal 1: Continue to enhance their coordinate regional response in an 18-county area
<ul style="list-style-type: none"> • Objective 1: Continue project leadership team and maintain project staff • Objective 2: Continue staff development days • Objective 3: Continue to develop and implement training for first responders, expanding to additional targeted professionals • Objective 4: Improve their public awareness outreach

Goal 2: Enhance service delivery to better meet the safety needs of rural victims of domestic violence/dating violence/sexual assault/stalking and better address geographical isolation and economic constraints in their 18-county service area
<ul style="list-style-type: none"> • Objective 1: Reduce geographical isolation and economic constraints in their 18-county service area by accessibility to the services • Objective 2: Improve response to culturally and linguistically underserved populations
Goal 3: Improve and enhance their regional response to sexual assault and stalking
<ul style="list-style-type: none"> • Objective 1: Improving agency capacity for responding to sexual assault victims • Objective 2: Improve outreach and response to victims • Objective 3: Complete outreach to first responders

Source: OJP's Grants Management System (GMS) and FVC officials

During our review of progress reports, we identified several program activities performed and reported by Crisis Center officials and partner agency officials. We noted instances where Crisis Center officials provided services for victims of domestic violence, sexual assault, and stalking. We also noted that the Crisis Center provided training events that targeted people like educators, law enforcement, victim advocates, and volunteers. After reviewing the activities performed, we did not see any indication that the Crisis Center and its partner agencies were not on track to accomplish the goals and objectives of the grant.

Conclusion

The purpose of this audit was to determine whether reimbursements claimed for costs under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, terms and conditions of the awards, and to determine program performance and accomplishments. We examined the Crisis Center's accounting records, financial and progress reports, and operating policies and procedures, and found:

- Crisis Center timesheets did not adequately document time worked on Grant No. 2009-WR-AX-0026;
- \$163,028 in unsupported personnel costs;
- \$1,220 in unsupported other direct costs;
- expenditures were not properly authorized;
- \$10,273 in reimbursements for unsupported subgrantee personnel costs;
- FFRs were not accurate; and
- the Crisis Center did not maintain supporting documentation to support information submitted for progress reports.

Recommendations

We recommend that the OVW coordinate with the Crisis Center to:

1. Remedy the \$163,028 in unsupported personnel costs.
2. Implement procedures to ensure that fringe benefit allocations are supported, reasonable, and allowable.
3. Remedy the \$1,220 in unsupported other direct costs.
4. Implement procedures to ensure that expenses are supported and properly authorized.
5. Remedy the \$10,273 in reimbursements for unsupported subgrantee personnel costs.
6. Ensure that the subgrantees implement policies to ensure that timesheets adequately document the time worked on the grant
7. Implement procedures to ensure that FFRs are accurate.
8. Ensure that the information submitted for progress reports is supported and accurate.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of the audit was to assess performance in the key areas of grant management that are applicable and appropriate for the grant under review. These areas included: (1) internal control environment, (2) drawdowns, (3) grant expenditures, (4) monitoring of subgrantees and contractors, (5) budget management and control, (6) financial status and progress reports, (7) program performance and accomplishments, and (8) special grant requirements.

We tested compliance with what we consider to be the most important conditions of the grant. Unless otherwise stated in this report, the criteria we audit against are contained in the OJP Financial Guide, the 2012 OVW Financial Grants Management Guide, and the award documentation.⁵

This was an audit of OVW Grant No. 2009-WR-AX-0026. Our audit concentrated on, but was not limited to, the period September 28, 2009, as the award date for the grant through August 20, 2013, the date the most recent drawdown requested as of the start of our fieldwork. The Crisis Center had drawn a total of \$1,293,254 in grant funds as of September 4, 2013.

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.

In conducting our audit, we performed sample testing in three areas, which were grant expenditures (including personnel expenditures and subgrantee reimbursements), financial reports, and progress reports. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the awards reviewed, such as dollar amounts, expenditure category, or risk. However, this non-statistical sample design does not allow a projection of the test results for all grant expenditures or internal controls and procedures.

In addition, we evaluated internal control procedures, drawdowns, monitoring of subgrantees and contractors, budget management and controls, and program performance and accomplishments. However, we did not test the reliability of the financial management system as a whole, and reliance on computer based data was not significant to our objective.

⁵ In February 2012, the OVW issued the 2012 OVW Financial Grants Management Guide, which is applicable to the grant audited in this report. The 2011 OJP Financial Guide and the OJP Financial Guide, October 2009 are also applicable to the grant audited in this report.

APPENDIX II

SCHEDULE OF DOLLAR-RELATED FINDINGS

QUESTIONED COSTS ⁶	AMOUNT	PAGE
Unsupported Costs		
Unsupported Personnel:	\$163,028	6
Unsupported Other Direct Costs:	1,220	6
Unsupported Subgrantee Reimbursements	10,273	7
Net Questioned Costs:	\$174,521	

⁶ **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.

**CRISIS CENTER FOR DOMESTIC ABUSE AND SEXUAL ASSAULT'S
RESPONSE TO THE DRAFT AUDIT REPORT**



Board members:

Courtney Wilder, President	Amanda Barron	Bev Lydick
Cyndy Koerber, Vice President	Sandy Roemer	Sid Dillon Jr.
Amy Fachman, Secretary	Jeremy Barton	Dian Christensen Hillis
Jason Harnisch, Treasurer	Rick Spalding	

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Fremont, NE 68025
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April 9, 2014

David M. Sheeren
Regional Audit Manager
Denver Regional Audit Office
Office of the Inspector General
U.S. Department of Justice
1120 Lincoln St., Suite 1500
Denver, CO 80203

Dear Mr. Sheeren,

The Crisis Center for Domestic Abuse/Sexual Assault respectfully submits our response to the Office of the Inspector General Draft Audit Report recommendations. Please review the answers submitted below with attachments. Also attached is the revised Financial Policy approved by the Board of Directors on April 8 2014.

1. Remedy the \$163,028 in unsupported personnel costs.

Please find the attached copy of the Crisis Center's Time and Activity Report that was revised and implemented October 2013 and is currently being used. The Time and Activity report reflects daily activity, including the activities and time charged to the Rural grant and other funding sources. The Crisis Center's Financial Policy section Cash Disbursements/Disbursements has been revised and implemented to include the use of the current Time and Activity Report. We agree with this recommendation and corrections have been made and implemented.

Personnel Time and Activity Reports

Employees will maintain a Time and Activity Report in sufficient detail that will track and allocate employee's time per activity and time allocated to grant funded programs, including allocations of payroll costs/fringes. The report will also track paid time off benefits. Time and Activity Reports will be signed by employees and submitted to the Executive Director for approval at the end of each payroll week. The Executive Director will sign, date and approve all Time and Activity Reports and then approve payroll for the bookkeeper to create a direct deposit, calculating payroll taxes and other designations as needed and mandated. The bookkeeper will review and reconcile gross and net pay amounts as shown on tax returns to total payroll on the payroll register and general ledger. Payroll deposit receipts are distributed to employees in sealed envelopes.

Fremont 402-721-4340 | Blair 402-533-4411 | West Point 402-372-2204 | 24-Hour Crisis Line 402-727-7777 | Toll-Free 888-721-4340

The total W-2 wages for the year will be reconciled to the general ledger and payroll register wages paid and other payroll reports by the bookkeeper.

Payments for the deductions from employee's checks such as health insurance premiums are prepared by the bookkeeper and approved by the Executive Director.

2. Implement procedures to ensure that the fringe benefit allocations are supported, reasonable and allowable.

Please see the attached copy of the Crisis Center's Time and Activity Report that was revised and implemented October 1, 2013 and is currently being used. The Time and Activity Report reflects daily activity, including time allocated to the Rural grant and other funding sources, including allocations of payroll costs/fringes. The Crisis Center's Financial Policy section Cash Disbursements/Disbursements has been revised to include the use of the current Time and Activity Report. We agree with this recommendation and corrections have been made and implemented.

Personnel Time and Activity Reports

Employees will maintain a Time and Activity Report in sufficient detail that will track and allocate employee's time per activity and time allocated to grant funded programs, including allocations of payroll costs/fringes. The report will also track paid time off benefits. Time and Activity Reports will be signed by employees and submitted to the Executive Director for approval at the end of each payroll week. The Executive Director will sign, date and approve all Time and Activity Reports and then approve payroll for the bookkeeper to create a direct deposit, calculating payroll taxes and other designations as needed and mandated. The bookkeeper will review and reconcile gross and net pay amounts as shown on tax returns to total payroll on the payroll register and general ledger. Payroll deposit receipts are distributed to employees in sealed envelopes.

3. Remedy the \$1,220 in unsupported other direct costs.

Please see the attached QuickBooks reports reflecting the questioned \$1,220 expenses. \$1,120.06 was fraudulently charged to the Crisis Center Chase charge card and incorrectly charged to the Rural grant in June 2013. Those funds (\$1,120.06) have now been credited back to the Rural grant. \$100 in baggage fees were charged to the Rural grant without a receipt to show supportive documentation. The \$100 charge has been corrected and re-classed to general funds and is no longer charged to the Rural grant. We agree with this recommendation and corrections have been made.

4. Implement procedures to ensure that expenses are supported and properly authorized.

Please see the attached Financial Policy/Procedures with the highlighted revisions in policy/procedures section of Cash Disbursements/Disbursements. Please also see the attached email/staff meeting notes explaining implementation of the staff voucher request system which was implemented in October 2013. Below are the new procedures. We agree with this recommendation and corrections have been made and implemented.

Cash Disbursements

Cash disbursements shall mean the disbursement of funds for Crisis Center liabilities and obligations and shall be made by check whenever possible after receiving approval.

Payment requests are prepared by staff on agency voucher request forms. The Executive Director reviews and approves all payment requests for mathematical accuracy, adequate supporting documentation, general ledger coding including funding source, and propriety of payment. Invoices are maintained until biweekly billing cycle occurs, at which time the invoices are paid.

Checks are written on a bi-weekly basis by the Executive Director and/or bookkeeper. Check numbers, funding sources and the line item budget name are designated on all invoices upon payment. Inaccurate checks are voided and designated as such by the word "VOID" on the face. All "void" checks are maintained in numerical order with the paid invoices.

All checks over \$500 require two signatures. The Executive Director and Executive Committee shall be the authorized officials that may sign checks.

The Executive Director may use an agency debit card or credit card to make purchases. However, charge accounts will be set up with businesses when possible and items will be charged instead of using debit/credit card and payment will be sent in form of a check when business sends statement. Access to all Crisis Center 's credit or debit card(s) shall be restricted to the Executive Director or to designated staff approved by Executive Director.

Disbursements

All disbursements shall be compared and corroborated by approved vouchers, invoices and/or receipts. No check will be written to "Cash" or to "Bearer".

Invoices that are approved and assigned funding source are filed by the Executive Director after appropriate staff has signed and dated verified deliveries or receipt of merchandise.

The Executive Director reviews all payment requests for mathematical accuracy and propriety of payment. Statements are maintained until biweekly billing cycle occurs, at which time statements are paid.

Approved and coded checks are written on a bi-weekly basis by the Executive Director and/or bookkeeper. Check numbers, funding sources and the line item budget name are designated on all statements and invoices upon payment. Inaccurate checks are voided and designated as such by the word "VOID" on the face. All "void" checks are maintained in numerical order with the paid invoices.

5. Remedy the \$10,273 in reimbursements for unsupported sub grantee personnel costs.

Please find the attached copy of Voices of Hope's Time and Activity Report that was revised and implemented November 25, 2013 and is currently being used. The Time and Activity report reflects daily activity, including the activities and time charged to the Rural grant and other funding sources. Also attached is Voices of Hope's Financial Policy that has been revised and implemented to include the use of the current Time and Activity Report. We agree with this recommendation and corrections have been made and implemented.

Employees will maintain a time and activity report in sufficient detail that will be able to track allocation of an employee's time per activity and time allocated to grant funded

programs, including allocations of payroll costs/fringes. The report will also track paid time off benefits. All benefits will be prorated for time allocated to specific grant. Time and Activity reports will be signed by employees and submitted to the Executive Director or designee for approval at the end of each payroll period. The Executive Director will sign, date and approve all time and activity reports and then approves payroll for the bookkeeper to create a direct deposit, calculating payroll taxes and other designations as needed and mandated. The bookkeeper will review and reconcile gross and net pay amounts as shown on tax returns to total payroll on the payroll register and general ledger. Payroll deposit receipts are distributed to employees per their direction to their online account or in sealed envelope.

The total W-2 wages for the year will be reconciled to the general ledger and payroll register wages paid and other payroll reports by the bookkeeper.

Payments for the deductions from employee's checks such as health insurance premiums are prepared by the bookkeeper and approved by the Executive Director.

Payroll shall be bi-weekly on Friday. If a payday falls on a holiday, payment shall be made on the last working day prior to the payday. Payroll will be directly deposited into Staff bank accounts by 5:00 p.m. on payroll days.

Please find the attached copies of Family Violence Council's Time and Activity Reports with explanation noted and corrected. On pay roll ending 9-15-11 it is noted that "not all hours are billed. Only 88 hours were billed". 88 hrs of the 92 hours reflected on the Time and Activity Report were actually billed (33.5 of those 88 hours were billed to SENTROC Rural grant). On pay roll ending 9-29-11 it is noted that "not all hours are billed. Only 88 hours were billed". 88 hrs of the 92.5 hours reflected on the Time and Activity Report were actually billed (16 of those were billed to SENTROC Rural grant). We agree with this recommendation and an explanation has been provided and corrected.

6. Ensure that the sub grantees implement policies to ensure that timesheets adequately document the time worked on the grant.

Please see the attached SENTROC Memorandum of Understanding which includes the Crisis Center's Roles and Responsibilities. This new MOU dated January 21, 2014 includes the following language (pg 4); "Ensure that draw downs of Federal grant funds are in compliance with Federal requirements, Completing and submitting quarterly financial reports, Providing fiscal oversight through site visits with grant partners". The MOU also includes the Joint Responsibilities of the grant partners including the following language "Comply with grant requirements regarding all reporting and financial record keeping and funds requests". The Crisis Center and Family Violence Council completed a site visit with each of the grant partner's following the new MOU and reviewed all partner time sheets to ensure that they are adequately documenting the time worked on the grant, reflecting daily activity, including the activities and time charged to the Rural grant and other funding sources. We agree with this recommendation and corrections have been made and implemented.

IV. Roles and Responsibilities

The Crisis Center for Domestic Abuse/Sexual Assault agrees to serve as fiscal agent for the project and be responsible for implementation of the project. CC will also coordinate the activities and provide services included within this project in Burt, Cuming, Dodge, Saunders

and Washington counties with the exception that it will not use rural grant funds to provide services or complete any grant-funded activities in Census tracts 501.01 and 501.02 in Washington County and Census tract 9883 in Saunders County, because those Census tracts are predominantly urban. CC activities will include:

- *Drawing funds through the Rural Grant management system.*
- *Ensure that draw downs of Federal grant funds are in compliance with Federal requirements*
- *Completing and submitting quarterly financial reports.*
- *Providing fiscal oversight through site visits with grant partners.*
- *Providing monthly financial status reports to the project coordinator.*
- *Contracting with the Family Violence Council to provide project management and coordination that will include managing the project and making sure reports are completed in a timely fashion.*
- *Providing community education and training in collaboration with other project partners to the local area.*
- *Providing direct services to victims of domestic violence, dating violence, sexual assault and stalking and their children including emergency shelter, transportation, medical and legal advocacy, food, financial assistance and other necessary services.*
- *Participating in regional meetings for educators and advocates.*
- *Participating in the sexual assault task force activities.*
- *Participating in the development of training for regional staff and first responder training.*
- *Participating in OVW sponsored technical assistance activities.*
- *Tracking and providing data and information as required for OVW progress reports.*
- *The executive director will serve as the management representative to SENTROC and will meet quarterly to monitor project/consortium activities.*

Joint responsibilities: All parties agree to respect individual organizations' confidentiality requirements and to collaboratively maintain confidentiality. In addition, all parties agree to:

- *Regularly attend project meetings and participate in regional response meetings.*
- *Provide documentation and statistical information required for outcome measurement through grant reporting.*
- *Comply with grant requirements regarding all reporting and financial record keeping and funds requests.*
- *Provide high quality services.*
- *Recognize and honor each other's perspective and expertise.*
- *Review and update this agreement annually or as needed.*
- *Have staff members participate in OVW-sponsored technical assistance and training opportunities.*

7. Implement procedures to ensure that FFRs are accurate.

Please see the attached Financial Policy/Procedures with the highlighted revisions in the policy/procedures section of Policies Relating to Grants addressing procedures to ensure

that Federal Financial Reports are accurate. We agree with this recommendation and corrections have been made and implemented.

Policies Relating to Grants

Accounting procedures, charts of accounts, etc., will provide for identifying receipts and expenditures of agency funds separately for each award or grant. The accounting system will provide for accumulating and recording expenditures by award or grant as shown in the approved budget. Reports will be filed on a timely basis with the grant agencies. The Executive Director will review expenditures charged to direct/indirect costs in accordance with the applicable grant agreements. The Crisis Center will follow the financial guidelines and procedures as may be set forth by grantors. The Crisis Center will provide reasonable assurance that consistent treatment is applied in distribution of charges of direct and indirect costs to applicable award of grants.

The Executive Director will prepare the Federal Financial Report based on actual quarterly expenditures. The Bookkeeper or Executive Director will run a report from the accounting system to determine the Crisis Center's quarterly report. Sub award grantees will be required to submit their quarterly financial reports in a timely manner to the Executive Director who will prepare the final Federal Financial Report per the grant required reporting timeline. Executive Director will prepare Federal Financial Report through the grant designated system accurately and on time.

8. Ensure that the information submitted for progress reports is supported and accurate.

Please see the attached SENTROC Memorandum of Understanding which includes the Crisis Center's Roles and Responsibilities. This new MOU dated January 21, 2014 includes the following language (pg 4); "Contracting with the Family Violence Council to provide project management and coordination that will include managing the project and making sure reports are completed in a timely fashion, Tracking and providing data and information as required for OVW progress reports." The MOU also includes the Joint Responsibilities of the grant partners including the following language "Comply with grant requirements regarding all reporting and financial record keeping and funds requests". The Crisis Center and Family Violence Council completed a site visit with each of the grant partner's following the new MOU and reviewed all partner progress reports and data collection process to ensure we are all collecting and reporting our services accurately. The Crisis Center also provided all SENTROC partners with the Rural Grant Semi Annual Progress Report Instructions and tracking tools to review again with their staff. The Crisis Center also provided this same document to our Rural Grant funded staff along with procedures of how the Progress Report is to be prepared to ensure that data is supported and accurate. Please see attached emails and documents. We agree with this recommendation and corrections have been made and implemented.

IV. Roles and Responsibilities

The Crisis Center for Domestic Abuse/Sexual Assault agrees to serve as fiscal agent for the project and be responsible for implementation of the project. CC will also coordinate the activities and provide services included within this project in Burt, Cuming, Dodge, Saunders and Washington counties with the exception that it will not use rural grant funds to provide services or complete any grant-funded activities in Census tracts 501.01 and 501.02 in Washington County and Census tract 9883 in Saunders County, because those Census tracts are predominantly urban. CC activities will include:

- *Drawing funds through the Rural Grant management system.*

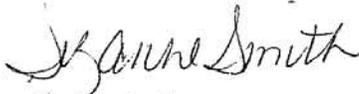
- *Ensure that draw downs of Federal grant funds are in compliance with Federal requirements*
- *Completing and submitting quarterly financial reports.*
- *Providing fiscal oversight through site visits with grant partners.*
- *Providing monthly financial status reports to the project coordinator.*
- *Contracting with the Family Violence Council to provide project management and coordination that will include managing the project and making sure reports are completed in a timely fashion.*
- *Providing community education and training in collaboration with other project partners to the local area.*
- *Providing direct services to victims of domestic violence, dating violence, sexual assault and stalking and their children including emergency shelter, transportation, medical and legal advocacy, food, financial assistance and other necessary services.*
- *Participating in regional meetings for educators and advocates.*
- *Participating in the sexual assault task force activities.*
- *Participating in the development of training for regional staff and first responder training.*
- *Participating in OVW sponsored technical assistance activities.*
- *Tracking and providing data and information as required for OVW progress reports.*
- *The executive director will serve as the management representative to SENTROC and will meet quarterly to monitor project/consortium activities.*

Joint responsibilities: *All parties agree to respect individual organizations' confidentiality requirements and to collaboratively maintain confidentiality. In addition, all parties agree to:*

- *Regularly attend project meetings and participate in regional response meetings.*
- *Provide documentation and statistical information required for outcome measurement through grant reporting.*
- *Comply with grant requirements regarding all reporting and financial record keeping and funds requests.*
- *Provide high quality services.*
- *Recognize and honor each other's perspective and expertise.*
- *Review and update this agreement annually or as needed.*
- *Have staff members participate in OVW-sponsored technical assistance and training opportunities.*

Thank you again for your assistance and allowing us to clarify and respond to your recommendations. If further information is needed, please let us know.

Sincerely,



Suzanne Smith
Executive Director

OFFICE ON VIOLENCE AGAINST WOMEN'S RESPONSE TO THE
DRAFT AUDIT REPORT



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

April 23, 2014

MEMORANDUM

TO: David M. Sheeren
Regional Audit Manager
Denver Regional Audit Office

FROM: Bea Hanson 
Director
Office on Violence Against Women

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

SUBJECT: Response to the Draft Audit Report – Audit of the Office on
Violence Against Women Rural Domestic Violence, Sexual
Assault and Stalking Assistance Program Grant Awarded to the
Crisis Center for Domestic Abuse and Sexual Assault Fremont
Nebraska

This memorandum is in response to your correspondence dated March 25, 2014 transmitting the above draft audit report for the Crisis Center for Domestic Abuse and Sexual Assault (CCDASA). We consider the subject report resolved and request written acceptance of this action from your office.

The report contains eight recommendations that includes \$163,028 in unsupported personnel costs, \$1,220 in unsupported other direct costs, and \$10,273 in reimbursements for unsupported subgrantee personnel costs. The Office on Violence Against Women (OVW) 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) Remedy the \$163,028 in unsupported personnel costs.

OVW does agree with the recommendation. We will coordinate with the CCDASA to remedy the \$163,028 in unsupported personnel costs.

2) Implement procedures to ensure that fringe benefit allocations are supported, reasonable, and allowable.

OVW does agree with the recommendation. We will coordinate with the CCDASA to be sure that they implement procedures to ensure that fringe benefit allocations are supported, reasonable, and allowable.

3) Remedy the \$1,220 in unsupported other direct costs.

OVW does agree with the recommendation. We will coordinate with CCDASA to remedy the \$1,220 in unsupported other direct costs.

4) Implement procedures to ensure that expenses are supported and properly authorized.

OVW does agree with the recommendation. We will coordinate with CCDASA to be sure that they implement procedures to ensure that expenses are supported and properly authorized.

5) Remedy the \$10,273 in reimbursements for unsupported subgrantee unsupported personnel costs.

OVW does agree with the recommendation. We will coordinate with CCDASA to remedy the \$10,273 in reimbursements for unsupported subgrantee unsupported personnel costs.

6) Ensure that the subgrantees implement policies to ensure that timesheets adequately document the time worked on the grant.

OVW does agree with the recommendation. We will coordinate with CCDASA to be sure that the subgrantees implement policies to ensure that timesheets adequately document the time worked on the grant.

7) Implement procedures to ensure that FFRs are accurate.

OVW does agree with the recommendation. We will coordinate with CCDASA to be sure that they implement procedures to ensure that FFRs are accurate.

8) Ensure that the information submitted for progress reports is supported and accurate.

OVW does agree with the recommendation. We will coordinate with CCDASA to ensure that the information submitted for progress reports is supported and accurate.

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

Myrta Charles
Program Specialist
Office on Violence Against Women (OVW)

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

The Office of the Inspector General (OIG) provided a draft of this audit report to the Crisis Center for Domestic Abuse and Sexual Assault (Crisis Center) and the Office on Violence Against Women (OVW). The Crisis Center's response is included as Appendix III and the OVW's response is included as Appendix IV of this final report. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendation:

1. Remedy the \$163,028 in unsupported personnel costs.

Resolved. The OVW agreed with our recommendation to remedy the \$163,028 in unsupported personnel costs. The OVW stated in its response that they will coordinate with the Crisis Center to remedy the \$163,028 in unsupported personnel costs.

The Crisis Center stated that they concurred with our recommendation. The Crisis Center also stated that they had revised and implemented the Time and Activity Report used for Crisis Center employees to reflect daily activities including the activities and time charged to the Rural grant and other funding sources. However, the documentation provided by Crisis Center officials does not provide any additional support for the \$163,028 in unsupported personnel costs.

This recommendation can be closed when we receive documentation demonstrating that the Crisis Center has remedied the \$163,028 in unsupported personnel costs.

2. Implement procedures to ensure that fringe benefit allocations are supported, reasonable, and allowable.

Closed. The OVW agreed with our recommendation to implement procedures to ensure that fringe benefit allocations are supported, reasonable, and allowable. The OVW stated in its response that they will coordinate with the Crisis Center to ensure that they implement procedures to ensure that fringe benefit allocations are supported, reasonable, and allowable.

The Crisis Center concurred with our recommendation and provided a copy of the Crisis Center's Time and Activity Report that was revised and implemented on October 1, 2013, demonstrating that procedures have been implemented to ensure that fringe benefit allocations are supported, reasonable, and allowable.

We determined that this adequately addresses our recommendation. We determined that this recommendation is closed.

3. Remedy the \$1,220 in unsupported other direct costs.

Closed. The OVW agreed with our recommendation to remedy the \$1,220 in unsupported other direct costs. The OVW stated in its response that they will coordinate with the Crisis Center to remedy the \$1,220 in unsupported other direct costs.

The Crisis Center concurred with our recommendation and provided documentation showing the \$1,220 in unsupported direct costs are no longer being charged to the Rural Grant.

We determined that this adequately addresses our recommendation. We determined that this recommendation is closed.

4. Implement procedures to ensure that expenses are supported and properly authorized.

Closed. The OVW agreed with our recommendation to implement procedures to ensure that expenses are supported and properly authorized. The OVW stated in its response that they will coordinate with the Crisis Center to ensure that they implement procedures to ensure that expenses are supported and properly authorized.

The Crisis Center concurred with our recommendation and provided a copy of the Crisis Center's updated Policies and Procedures, to ensure that expenses are supported with proper documentation and that they are properly authorized. The Crisis Center also provided evidence that new cash disbursement/disbursement procedures have been implemented.

We determined that this adequately addresses our recommendation. We determined that this recommendation is closed.

5. Remedy the \$10,273 in reimbursements for unsupported subgrantee personnel costs.

Resolved. The OVW agreed with our recommendation to remedy the \$10,273 in reimbursements for unsupported subgrantee personnel costs. The OVW stated in its response that they will coordinate with the Crisis

Center to remedy the \$10,273 in reimbursements for unsupported subgrantee personnel costs.

The Crisis Center concurred with our recommendation. The Crisis Center also provided a copy of the Time and Activity Report implemented by Voices of Hope, one of the subgrantees. However, the documentation provided by Crisis Center officials does not provide any additional support for the subgrantee costs relating to Voices of Hope. In regards to the subgrantee costs for the Family Violence Council, another of the subgrantees, Family Violence Council provided additional documentation which reduced the questioned costs by \$87. As a result, we determined that \$10,186 of subgrantee personnel costs remained unsupported.

This recommendation can be closed when we receive documentation demonstrating that the Crisis Center has remedied the remaining \$10,186 in reimbursements for unsupported subgrantee personnel costs.

6. Ensure that the subgrantees implement policies to ensure that timesheets adequately document the time worked on the grant.

Resolved. The OVW agreed with our recommendation to ensure that the subgrantees implement policies to ensure that timesheets adequately document the time worked on the grant. The OVW stated in its response that they will coordinate with the Crisis Center to ensure that the subgrantees implement policies to ensure that timesheets adequately document the time worked on the grant.

The Crisis Center concurred with our recommendation and provided a copy of an updated Memorandum of Understanding (MOU) dated January 21, 2014, which states that all parties agree to comply with grant requirements regarding all reporting and financial record keeping and funds requests. We noted that one of the subgrantees was not included in this MOU. The Crisis Center also stated that they completed site visits, with the Family Violence Council, following the new MOU and reviewed all partner timesheets to ensure that they were adequately documenting the time worked on the grant.

This recommendation can be closed when we receive documentation demonstrating that the MOU has been signed by all subgrantees demonstrating that Crisis Center has implemented the policies to ensure that subgrantee timesheets adequately document the time worked on the grant.

7. Implement procedures to ensure that FFRs are accurate.

Closed. The OVW agreed with our recommendation to implement procedures to ensure that FFRs are accurate. The OVW stated in its

response that they will coordinate with the Crisis Center to ensure that FFRs are accurate.

The Crisis Center concurred with our recommendation and provided a copy of the Crisis Center's updated Policies and Procedures to ensure that financial reports will be based on actual expenditures and that the Crisis Center will follow the financial guidelines and procedures as may be set forth by grantors.

We determined that this adequately addresses our recommendation. We determined that this recommendation is closed.

8. Ensure that the information submitted for progress reports is supported and accurate.

Closed. The OVW agreed with our recommendation to ensure that the information submitted for progress reports is supported and accurate. The OVW stated in its response that they will coordinate with the Crisis Center to ensure that the information submitted for progress reports is supported and accurate.

The Crisis Center concurred with our recommendation and provided a copy of the an updated MOU dated January 21,2014, which states that all parties agree to comply with grant requirements regarding all reporting and financial record keeping and funds requests. We noted that one of the subgrantees was not included in this MOU. The Crisis Center also stated that they completed site visits, with the Family Violence Council, following the new MOU and reviewed all partner timesheets to ensure that data submitted to be included in progress reports is supported and accurate.

We determined that this adequately addresses our recommendation. We determined that this recommendation is closed.