



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

OVERSIGHT ★ INTEGRITY ★ GUIDANCE



**Audit of the Office on Violence
Against Women Grants Awarded
to the Colorado Coalition
Against Sexual Assault,
Denver, Colorado**



Executive Summary

*Audit of the Office on Violence Against Women Grants Awarded to the Colorado Coalition Against Sexual Assault
Denver, Colorado*

Objectives

The Office on Violence Against Women (OVW) awarded the Colorado Coalition Against Sexual Assault (CCASA) four grants totaling \$1,473,861 for the State and Territorial Sexual Assault and Domestic Violence Coalitions Program; the Research and Evaluation Initiative; and the Rural Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program. The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the award; and to determine whether the grantee demonstrated adequate progress towards achieving program goals and objectives.

Results in Brief

As a result of our audit, we concluded that there were no indications that the CCASA had not demonstrated adequate achievement or progress towards achieving the grants' stated goals and objectives. However, we also identified discrepancies or instances of noncompliance with grant requirements. Specifically, we found that the CCASA did not comply with essential award conditions related to the accuracy of its financial and progress reports. In addition, we identified \$9,575 in subrecipient reimbursements, as well as expenditures for rent, supplies, accounting fees, and leased equipment that were not supported by adequate documentation.

Recommendations

Our report contains five recommendations to OVW. We requested responses to our draft audit report from the CCASA and OVW, and their responses are appended to this final report in Appendices 3 and 4, respectively. Our analysis of those responses is included in Appendix 5.

Audit Results

The purposes of the four OVW grants reviewed were to improve CCASA's, its members, and its subrecipients' ability to provide services to victims of sexual assault and to develop data driven recommendations for the implementation of forensic compliance data tracking systems across Colorado and nationally. The project period for the grants was from September 2015 through October 2020. The CCASA drew down a cumulative amount of \$721,124 for all of the grants we reviewed.

Program Goals and Accomplishments – We determined that the CCASA distributed printed materials, provided technical assistance, provided education and training events, and provided funding for CCASA officials and member agencies to attend training and conferences. We also determined that the CCASA's research contractor developed tracking mechanisms to track and collect sexual assault case data within the second and ninth judicial districts of Colorado. Rural subrecipients provided education and training events, as well as services to victims of sexual assault. We determined that although there were concerns relating to the accuracy of reported performance, we reviewed documentation from the CCASA and its subrecipients and there were no indications that CCASA had not demonstrated adequate progress towards, or completion of the four grants' goals and objectives.

Progress Report Accuracy – We noted discrepancies with both the retention and accuracy of progress report information maintained by the CCASA, as well as its rural subrecipients. We determined that 10 of the 17 Coalitions Program activities we sampled were either inaccurate or unsupported. We also noted that seven of the eight Rural Program activities we sampled were not accurate, including activities performed by rural subrecipients and reported to CCASA.

Unsupported Expenditures – We determined that the CCASA did not maintain adequate supporting documentation for rent, supplies, accounting, leased equipment expenditures, and reimbursement of subrecipient expenditures; totaling \$9,575.

**AUDIT OF THE OFFICE ON VIOLENCE AGAINST
WOMEN GRANTS AWARDED TO THE COLORADO
COALITION AGAINST SEXUAL ASSAULT,
DENVER, COLORADO**

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**AUDIT OF THE OFFICE ON VIOLENCE AGAINST
WOMEN GRANTS AWARDED TO THE COLORADO
COALITION AGAINST SEXUAL ASSAULT,
DENVER, COLORADO**

INTRODUCTION

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of four grants awarded by the Office on Violence Against Women (OVW) to the Colorado Coalition Against Sexual Assault (CCASA) in Denver, Colorado. The CCASA's awards totaled \$1,473,861; as shown in Table 1.

**Table 1
Grants Awarded to the CCASA**

Award Number	Grant Program	Award Date	Project Period Start Date	Project Period End Date	Award Amount
2015-SW-AX-0004	State Coalition	09/24/2015	09/01/2015	12/31/2017	\$278,987
2017-SI-AX-0005	Research and Evaluation	09/28/2017	11/01/2017	10/31/2020	400,000
2017-SW-AX-0008	State Coalition	09/05/2017	09/01/2017	08/31/2019	294,874
2017-WR-AX-0031	Rural Assistance	09/25/2017	10/01/2017	09/30/2020	500,000
				Total:	\$1,473,861

Source: Office of Justice Programs Grants Management System (GMS)

The State and Territorial Sexual Assault and Domestic Violence Coalitions Program (State Coalitions Program) supports the enhancement of coalitions by funding specific projects under OVW's STOP Violence Against Women Formula Program. Statewide sexual assault coalitions provide direct support to member rape crisis centers through funding, training and technical assistance, public awareness activities, and public policy advocacy, possibly working with law enforcement, prosecution, and community organization to enhance their responses to victims of sexual assault.

Funding through the Research and Evaluation Initiative supports the evaluation of promising practices for combatting domestic/dating violence, sexual assault, and stalking, and to research problems emerging in the field. By generating more knowledge about strategies for serving victims and holding offenders accountable, communities that benefit from OVW funding will be better equipped to align their work with practices that are known to be effective and will be more capable of making communities safer.

The Rural Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (Rural Assistance Program) supports programs that: (1) identify, assess, and appropriately respond to child, youth, and adult victims of domestic violence, dating violence, sexual assault and stalking in rural communities; (2) establish and expand nonprofit, nongovernmental state, tribal, territorial, and local government victim services in rural communities; and (3) increase the safety and well-being of

women and children in rural communities by dealing directly and immediately with domestic violence, dating violence, sexual assault, and stalking occurring in rural communities. The Rural Assistance Program encourages collaboration among service providers, law enforcement agencies, prosecutors, courts, human and community service providers, educational institutions, and health care providers as well as creating and implementing strategies to increase awareness and prevent domestic violence, dating violence, sexual assault, and stalking.

The Grantee

The CCASA was founded in 1984 as a 501(c) 3 nonprofit to be the collective voice of rape crisis advocates across the state of Colorado. The CCASA provides leadership, advocacy, and support to address and prevent sexual violence by supporting their members, partners, and the broader community through technical assistance, training, information and referrals, educational materials, statewide systems change, and public policy education and advocacy.¹

OIG Audit Approach

The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant; and to determine whether the grantee demonstrated adequate progress towards achieving the program goals and objectives. To accomplish these objectives, we assessed performance in the following areas of grant management: program performance, financial management, expenditures, budget management and control, drawdowns, and federal financial reports.

We tested compliance with what we consider to be the most important conditions of the grants. The 2015 and 2017 DOJ Grants Financial Guides² and the award documents contain the primary criteria we applied during the audit.

The results of our analysis are discussed in detail later in this report. Appendix 1 contains additional information on this audit's objectives, scope, and methodology. The Schedule of Dollar-Related Findings appears in Appendix 2.

¹ The CCASA describes its membership to include sexual assault survivors, victim advocates, rape crisis centers, dual domestic violence and sexual assault programs, law enforcement agencies, prosecutors, public health agencies, college and university campuses, medical professionals, offender treatment programs, and public officials.

² Referred to throughout this report as the Financial Guide.

AUDIT RESULTS

Program Performance and Accomplishments

We reviewed required performance reports and grant documentation, and interviewed CCASA officials as well as a CCASA contractor to determine whether the CCASA demonstrated adequate progress towards achieving the grants' goals and objectives. We also reviewed the progress reports, to determine if the required reports were accurate. Finally, we reviewed the CCASA's compliance with the special conditions identified in the award documentation.

Program Goals and Objectives

State Coalitions Program

For Grant Numbers 2015-SW-AX-0004 and 2017-SW-AX-0008, the stated goals included: (1) increasing support and capacity for addressing sexual assault in Colorado and nationally, (2) increasing the use of best and promising practices for addressing sexual violence in Colorado, and (3) maintaining and expanding the CCASA's capacity to serve sexual assault service providers in Colorado. During our audit, we noted that CCASA officials distributed printed materials, provided funding for CCASA officials and member agencies to attend training and conferences, provided technical assistance to member agencies, local government officials, and other members of the public. Based on our review, there were no indications that the CCASA was not adequately achieving the stated goals and objectives of Grant Numbers 2015-SW-AX-0004 and 2017-SW-AX-0008.

Research and Evaluation Initiative

The stated goals for Grant Number 2017-SI-AX-0005 were to be implemented in three different phases of the project. Specifically, the CCASA was to:

1. Define and develop variables of interest, tools, and measures to effectively track Colorado's forensic compliance process and cases through the criminal justice system.
2. Implement tracking mechanisms for forensic compliance sexual assault cases from the time of the medical forensic exam to prosecution with one urban and one rural Colorado jurisdiction as demonstration sites, as well as at the Colorado Bureau of Investigation (CBI) and the Sexual Assault Victims' Emergency (SAVE) payment program.³
3. Develop data driven recommendations and concrete action steps for implementation of forensic compliance data tracking systems and system fixes across Colorado and nationally.

³ The SAVE payment program provides financial assistance to medical and anonymous reporting victims of sexual assault. The program helps pay for costs associated with obtaining a medical forensic exam.

During our audit, CCASA officials explained they had meetings with police departments in the Second and Ninth Judicial Districts of Colorado as well as medical facilities in the Ninth Judicial District of Colorado in order to define and develop tracking mechanisms under phase 1 shown above. CCASA officials also explained they had developed the tracking mechanisms needed to begin collecting sexual assault case data under phase 2 shown above. We noted that the CCASA had developed forms for collecting information on: (1) the status of a case, (2) the victim and suspects, (3) characteristics of the case, and (4) victim advocacy services. These forms were developed for agencies in the Second and Ninth Judicial Districts to use in tracking case data. A CCASA official explained that at the time of the audit, the CCASA started the initial stage of phase 3 by collecting data to track sexual assault cases with the purpose of developing a process and/or recommendations that other states could use if they wished to track sexual assault case information. Based on our review, there were no indications that the CCASA was not adequately achieving the stated goals and objectives of the Grant Number 2017-SI-AX-0005.

Rural Assistance Program

The goals of Grant Number 2017-WR-AX-0031 focused on supporting nonprofit victim services to Hispanic/Latin@ and Native American victims of sexual assault. Specifically, under this grant, the goals were to increase the safety and well-being of victims of sexual assault and to provide training and technical assistance to organizations serving rural counties in Colorado. To achieve these goals, the CCASA utilized four subrecipients throughout the state of Colorado. Based on our review, we found that the CCASA and its subrecipients were providing education and training events. The CCASA's subrecipients also provided services to victims of sexual assault, including advocacy services, crisis intervention, language services, and transportation services. There were no indications that the CCASA was not adequately achieving the stated goals and objectives of grant 2017-WR-AX-0031.

Progress Reports

OVW requires award recipients to submit progress reports semiannually to provide information relevant to the performance and activities of the program. To this end, the Financial Guide requires that award recipients ensure that valid and auditable source documentation is available to support all data collected for each performance measure specified in the program solicitation. As a result, we tested the accuracy of the progress reports submitted under each award by selecting a judgmental sample, a cumulative total of 33 performance measures, from the 2 most recent reports submitted for the grants. We then traced the items to supporting documentation maintained by the CCASA.

State Coalitions Program

For Grant Number 2015-SW-AX-0004, we selected nine performance measures and accomplishments reported by the CCASA from the last two progress reports and were provided documentation maintained by CCASA officials as support for these measures. After reviewing the supporting documentation, we determined

that four of the nine activities sampled were not accurate.⁴ CCASA officials explained that the information for these four activities were maintained in a CCASA database. However, when compiling the progress reports, CCASA officials would allocate a portion of the activities between Grant Number 2015-SW-AX-0004 and state programs. The CCASA did not provide additional support to identify the amount allocated to Grant Number 2015-SW-AX-0004 and consequently, did not support the amounts reported to OVW.

For Grant Number 2017-SW-AX-0008, we selected a total of eight performance measures from the last two progress reports submitted to OVW. We found discrepancies with six of the eight performance measures tested. Specifically, for five of the six discrepancies, the CCASA did not maintain complete and auditable supporting documentation. For the remaining discrepancy identified, CCASA officials acknowledged that a reported activity did not actually occur, and they mistakenly included it in a progress report. During our audit, CCASA officials provided documentation showing that they had informed OVW of the mistake. In response, OVW officials advised the CCASA to include the updated information in their next progress report.

Research and Evaluation Initiative

For Grant Number 2017-SI-AX-0005, we selected a total of eight performance measures from the last two progress reports that the CCASA submitted to OVW. We were provided supporting documentation maintained by the subrecipients tasked with implementing this grant. After reviewing the supporting documentation, we determined that the performance measures selected were generally accurate.

Rural Assistance Program

For Grant Number 2017-WR-AX-0031, we judgmentally selected a total of eight program activities from the last two progress reports that the CCASA submitted to OVW. These activities included training and education events as well as services to victims of sexual assault. When compiling these reports, the CCASA would combine information reported by each subrecipient, as well as from documentation maintained by the CCASA for their own activities. CCASA officials explained that some of these activities, like providing training, were performed by both the CCASA and subrecipient officials. After reviewing site visit documentation maintained by CCASA officials for each subrecipient, we determined that in order to properly rely on the reports, we requested additional supporting documentation from each subrecipient. After compiling supporting documentation from the CCASA and its subrecipients, we noted that seven of the eight activities were not accurate.

Overall, due to the discrepancies identified with information relevant to the performance and activities of Grant Numbers 2015-SW-AX-0004, 2017-SW-AX-0008, and 2017-WR-AX-0031, we recommend that OVW ensure that the CCASA implement policies and procedures to ensure performance and activities contained in each

⁴ The remaining five sampled activities were supported by adequate documentation and did not involve activity allocation.

progress report is supported with valid and auditable source documentation, as required by the Financial Guide.

Compliance with Special Conditions

Special conditions are the terms and conditions that are included with the awards. We evaluated the special conditions for each grant and selected a judgmental sample of the requirements that are significant to performance under the grants and are not addressed in another section of this report. We evaluated two special conditions for each grant, concerning matters related to suspended and debarred entities, timing of drawdowns and expenditures, collection of performance data, rate of pay for consultants, restrictions on use of funds for lobbying, and attendance at appropriate training. Based on our review, we did not identify any instances of the CCASA violating special conditions we tested.

Grant Financial Management

According to the Financial Guide, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. To assess the CCASA's financial management of the grants within the scope of this audit, we conducted interviews with financial staff, examined policy and procedures, and reviewed grant documents to determine whether the CCASA adequately safeguards the grant funds audited. We also reviewed the CCASA's Financial Statement Audit for 2017 to identify internal control weaknesses and significant non-compliance issues related to federal awards. Finally, we performed testing in the areas that were relevant for the management of these grants, as discussed throughout this report.

Based on our review, we concluded that grant financial management related to subrecipient expenditures could be improved. We determined that CCASA officials required subrecipients to submit an expense summary noting only the total amounts requested for reimbursement, but did not require any additional supporting documentation. As a result, we found that the CCASA incurred \$6,959 in subrecipient reimbursements that were not supported by proper documentation. These deficiencies are discussed in more detail in the Subrecipient Costs and Supplies and Other Direct Costs sections of this report.

Single Audit

Non-federal entities that receive federal financial assistance are required to comply with the *Single Audit Act of 1984*, as amended. The Single Audit Act provides for recipients of federal funding above a certain threshold to receive an annual audit of their financial statements and federal expenditures. Under 2 C.F.R. 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), such entities that expend \$750,000 or more in federal funds within the entity's fiscal year must have a "single

audit” performed annually covering all federal funds expended that year.⁵ We reviewed the financial statements (and subsequent financial statement audit) for calendar year (CY) 2017. We noted that the CCASA’s total expenditures were below the threshold requiring a single audit, but CCASA officials explained that they have an annual financial statement audit.

A financial statement audit is conducted for the auditor to express an opinion on the financial statements and to obtain reasonable assurance about whether the financial statements are free of material misstatement. The financial statement auditor concluded that the financial statements were fairly stated and that there were no violations of laws or regulations whose effect should be considered for disclosure in the financial statements or as a basis for a loss contingency.

Grant Expenditures

Between September 2015 and January 2019, the CCASA charged over \$715,000 in expenditures to the four awards we audited. These expenditures included personnel, fringe benefits, supplies, travel, contracts, and other costs such as rent and utilities. The following table summarizes this information.

Table 2
Expenditures for Grants Awarded to the CCASA
From September 2015 to January 2019

Expenditure Category	2015-SW-AX-0004	2017-SI-AX-0005	2017-SW-AX-0008	2017-WR-AX-0031	Totals
Personnel	\$141,225	\$8,764	\$122,629	\$43,037	\$315,655
Fringe Benefits	23,183	1,172	20,760	8,740	53,855
Travel	38,298	-	13,037	8,349	59,684
Supplies	12,385	4,569	8,322	1,102	26,378
Contractors	37,744	68,473	13,062	88,417	207,696
Other Costs	27,378	931	18,158	5,796	52,263
Total:	\$280,212	\$83,908	\$195,967	\$155,442	\$715,529

Note: Here and throughout the report, differences in total amounts are due to rounding.

Source: CCASA Accounting Records

To determine whether costs charged to the awards were allowable, supported, and properly allocated in compliance with award requirements, we tested a sample of transactions. We judgmentally selected a total of 130 transactions for travel, equipment, supplies, contractors, subrecipients, and other direct costs, totaling \$195,082; as well as personnel and fringe benefit transactions in non-consecutive pay periods. We reviewed documentation, accounting records, and performed verification testing related to grant expenditures. We determined that the personnel, fringe benefit, and travel transactions selected for testing were allowable, supported, and properly allocated

⁵ On December 26, 2014, the Uniform Guidance superseded OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organization. Under OMB Circular A-133, which affected all audits of fiscal years beginning before December 26, 2014, the audit threshold was \$500,000.

in compliance with award requirements. However, we did note instances of noncompliance in our testing of subrecipients, supplies, and other direct costs.

Subrecipient Costs

During our transaction testing we noted that 14 of the 17 quarterly subrecipient reimbursement transactions for Grant Number 2017-WR-AX-0031, did not include any supporting information.⁶ As a result, in order to determine the allowability of these transactions, we requested supporting documentation for these transactions. Based on our review, we found 6 transactions, totaling \$6,959, were not fully supported. Therefore, we recommend that OVW remedy the \$6,959 in unsupported subrecipient reimbursements identified. Given the inconsistent practices for requesting reimbursements, we also recommend that OVW ensure that the CCASA require all supporting documentation be provided when a subrecipient requests a reimbursement to ensure costs are allowable and supported.

Supplies and Other Direct Cost Allocations

During our review of transactions charged to Grant Number 2015-SW-AX-0004, we noted four transactions for rent, supplies, accounting fees, and leased equipment, totaling \$2,616 in which CCASA officials did not maintain accurate information to adequately support the allocation of these expenses to the grant. CCASA accounting policies state that costs that benefit more than one grant program; like rent, supplies, accounting fees, and equipment; are allocated to each grant, based on either the portion of direct expenses on each grant program or the portion of employees' time spent on each grant program. However, since CCASA officials did not maintain this information for the transactions reviewed, we consider these transactions to be unsupported.⁷ We recommend that OVW remedy the \$2,616 in unsupported expenditures related to rent, supplies, accounting fees, and leased equipment.

Budget Management and Control

According to the Financial Guide, the recipient is responsible for establishing and maintaining an adequate accounting system, which includes the ability to compare actual expenditures or outlays with budgeted amounts for each award. Additionally, the grant recipient must initiate a Grant Adjustment Notice for a budget modification that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.

We compared grant expenditures to the approved budgets to determine whether the CCASA transferred funds among budget categories in excess of 10 percent. We determined that the cumulative difference between category

⁶ Supporting documentation was submitted with 3 of the 17 quarterly subrecipient reimbursement transactions. We did not identify any discrepancies with these three reimbursements.

⁷ We noted that the costs questioned occurred in CY 2015. We also noted that similar transactions after CY 2015 included adequate allocation support in conjunction with the CCASA's accounting policies. Therefore, we determined that the lack of support for these for allocations not to be a control weakness.

expenditures and approved budget category totals did not exceed 10 percent threshold.

Drawdowns

According to the Financial Guide, an adequate accounting system should be established to maintain documentation to support all receipts of federal funds. If, at the end of the grant award, recipients have drawn down funds in excess of federal expenditures, unused funds must be returned to the awarding agency. CCASA officials explained that drawdowns are made on a reimbursement basis. The CCASA has specific procedures for drawing down federal funds and requests drawdowns through Grants Payment Request System as expenses are incurred.

As shown in Table 3 below, the CCASA had drawn down a total of \$721,124 as of February 11, 2019. To assess whether the CCASA managed grant receipts in accordance with federal requirements, we compared the total amount reimbursed to the total expenditures in the accounting records.

Table 3

Drawdowns for OVW Awards to the CCASA as of February 11, 2019⁸

Award Number	Project Period End Date	Award Amount	Total Award Expenditures	Total Funds Drawn Down
2015-SW-AX-0004	12/31/2017	\$278,987	\$280,212	\$278,987
2017-SI-AX-0005	10/31/2020	400,000	86,900	86,640
2017-SW-AX-0008	08/31/2019	294,874	209,450	190,270
2017-WR-AX-0031	09/30/2020	500,000	160,014	165,226
		Total:	\$736,576	\$721,124

Source: OVW and CCASA Accounting Records

As shown in Table 3, we found that the CCASA's cumulative expenditures for Grant Number 2017-WR-AX-0031 exceeded cumulative grant drawdowns by \$5,212. CCASA officials explained that in January 2019 they estimated the amount needed because of the Federal Government shutdown. Due to the nature and amount of this difference, we do not take exception to this discrepancy.

Federal Financial Reports

According to the Financial Guide, recipients shall report the actual expenditures and unliquidated obligations incurred for the reporting period on each financial report as well as cumulative expenditures. To determine whether the CCASA submitted accurate FFRs, we compared the four most recent reports to the CCASA's accounting records for each grant. CCASA officials explained that FFRs are

⁸ According to the Financial Guide, advances made for drawdowns must be spent within 10 days of receipt. During our analysis, we noted that cumulative drawdowns exceeded cumulative expenditures (indicating an advance) in Grant Numbers 2017-SI-AX-0005 and 2017-WR-AX-0031. Therefore, we included the expenditures that occurred within 10 days of the last drawdown instead of at the date of the last drawdown.

compiled using reports from their accounting system, which are maintained by CCASA officials.

We found that for 14 of the 16 quarterly expenditures reported on the FFRs we reviewed did not match the CCASA's accounting records.⁹ CCASA officials explained that the differences between the FFRs and the CCASA's accounting records was likely due to timing differences since they maintain accounting records on an accrual basis. They also provided examples of reports from their accounting system, taken at the time the FFRs were compiled. However, during our review of these reports, we found that these accounting records also did not support the expenditures listed in the FFRs. Therefore, we recommend that OVW ensure that the CCASA develop policies and procedures to ensure that FFRs are accurate and supported.

Program Income

According to the Financial Guide, program income is gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of a Federal award during the period of performance. It also requires that program income only be used for allowable program costs and must be spent prior to drawdowns.

During our review of grant budget documentation and accounting records, we noted that program income was earned and approved by OVW. As a result, we judgmentally selected a sample of 10 program income entries and requested CCASA officials provide documentation related to these entries. After reviewing documentation provided, we noted that the income earned was from registration fees and for copies of printed materials. As noted in Table 3, drawdowns for Grant Number 2015-SW-AX-0004, totaled \$278,987 (the award amount of the grant); and program expenditures totaled \$280,212. We also noted in the CCASA's accounting records that the CCASA generated program income in Grant Number 2015-SW-AX-0004, totaling \$1,191. Since program expenditures exceeded grant drawdowns and program income, we determined that program income was used for allowable program costs and was spent prior to drawdowns grant funds as required by the Financial Guide.

⁹ We noted that the quarterly expenditures reported in the second FFR for grant 2017-SI-AX-0005 and the fifth FFR for grant 2017-WR-AX-0031 matched CCASA's accounting records.

CONCLUSION AND RECOMMENDATIONS

As a result of our audit testing, we conclude that the CCASA did not adhere to all of the grant requirements we tested, but demonstrated adequate progress towards achieving and demonstrated adequate achievement of the grants' stated goals and objectives, except for several discrepancies or instances of noncompliance. We did not identify significant issues regarding CCASA's processes for adhering to the 10-percent rule for award budgets, drawing down funds, and use of program income. However, we found that the CCASA did not comply with essential award conditions related to the accuracy of progress reports (and the accuracy of performance reports from subrecipients), expenditures that were not supported by adequate documentation, and FFRs that were not accurate based on accounting records. We provide five recommendations to OVW to address these deficiencies.

We recommend that OVW:

1. Ensure that the CCASA implement policies and procedures to ensure performance and activities contained in each progress report is supported with valid and auditable source documentation, as required by the Financial Guide.
2. Remedy the \$6,959 in unsupported subrecipient reimbursements.
3. Remedy the \$2,616 in unsupported expenditures related to rent, supply, accounting, and leased equipment costs.
4. Ensure that the CCASA require all supporting documentation be provided when a subrecipient requests a reimbursement to ensure costs are allowable and supported.
5. Ensure the CCASA develop policies and procedures to ensure that FFRs are accurate and supported.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant; and to determine whether the grantee demonstrated adequate progress towards achieving the program goals and objectives. To accomplish these objectives, we assessed performance in the following areas of grant management: program performance, financial management, expenditures, budget management and control, drawdowns, and federal financial reports.

Scope and Methodology

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.

This was an audit of Office on Violence Against Women (OVW) grants awarded to the Colorado Coalition Against Sexual Assault (CCASA) under the State and Territorial Sexual Assault and Domestic Violence Coalitions Program; the Research and Evaluation Initiative; and the Rural Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program. OVW awarded \$278,987 through grant 2015-SW-AX-0004; \$400,000 through grant 2017-SI-AX-0005; \$294,874 through grant 2017-SW-AX-0008; and \$500,000 through grant 2017-WR-AX-0031, and as of February 11, 2019, had drawn down \$721,124 of the total grant funds awarded. Our audit concentrated on, but was not limited to September 24, 2015, the award date for grant 2015-SW-AX-0004, through August 2019, the last day of our audit work. We also noted that grant 2015-SW-AX-0004 had reached its project end date and was closed prior to the start of our audit.

To accomplish our objectives, we tested compliance with what we consider to be the most important conditions of the CCASA's activities related to the audited grants. We performed sample-based audit testing for grant expenditures, including payroll and fringe benefit charges as well as program income; financial reports; and progress reports. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grants reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected. The 2015 and 2017 DOJ Grants Financial Guides and the award documents contain the primary criteria we applied during the audit.

During our audit, we obtained information from Office of Justice Programs' (OJP) Grants Management System, the FMIS OJP Grants Module and the CCASA's accounting system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

APPENDIX 2

SCHEDULE OF DOLLAR-RELATED FINDINGS

<u>Description</u>	<u>Amount</u>	<u>Page</u>
Questioned Costs¹⁰:		
Unsupported Subrecipient Reimbursements	\$6,959	8
Unsupported rent, supply, accounting fee, and leased equipment costs	\$2,616	8
TOTAL QUESTIONED COSTS	<u>\$9,575</u>	

¹⁰ **Questioned Costs** are expenditures that do not comply with legal, regulatory, or contractual requirements; 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, the provision of supporting documentation, or contract ratification, where appropriate.

COLORADO COALITION AGAINST SEXUAL ASSAULT'S RESPONSE TO THE DRAFT AUDIT REPORT



September 6, 2019

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:

Please see below, responses to the draft report for grants OVW 2015-SW-AX-0004, 2017-SI-AX-0005, 2017-SW-AX-0008, 2017-WR-AX-0031.

- 1. Ensure that the CCASA implement policies and procedures to ensure performance and activities contained in each progress report is supported with valid and auditable source documentation, as required by the Financial Guide.**

CCASA concurs and will develop and implement policies and procedures to ensure performance and activities contained in each progress report is supported with valid and auditable source documentation. Upon completion of the financial and grants management policies and procedures desk manual a copy will be forwarded to OIG and OVW within 90 days for approval and closure of recommendation.

- 2. Remedy the \$6,959 in unsupported subrecipient reimbursements.**

CCASA has already remedied the \$6,959 in unsupported subrecipient reimbursements, through either offset or the provision of supporting documentation, as appropriate.

- 3. Remedy the \$2,616 in unsupported expenditures related to rent, supply, accounting, and leased equipment costs.**

CCASA will work with OVW to remedy the \$2,616 in unsupported expenditures.

- 4. Ensure that the CCASA require all supporting documentation be provided when a subrecipient requests a reimbursement to ensure costs are allowable and supported.**

CCASA concurs and, as of January 1, 2019, CCASA requires subrecipients to provide all supporting documentation when requesting a reimbursement to ensure costs are allowable and supported.

5. Ensure the CCASA develop policies and procedures to ensure that FFRs are accurate and supported.

CCASA concurs and will develop and implement policies and procedures to ensure that FFRs are accurate and supported. Upon completion of the financial and grants management policies and procedures desk manual a copy will be forwarded to OIG and OVW within 90 days for approval and closure of recommendation.

Please let me know if you need additional information and I look forward to working in coordination with OIG and OVW to clear all recommendations.

Sincerely,



Brie Franklin
Executive Director
CCASA

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



U.S. Department of Justice

Office on Violence Against Women

Washington, DC 20530

September 19, 2019

MEMORANDUM

TO: David M. Sheeren
Regional Audit Manager

FROM: Nadine M. Neufville *NM Neufville*
Deputy Director, Grants Development and Management

Donna Simmons *DS*
Associate Director, Grants Financial Management Unit

Rodney Samuels *RS*
Audit Liaison/Staff Accountant

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grant Awarded to the Colorado Coalition Against Sexual Assault, Denver, Colorado

This memorandum is in response to your correspondence dated August 27, 2019 transmitting the above Draft Audit Report for the Colorado Coalition Against Sexual Assault (CCASA). We consider the subject report resolved and request written acceptance of this action from your office.

The report contains five recommendations with \$9,575 of Questioned Costs. OVW is committed to addressing and bringing the open recommendations identified by your office to a close as quickly as possible. The following is our analysis of each recommendation.

1. Ensures that CCASA implement policies and procedures to ensure performance and activities contained in each progress report is supported with valid and auditable source documentation, as required by the Financial Guide.

Concur: OVW will work with CCASA to ensure that they implement policies and procedures to ensure performance and activities contained in each progress report is supported with valid and auditable source documentation, as required by the Financial Guide.

MEMORANDUM

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grant Awarded to the Colorado Coalition Against Sexual Assault, Denver, Colorado

2. Remedy \$6,959 in unsupported subrecipient reimbursements.

Concur: OVW will work with the CCASA to ensure that they remedy the \$6,959 in unsupported subrecipient reimbursements.

3. Remedy \$2,616 in unsupported expenditures related to rent, supply, accounting, and lease equipment costs.

Concur: OVW will coordinate with the CCASA to ensure that they remedy the \$2,616 in unsupported expenditures related to rent, supply, accounting, and lease equipment costs.

4. Ensure that the CCASA require all supporting documentation be provided when a subrecipient requests a reimbursement to ensure costs are allowable and supported.

Concur: OVW will coordinate with the CCASA to develop policies requiring all supporting documentation be provided when a subrecipient requests a reimbursement to ensure costs are allowable and supported.

5. Ensures that CCASA implement policies and procedures to ensure that FFRs are accurate and supported.

Concur: OVW will coordinate with the CCASA to ensure that they implement policies and procedures to ensure that FFRs are accurate and supported.

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 at (202) 514-9820.

cc Louise M. Duhamel, Ph.D.
Acting Director, Internal Review and Evaluation Office, Audit Liaison Group
Justice Management Division

LaTonya Eaddy
Program Manager
Office on Violence Against Women

Virginia Baran
Program Manager
Office on Violence Against Women

Charlotte Turpin
Program Manager
Office on Violence Against Women

MEMORANDUM

**SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grant
Awarded to the Colorado Coalition Against Sexual Assault, Denver, Colorado**

**Omar Mohammed
Program Manager
Office on Violence Against Women**

**Thelma Bailey
Program Assistant
Office on Violence Against Women**

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

The OIG provided a draft of this audit report to the Colorado Coalition Against Sexual Assault (CCASA) and OVW for review and official comment. The CCASA's response is incorporated in Appendix 3, and OVW's response is incorporated in Appendix 4 of this final report. In response to our draft report, OVW concurred with our recommendations. In its response, the CCASA concurred with our recommendations. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendations for the OVW:

- 1. Ensure that the CCASA implement policies and procedures to ensure performance and activities contained in each progress report is supported with valid and auditable source documentation, as required by the Financial Guide.**

Resolved. The OVW concurred with our recommendation, stating that it will work with the CCASA to ensure that the CCASA implement policies and procedures to ensure performance and activities contained in each progress report is supported with valid and auditable source documentation, as required by the Financial Guide.

The CCASA concurred with our recommendation. The CCASA stated that it will develop and implement policies and procedures to ensure performance and activities contained in each progress report are supported with valid and auditable source documentation.

This recommendation can be closed when we receive documentation that the CCASA has implemented policies and procedures to ensure performance and activities contained in each progress report is supported with valid and auditable source documentation, as required by the Financial Guide.

- 2. Remedy the \$6,959 in unsupported subrecipient reimbursements.**

Resolved. The OVW concurred with our recommendation, explaining that it will work with the CCASA to remedy the \$6,959 in unsupported subrecipient reimbursements.

The CCASA did not state whether it concurred with our recommendation. The CCASA stated that it had already remedied the \$6,959 in unsupported subrecipient reimbursements through offset of other reimbursements and the provision of supporting documentation. However, the CCASA did not provide any additional documentation to the OIG evidencing these actions.

This recommendation can be closed when we receive documentation that the OVW has remedied the \$6,959 in unsupported subrecipient reimbursements.

3. Remedy the \$2,616 in unsupported expenditures related to rent, supply, accounting, and leased equipment costs.

Resolved. The OVW concurred with our recommendation, stating that it will coordinate with the CCASA to ensure that it remedies the \$2,216 in unsupported expenditures related to rent, supply, accounting, and lease equipment costs.

The CCASA did not state whether it concurred with our recommendation. However, the CCASA explained that it will work with OVW to remedy the \$2,616 in unsupported expenditures.

This recommendation can be closed when we receive documentation that the OVW has remedied the \$2,616 in unsupported expenditures related to rent, supply, accounting, and leased equipment costs.

4. Ensure that the CCASA require all supporting documentation be provided when a subrecipient requests a reimbursement to ensure costs are allowable and supported.

Resolved. The OVW concurred with our recommendation, explaining it will coordinate with the CCASA to ensure that the CCASA to develop policies requiring all supporting documentation be provided when a subrecipient requests a reimbursement to ensure costs are allowable and supported.

The CCASA concurred with our recommendation. The CCASA stated that as of January 1, 2019, the CCASA requires subrecipients to provide all supporting documentation when requesting a reimbursement to ensure costs are allowable and supported. However, the CCASA did not provide documentation indicating that these requirements have been added to the agreements with CCASA subrecipients or that these requirements are applied to subrecipient reimbursements.

This recommendation can be closed when we receive documentation demonstrating that the CCASA communicated to its subrecipients the requirement on supporting documentation when requesting reimbursements.

5. Ensure the CCASA develop policies and procedures to ensure that FFRs are accurate and supported.

Resolved. The OVW concurred with our recommendation and stated that it will coordinate with the CCASA to ensure that it implements policies and procedures to ensure that FFRs are accurate and supported.

The CCASA concurred with our recommendation and stated that it will develop and implement policies and procedures to ensure that FFRs are accurate and supported.

This recommendation can be closed when we receive documentation that the CCASA has implemented policies and procedures for submitting accurate and supported FFRs.



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