



Audit of the Office of Justice Programs
Victim Assistance Funds Subawarded by
the Rhode Island Public Safety
Grant Administration Office to
Refugee Dream Center,
Providence, Rhode Island



AUDIT DIVISION

23-092

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EXECUTIVE SUMMARY

Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Rhode Island Public Safety Grant Administration Office to Refugee Dream Center, Providence, Rhode Island

Background

The U.S. Department of Justice (DOJ) Office of Justice Programs (OJP) provided funds to the Rhode Island Department of Public Safety and administered by the Rhode Island Public Safety Grant Administration Office (PSGAO) to make subawards to support victim assistance programs in the state of Rhode Island. PSGAO awarded \$400,055 in crime victim assistance funds to the Refugee Dream Center (RDC) under three subawards starting October 1, 2018, through September 30, 2021. The purpose of RDC's subawards was to fund its Breaking Barriers program, which helps refugee victims of crime break cultural barriers such as stigma, inability to navigate the American society, language challenges, lack of knowledge of relevant places to access services, and misconstrued notions of a victim's rights and protections. As of October 2021, PSGAO reimbursed RDC for a cumulative amount of \$400,055 for the subawards we reviewed.

Audit Objective

The objective of this DOJ Office of the Inspector General audit was to review how RDC used Victims of Crime Act (VOCA) funds to assist crime victims and assess whether it accounted for these funds in compliance with select award requirements, terms, and conditions.

Summary of Audit Results

Based on our audit, nothing came to our attention to indicate that RDC was not serving victims of crime. However, as described below, we were not able to substantiate specific subaward-related activities. We determined that RDC should improve its overall management by developing and implementing written policies and procedures for its operations.

Program Performance Accomplishments

We found no indication that RDC was not providing services to refugee victims of crime. However, RDC's case management system did not collect and track performance specific to the VOCA-funded Breaking Barriers program. In addition, RDC lacked comprehensive written policies and procedures and did not have a well-designed process to ensure accurate reporting of program progress.

Financial Management

The audit concluded that RDC lacked written policies and procedures for its fiscal operations-related requirements imposed under the subawards. During our testing, we determined that all salary and fringe benefits costs charged to the subawards were not adequately supported or were based on budgeted percentages. As such, we questioned the total \$342,048 in personnel and fringe benefits as unsupported. Additionally, RDC could not demonstrate that it met its match requirement, and we questioned \$114,046 as unsupported.

Recommendations

Our report contains seven recommendations for OJP and PSGAO to assist RDC in improving its subaward management and administration. We requested a response to our draft audit report from RDC, PSGAO, and OJP officials, which can be found in Appendices 3, 4, and 5, respectively. Our analysis of those responses is included in Appendix 6.

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Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of victim assistance funds received by the Refugee Dream Center (RDC), located in Providence, Rhode Island. The Office of Justice Programs (OJP) Office for Victims of Crime (OVC) provided this funding to the Rhode Island Department of Public Safety and administered by the Rhode Island Public Safety Grant Administration Office (PSGAO), which serves as the State Administering Agency (SAA) for Rhode Island and makes subawards to direct service providers. As a direct service provider, RDC received three subawards from PSGAO totaling \$400,055 during our audit period. These funds originated from PSGAO’s 2018, 2019, and 2020 federal grants, as shown in Table 1.

Table 1

Audited Subawards to RDC from PSGAO

PSGAO Subaward Identifier	OJP Prime Award Numbers	Project Start Date	Project End Date	Subaward Amount
18-1829-VOCA	2018-V2-GX-0062	10/01/2018	09/30/2019	\$151,726
19-19245-VOCA	2019-V2-GX-0056	10/01/2019	09/30/2020	\$154,760
20-20142-VOCA	2020-V2-GX-0062	10/01/2020	09/30/2021	\$93,569
Total:				\$400,055

Source: JustGrants and PSGAO

Established by the Victims of Crime Act (VOCA) of 1984, the Crime Victims Fund (CVF) is used to support crime victims through DOJ programs and state and local victim assistance and compensation initiatives.¹ According to OJP’s program guidelines, victim assistance services eligible to receive VOCA support must: (1) respond to the emotional and physical needs of crime victims, (2) assist victims of crime to stabilize their lives after a victimization, (3) assist victims to understand and participate in the criminal justice system, or (4) provide victims of crime with a measure of safety and security. In addition, direct service providers receiving VOCA victim assistance subawards may provide a variety of support to victims of crime, to include offering help filing restraining orders, counseling in crises arising from the occurrence of crime, crisis intervention, and emergency shelter.

¹ The VOCA Victim Assistance Formula Grant Program is funded under 34 U.S.C. § 20101. Federal criminal fees, penalties, forfeited bail bonds, gifts, donations, and special assessments support the CVF. The total amount of funds that the OVC may distribute each year depends upon the amount of CVF deposits made during the preceding years and limits set by Congress.

The Refugee Dream Center

The Rhode Island Refugee Development Center, doing business as the Refugee Dream Center, is a non-profit 501(c)(3), post-resettlement refugee organization that is based in Providence, Rhode Island. According to RDC, it works with refugees to bridge gaps in services that lead to difficulties integrating into American society by operating four core programs, including adult education, youth mentoring, health promotion, and case management.

RDC's VOCA-funded Breaking Barriers is an intervention program focused on capacity building and facilitating refugee victims of crime to overcome the challenges associated with their experiences. Specifically, Breaking Barriers is intended to work with refugee victims of crime to break cultural barriers such as stigma, inability to navigate the American society, language challenges, lack of knowledge of relevant places to access services, and notion of a victim's rights and protections.

OIG Audit Approach

The objective of this audit was to review how RDC used the VOCA funds received through subawards from PSGAO to assist crime victims and assess whether RDC accounted for VOCA funds in compliance with select award requirements, terms, and conditions. To accomplish this objective, we assessed program performance and accomplishments and financial management.

To gain a further understanding of victim assistance subaward oversight, as well as to evaluate RDC's performance and administration of VOCA-funded programs, we solicited feedback from PSGAO officials regarding RDC records of delivering crime victim services, accomplishments, and compliance with PSGAO award requirements.² The officials did not express any significant concerns with RDC's ability to provide services to victims of crime or compliance with award requirements.

We tested compliance with what we considered to be the most important conditions of the subawards. The DOJ Grants Financial Guide; VOCA Guidelines and Final Rule; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; PSGAO guidance; and the OVC and SAA award documents contain the primary criteria we applied during this audit.

The results of our analysis are discussed in detail in the following sections of this report. Appendix 1 contains additional information on this audit's objective, scope, and methodology. Appendix 2 presents the audit's Schedule of Dollar-Related Findings.

² As an SAA, PSGAO is responsible for monitoring the performance of, providing technical assistance to, collecting data from, and processing victim assistance reimbursements requested by RDC. As such, we considered the results of our audit of victim assistance grants awarded to PSGAO in performing this separate review. See U.S. Department of Justice Office of the Inspector General, [Audit of the Office of Justice Programs Office for Victims of Crime Assistance Grants Awarded to the Rhode Island Department of Public Safety Grant Administration Office, Providence, Rhode Island](#), Audit Report GR-70-17-004 (March 2017), oig.justice.gov/reports/audit-office-justice-programs-office-victims-crime-assistance-grants-awarded-rhode-island.

Audit Results

Program Performance and Accomplishments

As established by the VOCA legislation, VOCA subawards are available to subrecipients for the purpose of providing direct services to victims. RDC received its VOCA funding from PSGAO to offer services targeting victims of crime in the refugee community in their efforts towards self-sufficiency and integrating into American society. We obtained an understanding of RDC's standard operating procedures in relation to the subaward-funded services. We also compared the subaward solicitation, project application, and subaward agreement against available evidence of accomplishments to determine whether RDC demonstrated adequate progress towards providing the services for which it was funded. Overall, there were no indications that RDC was not providing these services to refugee victims of crime. However, we were not able to substantiate specific subaward-related activities. As discussed below, RDC lacked comprehensive written policies and procedures and did not have well-designed processes to ensure accurate reporting of program progress.

Program Implementation

According to the DOJ Grants Financial Guide, recipients of federal awards should maintain a well-designed and tested system of internal controls. The DOJ Grants Financial Guide further defines internal controls as a process designed to provide reasonable assurance regarding the achievement of objectives in: (1) the effectiveness and efficiency of operations, (2) reliability of reporting for internal and external use, and (3) compliance with applicable laws and regulations.

To obtain an understanding of its operating procedures, including internal controls, in relation to the audited victim services, we conducted interviews with RDC's Executive Director, Founder and Director of Programs, Financial Coordinator, Case Managers, and a refugee community leader. We also requested RDC's written policies and procedures for its VOCA-funded refugee services, as well as documentation to support the assignment of responsibilities in executing VOCA-funded activities.

RDC officials provided us with a document titled *Program Specialist Transition Notes*, which described different processes associated with aspects of the subaward program. However, the document was informal, lacked evidence of internal controls, and did not include policies and procedures specific to the operation of the VOCA-funded program.

We believe that to promote effective and efficient operations, reliable reporting, and compliance with federal grant requirements, RDC must have written policies outlining standard operating procedures for staff. Therefore, we recommend that OJP and PSGAO ensure RDC develops and implements written policies and procedures specific to VOCA-funded program operations and distribute these among the relevant staff. We identified other deficiencies related to RDC's policies and procedures and determined further

enhancements are needed, as discussed in the [Program Services](#) and [Financial Management](#) sections of this report.³

Program Services

According to its subaward application, RDC's goal was to identify and educate refugees within its community to provide outreach services and referrals to RDC for case management services. While on site we reviewed victim case files and witnessed victims receiving services; as such, there was no indication that RDC was not serving victims of crime. However, we were unable to determine the number of victims served or what services were provided specifically with subaward funds, as required, and therefore we were unable to determine whether RDC met the goals outlined in its subaward application.

As a subrecipient of VOCA funds, RDC was required to file quarterly programmatic data, as well as narratives detailing information on victims served, such as the number of specific services that were provided. Based on our review of documentation, interviews with RDC officials, and a walkthrough of RDC's electronic case management system, we determined they did not have adequate written policies and procedures specific to performance reporting. Additionally, RDC did not collect and track the information necessary to measure program performance of the VOCA-funded program. As a result, we were not able to verify whether the information recorded in the Performance Measurement Tool (PMT) reports was accurate.

RDC was unable to provide us with the total universe of victims served using VOCA funds. According to RDC, Case Managers used an electronic case management system for intake and referral services. RDC's case management system currently serves as the data collection instrument and the basis for its quarterly performance reporting to PSGAO. Prior to upgrading to the electronic case management system in 2020, RDC used a spreadsheet to document its daily interactions with program participants. Neither of these data collection and reporting systems provided the level of data to effectively capture and measure program performance because it tracked all refugee victims of crime served and did not differentiate those being served through its Breaking Barriers program. RDC officials acknowledged this limitation and told us they are in the process of working with another vendor to develop and implement a case management system that will have the level of data needed to track performance relative to the subaward goals and objectives. Tracking program performance is essential to effective subaward management. Therefore, we recommend that OJP and PSGAO ensure that RDC establishes written policies and procedures specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant staff. In addition, we recommend OJP and PSGAO ensure RDC's case management system effectively identifies victims served through the Breaking Barriers program and develops a method to accurately report its services provided.

Financial Management

According to the DOJ Grants Financial Guide, all award recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records to accurately account for awarded funds. To determine whether RDC adequately accounted for the award funds, we interviewed RDC's Financial Coordinator and reviewed RDC's financial records and award documentation. As detailed below, we

³ In the [Conclusion and Recommendations](#) section of this report, we make one recommendation that consolidates the individual policy-related issues identified in this section of the report.

determined that RDC should improve its financial management by developing and implementing written policies and procedures for its fiscal operations.

Fiscal Policies and Procedures

We found that RDC used a commercially available financial management system for its accounting services and that its payroll was processed by a third-party service. RDC told us that its bank reconciliations are performed periodically but could not confirm the frequency of the reconciliations and did not have the reconciliation process formalized in writing.

Based on our discussions with RDC officials and review of available documentation, we determined that there were no formalized policies and procedures related to grant financial management. Although we were provided an ad hoc set of documents that had some fiscal-related procedures, we found the documentation to be inadequate, especially given the limited staffing and the lack of other staff that was knowledgeable and available to execute the financial and accounting functions in the absence of the Financial Coordinator. We found that overall, RDC's financial and accounting operations were not formalized to ensure compliance with the DOJ Grants Financial Guide and federal award requirements, including financial reporting, and maintaining adequate supporting documentation for payroll expenditures and matching costs. By not having adequate policies and procedures in place, RDC's ability to adequately manage grant funds was hindered, as described below in the [Subaward Expenditures and Matching Costs](#) section. We believe written financial management policies and procedures would help ensure compliance with federal award requirements. As a result, we recommend that OJP and PSGAO ensure RDC develops and implements written policies and procedures to ensure compliance with the DOJ Grants Financial Guide and federal award requirements, including financial reporting, subaward expenditures, and matching costs.

Subaward Expenditures and Matching Costs

PSGAO requires subrecipients to submit quarterly financial reports using its electronic Grants Management System. Subrecipients report expenditures against approved budget line items by budget category. Once submitted, PSGAO's Grants Management staff reviews the financial report and, if approved, PSGAO processes a reimbursement payment for the reported expenditures. Otherwise, PSGAO may return a financial report for clarification or revision.

RDC's approved budget categories for the Breaking Barriers program included personnel, fringe benefits, consultants and contracts, travel, supplies and operating costs, and other (e.g., rent and stipends). As of October 2021, RDC received \$400,055 in VOCA victim assistance program funds for costs incurred in these areas.

We reviewed a sample of RDC transactions to determine whether the costs charged to the project and paid with VOCA-funds were accurate, allowable, supported, and in accordance with the VOCA program requirements. We judgmentally selected 45 transactions, totaling approximately \$23,070. The transactions we reviewed included costs from every budget category. We also attempted to verify that RDC met its required match but were unable to do so because RDC did not maintain supporting documentation.

As described below, we found issues in the areas of personnel and fringe benefit costs, and matching requirement. As a result, we questioned a total of \$456,094 in unsupported costs. Unless noted below, the transactions tested were allowable and adequately supported.

Personnel and Fringe Benefit Costs

RDC's largest cost category was personnel costs. We determined personnel and fringe benefit costs represented \$342,048 of the total \$400,055 (86 percent) received for the subawards in our period of review. To test these costs, we judgmentally sampled 37 transactions from two non-consecutive pay periods for each subaward, totaling \$22,351 (\$14,833 in personnel and \$7,518 in fringe benefit costs). During our testing, we determined that all salary and fringe benefits costs charged to the subawards were based on RDC's approved subaward budget and not actual amounts. Therefore, we question the total \$342,048 in personnel and fringe benefits as unsupported, as described below.

OJP's "Time and Effort Best Practices for VOCA-Funded Personnel" (Best Practices) states: "Where employees work on multiple activities or cost objective, a distribution of their salaries or wages may be supported by personnel activity reports or equivalent documentation which meets the standards: (a) they must reflect an after the fact distribution of the actual activity of each employee, (b) they must account for the total activity for which each employee is compensated, (c) they must be certified by the employee and approved by a supervisor with firsthand knowledge of the work performed, and (d) budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to Federal awards." While the Best Practices document does not reflect specific requirements for documentation, 2 C.F.R. § 200.430 indicates that salaries and wages must be based on records that accurately reflect the work performed and these records must be supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated. In addition, this guidance also states that while a grant recipient may rely on budget estimates or other distribution percentages determined for preliminary or interim accounting purposes, such estimates cannot be used to support charges to federal awards without reconciling after-the-fact charges; and if a grant recipient allocates employee time across multiple projects records, it must support the distribution of the employee's salary or wages among the specific activities or cost objectives. Ultimately, a grant recipient needs to provide a reasonable approximation of time spent on grant-related activities, which must be periodically reviewed for accuracy and any significant changes in time be promptly adjusted.

During our testing, we determined that personnel costs charged to the subawards were not adequately supported by the available documentation. While the timesheets that we reviewed included some indication of time allocated to the Breaking Barriers program, several of the timesheets indicated "VOCA partial" without stating the total number of hours allocated to the subaward program. As a result, we were unable to rely on the timesheets to verify personnel related charges to the grant. According to RDC officials, it charged personnel based on the percentages in the approved budget. However, based on our testing, we identified several discrepancies in which the charges were not consistent with the approved budget. Subrecipients must ensure that the amounts charged to a federal award are accurate, allowable, properly allocated, and based on actual time worked. Because there was no documentation demonstrating that personnel charges were based on anything beyond the budgeted amounts approved for RDC's personnel expenditures, we concluded that the personnel expenditures were unsupported and question the total charged for personnel.

According to RDC officials, it also used the approved budgeted dollar amount and evenly distributed fringe benefits across each subaward period. As a result, we could not assess RDC's allocation of fringe expenditures. Therefore, we question the total amount of fringe benefits costs charged for all three grants as unsupported.

During our audit, we found that the Executive Director's timesheets were not reviewed or signed by an approving official, or independently verified by another source to ensure the time charged was accurate. PSGAO was aware that the Executive Director's timesheets were unreviewed and not signed by an approving official. We believe that developing and implementing internal controls for documenting and approving payroll expenses is essential for ensuring the appropriate use of federal award funds.

As a result of the issues identified during our testing of personnel and fringe benefits costs, we recommend that OJP and PSGAO ensure RDC develops and implements written policies and procedures to ensure salaries and wages expenses charged to the subaward are based on records that accurately reflect the work performed and these records are supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated. We also recommend OJP and PSGAO remedy \$342,048 in unsupported costs for the personnel and fringe benefits charged to the subaward. We also recommend that OJP works with PSGAO to develop and implement written policies and procedures that ensure the Executive Director's (or equivalent) time and effort reports are reviewed, accurate, allowable, and properly allocated and to ensure PSGAO subrecipients receive notification of the requirement.

Other Costs

To test non-personnel costs charged to the subawards, we selected a sample of transactions from RDC's accounting records to include the categories of travel, consultants, supplies and operating costs, and other (e.g., conferences). We judgmentally sampled 14 transactions totaling \$8,237. To perform verification testing of these expenditures, we reviewed accounting records and available supporting documentation. In our testing, we determined that all 14 transactions were accurate, allowable, supported, and in accordance with the VOCA program requirements.

Matching Requirement

VOCA Guidelines generally require that subrecipients match 20 percent of each subaward unless the subrecipient requests and receives a waiver. The purpose of this requirement is to increase the number of resources available to VOCA projects. Match contributions must come from non-federal sources and can be either cash or in-kind matches.⁴ The State Administering Agency has primary responsibility for ensuring subrecipient compliance with match requirements.

RDC was required to meet a cash match of \$114,046. Although PSGAO provided a VOCA Webinar that detailed the Match Waiver option, RDC did not request a Match Waiver. RDC officials told us they were not aware of the waiver option, and also stated they did not have difficulty meeting the match requirement. While RDC reported its match contributions on its monthly fiscal reports as salary, fringe benefits, and other

⁴ In-kind matches may include donations of expendable equipment, office supplies, workshop or classroom materials, workplace, or the value of time contributed by those providing integral services to the funded project.

costs. We were unable to verify that it met the match requirement because it did not maintain records that clearly indicated the source, amount, and timing for its match contributions. Because RDC could not demonstrate that it met its match requirement, we question \$114,046, as unsupported. We recommend that OJP and PSGAO remedy the \$114,046 in unsupported costs for the match requirement. Additionally, we previously made a recommendation for ensuring RDC implements policies and procedures, including for match requirements, to ensure compliance with the DOJ Grants Financial Guide.

Conclusion and Recommendations

Our audit concluded that there was no indication that RDC was not serving refugee victims of crime. However, we were not able to substantiate specific subaward-related operational activities because RDC lacked a case management system that effectively captured and measured program performance, including the number of victims served and the services provided to those victims. In addition, we concluded that RDC should improve its financial management by developing and implementing written policies and procedures for its fiscal operations of the VOCA-funded program. We provide seven recommendations to OJP and PSGAO to address these deficiencies and remedy \$456,094.

We recommend that OJP and PSGAO:

1. Ensure RDC develops and implements written policies and procedures: (1) specific to VOCA-funded program operations and distribute these among the relevant staff; and (2) specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant staff.
2. Ensure RDC's case management system effectively identifies victims served through the Breaking Barriers program and develops a method to accurately report its services provided.
3. Ensure RDC develops and implements written policies and procedures to ensure compliance with the DOJ Grants Financial Guide and federal award requirements, including financial reporting, subaward expenditures, and matching costs.
4. Ensure RDC develops and implements written policies and procedures to ensure salaries and wages expenses charged to the subaward are based on records that accurately reflect the work performed and these records are supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.
5. Remedy \$342,048 in unsupported costs for the personnel and fringe benefits charged to the subaward.
6. Remedy \$114,046 in unsupported costs for the match requirement.

We recommend that OJP:

7. Work with PSGAO to develop and implement written policies and procedures that ensure the Executive Director's (or equivalent) time and effort reports are reviewed, accurate, allowable, and properly allocated and to ensure PSGAO subrecipients receive notification of the requirement.

APPENDIX 1: Objective, Scope, and Methodology

Objective

The objective of this audit is to review how Refugee Dream Center (RDC) used Victims of Crime Act (VOCA) funds received through a subaward from the Rhode Island Public Safety Grant Administration Office (PSGAO) to assist crime victims and assess whether it accounted for VOCA funds in compliance with select award requirements, terms, and conditions. To accomplish this objective, we assessed program performance and accomplishments and grant financial management.

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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

This was an audit of three subawards to RDC. These subawards, totaling \$400,055, were funded by PSGAO from primary VOCA grants 2018-V2-GX-0062, 2019-V2-GX-0056, and 2020-V2-GX-0062, awarded by the Office of Justice Programs (OJP) Office for Victims of Crime (OVC). As of October 2021, RDC had received, through reimbursement from PSGAO, \$400,055 in subaward funds.

Our audit concentrated on, but was not limited to, activity from October 2018 through September 2021. The Department of Justice (DOJ) Grants Financial Guide; the VOCA Guidelines and Final Rule; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; PSGAO guidance; and the OVC and PSGAO award documents constitute the primary criteria we applied during the audit.

To accomplish our objective, we tested compliance with what we consider to be the most important conditions of RDC's activities related to the audited award. Our audit work included conducting interviews with RDC's officials and staff, examining policies and procedures, and reviewing subaward documentation and financial records. We performed sample-based audit testing for subaward expenditures and victim case files. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the award reviewed. This nonstatistical sample design did not allow projection of the test results to the universe from which the samples were selected.

During our audit, we obtained information from DOJ's JustGrants system, as well as PSGAO's electronic grants management 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.

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objective. We did not evaluate the internal controls of RDC to provide assurance on its internal control structure as a whole. RDC management is responsible for the establishment and maintenance of internal controls in accordance with 2 C.F.R. § 200. Because we do not express an opinion on RDC's internal control structure as a whole, we offer this statement solely for the information and use of RDC, PSGAO, and OJP.⁵

In planning and performing our audit, we identified internal control components and underlying internal control principles as significant to the audit objective. Specifically, we assessed the design and implementation of RDC's policies and procedures. We also tested the implementation and operating effectiveness of specific controls over award execution and compliance with laws and regulations in our audit scope. The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

⁵ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

APPENDIX 2: Schedule of Dollar-Related Findings

Description	OJP Prime Award Numbers	PSGAO Subaward Identifier	Amount	Page
Questioned Costs:⁶				
Unsupported Personnel and Fringe Benefits	2018-V2-GX-0062	18-1829-VOCA	\$123,435	6
	2019-V2-GX-0056	19-19245-VOCA	127,013	
	2020-V2-GX-0062	20-20142-VOCA	91,600	
<i>Total Unsupported Personnel and Fringe Benefits</i>			\$342,048	
Unsupported Match	2018-V2-GX-0062	18-1829-VOCA	\$51,964	7
	2019-V2-GX-0056	19-19245-VOCA	38,690	
	2020-V2-GX-0062	20-20142-VOCA	23,392	
<i>Total Unsupported Match</i>			\$114,046	
Unsupported Costs			\$456,094	
TOTAL DOLLAR-RELATED FINDINGS			\$456,094	

⁶ **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.

APPENDIX 3: Refugee Dream Center's Response to the Draft Audit Report



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Refugee Dream Center Response to the Draft Audit Report

June 26, 2023

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RESPONSE TO DRAFT AUDIT OF REPORT OF THE OFFICE OF JUSTICE PROGRAMS VICTIM ASSISTANCE FUNDS SUBAWARDED BY THE RHODE ISLAND PUBLIC SAFETY GRANT ADMINISTRATION OFFICE TO REFUGEE DREAM CENTER

Dear Mr. Puerzer,

We greatly appreciate the opportunity to thoroughly examine and offer feedback on the recommendations outlined in the draft audit report shared by the Office of Inspector General within the Department of Justice. The Refugee Dream Center (RDC) has diligently assessed these recommendations and is now presenting our formal response in a respectful manner.

Recommendation 1: Ensure RDC develops and implements written policies and procedures: (1) specific to VOCA-funded program operations and distribute these among the relevant staff; and (2) specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant staff.

To comply with this recommendation, we have diligently worked to create comprehensive policies and procedures that specifically cater to our VOCA-funded program operations. These guidelines have been carefully crafted to ensure clarity, consistency, and alignment with the requirements of the VOCA funding.

Furthermore, we have taken significant steps to distribute these policies and procedures among the relevant staff members. In addition to the development of policies and procedures, we have also addressed the second aspect of the recommendation. We have developed comprehensive guidance specific to the performance reporting of our VOCA-funded services. This guidance has been distributed to the relevant staff members, enabling them to accurately report on the performance of these services.

Recommendation 2: Ensure RDC's case management system effectively identifies victims served through the Breaking Barriers program and develops a method to accurately report its services provided.

To meet this recommendation, we have undertaken significant efforts to enhance our case management system. We have implemented necessary updates and modifications to ensure the system effectively identifies victims who have been served through the Breaking Barriers program. Also, we have implemented a new software solution called Salesforce, specifically tailored to enhance our case management capabilities. Through Salesforce, we are now able to specifically assign units of data to projects. As part of this new data entry and management system, we are now able to enter and maintain data specific to our Breaking Barriers project. This process enables us to identify the clients served through Breaking Barriers, and helps us also report accurately, the services rendered during the grant period.

Furthermore, we have developed a comprehensive method to accurately report the services provided through the Breaking Barriers program. This reporting method takes into account the unique requirements and complexities associated with this program. It enables us to capture and document relevant information in a structured and systematic manner, ensuring the accuracy and reliability of our reporting.

Recommendation 3: Ensure RDC develops and implements written policies and procedures to ensure compliance with the DOJ Grants Financial Guide and federal award requirements, including financial reporting, subaward expenditures, and matching costs.

In response to this recommendation, we have made diligent efforts to establish comprehensive written policies and procedures that specifically address the areas of financial reporting, subaward expenditures, and matching costs. These policies and procedures have been developed in alignment with the DOJ Grants Financial Guide and federal award requirements, ensuring strict compliance with the applicable regulations. Our team has taken significant measures to disseminate these policies and procedures among relevant staff members.

Recommendation 4: Ensure RDC develops and implements written policies and procedures to ensure salaries and wages expenses charged to the subaward are based on records that accurately reflect the work performed and these records are supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.

To comply with this recommendation, we have diligently worked towards the establishment of robust written policies and procedures. These policies and procedures specifically focus on ensuring that salaries and wages expenses charged to the subaward are accurately based on records that reflect the work performed. Moreover, we have emphasized the importance of maintaining a strong system of internal control to provide reasonable assurance that the charges are both accurate and allowable.

The developed policies and procedures outline clear guidelines for documenting and verifying the work performed by our staff, ensuring that the salaries and wages expenses charged to subawards are supported by accurate records. We have implemented mechanisms to track and allocate these expenses appropriately, adhering to the applicable regulations and guidelines.

Recommendation 5: Remedy \$342,048 in unsupported costs for the personnel and fringe benefits charged to the subaward.

To meet this recommendation, we have taken significant steps to remedy the unsupported costs. Firstly, we have updated our timesheets to ensure compliance with the standard requirements set forth by the VOCA grant. These updated timesheets now accurately reflect the daily work routines covered by various grants, including specific references to funders and time periods. This enhancement in our timesheet documentation allows for better traceability and accountability, mitigating the risk of unsupported costs.

Recommendation 6: Remedy \$114,046 in unsupported costs for the match requirement.

To address this aspect of the report, we have been actively collaborating with the Public Safety Grant Administration Office (PSGAO) of Rhode Island. Together, we are working towards obtaining grant matching waivers to resolve the unsupported costs associated with the match requirement.

Recommendation 7: Work with PSGAO to develop and implement written policies and procedures that ensure the Executive Director's (or equivalent) time and effort reports are reviewed, accurate, allowable, and properly allocated and to ensure PSGAO subrecipients receive notification of the requirement.

In response to this recommendation, we have recognized the importance of implementing better practices in ensuring accountability and transparency. For close to a year now, we have modified our procedures, and the executive director no longer signs their own timesheets. Instead, the timesheets are signed and approved by the chair of the board. This change ensures an independent review of the executive director's time and effort reports, enhancing the accuracy, allowability, and proper allocation of these reports.

Furthermore, we have actively collaborated with the Public Safety Grant Administration Office (PSGAO) to develop and implement written policies and procedures that address the requirements outlined in Recommendation 7. These policies and procedures ensure that the executive director's time and effort reports are thoroughly reviewed, accurate, and in compliance with grant regulations.

In addition, the PSGAO has facilitated an introduction between the RDC and the OVC VOCA Center, with the purpose of providing technical support and training to the RDC in the administration of VOCA grants.

Thank you once again for the opportunity to review and provide our comments on the draft audit report. If you have any further questions or require additional information regarding our response, please feel free to reach out to me directly. I am available to address any inquiries you may have.

Sincerely,



Teddi Jallow,
Executive Director

APPENDIX 4: Rhode Island Public Safety Grant Administration Office Response to the Draft Audit Report



RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY

Public Safety Grant Administration Office

311 Danielson Pike, North Scituate, RI 02857
Telephone: (401) 764-5991 — Fax: (401) 764-5834

Colonel Darnell S. Weaver
Director, Rhode Island Department of Public Safety
Superintendent, Rhode Island State Police

Michael J. Hogan
Executive Director
Public Safety Grant Administration Office

July 5, 2022

Thomas Puerzer
Regional Audit Manager
Office of the Inspector General

RE: Draft Audit Report, Refugee Dream Center

Mr. Puerzer:

The Office of Inspector General, Department of Justice recently released a draft audit report for the Refugee Dream Center (RDC), which included seven recommendations. The Rhode Island Public Safety Grant Administration Office (PSGAO), the State Administering Agency for DOJ grants, concurs in those recommendations that improvements need to be made in the bookkeeping and policies of the Refugee Dream Center. Importantly, the audit states, "Our audit concluded that there was no indication that RDC was not serving refugee victims of crime." The PSGAO agrees with this statement.

- 1. Ensure RDC develops and implements written policies and procedures: (1) specific to VOCA-funded program operations and distribute these among the relevant staff; and (2) specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant staff.*
- 2. Ensure RDC's case management system effectively identifies victims served through the Breaking Barriers program and develops a method to accurately report its services provided.*
- 3. Ensure RDC develops and implements written policies and procedures to ensure compliance with the DOJ Grants Financial Guide and federal award requirements, including financial reporting, subaward expenditures, and matching costs.*
- 4. Ensure RDC develops and implements written policies and procedures to ensure salaries and wages expenses charged to the subaward are based on records that*

accurately reflect the work performed and these records are supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.

The first four recommendations regard the policies and procedures of the RDC. The RDC is a relatively young nonprofit organization that has made great progress in recent years however further action is needed to strengthen their policies and procedures. They have begun to draft stronger, clearer policies, but require further assistance. We have connected them with The VOCA Center for direct training and technical assistance.

The PSGAO has introduced the RDC to the OVC TTAC center who are now able to provide technical assistance to subgrantee agencies. The PSGAO believes that with their assistance, these policies can be upgraded and formalized to meet DOJ specifications.

5. Remedy \$342,048 in unsupported costs for the personnel and fringe benefits charged to the subaward.

The PSGAO agrees that timesheets from the RDC needed additional information, and the RDC has begun to review and reform these and has recently sent updated time records to the OIG.

6. Remedy \$114,046 in unsupported costs for the match requirement.

The PSGAO agrees that more documentation is needed to substantiate RDC's match requirement. The PSGAO, which has an approved match waiver policy, will work with RDC to issue a match waiver where applicable or to update documentation where appropriate.

7. Work with PSGAO to develop and implement written policies and procedures that ensure the Executive Director's (or equivalent) time and effort reports are reviewed, accurate, allowable, and properly allocated and to ensure PSGAO subrecipients receive notification of the requirement.

The PSGAO agrees with this recommendation. Many VOCA recipients in Rhode Island are small agencies where the executive director performs direct service or other work that is directly eligible under the VOCA grant. While the DOJ financial guide does not explicitly state that an executive director's time sheets must be approved by the agencies board of directors or other review process, the PSGAO create a new policy requiring this, in those few cases where an executive director is being paid in part from the grant.

Sincerely,



Michael J. Hogan
Executive Director
Public Safety Grant Administration Office
Rhode Island Department of Public Safety
Office phone: (401)764-5794

APPENDIX 5: Office of Justice Programs Response to the Draft Audit Report



U.S. Department of Justice

Office of Justice Programs

Office of Audit, Assessment, and Management

Washington, D.C. 20531

July 19, 2023

MEMORANDUM TO: Thomas O. Puerzer
Regional Audit Manager
Philadelphia Regional Audit Office
Office of the Inspector General

FROM: Jeffery A. Haley *Jeffery A. Haley*
Deputy Director, Audit and Review Division

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Rhode Island Public Safety Grant Administration Office to Refugee Dream Center, Providence, Rhode Island*

This memorandum is in reference to your correspondence, dated June 7, 2023, transmitting the above-referenced draft audit report for the Refugee Dream Center (RDC). RDC received sub-award funds from the Rhode Island Public Safety Grant Administration Office (PSGAO), under the Office of Justice Programs' (OJP), Office for Victims of Crime (OVC), Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 2018-V2-GX-0062, 2019-V2-GX-0056, and 2020-V2-GX-0062. We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains seven recommendations and \$456,094 in questioned costs. The following is OJP's analysis of the draft audit report recommendations. For ease of review, the recommendations are restated in bold and are followed by OJP's response.

- 1. We recommend that OJP and PSGAO ensure RDC develops and implements written policies and procedures: (1) specific to VOCA-funded program operations and distribute these among the relevant staff; and (2) specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant staff.**

OJP agrees with the recommendation. In its response, dated July 5, 2023, the PSGAO stated that the RDC is a relatively young nonprofit organization, and that further action is needed to strengthen their policies and procedures. The PSGAO also stated that RDC has begun to draft stronger, clearer policies, but will require further assistance. To that end, the PSGAO stated that they have contacted the OVC VOCA Center, to request technical assistance for RDC, to strengthen and formalize their policies and procedures to meet the Department of Justice (DOJ) specifications.

Accordingly, we will coordinate with the PSGAO to obtain a copy of RDC's written policies and procedures, developed and implemented, containing guidance specific to VOCA-funded program operations and the performance reporting of VOCA-funded services. We will also coordinate with the PSGAO to obtain evidence that RDC distributed the policies and procedures to staff responsible for managing Federal grant funds.

2. We recommend that OJP and PSGAO ensure RDC's case management system effectively identifies victims served through the Breaking Barriers program and develops a method to accurately report its services provided.

OJP agrees with the recommendation. In its response, dated July 5, 2023, the PSGAO stated that the RDC is a relatively young nonprofit organization, and that further action is needed to strengthen their policies and procedures. The PSGAO also stated that RDC has begun to draft stronger, clearer policies, but will require further assistance. To that end, the PSGAO stated that they have contacted the OVC VOCA Center, to request technical assistance for RDC, to strengthen and formalize their policies and procedures to meet the DOJ specifications.

Accordingly, we will coordinate with the PSGAO to obtain a copy of RDC's written policies and procedures, developed and implemented, to ensure that RDC's case management system effectively identifies victims served through its Breaking Barriers program, and develops a method to accurately report the services provided.

3. We recommend that OJP and PSGAO ensure RDC develops and implements written policies and procedures to ensure compliance with the DOJ Grants Financial Guide and federal award requirements, including financial reporting, subaward expenditures, and matching costs.

OJP agrees with the recommendation. In its response, dated July 5, 2023, the PSGAO stated that the RDC is a relatively young nonprofit organization, and that further action is needed to strengthen their policies and procedures. The PSGAO also stated that RDC has begun to draft stronger, clearer policies, but will require further assistance. To that end, the PSGAO stated that they have contacted the OVC VOCA Center, to request technical assistance for RDC, to strengthen and formalize their policies and procedures to meet the DOJ specifications.

Accordingly, we will coordinate with the PSGAO to obtain a copy of RDC's written policies and procedures, developed and implemented, to ensure compliance with the DOJ Grants Financial Guide and Federal award requirements, including financial reporting, subaward expenditures, and matching costs.

4. **We recommend that OJP and PSGAO ensure RDC develops and implements written policies and procedures to ensure salaries and wages expenses charged to the subaward are based on records that accurately reflect the work performed and these records are supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.**

OJP agrees with the recommendation. In its response, dated July 5, 2023, the PSGAO stated that the RDC is a relatively young nonprofit organization, and that further action is needed to strengthen their policies and procedures. The PSGAO also stated that RDC has begun to draft stronger, clearer policies, but will require further assistance. To that end, the PSGAO stated that they have contacted the OVC VOCA Center, to request technical assistance for RDC, to strengthen and formalize their policies and procedures to meet the DOJ specifications.

Accordingly, we will coordinate with the PSGAO to obtain a copy of RDC's written policies and procedures, developed and implemented, to ensure that employee salaries and wages expenses charged to subawards are based on records that accurately reflect the work performed, and are supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.

5. **We recommend that OJP and PSGAO remedy \$342,048 in unsupported costs for the personnel and fringe benefits charged to the subaward.**

OJP agrees with the recommendation. In its response, dated July 5, 2023, the PSGAO stated that the timesheets from the RDC needed additional information, and that the RDC had recently sent updated time records to the OIG. However, the PSGAO did not state how it will remedy the \$342,048 in questioned costs, related to the personnel and fringe benefits costs by RDC that lacked supporting documentation.

Accordingly, we will review the \$342,048 in questioned costs, related to unsupported personnel and fringe benefits expenditures that were charged to the subawards under Grant Numbers 2018-V2-GX-0062, 2019-V2-GX-0056, and 2020-V2-GX-0062, and will work with PSGAO to remedy, as appropriate.

6. **We recommend that OJP and PSGAO remedy \$114,046 in unsupported costs for the match requirement.**

OJP agrees with the recommendation. In its response, dated July 5, 2023, the PSGAO stated that more documentation was needed to substantiate RDC's match requirement, and that it would work with the RDC to issue a match waiver, as applicable, or to update documentation, as appropriate.

Accordingly, we will review the \$114,046 in questioned costs, related to the unsupported match expenditures for the subawards under Grant Numbers 2018-V2-GX-0062, 2019-V2-GX-0056, and 2020-V2-GX-0062, and will work with PSGAO to remedy, as appropriate.

7. **We recommend that OJP work with PSGAO to develop and implement written policies and procedures that ensure the Executive Director’s (or equivalent) time and effort reports are reviewed, accurate, allowable, and properly allocated and to ensure PSGAO subrecipients receive notification of the requirement.**

OJP agrees with the recommendation. In its response, dated July 5, 2023, the PSGAO stated that while the DOJ Grants Financial Guide does not explicitly state that an Executive Director's time sheets must be approved by the agency’s board of directors or other review process, it would create a new policy for the few cases in which an Executive Director is paid, in part, by VOCA grant funds.

Accordingly, we will coordinate with the PSGAO to obtain a copy of its written policies and procedures, developed and implemented, to ensure that the Executive Director’s (or equivalent) time and effort reports are reviewed for accuracy, allowability, and proper allocation; and will obtain evidence to ensure that PSGAO subrecipients receive notification of the requirement.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact Linda J. Taylor, Lead Auditor, Audit Coordination Branch, Audit and Review Division, on (202) 514-7270.

cc: Maureen A. Henneberg
Deputy Assistant Attorney General
for Operations and Management

LeToya A. Johnson
Senior Advisor
Office of the Assistant Attorney General

Linda J. Taylor
Lead Auditor, Audit Coordination Branch
Audit and Review Division
Office of Audit, Assessment, and Management

Kristina Rose
Director
Office for Victims of Crime

Katherine Darke Schmitt
Principal Deputy Director
Office for Victims of Crime

James Simonson
Associate Director for Operations
Office for Victims of Crime

cc: Kathrina S. Peterson
Deputy Director
Office for Victims of Crime

Joel Hall
Associate Director, State Victim Resource Division
Office for Victims of Crime

Jennifer Yoo
Grants Management Specialist
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Christal McNeil-Wright
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Joanne M. Suttington
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Louise Duhamel
Assistant Director, Audit Liaison Group
Internal Review and Evaluation Office
Justice Management Division

OJP Executive Secretariat
Control Number OCOM000362

APPENDIX 6: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report

The Office of the Inspector General (OIG) provided a draft of this audit report to the Office of Justice Programs (OJP), the Refugee Dream Center (RDC), and Rhode Island Public Safety Grant Administration Office (PSGAO) for review and official comment. OJP's response is incorporated in Appendix 5, PSGAO's response is incorporated in Appendix 4, and RDC's response is incorporated in Appendix 3 of this final report. In response to our draft report, OJP agreed with our recommendations and, as a result, the status of the audit report is resolved. In its response, PSGAO agreed with our recommendations. RDC did not agree or disagree with our recommendations. The following provides the OIG analysis of the summary of actions necessary to close the report.

Recommendations OJP and PSGAO:

- 1. Ensure RDC develops and implements written policies and procedures: (1) specific to VOCA-funded program operations and distribute these among the relevant staff; and (2) specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant staff.**

Resolved. OJP agreed with our recommendation. In its response, OJP stated it will work with PSGAO to obtain a copy of RDC's written policies and procedures and evidence that RDC distributed the policies and procedures to staff.

PSGAO agreed with our recommendation and stated that RDC has begun to draft stronger policies and procedures and that PSGAO has connected RDC with the VOCA Center, as well as the OVC Training and Technical Assistance Center (TTAC) for direct training and technical assistance. PSGAO further stated that with this assistance, it believes RDC's policies can be updated and formalized to meet DOJ specifications.

RDC did not agree or disagree with this recommendation and stated in its response that it has taken significant steps to develop comprehensive policies and procedures and distributed them to relevant staff members. In addition, RDC provided a copy of its policies and procedures recently developed and implemented.

As both PSGAO and OJP stated that work would be coordinated to ensure RDC's policies met DOJ specifications, this recommendation is resolved. This recommendation can be closed when we receive documentation demonstrating that RDC has developed and implemented written policies and procedures: (1) specific to VOCA-funded program operations; and (2) specific to the performance reporting of VOCA-funded services, and that the guidance has been provided to relevant staff.

2. Ensure RDC's case management system effectively identifies victims served through the Breaking Barriers program and develops a method to accurately report its services provided.

Resolved. OJP agreed with our recommendation. In its response, OJP stated it will coordinate with PSGAO to obtain a copy of written policies and procedures to ensure accurate performance reporting of the victims served by the Breaking Barriers program.

PSGAO agreed with our recommendation and stated that RDC has begun to draft stronger policies and procedures and that PSGAO has connected RDC with the VOCA Center, as well as the OVC TTAC for direct training and technical assistance. PSGAO further stated that with this assistance, they believe RDC's policies can be updated and formalized to meet DOJ specifications.

RDC did not agree or disagree with this recommendation and stated in its response that it has implemented a new software solution that is specifically tailored to enhance its case management capabilities to effectively identify victims who have been served through the Breaking Barriers program. As part of this new data entry and management system, RDC said it is now able to enter and maintain data specific to its Breaking Barriers project to identify the clients served and services provided during the grant period.

This recommendation can be closed when we receive documentation demonstrating that the RDC's enhancements to its case management system effectively identify victims served through the Breaking Barriers program and provide a method that allows RDC to accurately report the services provided.

3. Ensure RDC develops and implements written policies and procedures to ensure compliance with the DOJ Grants Financial Guide and federal award requirements, including financial reporting, subaward expenditures, and matching costs.

Resolved. OJP agreed with our recommendation. In its response, OJP stated it will coordinate with PSGAO to obtain a copy of written policies and procedures to ensure compliance with the DOJ Grants Financial Guide and Federal award requirements, including financial reporting, subaward expenditures, and matching costs.

PSGAO agreed with our recommendation and stated that RDC has begun to draft stronger policies and procedures and that PSGAO has connected RDC with the VOCA Center, as well as the OVC TTAC for direct training and technical assistance. PSGAO further stated that with this assistance, they believe RDC's policies can be updated and formalized to meet DOJ specifications.

RDC did not agree or disagree with this recommendation and stated in its response that policies and procedures have been developed in alignment with the DOJ Grants Financial Guide and federal award requirements, ensuring compliance with the applicable regulations. RDC further stated that the policies and procedures have been disseminated to relevant staff. In addition, RDC provided recently developed written policies and procedures to address this recommendation.

As both PSGAO and OJP stated that work would be coordinated to ensure RDC's policies met DOJ specifications, this recommendation is resolved. This recommendation can be closed when we receive documentation demonstrating that RDC developed and implemented written policies and procedures to ensure compliance with the DOJ Grants Financial Guide and federal award requirements, including financial reporting, subaward expenditures, and matching costs.

4. Ensure RDC develops and implements written policies and procedures to ensure salaries and wages expenses charged to the subaward are based on records that accurately reflect the work performed and these records are supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.

Resolved. OJP agreed with our recommendation. In its response, OJP stated it will coordinate with the PSGAO to obtain a copy of RDC's written policies and procedures to ensure that employee salaries and wages expenses charged to subawards are based on records that accurately reflect the work performed.

PSGAO agreed with our recommendation and stated that RDC has begun to draft stronger policies and procedures and that PSGAO has connected RDC with the VOCA Center, as well as the OVC TTAC for direct training and technical assistance. PSGAO further stated that with this assistance, they believe RDC's policies can be updated and formalized to meet DOJ specifications.

RDC did not agree or disagree with this recommendation and stated in its response that it has developed policies and procedures specifically focused on ensuring that salaries and wages expenses charged to the subaward are accurate and based on records that reflect the work performed. In addition, RDC provided new timesheet documentation and a copy of recently updated policies and procedures for allocating time.

As both PSGAO and OJP stated that work would be coordinated to ensure RDC's policies met DOJ specifications, this recommendation is resolved. This recommendation can be closed when we receive documentation demonstrating that RDC developed and implemented written policies and procedures to ensure salaries and wages expenses charged to the subaward are based on records that accurately reflect the work performed and these records are supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.

5. Remedy \$342,048 in unsupported costs for the personnel and fringe benefits charged to the subaward.

Resolved. OJP agreed with our recommendation. In its response, OJP stated it will work with PSGAO to remedy the \$342,048 in questioned costs related to unsupported personnel and fringe benefits expenditures.

PSGAO agreed with our recommendation and agreed that timesheets from the RDC needed additional information. PSGAO further stated that RDC has begun to review, reform, and send records to the OIG.

RDC did not agree or disagree with this recommendation and stated in its response that updated timesheets now accurately reflect the daily work routines covered by various grants, including specific references to funding sources and time periods. RDC provided documentation of a new timesheet that identifies hours worked by grant program. However, this documentation does not include an explanation on how RDC addressed the \$342,048 in questioned costs.

This recommendation can be closed when we receive documentation demonstrating how RDC addressed the \$342,048 in unsupported costs for the personnel and fringe benefits charged to the subaward and that PSGAO and OJP have appropriately remedied these costs.

6. Remedy \$114,046 in unsupported costs for the match requirement.

Resolved. OJP agreed with our recommendation. In its response, OJP stated it will work with PSGAO to remedy the \$114,046 in questioned costs related to the unsupported match expenditures.

PSGAO agreed with our recommendation and agreed that more documentation is needed to substantiate RDC's match requirement. In the response, it also stated that it has an approved match waiver policy and will work with RDC to issue a match waiver where applicable or to update documentation where appropriate.

RDC did not agree or disagree with this recommendation and stated in its response that it is working with PSGAO to obtain a match waiver to resolve the unsupported costs associated with the match requirement.

This recommendation can be closed when we receive documentation demonstrating that the \$114,046 in questioned costs related to unsupported match expenditures has been appropriately remedied.

Recommendation to OJP:

7. Work with PSGAO to develop and implement written policies and procedures that ensure the Executive Director's (or equivalent) time and effort reports are reviewed, accurate, allowable, and properly allocated, and to ensure PSGAO subrecipients receive notification of the requirement.

Resolved. OJP agreed with our recommendation. In its response, OJP stated it will work with PSGAO to obtain a copy of its written policies and procedures to ensure that the Executive Director's time and effort reports are reviewed for accuracy, allowability, and proper allocation, and obtain evidence to ensure that PSGAO subrecipients receive notification of the requirement.

Although this recommendation was addressed only to OJP, PSGAO agreed with our recommendation. However, PSGAO also noted that the DOJ Financial Guide does not explicitly state that an Executive Director's timesheets must be approved by the agency's board of directors or other review process. However, PSGAO stated it has created a new policy requiring Executive Directors' timesheets to be approved by the agency's board of directors or other review process.

RDC did not agree or disagree with this recommendation and stated in its response that it will work with PSGAO to develop and implement written policies and procedures that address the requirements to ensure the Executive Director's time and effort reports are thoroughly reviewed, accurate, and comply with grant regulations.

This recommendation can be closed when we receive documentation demonstrating PSGAO's new policy requiring Executive Directors' timesheets to be approved by the agency's board of directors or other review process. In addition, this recommendation can be closed when we receive evidence that PSGAO subrecipients received notification of the requirement.