



Audit of the Office of Justice Programs Victim  
Assistance Funds Subawarded by the Oregon  
Department of Justice to J Bar J Youth Services,  
Bend, Oregon



AUDIT DIVISION

23-109

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REDACTED FOR PUBLIC RELEASE

*Redactions were made to the full version of the report for privacy reasons. The redactions are contained only in Appendix 3, the grantee's response, and are the names of a subgrantee and individual.*



# EXECUTIVE SUMMARY

## **Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Oregon Department of Justice to J Bar J Youth Services, Bend, Oregon**

### **Background**

The U.S. Department of Justice (DOJ) Office of Justice Programs (OJP) provided funds to the Oregon Department of Justice (Oregon DOJ) to make subawards to support victim assistance programs in the state of Oregon. Oregon DOJ awarded \$590,390 in crime victim assistance funds to J Bar J Youth Services (J Bar J) under one subaward in October 2020. The purpose of J Bar J's subaward was to provide services to victims of all forms of human trafficking throughout Central Oregon. As of March 31, 2023, Oregon DOJ reimbursed J Bar J for a cumulative amount of \$462,866 for the subaward we reviewed.

### **Audit Objective**

The objective of this DOJ Office of the Inspector General audit was to review how J Bar J 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**

We concluded that J Bar J provided services to human trafficking victims of crime throughout Central Oregon. However, we determined that J Bar J could improve certain areas of its award management, to include enhancing its programmatic and financial procedures.

#### **Program Performance Accomplishments**

Our audit found that J Bar J provided services to victims, organized meetings and events, and developed training to continue implementing victim-centered, collaborative, and sustainable approaches to combat human trafficking as well as enhance and sustain its multi-disciplinary team's missions. The audit also found that J Bar J submitted its programmatic reports timely, but the reports were incomplete because they did not include accomplishments attributable to a subgrantee to which J Bar J had further subawarded funds.

#### **Financial Management**

Our audit found that J Bar J commingled its VOCA grant funds with state grant funds, paid out \$6,601 in unapproved employee bonuses, and reported inaccurate volunteer match hours to Oregon DOJ. In addition, we identified issues related to the personnel expenditure activity of J Bar J's subgrantee.

#### **Recommendations**

Our report contains six recommendations to OJP and Oregon DOJ to assist J Bar J in improving its award management and administration and to remedy \$6,601 in questioned costs. We requested a response to our draft audit report from J Bar J, Oregon DOJ, 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 Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of victim assistance funds received by J Bar J Youth Services (J Bar J), which is located in Bend, Oregon. The Office of Justice Programs (OJP) Office for Victims of Crime (OVC) provided this funding to the Oregon Department of Justice (Oregon DOJ), which serves as the state administering agency (SAA) for Oregon and makes subawards to direct service providers. As a direct service provider, J Bar J received a subaward from Oregon DOJ totaling \$590,390 in October 2020. The Oregon DOJ subaward to J Bar J was funded by OJP's 2018-V2-GX-0033 and 2019-V2-GX-0015 federal grants, as shown in Table 1.

**Table 1**

**Audited Subaward to J Bar J from Oregon DOJ**

SAA Subaward Identifier	OJP Prime Award Numbers	Project Start Date	Project End Date	Subaward Amount
VOCA-FI-2020-JBarJ-00029	2018-V2-GX-0033, 2019-V2-GX-0015	10/01/2020	9/30/2023 <sup>a</sup>	\$590,390

<sup>a</sup> Oregon DOJ's original subaward was for \$381,295. On August 23, 2022, Oregon DOJ granted an additional \$209,095 and extended the project period from September 30, 2022, to September 30, 2023.

Source: Oregon DOJ Grant Award and amendment

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.<sup>1</sup> 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, and (4) provide victims of crime with a measure of safety and security. Direct service providers receiving VOCA victim assistance subawards thus 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.

## J Bar J Youth Services

According to its website, J Bar J is a 501(c)(3) non-profit corporation founded in 1968 and, as of February 2023, was the largest provider of services to youth and families in Central Oregon and has been a subrecipient of VOCA grants since 2018. Serving youths from the ages of 6 to 24 years old, J Bar J's programs include a residential facility for court ordered and behavioral rehabilitation services, emergency shelter and

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<sup>1</sup> 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.

support for youth in need, case management and crisis intervention, transitional shelter and temporary housing, mentorship, boarding school and alternative education programs.

J Bar J's anti-trafficking project entitled "at: project" (Anti-Trafficking Project) is one of the eight programs provided by J Bar J. The Anti-Trafficking Project helps victims of human trafficking become survivors by helping individuals regain independence, safety, and stability to rebuild their lives. The program provides comprehensive case management and crisis intervention, assistance in creating safety plans, and offering emotional support to survivors of sex and labor trafficking. Case managers work with survivors to access community resources such as psychological counseling, medical care, emergency housing, transportation, and academic needs. J Bar J applied for the Oregon DOJ grant to support and enhance its Deschutes County Commercial Sexual Exploitation of Children (CSEC) Response Team, which is administered by the Anti-Trafficking Project. According to J Bar J, the CSEC Response Team is a collaboration of agencies working together to coordinate and leverage resources to provide a comprehensive approach to child sex trafficking and services to victims and survivors, and consists of partners from law enforcement, prosecutors, government agencies, and service providers. In addition, the CSEC Response Team is responsible for responding to cases of human trafficking in Central Oregon.

## **OIG Audit Approach**

The objective of this audit was to review how J Bar J used the VOCA funds received through a subaward from Oregon DOJ to assist crime victims and assess whether J Bar J 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 subrecipient performance and administration of VOCA-funded programs, we solicited feedback from Oregon DOJ officials regarding J Bar J's record of delivering crime victim services, accomplishments, and compliance with Oregon DOJ award requirements.<sup>2</sup>

We tested compliance with what we considered to be the most important conditions of the subaward. 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; Oregon DOJ VOCA Subaward Handbook and Oregon DOJ VOCA Match Waiver Guidance; and the OVC and SAA award documents contain the primary criteria we applied during this audit.

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<sup>2</sup> As an SAA, Oregon DOJ is responsible for ensuring that J Bar J's subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. As such, we considered the results of our audit of victim assistance grants awarded to Oregon DOJ in performing this separate review. See U.S. Department of Justice Office of the Inspector General, [Audit of the Office of Justice Programs Victim Assistance Grants Awarded to the Oregon Department of Justice, Salem, Oregon](#), Audit Report 22-098 (August 2022), [oig.justice.gov/reports/audit-office-justice-programs-victim-assistance-grants-awarded-oregon-department-justice](https://oig.justice.gov/reports/audit-office-justice-programs-victim-assistance-grants-awarded-oregon-department-justice).

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.

# 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. J Bar J received its VOCA funding from Oregon DOJ to enhance and sustain the CSEC Response Team to continue implementing victim-centered, collaborative, and sustainable approaches to combat human trafficking. This effort included the use of coordinated training, public awareness and outreach efforts, and trauma-informed screening and interview techniques. Additionally, VOCA funding from Oregon DOJ was used to build, expand, and sustain capacity to provide direct services, assistance, and referrals to child and youth victims of human trafficking. Specifically, J Bar J utilized its VOCA funds to pay the salaries of its Victim Advocates, Training and Awareness Coordinator, CSEC Response Team Coordinator, and Program Manager, as well as rent, indirect costs, and a subgrant agreement. We obtained an understanding of J Bar J's standard operating procedures in relation to the subaward funded services. We also reviewed the project application and subaward agreement against available evidence of accomplishments to determine whether J Bar J demonstrated adequate progress towards providing the services for which it was funded. Overall, we concluded that J Bar J adhered to its subaward goals. However, we believe J Bar J would benefit from enhanced written programmatic and financial procedures, as discussed below.

## 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 standard operating procedures in relation to audited victim services, we conducted interviews with the Chief Operating Officer, Finance Director, Program Manager, and CSEC Response Team Coordinator. We also requested J Bar J's written policies and procedures that govern the VOCA-funded program.

We found that J Bar J's Financial Management Policies and Procedures had general procedures related to payroll, revenue posting, cost allocation, timekeeping, and internal controls. However, we noted that J Bar J did not have detailed programmatic procedures that provided guidance on how to track and report performance measures and goals, including those related to its subgrant. The lack of procedures may have led to instances of noncompliance we found and discuss in the following section.

## *Subgrant Monitoring*

J Bar J subawarded \$91,850 to a subgrantee to pay for 30 percent of the services of a victim advocate over a 3-year period. The victim advocate is responsible for providing comprehensive assessment, case management, and service navigation to victims of human trafficking in Central Oregon. Also, the position is responsible for providing outreach, crisis response, on-call support, and service coordination. According to J Bar J's grant application, J Bar J had partnered with its subgrantee on several projects and client support cases and its subgrantee approached J Bar J about being included in J Bar J's application for the Oregon DOJ VOCA subaward as J Bar J's subgrantee. Subsequently, J Bar J issued its subgrantee a sole-source subaward

from its subgrant issued by Oregon DOJ. As part of the subgrant requirements, the subgrantee was required to submit to J Bar J: (1) quarterly outcome measure reports and client feedback forms; (2) quarterly financial reports; (3) quarterly performance measurement reports; and (4) annual narrative reports.

According to an Oregon DOJ official, J Bar J was consistently delinquent in its quarterly financial reporting. A J Bar J official explained that its quarterly financial reports to Oregon DOJ were late because the subgrantee submitted its invoices to J Bar J late. An official from J Bar J's subgrantee told us that its invoices were late because of its own internal approval process.<sup>3</sup> Also, J Bar J's subgrantee failed to submit the required quarterly outcome measures, quarterly performance measures, and annual VOCA narrative reports. Although J Bar J submitted programmatic progress reports timely, the submitted reports were incomplete because they did not include the accomplishments of J Bar J's subgrantee.

J Bar J's Chief Operating Officer stated that it was aware of the subgrantee's failure to provide the programmatic progress reports since the inception of the subaward and J Bar J struggled to have the subgrantee comply with the subgrant requirements. Without proper reporting, J Bar J does not have full visibility on its subgrantee's achievements and progress towards meeting the subgrant goals, which puts J Bar J at risk of being in violation of its subaward from Oregon DOJ. Due to various factors, J Bar J decided not to extend its subaward relationship with this subgrantee beyond the end of this grant period, September 30, 2023.

We believe that to ensure compliance with federal grant reporting requirements, J Bar J must have written procedures related to programmatic reporting. The procedures should include controls to help ensure that programmatic reports are complete, including overseeing any subgrantees to ensure they are complying with subgrant reporting requirements and making progress towards program goals. As the primary subaward recipient, such procedures will also help J Bar J ensure its reports are accurate and timely, as required by its Oregon DOJ subaward reporting requirements. Therefore, we recommend that OJP and Oregon DOJ ensure that J Bar J establish written policies and procedures related to programmatic progress tracking and reporting and distribute these among the relevant officials and staff.

## Program Services

According to the subaward, J Bar J's goals were to enhance and sustain the CSEC Response Team's implementation of victim-centered, collaborative, and sustainable approaches to combat human trafficking, as well as to build, expand, and sustain capacity to provide direct services, assistance, and referrals to child and youth victims of human trafficking. To achieve its goals, J Bar J planned to review the CSEC Response Team's protocols, hold CSEC Response Team meetings, develop training and facilitate community outreach, provide holistic case management, and provide 24-hour response to clients and partners.

Based on our interviews with J Bar J officials, as well as review of client survey forms and evidence of task force events, we determined J Bar J used the subaward for the purposes for which it received funding.

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<sup>3</sup> We discuss our review of all financial matters in the [Financial Management](#) section of this report.



## **Financial Management**

According to the DOJ Grants Financial Guide, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records to accurately account for awarded funds. We interviewed J Bar J officials, reviewed available policies and procedures, reviewed accounting records, and judgmentally selected samples from J Bar J for our expenditure testing to determine whether J Bar J adequately accounted for the subaward funds. We also interviewed J Bar J's subgrantee and performed limited testing of its invoices to J Bar J. We identified ways J Bar J could improve its financial management related to its accounting of grant funds, expenditure review, and match reporting.

### **Fiscal Policies and Procedures**

J Bar J's Finance Director oversaw day-to-day finance operations such as accounts receivable, accounts payable, and payroll duties. The Finance Director explained that timecards are completed by the staff and approved by their supervisors. J Bar J's accounting system maintains an audit trail of edits, and the Finance Director set up varying access levels or permissions within the system to ensure appropriate access controls. J Bar J also hired external auditors to perform annual audits and help ensure the staff is following J Bar J's internal financial controls.

We determined that J Bar J exercised adequate separation of duties with regards to the financial practices that we reviewed. However, J Bar J's Finance Director told us that J Bar J lacked written procedures for grant financial management and that J Bar J relies on employees with institutional knowledge to perform grant-related responsibilities. The lack of written grant financial management procedures may have led to instances of noncompliance we found and discuss in the sections below.

### ***Commingling***

J Bar J's Financial Management Policies and Procedures states that each restricted grant will be set up as a separate cost center class within J Bar J's applicable program to allow for accurate and consistent recording of expenses for each grant, which J Bar J did to manage its VOCA subaward revenues and expenditures. However, we found that J Bar J did not restrict this cost center to the VOCA subaward and commingled its VOCA funds with state grant funds for housing. According to the Finance Director, this practice was adopted for convenience and could not provide an adequate explanation for why this occurred. The DOJ Grants Financial Guide states that all recipients and subrecipients must establish and maintain adequate accounting systems and financial records to accurately account for funds awarded to them. By commingling its VOCA funds with state grant funds, J Bar J risks not being able to accurately account for and report on its spending related to the Oregon DOJ subaward and related VOCA grants. Therefore, we recommend that OJP and Oregon DOJ ensure that J Bar J maintain an adequate accounting process that separately and accurately tracks all federal financial assistance.

### **Subaward Expenditures and Matching Costs**

J Bar J requested reimbursement for subaward expenditures on a quarterly basis via Oregon DOJ's web-based grant management system. J Bar J's Chief Operating Officer submitted the reimbursement requests in the system after reviewing the reimbursement forms and supporting documents prepared by the Finance Director. For the subaward we audited, J Bar J's approved budget included salaries, personnel expenses,

contractual services, office supplies, rent, and indirect costs. As of March 31, 2023, we found that Oregon DOJ reimbursed J Bar J a total of \$462,866 (approximately 78 percent of the \$590,390 subawarded).

We reviewed a sample of J Bar J 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 16 expenditure transactions totaling \$94,345. The transactions we reviewed included costs in the following categories: salaries, fringe benefit expenses, contractual services, rent, and indirect costs.

Oregon DOJ waived J Bar J's match requirement in March 2022, after J Bar J had reported match on two quarterly financial reports. We discuss our review of J Bar J's match transactions in the [Matching Requirements](#) section of this report.

As described below, we found issues in the areas of personnel costs, contractual services, and match, and identified a total of \$6,601 in questioned costs. Unless noted below, the remaining transactions tested were allowable and adequately supported.

### ***Personnel Costs***

The largest cost area for which J Bar J received reimbursement was personnel costs. We selected a judgmental sample of 10 salary and fringe transactions totaling \$73,153, which included one transaction for each quarter of the subaward period. We determined that our personnel costs sample included salary, bonus payments, and fringe transactions, and J Bar J's salary and fringe were allowable and supported. However, our transaction sample included a total of \$3,220 in employee bonuses, and these bonuses were not authorized. OVC allows bonuses when permitted by the SAA and when paid in accordance with 2 C.F.R. § 200.430. J Bar J had not included employee bonuses in its Oregon DOJ subaward application, nor did it inform Oregon DOJ of its intention to pay employee bonuses with VOCA funds. When we asked about these transactions, the Chief Operating Officer confirmed that the bonuses were not authorized by Oregon DOJ and explained that it was an oversight. We reviewed the rest of J Bar J's VOCA expenditures and found a total of \$6,601 in bonuses that J Bar J paid from its VOCA funds, which included the \$3,220 mentioned above. As a result of this noncompliance with VOCA Guidelines, we question the \$6,601 in subaward funds paid for employee bonuses. We recommend OJP and Oregon DOJ remedy the \$6,601 in unapproved employee bonuses charged to the subaward.

### ***Subgrantee Expenditures***

J Bar J's subgrantee is required to send its invoices to J Bar J on a quarterly basis for reimbursement. The Finance Director informed us that the Chief Operating Officer receives and reviews J Bar J's subgrantee's quarterly invoices, who in turn forwards the invoices to the Finance Director for payment. We judgmentally selected a sample of two of the subgrantee's quarterly invoices that were submitted to J Bar J, and we separately obtained supporting documentation from the subgrantee. We confirmed that the subgrantee invoiced J Bar J in accordance with J Bar J's Oregon DOJ budget estimate of 30 percent for this subgrantee's victim advocate's work performed. However, when we reviewed the victim advocate's detailed timekeeping records for the sampled quarterly invoices, we determined that the victim advocate's subgrant-related work equated to 19 percent during the period of July 2021 through September 2021 and 17 percent during the period of October 2022 and December 2022, significantly less than the 30 percent billed to J Bar J. For these two periods, the difference between the amount the subgrantee charged J Bar J for personnel and the

amount supported by its timesheets for the same periods totaled \$6,926. According to 2 C.F.R § 200.430(i)(1), charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed and supported by a system of internal control, which provides reasonable assurance that the charges are accurate, allowable, and properly allocated.<sup>4</sup> Additionally, OJP's Time and Effort Best Practices for VOCA Funded Personnel states that estimates cannot be used to support charges to federal awards without reconciling after-the-fact charges of actual activity of each employee.

Because our testing of J Bar J's subgrantee personnel costs was done on a sample basis, we do not know if the subgrantee or J Bar J later performed a reconciliation to confirm that the personnel charges, as budgeted at 30 percent of the individual's salary, was a reasonable approximation of the actual activity performed. Therefore, we recommend that OJP and Oregon DOJ require J Bar J obtain its subgrantee's timekeeping records for the entire period of this grant, determine any amount overcharged, and remedy accordingly.

When we brought this matter to J Bar J's attention, J Bar J informed its subgrantee of our finding as it relates to the disparity between reimbursement and timekeeping records. J Bar J's COO informed us that J Bar J did not review any supporting documentation related to its subgrantee's invoices. In reviewing J Bar J's written policies and procedures, we determined that J Bar J did not have procedures or controls in place to review and ensure that the subgrantee's invoices were accurate and supported. Therefore, we recommend that OJP and Oregon DOJ ensure that J Bar J implements procedures to ensure that invoices received from J Bar J's subgrantee are accurate and reflective of the work performed.

### ***Matching Requirement***

VOCA Guidelines generally require that subrecipients match 20 percent of each subaward unless OVC waives this requirement. The purpose of this requirement is to increase the amount of resources available to VOCA projects, prompting subrecipients to obtain independent resources to leverage federal funding and encourage investment and engagement in VOCA-funded projects. Match contributions must come from non-federal sources and can be either cash or in-kind match.<sup>5</sup> The SAA has primary responsibility for ensuring subrecipient compliance with the matching requirements.

In March 2022, following guidance from the VOCA Fix to Sustain the Crime Victims Fund Act of 2021, Oregon DOJ waived J Bar J's match requirement for the remainder of the subaward period of performance. However, prior to the waiver, J Bar J had reported match within its financial reports for the period October 2020 through March 2021. During this period, J Bar J identified its in-kind match of an employee who was paid with non-VOCA funds and volunteer hours of the CSEC Response Team meeting attendees hosted by J Bar J. To review J Bar J's compliance with the match requirement prior to receiving the waiver, we reviewed J Bar J's payroll records for the quarter period ending in March 2021. We also reviewed J Bar J's match volunteer log identifying meeting dates, attendee names, and organizations, and we reconciled the names to J Bar J's VOCA accounting and timekeeping records, as well as J Bar J's subgrantee's timekeeping

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<sup>4</sup> 2 C.F.R § 200.430(i)(1)(viii) states that budget estimates alone, determined before the services are performed, do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that the system for establishing the estimates produces reasonable approximations of the actual activity performed.

<sup>5</sup> In-kind match contributions 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.

records. In addition, we reviewed J Bar J's payroll records for the in-kind match and found it to be supported and accurate. However, we determined that the volunteer match reported was inaccurate because J Bar J had included the hours worked by VOCA-funded employees also as volunteer match hours. According to 2 C.F.R § 200.434(c), services donated or volunteered to the non-federal entity may be furnished to a non-Federal entity by professional and technical personnel, consultants, and other skilled and unskilled labor, and may be used for matching requirements. However, these services may not be charged to the federal award either as a direct or indirect cost. J Bar J's COO confirmed that the inclusion of those employees' hours was an oversight.

We reviewed J Bar J's Federal Grant Match Policy and determined that it did not prescribe controls to validate the accuracy and appropriateness of match transactions to ensure volunteer hours do not include hours reimbursed by VOCA funds. Because Oregon DOJ had waived J Bar J's match requirement, we have not identified the overstated volunteer match as questioned costs. However, we recommend that OJP and Oregon DOJ ensure that J Bar J enhance its procedures to incorporate controls to validate the accuracy and appropriateness of in-kind match contributions to federal awards.

## Conclusion and Recommendations

As a result of our audit testing, we concluded that J Bar J provided services to human trafficking victims of crime throughout Central Oregon. However, we determined that J Bar J could improve certain areas of its award management, to include enhancing its procedures related to programmatic reporting and financial procedures to ensure review of subgrantee expenditures, validation of accuracy and appropriateness of in-kind match contributions, and compliance with the DOJ Grants Financial Guide. We provide six recommendations to OJP and Oregon DOJ to address these deficiencies and remedy \$6,601 in dollar-related findings.

We recommend that OJP and Oregon DOJ:

1. Ensure that J Bar J establish written policies and procedures related to programmatic progress tracking and reporting and distribute these among the relevant officials and staff.
2. Ensure that J Bar J maintain an adequate accounting process that separately and accurately tracks all federal financial assistance.
3. Remedy the \$6,601 in unapproved employee bonuses charged to the subaward.
4. Require J Bar J obtain its subgrantee's timekeeping records for the entire period of this grant, determine any amount overcharged, and remedy accordingly.
5. Ensure that J Bar J implements procedures to ensure that invoices received from J Bar J's subgrantee are accurate and reflective of the work performed.
6. Ensure that J Bar J enhance its procedures to incorporate controls to validate the accuracy and appropriateness of in-kind match contributions to federal awards.

# APPENDIX 1: Objective, Scope, and Methodology

## Objective

The objective of this audit was to review how J Bar J Youth Services (J Bar J) used the Victims of Crime Act (VOCA) funds received through a subaward from the Oregon Department of Justice (Oregon DOJ) 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 VOCA-FI-2020-JBarJ-00029 subaward to J Bar J. This subaward, totaling \$590,390, was funded by Oregon DOJ from VOCA grants 2018-V2-GX-0033 and 2019-V2-GX-0015 awarded by the Office of Justice Programs (OJP) Office for Victims of Crime (OVC). As of March 31, 2023, Oregon DOJ had reimbursed J Bar J \$462,866 in subaward funds.

Our audit concentrated on, but was not limited to, the period of October 2020 through March 2023. 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; Oregon DOJ guidance; and the OVC and Oregon DOJ award documents contain the primary criteria we applied during the audit.

To accomplish our objective, we tested compliance with what we considered to be the most important conditions of J Bar J's activities related to the audited subaward. Our work included conducting interviews with J Bar J financial staff, examining policies and procedures, and reviewing subaward documentation and financial records. We performed sample-based audit testing for salaries, fringe benefits, bonus, rent, and match reported. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the subaward reviewed. This non-statistical 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 OJP's Performance Measurement Tool, Oregon DOJ's grant management system and J Bar J's financial 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 J Bar J to provide assurance on its internal control structure as a whole. J Bar J 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 J Bar J's internal control structure as a whole, we offer this statement solely for the information and use of J Bar J, Oregon DOJ and OJP.<sup>6</sup>

In planning and performing our audit, we identified internal control components and underlying internal control principles as significant to the audit objective. Specifically, we reviewed the design and implementation of J Bar J's written policies and procedures. We also tested the existence, implementation, and operating effectiveness of J Bar J's controls over management of VOCA funds and expenditures, as well as 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 those internal control components and underlying principles that we found significant to the objective of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

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<sup>6</sup> 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 Numbers	Oregon DOJ Subaward Identifier	Amount	Page
<b>Questioned Costs:<sup>7</sup></b>				
Unallowable Employee Bonuses	2018-V2-GX-0033	VOCA-FI-2020-JBarJ-00029	\$2,570	7
	2019-V2-GX-0015	VOCA-FI-2020-JBarJ-00029	<u>\$4,031</u>	7
Total Unallowable Costs			\$6,601	
<b>TOTAL DOLLAR-RELATED FINDINGS</b>			<b><u>\$6,601</u></b>	

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<sup>7</sup> **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: J Bar J's Response to the Draft Audit Report

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### J BAR J YOUTH SERVICES

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August 25, 2023

David J. Gaschke  
Regional Audit Manager  
U.S. Department of Justice  
Office of the Inspector General  
San Francisco Regional Audit Office  
90 7<sup>th</sup> Street, Suite 3-100  
San Francisco, California 94103

Dear Mr. Gaschke:

This letter serves as the official response from J Bar J Youth Services (J Bar J) to the U.S. Department of Justice (DOJ), Office of the Inspector General (OIG) draft audit report, dated August 24, 2023, on the Audit of the Office of Justice Programs Victims Assistance Funds Subawarded by the Oregon Department of Justice to J Bar J Youth Services. Below are individual responses to each of the six recommendations, to include correction actions completed, in process and planned, as well as a timeline for completing all corrective actions:

- 1. Ensure that J Bar J establish written policies and procedures related to programmatic progress tracking and reporting and distribute these among the relevant officials and staff.**  
J Bar J Youth Services agrees with this recommendation. J Bar J will establish written policies and procedures related to programmatic progress tracking and reporting, to include the tracking and reporting of performance measures and goals, including those related to any subgrant, and will distribute these policies and procedures to all relevant staff. This corrective action is in process and will be completed by October 31, 2023.
- 2. Ensure that J Bar J maintain an adequate accounting process that separately and accurately tracks all federal financial assistance.**  
J Bar J Youth Services agrees with this recommendation. J Bar J has established separate cost center classes for each federal funding source. This corrective action is complete.
- 3. Remedy the \$6,601 in unapproved employee bonuses charged to the subaward.**  
J Bar J Youth Services agrees with this recommendation. J Bar J will remedy this recommendation by completing a Supplemental Financial Report and reimbursing Oregon DOJ for the bonuses totaling \$6,601. J Bar J spoke with Oregon DOJ on August 25, 2023 regarding how to complete this process. This corrective action will be completed by September 15, 2023.
- 4. Require J Bar J obtain its subgrantee's timekeeping records for the entire period of this grant, determine any amount overcharged, and remedy accordingly.**  
J Bar J Youth Services agrees with this recommendation. J Bar J met with [REDACTED] on August 23, 2023 regarding this recommendation. [REDACTED] is in process of compiling all required documentation to determine any amount overcharged.

J Bar J will acquire and review all documentation in order to remedy this recommendation and assist in the process of repaying any overcharging found. Additionally, J Bar J has ended the subgrant with the [REDACTED]. This corrective action will be completed by October 31, 2023.

**5. Ensure that J Bar J implements procedures to ensure that invoices received from J Bar J's subgrantee are accurate and reflective of the work performed.**

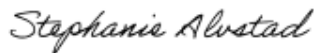
J Bar J Youth Services agrees with this recommendation. J Bar J will establish written policies, procedures and controls in order to ensure subgrantee invoices and financial reporting are accurate, fully reflect the work performed, and are timely. This corrective action will be completed by October 31, 2023.

**6. Ensure that J Bar J enhance its procedures to incorporate controls to validate the accuracy and appropriateness of in-kind match contributions to federal awards.**

J Bar J Youth Services agrees with this recommendation. J Bar J will establish written policies, procedures and controls related to matching funds, including in-kind match contributions. This corrective action will be completed by October 31, 2023.

If you have any questions related to this response. Please do not hesitate to contact one of us at (541)389-1409.

Sincerely,



Stephanie Alvstad  
Chief Executive Officer/President  
J Bar J Youth Services



Deirdre Kasberger  
Chief Operating Officer  
J Bar J Youth Services

cc: Marjorie Doran  
Grant Fund Coordinator  
Crime Victim and Survivor Services  
Oregon Department of Justice

Letetia Wilson  
Fund Coordinator  
Crime Victim and Survivor Services  
Oregon Department of Justice

Lauren Bagley  
Finance Director  
J Bar J Youth Services

# APPENDIX 4: Oregon Department of Justice Response to the Draft Audit Report

ELLEN F. ROSENBLUM  
Attorney General



LISA M. UDLAND  
Deputy Attorney General

## DEPARTMENT OF JUSTICE CRIME VICTIM AND SURVIVOR SERVICES DIVISION

September 5, 2023

David J. Gaschke  
Regional Audit Manager  
U.S. Department of Justice  
Office of the Inspector General  
San Francisco Regional Audit Office  
90 7th Street, Suite 3-100  
San Francisco, California 94103  
VIA: Electronic Mail at: David.J.Gaschke@usdoj.gov.

Re: J Bar J Youth Services, Bend, OR, Audit Draft  
Report Issue Date: August 24, 2023

Dear Mr. Gaschke,

The U.S. Department of Justice (DOJ), Office of the Inspector General (OIG), San Francisco Regional Audit Office, issued a draft audit report, dated August 24, 2023, to the Office of Justice Programs (OJP), related to an audit of Sub-Award Number VOCA-FI-2020-JBarJ-00029, made by the Oregon Department of Justice (Oregon DOJ), to J Bar J Youth Services (J Bar J), under OJP's Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 2018-V2-GX-0033 and 2019-V2-GX-0015.

The draft report contains six recommendations and \$6,601 in questioned costs. We understand that as the direct recipient of OJP grant funds, Oregon DOJ is required to work directly with J Bar J to address each of the recommendations.

**1. The OIG recommended that Oregon DOJ work with J Bar J to ensure that J Bar J establish written policies and procedures related to programmatic progress tracking and reporting and distribute these among the relevant officials and staff.**

- a. Oregon DOJ concurs with this recommendation.
- b. Name and number of contact person responsible for working J Bar J Youth Services on their corrective plan:  
*Marjorie Doran, 971-239-8338*
- c. Specific steps taken to comply with the recommendation:  
*J Bar J will establish written policies and procedures related to programmatic progress tracking and reporting, to include the tracking and reporting of performance measures and goals, including those related to any subgrant, and will*

1162 Court Street NE, Salem, OR 97301-4096  
Telephone: (503) 378-5348 Fax: (503) 378-5738 TTY: (800) 735-2900 www.doj.state.or.us

*distribute these policies and procedures to all relevant staff. J Bar J states this corrective action is in process and will be complete by October 31, 2023. J Bar J will provide OR DOJ with documentation supporting the completion of this action. Upon receipt of J Bar J documentation of completion, Oregon DOJ will review and forward information to OIG.*

2. **The OIG recommended that Oregon DOJ work with J Bar J to ensure that J Bar J maintain an adequate accounting process that separately and accurately tracks all federal financial assistance.**
  - a. Oregon DOJ concurs with this recommendation.
  - b. Name and number of contact person responsible for working J Bar J Youth Services on their corrective plan:  
*Marjorie Doran, 971-239-8338*
  - c. Specific steps taken to comply with the recommendation:  
*J Bar J will establish separate cost center classes for each federal funding source and provide OR DOJ with documentation supporting the completion of this action. J Bar J states this corrective action is now complete. J Bar J will provide OR DOJ with documentation supporting the completion of this action. Upon receipt of J Bar J documentation of completion, Oregon DOJ will review and forward information to OIG.*
  
3. **The OIG recommends that OR DOJ work with J Bar J to remedy the \$6,601 in unapproved employee bonuses charged to the subaward.**
  - a. Oregon DOJ concurs with this recommendation.
  - b. Name and number of contact person responsible for working J Bar J Youth Services on their corrective plan:  
*Marjorie Doran, 971-239-8338*
  - c. Specific steps taken to comply with this recommendation:  
*J Bar J will remedy this recommendation by completing a Supplemental Financial Report and reimbursing Oregon DOJ for the bonuses totaling \$6,601. J Bar J states this corrective action will be complete by September 15, 2023. J Bar J will provide OR DOJ with documentation supporting the completion of this action. Upon receipt of J Bar J documentation of completion, Oregon DOJ will review and forward information to OIG.*
  
4. **The OIG recommends that OR DOJ work with J Bar J to obtain its subgrantee's timekeeping records for the entire period of this grant, determine any amount overcharged, and remedy accordingly.**
  - a. Oregon DOJ concurs with this recommendation.
  - b. Name and number of contact person responsible for working J Bar J Youth Services on their corrective plan:  
*Marjorie Doran, 971-239-8338*
  - c. Specific steps taken to comply with this recommendation:  
*J Bar J will acquire and review all documentation in order to remedy this recommendation and assist in the process of repaying any overcharging found. J*

*Bar J states this corrective action will be complete by October 31, 2023. J Bar J will provide OR DOJ supporting documentation to demonstrate the determination of any amount overcharged and the return of funds. Upon receipt of J Bar J documentation of completion, Oregon DOJ will review and forward information to OIG.*

- 5. The OIG recommends that OR DOJ work with J Bar J to ensure J Bar J implements procedures to ensure that invoices received from J Bar J's subgrantee are accurate and reflective of the work performed.**
  - a. Oregon DOJ concurs with this recommendation.
  - b. Name and number of contact person responsible for working J Bar J Youth Services on their corrective plan:  
*Marjorie Doran, 971-239-8338*
  - c. Specific steps taken to comply with this recommendation:  
*J Bar J will establish written policies, procedures and controls in order to ensure subgrantee invoices and financial reporting are accurate, fully reflect the work performed, and are timely. J Bar J states this corrective action will be complete by October 31, 2023. J Bar J will provide OR DOJ with documentation supporting the completion of this action. Upon receipt of J Bar J documentation of completion, Oregon DOJ will review and forward information to OIG.*
  
- 6. The OIG recommends that OR DOJ work with J Bar J to ensure that J Bar J enhances its procedures to incorporate controls to validate the accuracy and appropriateness of in-kind match contributions to federal awards.**
  - a. Oregon DOJ concurs with this recommendation.
  - b. Name and number of contact person responsible for working J Bar J Youth Services on their corrective plan:  
*Marjorie Doran, 971-239-8338*
  - c. Specific steps taken to comply with this recommendation:  
*J Bar J will establish written policies, procedures, and controls related to matching funds, including in-kind match contributions. J Bar J states this corrective action will be complete by October 31, 2023. J Bar J will provide OR DOJ with documentation supporting the completion of this action. Upon receipt of J Bar J documentation of completion, Oregon DOJ will review and forward information to OIG.*

If you have any questions related to this response, please contact Marjorie Doran, OR DOJ, CVSSD, VOCA Fund Coordinator, at 971-239-8338 or [Marjorie.doran@doj.state.or.us](mailto:Marjorie.doran@doj.state.or.us)

Sincerely,



Shannon Sivell  
Director  
Oregon Department of Justice, CVSSD

September 5, 2023

Page 4

Enclosure

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

Stephanie Alvstad  
Chief Executive Officer  
J Bar J Youth Services

Deirdre Kasberger  
Chief Operating Officer  
J Bar J Youth Services

# 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

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Washington, D.C. 20531

September 13, 2023

MEMORANDUM TO: David J. Gaschke  
Regional Audit Manager  
San Francisco Regional Audit Office  
Office of the Inspector General

FROM: Jeffery 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 Oregon Department of Justice to J Bar J Youth Services, Bend, Oregon*

This memorandum is in response to your correspondence, dated August 23, 2023, transmitting the subject draft audit report for J Bar J Youth Services (J Bar J). J Bar J received sub-award funds from the Oregon Department of Justice (Oregon DOJ), under the Office of Justice Programs' (OJP), Victims of Crime Act, Victim Assistance Formula Grant Program, Grant Numbers 2018-V2-GX-0033 and 2019-V2-GX-0015. We consider the subject report resolved and request written acceptance of this action from your office.

The draft audit report contains **six** recommendations and **\$6,601** 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 Oregon DOJ ensure that J Bar J establish written policies and procedures related to programmatic progress tracking and reporting and distribute these among the relevant officials and staff.**

OJP agrees with the recommendation. In its response, dated September 5, 2023, Oregon DOJ stated that it will require J Bar J to establish written policies and procedures related to programmatic progress tracking and reporting, to include the tracking and reporting of performance measures and goals, and distribute those policies and procedures to all relevant staff, which it anticipates will be completed by October 31, 2023.

Accordingly, we will coordinate with Oregon DOJ to obtain a copy of J Bar J's written policies and procedures, developed and implemented, related to programmatic progress tracking and reporting. In addition, we will coordinate with Oregon DOJ to obtain evidence that J Bar J distributed the policies and procedures to all staff responsible for managing Federal grant funds.

2. **We recommend that OJP and Oregon DOJ ensure that J Bar J maintain an adequate accounting process that separately and accurately tracks all federal financial assistance.**

OJP agrees with the recommendation. In its response, dated September 5, 2023, Oregon DOJ stated that it will require J Bar J to establish separate cost center classes for each Federal funding source, which J Bar J stated has already been completed.

Accordingly, we will coordinate with Oregon DOJ to obtain evidence from J Bar J that it has established a separate cost center in its accounting system, to track its VOCA Federal funding. In addition, we will coordinate with Oregon DOJ to obtain a copy of J Bar J's written policies and procedures, developed and implemented, to ensure that all Federal financial assistance funds are separately and accurately recorded in J Bar J's accounting system. Further, we will coordinate with Oregon DOJ to obtain evidence that J Bar J distributed the policies and procedures to staff responsible for managing Federal grant funds.

3. **We recommend that OJP and Oregon DOJ remedy the \$6,601 in unapproved employee bonuses charged to the subaward.**

OJP agrees with the recommendation. In its response, dated September 5, 2023, Oregon DOJ stated that it will require J Bar J to complete a Supplemental Financial Report and reimburse Oregon DOJ for the bonuses, totaling \$6,601. Oregon DOJ stated that J Bar J anticipates that this action will be completed by September 15, 2023.

Accordingly, we will review the \$6,601 in questioned costs, related to unapproved employee bonuses that were charged to Grant Numbers 2018-V2-GX-0033 (\$2,570) and 2019-V2-GX-0015 (\$4,031), and will work with Oregon DOJ to remedy, as appropriate.

4. **We recommend that OJP and Oregon DOJ require J Bar J [to] obtain its subgrantee's timekeeping records for the entire period of this grant, determine any amount overcharged, and remedy accordingly.**

OJP agrees with the recommendation. In its response, dated September 5, 2023, Oregon DOJ stated that it will require J Bar J to provide it with supporting documentation to demonstrate the determination of any amount overcharged by its subgrantee, and return those funds. Oregon DOJ stated that J Bar J intends to complete this by October 31, 2023.

Accordingly, we will coordinate with Oregon DOJ to obtain documentation to support J Bar J's subgrantee personnel costs, covering the entire period of its subaward, that were reimbursed under Grant Numbers 2018-V2-GX-0033 and 2019-V2-GX-0015, to determine if the subgrantee overcharged the subaward; and if so, ensure that all overcharged amounts are appropriately remedied.



**5. We recommend that OJP and Oregon DOJ ensure that J Bar J implements procedures to ensure that invoices received from J Bar J's subgrantee are accurate and reflective of the work performed.**

OJP agrees with the recommendation. In its response, dated September 5, 2023, Oregon DOJ stated that it will require J Bar J to establish written policies, procedures, and controls, to ensure that subgrantee invoices and financial reporting are accurate, fully reflect the work performed, and are timely submitted. Oregon DOJ stated that it anticipates providing this documentation by October 31, 2023.

Accordingly, we will coordinate with Oregon DOJ to obtain a copy of J Bar J's written policies and procedures, developed and implemented, to ensure that invoices from J Bar J's subgrantee are accurate and reflective of the work performed. In addition, we will coordinate with Oregon DOJ to obtain evidence that J Bar J distributed the policies and procedures to staff responsible for managing Federal grant funds.

**6. We recommend that OJP and Oregon DOJ ensure that J Bar J enhance its procedures to incorporate controls to validate the accuracy and appropriateness of in-kind match contributions to federal awards.**

OJP agrees with the recommendation. In its response, dated September 5, 2023, Oregon DOJ stated that it will require J Bar J to establish written policies, procedures, and controls, related to matching funds, including in-kind match contributions, which it anticipates will be provided by October 31, 2023.

Accordingly, we will coordinate with Oregon DOJ to obtain a copy of J Bar J's written policies and procedures, developed and implemented, to ensure that appropriate controls are established to validate the accuracy and appropriateness of in-kind matching contributions for Federal awards.

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, of my staff 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

cc: Kristina Rose  
Director  
Office for Victims of Crime

Katherine Darke Schmitt  
Principal Deputy Director  
Office for Victims of Crime

Kathrina S. Peterson  
Deputy Director  
Office for Victims of Crime

James Simonson  
Associate Director for Operations  
Office for Victims of Crime

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

Jennifer Yoo  
Grants Management Specialist  
Office for Victims of Crime

Rachel Johnson  
Chief Financial Officer

Christal McNeil-Wright  
Associate Chief Financial Officer  
Grants Financial Management Division  
Office of the Chief Financial Officer

Joanne M. Suttington  
Associate Chief Financial Officer  
Finance, Accounting, and Analysis Division  
Office of the Chief Financial Officer

Aida Brumme  
Manager, Evaluation and Oversight Branch  
Grants Financial Management Division  
Office of the Chief Financial Officer

Louise Duhamel  
Assistant Director, Audit Liaison Group  
Internal Review and Evaluation Office  
Justice Management Division

cc: Jorge L. Sosa  
Director, Office of Operations – Audit Division  
Office of the Inspector General

OJP Executive Secretariat  
Control Number OCOM000520

## **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 Oregon Department of Justice (Oregon DOJ) and J Bar J Youth Services (J Bar J). OJP's response is incorporated in Appendix 5, Oregon DOJ's response is incorporated in Appendix 4, and J Bar J's response is incorporated in Appendix 3 of this final report. In response to our draft audit report, OJP agreed with all six of our recommendations, and as a result, the status of the audit report is resolved. Oregon DOJ concurred with all six recommendations. Finally, J Bar J agreed with all six of our recommendations. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

### **Recommendations for OJP and Oregon DOJ:**

- 1. Ensure that J Bar J establish written policies and procedures related to programmatic progress tracking and reporting and distribute these among the relevant officials and staff.**

*Resolved.* OJP agreed with our recommendation. OJP stated in its response that it will coordinate with Oregon DOJ to obtain a copy of J Bar J's written policies and procedures, developed and implemented, related to programmatic progress tracking and reporting, and evidence that J Bar J distributed the policies and procedures to all staff responsible for managing federal grant funds. As a result, this recommendation is resolved.

Oregon DOJ concurred with our recommendation and stated in its response that J Bar J will establish written policies and procedures related to programmatic progress tracking and reporting. These policies and procedures will include the tracking and reporting of performance measures and goals, as well as the performance measures and goals related to any subgrant.

J Bar J agreed with our recommendation and stated in its response that J Bar J will establish written policies and procedures related to programmatic progress tracking and reporting of performance measures and goals, to include those related to any subgrant, and will distribute these policies and procedures to all relevant staff. J Bar J also stated that this corrective action will be completed by October 31, 2023.

This recommendation can be closed when we receive evidence of written policies and procedures related to programmatic progress tracking and reporting. The procedures should include controls to help ensure that programmatic reports are complete, including overseeing any subgrantees to ensure they are complying with subgrant reporting requirements and making progress towards program goals. Evidence should also demonstrate that the policies and procedures were distributed to relevant officials and staff.

**2. Ensure that J Bar J maintain an adequate accounting process that separately and accurately tracks all federal financial assistance.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with Oregon DOJ to obtain evidence from J Bar J that it has established a separate cost center in its accounting system to track its VOCA Federal funding; a copy of J Bar J's written policies and procedures, developed and implemented, to ensure that all federal financial assistance funds are separately and accurately recorded in J Bar J's accounting system; and evidence that J Bar J distributed the policies and procedures to staff responsible for managing federal grant funds. As a result, this recommendation is resolved.

Oregon DOJ concurred with our recommendation and stated in its response that J Bar J will establish separate cost center classes for each federal funding source and provide Oregon DOJ with documentation supporting the completion of this action.

J Bar J agreed with our recommendation and stated in its response that J Bar J had completed the corrective action of establishing separate cost center classes for each federal funding source. However, J Bar J did not provide supporting documentation related to this corrective action with its response.

This recommendation can be closed when we receive evidence of the establishment and use of separate cost center classes for each federal funding source.

**3. Remedy the \$6,601 in unapproved employee bonuses charged to the subaward.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will review the \$6,601 in questioned costs, related to unapproved employee bonuses that were charged to Grant Numbers 2018-V2-GX-0033 (\$2,570) and 2019-V2-GX-0015 (\$4,031), and work with Oregon DOJ to remedy, as appropriate. As a result, this recommendation is resolved.

Oregon DOJ concurred with our recommendation and stated in its response that J Bar J will remedy this recommendation by completing a Supplemental Financial Report and reimbursing Oregon DOJ for the bonuses totaling \$6,601.

J Bar J agreed with our recommendation and stated in its response that J Bar J will complete a Supplemental Financial Report and will reimburse Oregon DOJ for the bonuses totaling \$6,601. J Bar J stated that it conferred with Oregon DOJ regarding how to complete this process and J Bar J will complete this corrective action by September 15, 2023.

This recommendation can be closed when we receive a copy of the completed Supplemental Financial Report and documentation that Oregon DOJ and OJP have appropriately remedied these costs.

**4. Require J Bar J obtain its subgrantee's timekeeping records for the entire period of this grant, determine any amount overcharged, and remedy accordingly.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with Oregon DOJ to obtain documentation to support J Bar J's subgrantee personnel costs for the entire period of its subaward and reimbursed under Grant Numbers 2018-V2-GX-0033 and 2019-V2-GX-0015 to determine if the subgrantee overcharged the subaward. If overcharges are found, OJP will coordinate with Oregon DOJ to ensure that all overcharged amounts are appropriately remedied. As a result, this recommendation is resolved.

Oregon DOJ concurred with our recommendation and stated in its response that J Bar J will acquire and review all documentation in order to remedy this recommendation and assist in the process of repaying any overcharging found.

J Bar J agreed with our recommendation and stated in its response that J Bar J met with the subgrantee and the subgrantee is in the process of compiling all the required documentation to determine any amount overcharged. J Bar J stated it will acquire and review all documentation in order to remedy the recommendations and assist in the process of repaying any overcharges found. Additionally, J Bar J has ended the subgrant with the subgrantee. Finally, J Bar J also expects that this corrective action will be completed by October 31, 2023.

This recommendation can be closed when we receive evidence of the reconciliation of the subgrantee's invoices and timesheets for the entire period of performance. Evidence should also include remedial actions taken to correct any overcharges.

**5. Ensure that J Bar J implements procedures to ensure that invoices received from J Bar J's subgrantee are accurate and reflective of the work performed.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with Oregon DOJ to obtain a copy of J Bar J's written policies and procedures, developed and implemented, to ensure that invoices from J Bar J's subgrantee are accurate and reflective of the work performed, and obtain evidence that J Bar J distributed the policies and procedures to staff responsible for managing federal grant funds. As a result, this recommendation is resolved.

Oregon DOJ concurred with our recommendation and stated in its response that J Bar J will establish written policies, procedures, and controls in order to ensure subgrantee invoices and financial reporting are accurate, timely, and fully reflect the work performed.

J Bar J agreed with our recommendation and stated in its response that J Bar J will establish written policies, procedures, and controls in order to ensure subgrantee invoices and financial reporting are accurate, timely, and fully reflect the work performed. J Bar J stated that this corrective action will be completed by October 31, 2023.

This recommendation can be closed when we receive evidence of implemented procedures to ensure that subgrantee invoices are reviewed for accuracy and fully reflect the work performed.

**6. Ensure that J Bar J enhance its procedures to incorporate controls to validate the accuracy and appropriateness of in-kind match contributions to federal awards.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with Oregon DOJ to obtain a copy of J Bar J's written policies and procedures, developed and implemented, to ensure that appropriate controls are established to validate the accuracy and appropriateness of in-kind matching contributions for federal awards. As a result, this recommendation is resolved.

Oregon DOJ concurred with our recommendation and stated in its response that J Bar J will establish written policies, procedures, and controls related to matching funds, including in-kind match contributions.

J Bar J agreed with our recommendation and stated in its response that J Bar J will establish written policies, procedures, and controls related to matching funds, including in-kind match contributions. J Bar J stated that this corrective action will be completed by October 31, 2023.

This recommendation can be closed when we receive evidence of J Bar J's enhanced procedures to validate the accuracy and appropriateness of matching funds, including in-kind match contributions.