



Audit of the Office of Justice Programs Victim Assistance Grants Awarded to the Guam Office of the Attorney General, Tamuning, Guam



AUDIT DIVISION

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A redaction was made to the full version of this report for privacy reasons. The redaction is contained only in Appendix 3, the auditee's response, and is of an individual's name.



EXECUTIVE SUMMARY

Audit of the Office of Justice Programs Victim Assistance Grants Awarded to the Guam Office of the Attorney General, Tamuning, Guam

Objective

The objective of the audit was to evaluate how the Guam Office of the Attorney General (Guam OAG), located in Tamuning, Guam, designed and implemented its crime victim assistance program. To accomplish this objective, we assessed performance in the following areas of grant management: (1) grant program planning and execution, (2) program requirements and performance reporting, (3) grant financial management, and (4) monitoring of subrecipients.

Results in Brief

As a result of our audit, we concluded that the Guam OAG distributed its Crime Victim Fund (CVF) funding to organizations that provided direct services to victims in Guam. However, we identified several areas where the Guam OAG can improve its administration and oversight of its victim assistance program, including maintaining adequate documentation to support subaward priority funding allocations. Further, the Guam OAG should take steps to improve its subrecipient monitoring to include ensuring required monitoring reviews are conducted and that accurate programmatic data is being provided by subrecipients for submission to the Office for Victims of Crime (OVC). Lastly, we identified \$3,897 in unapproved personnel costs charged to the Victims of Crime Act (VOCA) grants.

Recommendations

Our report contains eight recommendations to the Office of Justice Programs (OJP) to assist the Guam OAG in improving its grant management and administration and to remedy questioned costs. We requested a response to our draft audit report from Guam OAG and OJP officials; these responses can be found in Appendices 3 and 4, respectively. Our analysis of those responses is included in Appendix 5.

Audit Results

The U.S. Department of Justice Office of the Inspector General completed an audit of three VOCA victim assistance formula grants awarded by OVC to the Guam OAG. The OVC awarded these formula grants, totaling \$3,073,496 for fiscal years (FY) 2019 through 2021, from the CVF to enhance crime victim services in Guam. As of June 2023, the Guam OAG drew down a cumulative amount of \$1,665,686 for all of the grants we reviewed.

Grant Program Planning and Execution

We found that the Guam OAG's victim assistance program awarded 17 subawards and provided services to thousands of victims in Guam. We found the Guam OAG properly informed subrecipients of VOCA requirements and submitted timely performance reports to the OVC. However, the Guam OAG has not conducted a victim needs assessment or implemented a formal subaward allocation plan.

Grant Financial Management

The Guam OAG submitted accurate federal financial reports to OJP. However, we identified that the Guam OAG reported inaccurate VOCA victim assistance grant-related expenditures on its Schedule of Expenditures of Federal Awards. In addition, the Guam OAG reimbursed two subrecipients a total of \$3,897 in unapproved personnel costs.

Monitoring of Subrecipients

We found instances in which the Guam OAG did not comply with its own policies and procedures, to include that it did not have a monitoring schedule and ensure accurate performance data was submitted by subrecipients to the OVC. We also found that two subrecipients did not complete required single audits and one subrecipient did not separately account for VOCA grant funds as required by OJP.

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Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of three victim assistance formula grants awarded by the Office of Justice Programs (OJP), Office for Victims of Crime (OVC) to the Guam Office of the Attorney General (Guam OAG) in Tamuning, Guam. The OVC awards victim assistance grants annually from the Crime Victims Fund (CVF) to state administering agencies (SAA). As shown in Table 1, from fiscal years (FY) 2019 to 2021, these OVC grants totaled \$3,073,496.

Table 1

Audited Grants

Fiscal Years 2019 – 2021

Award Number	Award Date	Award Period Start Date	Award Period End Date	Award Amount
2019-V2-GX-0035	09/13/2019	10/01/2018	09/30/2023	\$1,328,944
2020-V2-GX-0036	09/17/2020	10/01/2019	09/30/2024	\$1,031,562
15POVC-21-GG-00620-ASSI	09/16/2021	10/01/2020	09/30/2024	\$712,990
Total:				\$3,073,496

Note: Grant funds are available for the fiscal year of the award plus 3 additional fiscal years. Grant numbers 2019-V2-GX-0035 and 2020-V2-GX-0036 each received a 1-year extension.

Grant Number 15POVC-22-GG-00728-ASSI was awarded to the Guam OAG in FY 2022; this award had no programmatic activity or financial expenditures at the time of our audit fieldwork.

Source: JustGrants

Established by the Victims of Crime Act (VOCA) of 1984, the CVF is used to support crime victims through DOJ programs and state and local victim services.¹ The CVF is supported entirely by federal criminal fees, penalties, forfeited bail bonds, gifts, donations, and special assessments. OVC annually distributes proceeds from the CVF to states and territories. The total amount of funds that OVC may distribute each year depends upon the amount of CVF deposits made during the preceding years and limits set by Congress (the cap).

Beginning in FY 2015, Congress significantly raised the cap on CVF disbursements from prior years, which increased funding for victim assistance grants from \$456 million in 2014 to a high of \$3 billion in 2018. Since 2018, the cap has decreased along with deposits into the CVF, with the most recent cap set at \$1.9 billion for FY 2023. The OVC allocates the annual victim assistance program awards based on the amount available for victim assistance each year and the states’ population. As such, the annual VOCA

¹ The VOCA victim assistance formula program is funded under 34 U.S.C. § 20103.

victim assistance grant funds available to the Guam OAG fluctuated between \$1.3 million in 2019 and \$713,000 in 2021.

VOCA victim assistance grant funds support the provision of direct services—such as crisis intervention, assistance filing restraining orders, counseling in crises arising from the occurrence of crime, and emergency shelter—to victims of crime. The OVC distributes these assistance grants to states and territories, which in turn fund subawards to public and private nonprofit organizations that directly provide the services to victims. Eligible services are efforts that: (1) respond to the emotional and physical needs of crime victims, (2) assist primary and secondary 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.

The Grantee

As the Guam SAA, the Guam OAG is responsible for administering the VOCA victim assistance program. The Guam OAG's victim assistance program helps victims cover crime-related costs, protects victims' rights, and helps fund local services providers. The Guam OAG also helps crime victims and their families by providing information on the criminal justice process, referrals for counseling, emergency assistance, and safety planning. The Guam OAG serves the island of Guam, which has a population of roughly 150,000 people and is located about 4,000 miles west of Hawaii.

OIG Audit Approach

The objective of the audit was to evaluate how the Guam OAG designed and implemented its crime victim assistance program. To accomplish this objective, we assessed performance in the following areas of grant management: (1) grant program planning and execution, (2) program requirements and performance reporting, (3) grant financial management, and (4) monitoring of subrecipients.

We tested compliance with what we considered the most important conditions of the grants. Unless otherwise stated in our report, we applied the authorizing VOCA legislation, the VOCA victim assistance program guidelines and Final Rule (VOCA Guidelines); 2 C.F.R. § 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance); and the DOJ Grants Financial Guide as our primary criteria. We also reviewed relevant Guam OAG policy and procedures and interviewed Guam OAG personnel to determine how they administered the CVF funds. We interviewed subrecipient personnel and further obtained and reviewed the Guam OAG subrecipient records reflecting grant activity.

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

Grant Program Planning and Execution

The main purpose of the VOCA victim assistance grants is to support crime victim services. The Guam OAG, which is the primary recipient of victim assistance grants in the territory of Guam, must distribute the majority of the funding to organizations that provide direct services to victims, such as criminal justice advocacy, crisis intervention, emergency shelter, and emergency medical services. As the SAA, the Guam OAG has the discretion to select subrecipients from among eligible organizations, although the VOCA Guidelines require state administering agencies give priority to victims of sexual assault, domestic abuse, and child abuse. SAAs must also make funding available for previously underserved populations of violent crime victims.² As long as an SAA allocates at least 10 percent of available funding to victim populations in each of these victim categories, it has the discretion in determining the amount of funds each subrecipient receives.

As part of our audit, we assessed the Guam OAG's overall plan to allocate and award victim assistance funding. We reviewed how the Guam OAG planned to distribute its available victim assistance grant funding, made subaward selection decisions, and informed its subrecipients of necessary VOCA requirements. We also assessed whether the Guam OAG met priority funding areas and subaward reporting requirements. As discussed below, in our overall assessment of grant program planning and execution, we determined that the Guam OAG properly informed its subrecipients of necessary VOCA requirements and allocated at least 10 percent of available funding to each of the priority funding areas. However, we determined that the Guam OAG has not yet performed a victim needs assessment or implemented a formal subaward allocation plan and did not maintain documentation to support the methodologies used to determine priority funding areas as required by OJP.

Subaward Allocation Plan

The VOCA Guidelines require SAAs to identify crime victims by the types of crimes they have experienced, such as drunk driving, sexual assault, or domestic violence. The VOCA Guidelines also encourage agencies to identify gaps in available services, which may be achieved by conducting public hearings, performing a needs assessment, creating a task force, and holding meetings with victim services agencies. We determined that the Guam OAG had not conducted a formal needs assessment or a review of its funding allocation methods. Rather, a Guam OAG official stated that victim assistance program officials informally discuss subaward allocation methods and priority needs. The Program Coordinator stated that priority service needs in Guam typically include emergency shelter and food and assistance with legal services. The Program Coordinator also stated that the Guam OAG is in the process of developing a strategic plan for its victim assistance program and creating a survey to better identify gaps in the types of services needed, where those services are needed, and who are most in need of services. A Guam OAG official stated that because the VOCA Administrator position has recently become vacant, the Guam OAG has not yet

² The VOCA Guidelines state these underserved victims may include, but are not limited to, victims of federal crimes; survivors of homicide victims; or victims of assault, robbery, gang violence, hate and bias crimes, intoxicated drivers, bank robbery, economic exploitation and fraud, and elder abuse. The Guidelines also indicate that in defining underserved victim populations, states should also identify gaps in available services by victims' demographic characteristics.

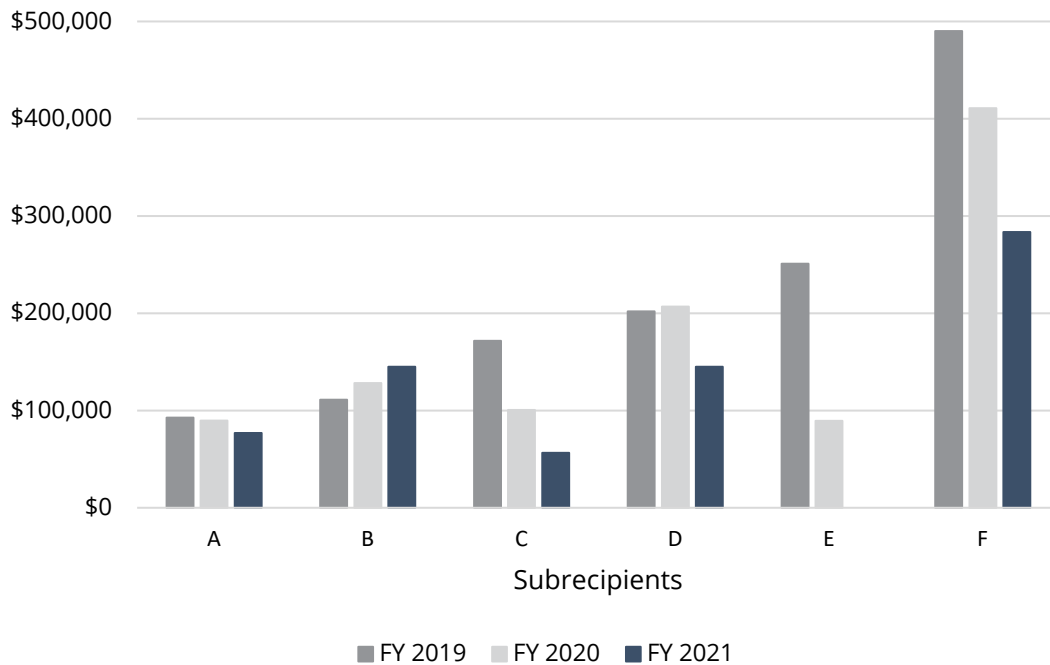
conducted a survey of victim service needs in Guam. Obtaining input from various stakeholders relevant to the victim services community is important to provide a comprehensive picture of victim-related needs in Guam. Therefore, we recommend that OJP ensure the Guam OAG implements its plan to formally assess victim service needs in Guam.

The Guam OAG generally offers competitive subawards with a period of performance ranging from 18 to 20 months. As shown in Figure 1, the Guam OAG subawarded a total of \$3,050,470 (17 subawards) from its FY 2019, 2020, and 2021 grants, to six subrecipients.

Figure 1

Subrecipient Awards

FY 2019 - 2021



Note: Subrecipients E and F represent subawards made to divisions within the Guam OAG.

Source: OIG Analysis of Guam OAG data

Between FYs 2019 and 2021, the Guam OAG’s victim assistance grant funding dropped by approximately \$616,000 (46 percent). We asked the Guam OAG, if its CVF funding continues to decrease, how it plans to account for the reduction in federal funding. According to the Guam OAG’s Program Coordinator, as funding has decreased, it has decreased the amounts of some of its subawards, and therefore, the number of services offered. Additionally, the Program Coordinator mentioned that it has reduced its budget for administrative costs to help offset decreases in federal funding. Further, the Guam OAG decided not to provide a FY 2021 subaward to Subrecipient E and greatly reduced its FY 2021 subaward to Subrecipient F. Both subrecipients are separate divisions within the Guam OAG and have previously received OVC approved

self-awards from the Guam OAG.³ The Program Coordinator explained that if funding continues to decrease, the Guam OAG may have to further reduce the number of subawards, and victim services provided.

Subaward Selection Process

To assess how the Guam OAG granted its subawards, we identified the steps that it took to inform, evaluate, and select subrecipients for VOCA grant funding. First, the Guam OAG will announce funding opportunities in the local newspaper, on its website, and through email to existing and potential subrecipients. Once proposals are received, the Guam OAG will conduct a review of each application for completeness and compliance with Guam's statutes. Next, Program Coordinators are responsible for reviewing and scoring each proposal, citing an application's strengths and weaknesses, as well as conformance to VOCA program guidelines and past performance, if applicable. According to the Guam OAG's Grants Management and Monitoring Guidelines, it may conduct a pre-award risk assessment of applicants' financial and organizational capacity to administer the grant. The Guam OAG will also request a copy of an applicant's most recent audit to evaluate its overall operational and financial controls. Lastly, subrecipient proposals recommended for funding are presented to the Guam OAG Chief of Staff and the Attorney General for final review and approval.

Subaward Requirements

SAs must adequately communicate VOCA requirements to their subrecipients. We reviewed the Guam OAG's subaward solicitations and award packages to determine how the grantee communicated its subaward requirements and conveyed to potential applicants the VOCA-specific requirements. We found that the Guam OAG included appropriate information in its subaward solicitations and award packages. The Guam OAG also has subrecipients initial each page of their agreement to affirm their compliance and understanding of all VOCA requirements.

Priority Areas Funding Requirement

The VOCA Guidelines require that the Guam OAG award a minimum of 10 percent of the total grant funds to programs that serve victims in each of the four following categories: (1) child abuse, (2) domestic abuse, (3) sexual assault, and (4) previously underserved. The VOCA Guidelines give each SAA the latitude for determining the method for identifying "previously underserved" crime victims.⁴ In its FYs 2019 and 2020 victim assistance subaward applications, the Guam OAG identified "previously underserved" victims to include campus sexual assault victims and elderly victims. Based on internal discussions held within the Guam OAG, it also considers previously underserved victims to include: (1) cybercrime victims, (2) LGBTQ+

³ Subrecipient E contracted with a company for an online portal that gives victims notifications about local criminal cases. Approximately \$340,000 was awarded for the contracted services in FYs 2019 and 2020. Subrecipient F provided victim outreach services in Guam. Approximately \$901,000 was awarded to Subrecipient F for victim services in FYs 2019 and 2020.

⁴ Methods for identifying "previously underserved" victims may include public hearings, needs assessments, task forces, and meetings with statewide victim services agencies.

victims, (3) surviving family members of homicide victims, (4) victims with disabilities, (5) sex trafficking victims, and (6) victims of hate and bias crimes.

According to the DOJ Grants Financial Guide, recipients must retain all financial records, supporting documentation, statistical records, and all other records pertinent to the award for a period of 3 years from the date of submission of the final expenditure report. The Guam OAG's Grants Management and Monitoring Guidelines also requires all records pertinent to the award to be maintained for a period of 3 years from the date of submission of the final expenditure report. However, we determined that the Guam OAG did not maintain documentation to support its methodology for allocating at least 10 percent of the total grant funds to each of the four priority funding areas. Based on our analysis of the Guam OAG's subaward documentation, we determined that the Guam OAG did award the minimum amount required of its total grant funds to each of the four program priority areas, including child abuse, domestic abuse, sexual assault, and previously underserved. A Guam OAG official stated that when the previous VOCA Administrator departed, the documentation supporting the methodology used was misplaced. Without maintaining adequate documentation of its subaward allocations made and methodologies used, the Guam OAG cannot readily ensure it is complying with VOCA Guidelines. Therefore, we recommend that OJP ensure the Guam OAG maintains documentation to support its methodology for allocating at least 10 percent of the total grant funds to priority funding program areas as required by OJP.

Performance Reporting

For the victim assistance grants, states must report the number of agencies funded, VOCA subawards, victims served, and victim services funded by these grants. Additionally, states must collect, maintain, and provide to the OJP data that measures the performance and effectiveness of activities funded by the award. Each SAA must annually report to the OVC on activity funded by any VOCA awards active during the federal fiscal year. The OVC requires states to submit performance data quarterly through the Performance Measurement Tool (PMT). States may provide subrecipients with direct access to the system to report quarterly data, but states must approve the data.

Based on the Guam OAG's FYs 2019 through 2022 annual performance reports, we determined that over a 4-year period the number of victims served was reported to have increased 137 percent and the number of services provided was reported to have increased by 258 percent. Table 2 presents a summary of the data from these annual performance reports.

Table 2

Summary from Guam OAG
Victim Assistance Program Annual Performance Report
FY 2019 through 2022

Performance Categories	FY 2019	FY 2020	FY 2021	FY 2022
Number of Victims Served	2,321	2,312	3,757	5,500
Number of Services Provided	7,870	7,588	16,376	28,166

Source: OIG Analysis of PMT data

To assess whether the Guam OAG’s annual performance report was submitted to the OVC in a timely manner and fairly reflected the performance figures its subrecipients had reported to the Guam OAG, we reconciled a sample of performance data from the FY 2022 annual performance report and determined that the reports were timely. However, in the [Performance Monitoring](#) section of this report, we identified instances in which the subrecipients’ reported figures did not reconcile to supporting documentation.

Grant Financial Management

Award recipients must establish an adequate accounting system and maintain financial records that accurately account for awarded funds. To assess the adequacy of the Guam OAG’s financial management of the VOCA grants, we reviewed the processes by which the Guam OAG administered these funds by examining expenditures charged to the grants, drawdown requests, matching funds activity, and financial reports. We also interviewed the Guam Department of Administration personnel who were responsible for financial aspects of the grants, reviewed the Guam OAG written policies and procedures, inspected award documents, and reviewed financial records.

As discussed below, in our overall assessment of grant financial management, we determined that the Guam OAG implemented adequate processes for grant financial management, to include submitting accurate Federal Financial Reports and timing drawdown requests to ensure that the federal cash-on-hand was the minimum amount needed for reimbursement. However, we identified that the Guam OAG reported inaccurate VOCA victim assistance grant-related expenditures on its Schedule of Expenditures of Federal Awards (SEFA).

Accurately Reporting VOCA Expenditures on the SEFA

We reviewed the Government of Guam’s single audit report for FY 2021 and found that the Summary of Auditor’s results identified material weaknesses in the Government of Guam’s internal controls over its financial reporting.⁵ Specifically, the Guam’s Department of Administration did not perform timely

⁵ According to the Uniform Guidance, a non-federal entity that expends \$750,000 or more in federal awards during the non-federal entity’s fiscal year must have a single or program-specific audit conducted.

reconciliation of its accounting records and did not ensure its SEFA was accurate and complete.⁶ Although the single audit findings were not specifically related to VOCA grant funds, we determined that a similar condition existed for the VOCA grants. The single audit report identified expenditures related to amounts passed through to subrecipients, and these figures did not reconcile to Guam's accounting records. Based on our review of the Guam OAG's records, we determined that Guam's FY 2021 SEFA did not include all VOCA subrecipient reimbursements as amounts passed through to subrecipients as required. A Guam OAG official stated that the Department of Administration is responsible for preparing the SEFA but that the Guam OAG does maintain documentation of subrecipient reimbursements that can be reconciled with the Department of Administration's records. It is important that information on the SEFA be accurate and complete as the SEFA is used to determine the applicability and scope of the single audit. Therefore, we recommend that OJP ensure the Guam OAG is accurately reporting VOCA victim assistance grant-related expenditures on its SEFA.

Grant Expenditures

SAA victim assistance expenses fall into two overarching categories: (1) administrative expenses—which are allowed to total up to 5 percent of each award, and (2) reimbursements to subrecipients—which constitute the majority of total expenses. To determine whether costs charged to the awards were allowable, supported, and properly allocated in compliance with award requirements, we tested a sample of transactions by reviewing accounting records and verifying support for select transactions. We determined that the Guam OAG did not charge any administrative expenses to the grants during our review period.

We judgmentally selected 1 month of reimbursements from each of the six subrecipients, totaling \$81,040.⁷ The transactions we reviewed included costs in the following categories: (1) salary, (2) fringe benefits, (3) rent, (4) contractual expenses, (5) supplies, and (6) telephone services. We found that the transactions we reviewed were generally accurate, allowable, and in accordance with the VOCA Guidelines. However, we found several instances of subrecipient non-compliance with VOCA requirements, which we discuss further in the [Financial Monitoring](#) section of this report.

Drawdowns

Award recipients should request funds based upon immediate disbursement or reimbursement needs, and the grantee should time drawdown requests to ensure that the federal cash-on-hand is the minimum needed for reimbursements or disbursements made immediately or within 10 days. To assess whether the Guam OAG managed grant receipts in accordance with these federal requirements, we compared the total amount reimbursed to the total expenditures in the Guam OAG's accounting system and accompanying financial records.

For the VOCA victim assistance awards, the Guam OAG requested drawdowns on a reimbursement basis. Table 3 shows the total amount drawn down for each grant as of June 2023.

⁶ The SEFA is a supplemental schedule to the audited financial statements.

⁷ As of June 2023, the FY 2021 grant had not yet incurred expenditures to review. The expenditures judgmentally selected for testing were associated with the 2019 grant.

Table 3

Amount Drawn Down for Each Grant as of June 2023

Award Number	Award Period End Date	Total Award	Amount Drawn Down	Amount Remaining
2019-V2-GX-0035	09/30/2023	\$1,328,944	\$1,211,468	\$117,476
2020-V2-GX-0036	09/30/2024	1,031,562	454,218	577,344
Total:		\$2,360,506	\$1,665,686	\$694,820

Note: During our audit, the FY 2021 grant had not yet drawn down grant funds.

Source: JustGrants

During this audit, we did not identify significant deficiencies related to the recipient’s process for developing drawdown requests.

Financial Reporting

According to the DOJ Grants Financial Guide, recipients shall report the actual expenditures, program income, and unliquidated obligations incurred for the reporting period on each financial report as well as cumulative expenditures. To determine whether the Guam OAG submitted accurate Federal Financial Reports to OJP, we compared the most recent report to the Guam OAG’s accounting records for each grant. We determined that quarterly and cumulative expenditures for the reports reviewed matched the accounting records.

Matching Requirement

VOCA Guidelines require subrecipients to match 20 percent of project costs, except for the U.S. Virgin Islands, and all other territories and possessions of the U.S., which are not required to match VOCA funds. Since Guam is a territory of the U.S., it did not have a match requirement.⁸

Monitoring of Subrecipients

According to the DOJ Grants Financial Guide, the purpose of subrecipient monitoring is to ensure that subrecipients: (1) use grant funds for authorized purposes; (2) comply with the federal program and grant requirements, laws, and regulations; and (3) achieve subaward performance goals. As the primary grant recipient, the Guam OAG must develop policies and procedures to monitor subrecipients. To assess the adequacy of the Guam OAG’s monitoring of its VOCA subrecipients, we interviewed Guam OAG personnel, identified monitoring procedures, and obtained records of interactions between the Guam OAG and its subrecipients. We also conducted site visits to four of the six subrecipients, which included interviewing personnel, visiting facilities, and reviewing accounting and performance records. When we spoke to

⁸ 28 C.F.R. § 94.118 (b)(2).

subrecipient officials about the support they received from the Guam OAG, the subrecipients' officials indicated that they were generally satisfied with the services provided by the Guam OAG.

According to the Guam OAG's Grants Management and Monitoring Guidelines, the VOCA Administrator is responsible for programmatic oversight and ensuring subrecipient adherence to the VOCA Guidelines. The Guam OAG utilizes a risk-based program management system, identifying subrecipients as low, medium, or high-risk based on factors, such as prior experience as a subrecipient, the results of previous audits, agency infrastructure and support, and staff tenure or substantial personnel or system changes. The risk-based assessment is conducted during the pre-award phase and then usually quarterly thereafter. Subrecipients designated as high-risk should receive increased monitoring, which may include a follow-up site visit, operating site interviews, and increased case file sampling.

In our overall assessment of the Guam OAG's subrecipient monitoring, we found that the Guam OAG should take steps to improve its subrecipient monitoring. As detailed in the sections below, we determined that the Guam OAG did not conduct on-site monitoring reviews for two of its six subrecipients as required by the Guam OAG policy. Further, we found that two subrecipients did not submit single audit reports as required, one subrecipient had commingled its VOCA subaward with non-VOCA funds, and two subrecipients were reimbursed a total of \$3,897 in unapproved personnel costs. Lastly, we identified that three of the six subrecipients (50 percent) had incorrectly reported their performance data in the PMT.

Financial Monitoring

The Guam OAG required its subrecipients to submit monthly reimbursement requests detailing all VOCA expenses, approved budgets, and supporting documents to include timesheets and invoices. The Program Coordinator reviews the reimbursement request for accuracy and compares the expenses in the request with the approved subrecipient budget. If discrepancies are noted, the subrecipient is contacted and asked to correct the errors as appropriate. After the reimbursement request is reviewed by the VOCA Administrator and Management Analyst, the Attorney General will conduct a final review and approval. The Government of Guam's Department of Administration then processes the reimbursement for payment via check or electronic funds transfer.

During our review, we found two instances in which subrecipients had charged a total of \$3,897 for personnel expenses not listed in their approved budgets. According to the Guam OAG's Grants Management and Monitoring Guidelines, a cost is considered allowable if it is listed in an itemized budget and approved by the Guam OAG. Subrecipient D paid \$1,984 to its Executive Director for legal services and Subrecipient F paid \$1,913 to a Program Coordinator who acted as the point of contact for victims and prepared performance reports; these costs were not accounted for in the subrecipients' approved budgets. When we asked the subrecipients about the personnel expenditures, Subrecipient D stated that it had informed the Guam OAG that its Executive Director was performing attorney-related duties while its attorney was out, but it did not obtain a formal budget modification. Subrecipient F stated that it did not realize that the Program Coordinator position was not in its approved budget. A Guam OAG official stated they did not realize the positions charged were not on the subrecipients' approved budgets. As a result, we recommend that OJP work with the Guam OAG to remedy the \$3,897 in unapproved personnel expenditures.

Commingling of Grant Funds

According to the DOJ Grants Financial Guide, subrecipients are required to establish and maintain an adequate accounting system and financial records to accurately account for funds awarded to them. The DOJ Grants Financial Guide further states that the accounting system should be able to account for award funds separately. We found that Subrecipient A had commingled its VOCA grant funds with non-grant funds in its accounting system. The subrecipient stated that it was unaware that VOCA grant funds needed to be separately accounted for in its accounting system. A Guam OAG official stated that they were unaware that Subrecipient A had commingled its VOCA grant funds with other funding and will work with the subrecipient to correct the issue. We recommend that OJP require the Guam OAG to ensure its subrecipients are adequately accounting for VOCA grant funds.

Single Audit Requirements

Non-federal entities that receive federal financial assistance are required to comply with the Single Audit Act of 1984, as amended. The Single Audit Act requires recipients of federal funding, above a certain threshold, to receive an annual audit of their financial statements and federal expenditures. Under the Uniform Guidance, entities that expend \$750,000 or more in federal funds within the entity's fiscal year must have a single audit performed annually covering all federal funds expended that year.

According to the DOJ Grants Financial Guide, primary recipients are required to ensure that subrecipients have single audits completed when required and, as appropriate, corrective actions on all audit findings have been implemented. The Guam OAG VOCA Administrator stated that on its subaward application, applicants are required to identify if they have undergone a single audit, and if so, to provide a copy of its most recent single audit to the Guam OAG. However, we found that two subrecipients (Subrecipients C and D) did not complete and submit single audit reports to the Federal Audit Clearinghouse, as required.⁹ Specifically, Subrecipient C did not complete and submit its single audit reports for FYs 2018, 2019, and 2021. When we asked about the reports, the VOCA Administrator stated that Subrecipient C had been delinquent in conducting its single audits for a long time, in part, due to frequent turnover in leadership. After identifying this issue during a November 2021 remote desk review, the Guam OAG subsequently awarded Subrecipient C on the condition that it prioritize its audit reporting requirements and that all outstanding reports be brought current by July 2022. In August 2023, Subrecipient C told us that it is not able to comply with the requirement due to financial reasons. We also found that Subrecipient D did not complete and submit its single audit reports for FYs 2020 through 2022 because its Certified Public Accountant (CPA) firm had shut down and it had not obtained a replacement. In May 2023, Subrecipient D provided us evidence that it had signed an engagement letter with a new CPA firm to complete all of its required single audits. Without ensuring that subrecipients that are required to undergo a single audit have completed those audits, federal award funding may be at risk. Therefore, we recommend that OJP require the Guam OAG to ensure that its subrecipients are in compliance with the Uniform Guidance single audit requirements.

⁹ According to the Guam OAG, Subrecipients A and B did not meet the single audit threshold. As previously noted, Subrecipients E and F were other divisions within the Guam OAG; therefore, these subrecipients were covered in Guam's single audit report, which is discussed in the [Grant Financial Management](#) section of this report.

Performance Monitoring

According to the Guam OAG's policy, each subrecipient is required to submit its performance metrics, on a quarterly basis, in OJP's PMT. Once entered, the VOCA Administrator will review the data for consistency and request revisions if deviations or errors are found. The Guam OAG's VOCA Administrator explained that deviations often occur when different individuals from the same subrecipient interpret the performance questions differently. We found that although the VOCA Administrator does compare quarterly reported performance metrics with prior reported figures to help ensure consistency from one period to the next, the Guam OAG is not ensuring the performance data reported to the OVC is accurate.

To determine if the information reported in the quarterly performance reports was accurate and supported, we selected the most recent report from each of the six subrecipients. We tested a total of 18 performance metrics and found that Subrecipients B, E, and F reported incorrect information in their quarterly reports. Specifically, we found that Subrecipients B and F incorrectly reported the total number of *new* individuals who received services for the reporting period, when in fact, the performance question required the reporting of the total number of *all* individuals (new and existing) who had received services during the reporting period. This error caused Subrecipients B and F's performance metrics for the total number of individuals who received services during the reporting period to be underreported. When we asked Subrecipients B and F why it did not report all individuals served for the quarter, the subrecipient officials explained that is how the Guam OAG taught them to answer the performance question. A Guam OAG official confirmed that it had mistakenly told subrecipients to only report new victims served rather than the total number of all individuals who had received services during the reporting period.

Further, we found that Subrecipient E mistakenly reported in its quarterly performance reports its total population served as the total number of victims receiving services. As previously mentioned, Subrecipient E provided an online victim information and notification portal for the Guam OAG. The individuals who sign up for these notifications are anonymous and may or may not have been victims who received services. We found that Subrecipient E mistakenly reported all users who signed up for notifications as victims served, while it should have reported the users who signed up as the "Total number of anonymous contacts received during the reporting period." By reporting anonymous contacts as victims served, Subrecipient E over reported the number of victim services provided in its quarterly performance report to the OVC.

Lastly, we determined that Subrecipient F used inconsistent and inaccurate methods for gathering its performance data. For example, we found that Subrecipient F reported business entities as crime victims who had received services. The VOCA Guidelines define a crime victim as a person who has suffered physical, sexual, financial, or emotional harm as a result of the commission of a crime. Therefore, business entities do not meet the definition of a crime victim and should not be reported on the quarterly performance report.

The Guam OAG VOCA Administrator confirmed that the Guam OAG does not periodically check or have controls in place to ensure the information reported by subrecipients in their performance reports is accurate. Without such controls, the Guam OAG is at higher risk for reporting inaccurate information in its annual performance report to the OVC. Therefore, we recommend that OJP ensure the Guam OAG implements procedures to perform periodic verification of the performance data submitted by subrecipients.

According to the VOCA Guidelines Monitoring Requirements, SAAs shall conduct on-site monitoring of all subrecipients at least once every 2 years during the award period and shall maintain a copy of site visit results and other documents related to compliance. According to the Guam OAG's guidelines, subrecipient monitoring will occur once within the grant period unless it is determined that more frequent monitoring reviews are warranted. During our audit, we determined that the Guam OAG was conducting its reviews virtually because of the COVID-19 pandemic. We found that the Guam OAG had completed monitoring reviews for four of its six subrecipients (Subrecipients B, C, E, and F). However, even though the Guam OAG had identified Subrecipient C as high-risk, it did not conduct increased monitoring of the subrecipient as required by the Guam OAG's policy. For the remaining two subrecipients (Subrecipients A and D), a Guam OAG official stated that they could not provide evidence that it had in fact completed the two required monitoring reviews. The previous VOCA Administrator did not maintain documentation of the reviews and the Acting VOCA Administrator did not know if the reviews had occurred. When we asked Subrecipients A and D if they had received a monitoring review, they both stated yes, but were unable to provide evidence that the reviews had occurred.

As of August 2023, the Guam OAG did not have any monitoring reviews scheduled. A Guam OAG official stated that due to the turnover in its VOCA Administrator position, it does not have a current monitoring schedule, but that it plans to re-start its on-site subrecipient monitoring. Without maintaining adequate documentation to ensure on-site monitoring activities occurred and that high-risk subrecipient are being properly monitored, the Guam OAG cannot provide reasonable assurance that its subrecipients are administering VOCA funding in compliance with the Guam OAG and VOCA Guidelines. Therefore, we recommend that OJP ensure the Guam OAG conducts its outstanding subrecipient monitoring reviews and maintains adequate documentation of subrecipient monitoring as required by the Guam OAG and VOCA guidelines.

Conclusion and Recommendations

Our audit concluded that the Guam OAG used CVF funding to enhance its victim services program and subaward funds to organizations that provide direct services to victims within Guam. We found that the Guam OAG's victim assistance program awarded 17 subawards and provided services to thousands of victims in Guam. Additionally, the Guam OAG appropriately allocated its CVF funding to victim priority funding areas, properly informed subrecipients of VOCA requirements, and submitted timely performance reports to the OVC. However, we identified several areas where the Guam OAG can improve its administration and oversight of its victim assistance program. Specifically, the Guam OAG has not conducted a victim needs assessment or implemented a formal subaward allocation plan. Additionally, the Guam OAG did not maintain documentation to support the methodologies used to determine its priority victim funding areas, did not conduct all necessary monitoring activities, and did not accurately identify expenditures to subrecipients in its single audit report. Further, we identified subrecipients that did not separately account for VOCA grant funds, complete single audits, or submit accurate performance data as required by the DOJ Grants Financial Guide or the Guam OAG's policy. Lastly, we identified \$3,897 in unapproved questions costs charged to the VOCA grants. We provide eight recommendations to OJP to address these deficiencies.

We recommend that OJP:

1. Ensure the Guam OAG implements its plan to formally assess victim service needs in Guam.
2. Ensure the Guam OAG maintains documentation to support its methodology for allocating at least 10 percent of the total grant funds to priority funding program areas as required by OJP.
3. Ensure the Guam OAG is accurately reporting VOCA victim assistance grant-related expenditures on its SEFA.
4. Work with the Guam OAG to remedy \$3,897 in unapproved questioned costs.
5. Require the Guam OAG to ensure its subrecipients are adequately accounting for VOCA grant funds.
6. Require the Guam OAG to ensure that its subrecipients are in compliance with the Uniform Guidance single audit requirements.
7. Ensure the Guam OAG implements procedures to perform periodic verification of the performance data submitted by subrecipients.
8. Ensure the Guam OAG conducts its outstanding subrecipient monitoring reviews and maintains adequate documentation of subrecipient monitoring as required by the Guam OAG and VOCA guidelines.

APPENDIX 1: Objective, Scope, and Methodology

Objective

The objective of the audit was to evaluate how the Guam Office of the Attorney General (OAG) designed and implemented its crime victim assistance program. To accomplish this objective, we assessed performance in the following areas of grant management: (1) grant program planning and execution, (2) program requirements and performance reporting, (3) grant financial management, and (4) monitoring of subrecipients.

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 Victims of Crime Act (VOCA) victim assistance formula grants 2019-V2-GX-0035, 2020-V2-GX-0036, and 15POVC-21-GG-00620-ASSI from the Crime Victims Fund (CVF) awarded to the Guam OAG. The Office of Justice Programs (OJP), Office for Victims of Crime (OVC) awarded these grants totaling \$3,073,496 to the Guam OAG, which serves as the state administering agency (SAA). Our audit concentrated on, but was not limited to, the period of October 2018 through November 2022. As of June 2023, the Guam OAG had drawn down a total of \$1,665,686 from the three audited grants.

To accomplish our objective, we tested compliance with what we consider to be the most important conditions of the Guam OAG's activities related to the audited grants, which included conducting interviews with the Guam OAG financial staff, examining policies and procedures, and reviewing grant documentation and financial records. We performed sample-based audit testing for grant expenditures including payroll and fringe benefit charges, financial reports, and performance reports. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grants reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected. We also conducted site visits to four of the six subrecipients to provide a broad coverage of different victim services that were funded by the VOCA grants. The remaining two subrecipients were divisions located within the Guam OAG. The authorizing VOCA legislation, the VOCA victim assistance program guidelines and Final Rule (VOCA Guidelines); the DOJ Grants Financial Guide; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; and the award documents contain the primary criteria we applied during the audit.

During our audit, we obtained information from DOJ's JustGrants System and OJP's Performance Measurement Tool, as well as the Guam OAG's accounting system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems as a whole; therefore, any findings identified involving information from those systems was verified with documents from other sources.

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of the Guam OAG to provide assurance on its internal control structure as a whole. The Guam OAG 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 the Guam OAG's internal control structure as a whole, we offer this statement solely for the information and use of the Guam OAG and OJP.¹⁰

In planning and performing our audit, we identified internal control components and underlying internal control principles significant to the audit objective. Specifically, we reviewed the Guam OAG's written policies and procedures, as well as controls over performance reporting and financial management. We also tested the implementation and operating effectiveness of specific controls over the grant execution and compliance with laws and regulations for the awards in our 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 objectives of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

¹⁰ 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	Grant No.	Amount	Page
Questioned Costs:¹¹			
Unapproved personnel costs	2019-V2-GX-0035	\$3,897	10
TOTAL DOLLAR-RELATED FINDINGS		<u>\$3,897</u>	

¹¹ **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: The Guam Office of the Attorney General's Response to the Draft Audit Report



January 11, 2024

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

Dear Mr. Gaschke:

Please be informed that the undersigned Attorney General was not the managing government official during the time of your audit. The Attorney General was Leevin Camacho and we sent an email to Leevin Camacho and [REDACTED] (previous Program Coordinator IV) asking them for comment to the audit findings since this occurred during their tenure. As of the signing of this letter, neither have responded.

Notwithstanding that information we respond as follows:

1. Ensure the Guam OAG implements its plan to formally assess victim services needs in Guam.

Once audit is released, we will begin scheduling with sub recipients to discuss audit, our plans to address the identified deficiencies, our sub-recipient monitoring schedule and criteria, and victim services needs.

2. Ensure the Guam OAG maintains documentation to support its methodology for allocating at least 10 percent of the total grant funds to priority funding program areas as required by OJP.

A majority of the audit had taken place under Leevin Camacho's administration and while we cannot go back in time to address the issues, we can implement internal controls and corrective actions to ensure that these significant deficiencies do not reoccur. In addition, we would document our priority funding program determinations.

3. Ensure the Guam OAG is accurately reporting VOCA victim assistance grant-related expenditures on its SEFA.

In light of our response to Item #2, we have implemented an SOP relating to the compensation audit that will address this issue.

Office of the Attorney General
Douglas B. Moylan · Attorney General of Guam

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"Guam's Toughest Law Enforcers"

David J. Gashke
January 11, 2024
Page 2 of 2

4. Work with the Guam OAG to remedy \$3,897 in unapproved questioned costs.

After review of the unapproved costs that had been submitted for reimbursement during the Leevin Camacho administration, we concur and will reimburse the full amount.

5. Require the Guam OAG to ensure its subrecipients are adequately accounting for VOCA grant funds.

In addition to our response to Item #1, we will be conducting site visits. We believe that all of these recommendations stem from major deficiency which is sub recipient monitoring. We will be meeting with sub recipients to discuss this issue in particular after audit is formally released.

6. Require the Guam OAG to ensure that its subrecipients are in compliance with the Uniform Guidance single audit requirements.

While this argument has been made ad nauseam, this issue occurred during Leevin Camacho's administration. We are thankful that the auditors brought this to our attention. This will be addressed when we meet with all sub recipients. Both sub recipients will be put on conditional awards.


7. Ensure the Guam OAG implements procedures to perform periodic verification of the performance data submitted by subrecipients.

8. Ensure the Guam OAG conducts its outstanding subrecipient monitoring reviews and maintains adequate documentation of subrecipient monitoring as required by the Guam OAG and VOCA guidelines.

In response to Items 7 & 8:

Again, this occurred during Leevin Camacho's administration and we are now abreast of the deficiencies of the OAG's Subrecipient Monitoring performance. We believe that adequate subrecipient monitoring would have identified these issues and it is our goal to adhere to the Office of the Attorney General's subrecipient protocols.

Sincerely,



Douglas B. Moylan
Attorney General of Guam



Yolanda Elliott
Chief of Staff
Office of the Attorney General of Guam

APPENDIX 4: The 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

January 23, 2024

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

FROM: Jeffery A. Haley *Jeffery A Haley*
Acting Director

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs Victim Assistance Grants Awarded to the Guam Office of the Attorney General, Tamuning, Guam*

This memorandum is in reference to your correspondence, dated December 14, 2023, transmitting the above-referenced draft audit report for the Guam Office of the Attorney General (Guam OAG). We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains **eight** recommendations and **\$3,897** in questioned costs. The following is the Office of Justice Programs' (OJP) analysis of the draft audit report recommendations. For ease of review, the recommendations directed to OJP are restated in bold and are followed by OJP's response.

1. We recommend that OJP ensure the Guam OAG implements its plan to formally assess victim service needs in Guam.

OJP agrees with the recommendation. In its response, dated January 11, 2024, the Guam OAG stated that it will begin scheduling meetings with subrecipients to discuss the audit, address identified deficiencies, sub-recipient monitoring schedule and criteria, and victim service needs.

Accordingly, we will coordinate with the Guam OAG to obtain: a copy of its implemented plan for formally assessing victim service needs, to identify gaps in available services in Guam; and support to validate that the plan has been executed.

2. **We recommend that OJP ensure the Guam OAG maintains documentation to support its methodology for allocating at least 10 percent of the total grant funds to priority funding program areas as required by OJP.**

OJP agrees with the recommendation. In its response, dated January 11, 2024, the Guam OAG acknowledged that, while many issues occurred under a different administration, it would implement and document its priority funding program determinations to ensure that these deficiencies do not reoccur.

Accordingly, we will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, which document its methodology for allocating at least 10 percent of total grant funds to serve victims in the priority funding areas, as required by OJP.

3. **We recommend that OJP ensure the Guam OAG is accurately reporting VOCA victim assistance grant-related expenditures on its SEFA.**

OJP agrees with the recommendation. In its response, dated January 11, 2024, the Guam OAG stated that it had implemented a Standard Operating Procedure (SOP), related to the compensation audit, that will also address this recommendation.

Accordingly, we will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, to ensure that Victims of Crime Act (VOCA) victim assistance grant-related expenditures are accurately reported to OJP.

4. **We recommend that OJP work with the Guam OAG to remedy \$3,897 in unapproved questioned costs.**

OJP agrees with the recommendation. In its response, dated January 11, 2024, the Guam OAG stated that it will reimburse the \$3,897 in unapproved questioned costs to the Department of Justice (DOJ).

Accordingly, we will work with Guam OAG to facilitate the return of the \$3,897 in unapproved questioned costs, that were charged to Grant Number 2019-V2-GX-0035, including the submission of the revised, final Federal Financial Report for the award.

5. **We recommend that OJP require the Guam OAG to ensure its subrecipients are adequately accounting for VOCA grant funds.**

OJP agrees with the recommendation. In its response, dated January 11, 2024, the Guam OAG stated that it believes that all of the recommendations arise from sub-recipient monitoring deficiencies, and it plans to meet with subrecipients to discuss reporting of the VOCA funds, after the release of the audit report.

Accordingly, we will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, to ensure that subrecipients adequately account for VOCA-related grant funds in their accounting system.

6. We recommend that OJP require the Guam OAG to ensure that its subrecipients are in compliance with the Uniform Guidance single audit requirements.

OJP agrees with the recommendation. In its response, dated January 11, 2024, the Guam OAG stated that it will meet with subrecipients to ensure compliance with the Uniform Guidance regarding the single audit requirements, after release of the final audit report.

Accordingly, we will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, to ensure that subrecipients are in compliance with the Uniform Guidance single audit requirements.

7. We recommend that OJP ensure the Guam OAG implements procedures to perform periodic verification of the performance data submitted by subrecipients.

OJP agrees with the recommendation. In its response, dated January 11, 2024, the Guam OAG stated that adequate subrecipient monitoring would have identified these issues, and therefore, plans to implement appropriate procedures, in accordance with the VOCA guidelines.

Accordingly, we will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, to ensure that periodic verification of performance data submitted by subrecipients is performed.

8. We recommend that OJP ensure the Guam OAG conducts its outstanding subrecipient monitoring reviews and maintains adequate documentation of subrecipient monitoring as required by the Guam OAG and VOCA guidelines.

OJP agrees with the recommendation. In its response, dated January 11, 2024, the Guam OAG stated that adequate subrecipient monitoring would have identified these issues, and therefore, plans to implement appropriate procedures, in accordance with the VOCA guidelines.

Accordingly, we will coordinate with Guam OAG to obtain: 1) documentation to support that all outstanding subrecipient monitoring reviews are completed; and 2) a copy of written policies and procedures, developed and implemented, to ensure that adequate documentation is maintained from its subrecipient monitoring, as required by the Guam OAG and VOCA guidelines.

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, of my staff, on (202) 514-7270.

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

cc: 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
Director of Operations, Budget, and
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Director, Office of Operations – Audit Division
Office of the Inspector General

OJP Executive Secretariat
Control Number OCOM000698

APPENDIX 5: 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) Office for Victims of Crime (OVC) and the Guam Office of the Attorney General (Guam OAG). OJP's response is incorporated in Appendix 4, and the Guam OAG's response is incorporated in Appendix 3 of this final report. In response to our draft audit report, OJP agreed with our recommendations and, as a result, the status of the audit report is resolved. The Guam OAG noted in its response that the current administration was not in place during our audit scope; and while the Guam OAG neither agreed nor disagreed with the recommendations, its response included actions taken or planned to address each recommendation. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendations for OJP:

1. Ensure the Guam OAG implements its plan to formally assess victim service needs in Guam.

Resolved. OJP agreed with our recommendation and stated that it will coordinate with the Guam OAG to obtain a copy of its implemented plan for formally assessing victim service needs to identify gaps in available services in Guam and evidence that the plan has been executed.

In its response, the Guam OAG did not explicitly agree or disagree with our recommendation. The Guam OAG stated that once the audit is released, it will begin scheduling meetings with subrecipients to discuss the audit, victim service needs, and plans to address deficiencies identified in the report.

This recommendation can be closed when we receive evidence that the Guam OAG has implemented its plan to formally assess victim services needs in Guam.

2. Ensure the Guam OAG maintains documentation to support its methodology for allocating at least 10 percent of the total grant funds to priority funding program areas as required by OJP.

Resolved. OJP agreed with our recommendation and stated that it will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, which document its methodology for allocating at least 10 percent of total grant funds to serve victims in the priority funding areas, as required by OJP.

In its response, the Guam OAG did not explicitly agree or disagree with our recommendation. The Guam OAG stated that it plans to implement internal controls and corrective actions to ensure that the identified significant deficiencies do not reoccur. In addition, the Guam OAG stated that it will document its priority funding program determinations.

This recommendation can be closed when we receive evidence that the Guam OAG is maintaining documentation to support its methodology for allocating at least 10 percent of the total grant funds to priority funding program areas as required by OJP.

3. Ensure the Guam OAG is accurately reporting VOCA victim assistance grant-related expenditures on its SEFA.

Resolved. OJP agreed with our recommendation and stated that it will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, to ensure that Victims of Crime Act (VOCA) victim assistance grant-related expenditures are accurately reported.

In its response, the Guam OAG did not explicitly agree or disagree with our recommendation. The Guam OAG stated that it has recently implemented standard operating procedures to address Recommendation Number 3 made in the OIG's Audit of the Office of Justice Programs Victim Compensation Grants Awarded to the Guam Office of the Attorney General and that this policy will also address this recommendation.¹²

This recommendation can be closed when we receive evidence that the Guam OAG has implemented standard operating procedures to ensure that it is accurately reporting VOCA victim assistance grant-related expenditures on its SEFA.

4. Work with the Guam OAG to remedy \$3,897 in unapproved questioned costs.

Resolved. OJP agreed with our recommendation and stated that it will work with the Guam OAG to facilitate the return of the \$3,897 in unapproved questioned costs that were charged to Grant Number 2019-V2-GX-0035, including the submission of the revised, final Federal Financial Report for the award.

In its response, the Guam OAG did not explicitly agree or disagree with our recommendation. The Guam OAG stated that it has reviewed the unapproved costs, concurred with the audit results, and will reimburse the full amount to OJP.

This recommendation can be closed when we receive evidence that the \$3,897 in unapproved questioned costs has been remedied in an appropriate manner.

¹² U.S. Department of Justice (DOJ) Office of the Inspector General (OIG), [Audit of the Office of Justice Programs Victim Compensation Grants Awarded to the Guam Office of the Attorney General, Tamuning, Guam](#), Audit Report 23-106 (September 2023), oig.justice.gov/reports/audit-office-justice-programs-victim-compensation-grants-awarded-guam-office-attorney.

5. Require the Guam OAG to ensure its subrecipients are adequately accounting for VOCA grant funds.

Resolved. OJP agreed with our recommendation and stated that it will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, to ensure that subrecipients adequately account for VOCA-related grant funds in their accounting system.

In its response, the Guam OAG did not explicitly agree or disagree with our recommendation. The Guam OAG acknowledged deficiencies in subrecipient monitoring activities and stated that, in addition to its aforementioned plans to implement internal controls and corrective actions to ensure that significant deficiencies do not reoccur, the Guam OAG also plans to conduct subrecipient site visits, which will include discussions on adequately accounting for VOCA grant funds.

This recommendation can be closed when we receive evidence that the Guam OAG has implemented controls to ensure that its subrecipients are adequately accounting for VOCA grant funds.

6. Require the Guam OAG to ensure that its subrecipients are in compliance with the Uniform Guidance single audit requirements.

Resolved. OJP agreed with our recommendation and stated that it will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, to ensure that subrecipients are in compliance with the Uniform Guidance single audit requirements.

In its response, the Guam OAG did not explicitly agree or disagree with our recommendation. The Guam OAG stated that it intends to conduct subrecipient site visits, which will include discussions on the Uniform Guidance single audit requirements.

This recommendation can be closed when we receive evidence that the Guam OAG has implemented controls to ensure that its subrecipients are in compliance with the Uniform Guidance single audit requirements.

7. Ensure the Guam OAG implements procedures to perform periodic verification of the performance data submitted by subrecipients.

Resolved. OJP agreed with our recommendation and stated that it will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, to ensure that periodic verification of performance data submitted by subrecipients is performed.

In its response, the Guam OAG did not explicitly agree or disagree with our recommendation. The Guam OAG stated that its goal is to adhere to the Guam OAG's subrecipient protocols.

This recommendation can be closed when we receive evidence that the Guam OAG has implemented procedures to perform periodic verification of the performance data submitted by subrecipients.

- 8. Ensure the Guam OAG conducts its outstanding subrecipient monitoring reviews and maintains adequate documentation of subrecipient monitoring as required by the Guam OAG and VOCA guidelines.**

Resolved. OJP agreed with our recommendation and stated that it will coordinate with the Guam OAG to obtain documentation to support that all outstanding subrecipient monitoring reviews are completed. OJP further stated that it will coordinate with the Guam OAG to obtain a copy of written policies and procedures, developed and implemented, to ensure that adequate documentation is maintained from its subrecipient monitoring, as required by the Guam OAG and VOCA guidelines.

In its response, the Guam OAG did not explicitly agree or disagree with our recommendation. The Guam OAG reiterated that its goal is to adhere to the Guam OAG's subrecipient protocols.

This recommendation can be closed when we receive evidence that the Guam OAG has conducted its outstanding subrecipient monitoring reviews and maintains adequate documentation of subrecipient monitoring as required by the Guam OAG and VOCA guidelines.