



Audit of the Office of Justice Programs  
Bureau of Justice Assistance  
Harold Rogers Prescription Drug Monitoring Program Grants  
Awarded to the Pennsylvania Department of Health,  
Harrisburg, Pennsylvania



AUDIT DIVISION

26-036

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**MARCH 2026**

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# EXECUTIVE SUMMARY

## **Audit of the Office of Justice Programs Bureau of Justice Assistance Harold Rogers Prescription Drug Monitoring Program Grants Awarded to the Pennsylvania Department of Health, Harrisburg, Pennsylvania**

### **Objectives**

The Office of Justice Programs (OJP) Bureau of Justice Assistance (BJA) awarded the Pennsylvania Department of Health (DOH) two grants totaling \$2,996,801 through the Harold Rogers Prescription Drug Monitoring Program (PDMP). The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the award; and to determine whether the Pennsylvania DOH demonstrated adequate progress towards achieving program goals and objectives.

### **Background**

The overall goal of the PDMP is to support state and local governments in detecting and preventing the diversion and misuse of pharmaceutically controlled substances, such as opioids and other prescription drugs. The PDMP contains category 1 awards—which aim to implement, maintain, and enhance PDMPs—and category 2 awards to strengthen PDMP efforts to develop and test innovative strategies and implement evidence-based approaches that demonstrate the impact of expanded use of PDMP data to support decision making. The Pennsylvania DOH was awarded both a category 1 and a category 2 grant. The project period for the grants was October 2023 through September 2026. As of November 18, 2025, the Pennsylvania DOH had drawn down a cumulative amount of \$813,880 for the two grants we reviewed.

### **Audit Results**

Between October 2023 and March 2025, the Pennsylvania DOH expended only \$269,833 (about 9 percent) of the total grant funds due to delays related to the PDMP system enhancements. However, as a result of our audit, we concluded that the Pennsylvania DOH was demonstrating progress toward achieving the program goals and objectives we reviewed. Specifically, under the category 1 award, we found that the Pennsylvania DOH made enhancements to its PDMP system to allow for data submissions in additional formats and the ability to pull data real-time. Additionally, under the category 2 award, we found that the Pennsylvania DOH pursued if collection of additional pharmaceutical data would support the Pennsylvania DOH in its PDMP decision making. We also determined that the Pennsylvania DOH maintained adequate documentation to support the statements contained in its progress reports for the goals and objectives we tested.

Further, this audit did not identify significant concerns regarding the Pennsylvania DOH's management of the grant budget, accuracy of completed federal financial reports, accuracy of drawdowns, or expenditures related to personnel, fringe benefits, travel, other direct costs, indirect costs, and contract costs. We make no recommendations in this report. We provided a draft of this report to OJP BJA and the Pennsylvania DOH for a response. OJP BJA provided a written response, which can be found in Appendix 2. The Pennsylvania DOH elected not to provide a written response.

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## Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of two grants awarded by the Office of Justice Programs (OJP) Bureau of Justice Assistance (BJA) through the Harold Rogers Prescription Drug Monitoring Program (PDMP) to the Pennsylvania Department of Health (Pennsylvania DOH) in Harrisburg, Pennsylvania. The two grants totaled \$2,996,801, as shown in Table 1.

**Table 1**

**Grants Awarded to the Pennsylvania Department of Health**

Award Number	Program Office	Award Date	Award Category	Project Period Start Date	Project Period End Date <sup>a</sup>	Award Amount
15PBJA-23-GK-05225-PDMP	BJA	09/27/2023	2	10/01/2023	09/30/2026	\$996,801
15PBJA-23-GK-05232-PDMP	BJA	09/27/2023	1	10/01/2023	09/30/2026	\$2,000,000
<b>Total:</b>						<b>\$2,996,801</b>

<sup>a</sup> The Pennsylvania DOH requested and received a 12-month extension of the project period for both grants.

Source: Grant documents obtained from JustGrants.

Funding through the PDMP supports state and local governments in detecting and preventing the diversion and misuse of controlled substances and scheduled chemical products by collecting and analyzing prescription data. The program contains two categories: category 1 awards, which are meant for PDMP implementation, maintenance, and enhancement; and category 2 awards, which strengthen PDMP efforts to develop and test innovative strategies, implement evidence-based approaches that demonstrate the impact of expanded use of PDMP data, or implement a multi-state effort. Due to the expected substantial involvement of BJA staff in carrying out award activities, BJA awarded all category 2 awards as cooperative agreements rather than grants.<sup>1</sup> The Pennsylvania DOH was awarded both a category 1 grant and a category 2 cooperative agreement. For simplicity, we will refer to both of these awards as grants throughout the audit report.

### The Grantee

The Pennsylvania DOH, a state agency located in Harrisburg, Pennsylvania, is responsible for providing programs and services that benefit the health, safety, and wellbeing of all Pennsylvanians. Within the

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<sup>1</sup> 31 U.S.C. § 6305 states that each executive agency shall use a cooperative agreement as the legal instrument reflecting a relationship between the federal government and a state or local government or other recipient whenever— (1) the principal purpose of the relationship is the transfer of money, property, services, or anything of value to the state or local government or other recipient to accomplish a public purpose of support or stimulation authorized by federal statute, rather than acquisition by purchase, lease, or barter of property or services for the direct benefit or use of the federal government; and (2) substantial involvement is expected between the executive agency and the state or local government or other recipient when carrying out the activity contemplated in the agreement. Cooperative agreements must also adhere to requirements in 2 C.F.R. § 200, which outlines implementation and expenditure requirements for federal financial assistance.

Pennsylvania DOH, the Office of Drug Surveillance and Misuse Prevention aims to prevent prescription drug abuse and oversees Pennsylvania's PDMP system and the awarded BJA grants.

Pennsylvania's PDMP system is an electronic database that was created in 1972 to collect information on all filled controlled substance prescriptions. The goal of the PDMP system is to help prevent prescription drug misuse and empower healthcare providers to make informed decisions about prescribing and treatment for their patients. Additionally, according to the Pennsylvania DOH, the PDMP is also a vital public health tool, providing critical data for surveillance, planning, and resource allocation.

## **OIG Audit Approach**

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

We tested compliance with what we considered to be the most important conditions of the grants. The DOJ Grants Financial Guide; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance); and the award documents contain the primary criteria we applied during the audit.

The results of our analysis are discussed in detail later in this report. Appendix 1 contains additional information on this audit's objectives, scope, and methodology.

# Audit Results

## Program Performance and Accomplishments

We reviewed the required performance reports, grant solicitations, and grant documentation, and interviewed Pennsylvania DOH officials to determine whether the Pennsylvania DOH demonstrated adequate progress towards achieving the program goals and objectives. We also reviewed progress reports to determine if the required reports were accurate.

## Program Goals and Objectives

To determine whether the Pennsylvania DOH demonstrated adequate progress towards achieving grant goals and objectives, we interviewed Pennsylvania DOH officials and reviewed relevant supporting documentation for a sample of six award objectives as noted in Table 2 below. From our review of progress reports, testimonial evidence, and other supporting documentation as described below, we determined that the Pennsylvania DOH had experienced delays in certain areas of grant activity but was making progress towards achieving the objectives of the grants.

Table 2

Award Objectives Selected for Review

Award Number	Objective Description
15PBJA-23-GK-05232-PDMP	Facilitate electronic information sharing among states in compliance with the Prescription Monitoring Information Exchange (PMIX) National Architecture.
	Improve the quality and accuracy of PDMP data.
	Utilize emerging technology and reporting methods to improve the collection and sharing of PDMP data both intrastate and interstate.
	Address staffing needs for the state agency and support agencies.
15PBJA-23-GK-05225-PDMP	Ensure data quality and integrity.
	Produce data reports and analysis.

Source: Grant documents obtained from JustGrants.

Specifically, under the category 1 award, grant 15PBJA-23-GK-05232-PDMP, the Pennsylvania DOH enhanced its PDMP by working with the system's vendor to allow for additional data formats to be entered into the system. Additional enhancements were also made to the PDMP system by creating real-time dashboards to query PDMP data. For example, a dashboard was created to assist in determining the impact of a care disruption event. Additionally, funds were used to maintain the PDMP system's RxCheck data sharing hub connection for interstate PDMP data sharing.

In reviewing the category 2 award, grant 15PBJA-23-GK-05225-PDMP, we found the Pennsylvania DOH made progress toward expanding its use of PDMP data through the performance of a review of data fields utilized by the pharmaceutical industry to determine if the fields would benefit the Pennsylvania DOH's PDMP.

Additionally, funds were used to analyze prescriber and dispenser identifiers to determine best practices for data collection and analysis.

## Performance Delays

In April of 2025, the Pennsylvania DOH received a 12-month no-cost extension for each grant citing delays caused by (1) lengthy procurement processes to establish purchase and change orders for work to be completed by the PDMP provider in order to make system enhancements and (2) the time-consuming enhancement production process. As of March 2025, the Pennsylvania DOH had not yet recorded any expenditures made to its PDMP system provider for completed system enhancements because the provider had not yet requested payment. However, during our audit the Pennsylvania DOH provided us with demonstrations of the aforementioned enhancements that were in the process of being deployed.

## Required Performance Reports

According to the DOJ Grants Financial Guide, the funding recipient should ensure that valid and auditable source documentation is available to support all data collected for each performance measure specified in the program solicitation. To verify the information reported by Pennsylvania DOH in the required performance reports, we selected performance measures from each grant's reports for the period ending December 31, 2024. Under the category 1 award, we selected 4 performance measures related to the enhancement of the PDMP system and under the category 2 award, we selected 2 performance measures related to the expanded use of PDMP data to support decision making. We then traced reported statements to supporting documentation maintained by the Pennsylvania DOH. Supporting documentation included records of PDMP data analysis, contract documentation for the implementation of a system dashboard, and records of data integrations.

Based on our progress report testing, we did not identify any instances where the accomplishments described in the required reports did not match the supporting documentation.

## Grant 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 and to accurately account for funds awarded to them. To assess the Pennsylvania DOH's financial management of the grants covered by this audit, we conducted interviews with financial staff, examined policy and procedures, and inspected grant documents to determine whether the Pennsylvania DOH adequately safeguarded the grant funds we audited. We also reviewed the Pennsylvania single audit report for 2024 and did not identify any internal control weaknesses or significant non-compliance issues related to the PDMP federal awards granted to the Pennsylvania DOH.<sup>2</sup>

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<sup>2</sup> 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. The audit is referred to as "single" because it includes all federal financial assistance that the entity has received and expended. Under the Uniform Guidance, such entities that

*Continued*

We performed testing in the areas that were relevant for the management of this grant, as discussed throughout this report, and did not identify concerns.

## Grant Expenditures

For awards 15PBJA-23-GK-05225-PDMP and 15PBJA-23-GK-05232-PDMP, the Pennsylvania DOH's approved budgets included personnel, fringe, travel, supplies, contracts, other, and indirect costs.<sup>3</sup> Between October 2023 (the start date of the awards) and March 2025, the Pennsylvania DOH charged a total of \$269,833 to the two grants we audited. Of the expenditures charged, we determined that personnel and fringe-related costs accounted for \$110,403, or 41 percent, and contracted services for PDMP integration accounted for \$123,316, or 46 percent.

To determine whether the costs charged to the awards were allowable, supported, and properly allocated in compliance with award requirements, we tested a sample of 84 transactions totaling \$219,564, or 81 percent of the total grant expenditures as of March 2025. We reviewed accounting records and documentation, including the procurement of contracted services, and performed verification testing related to the selected grant expenditure transactions. We did not identify any significant concerns applicable to personnel, fringe, travel, other direct costs, indirect costs, or contract costs.

## Budget Management and Control

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

We compared grant expenditures to the approved budgets to determine whether the Pennsylvania DOH transferred funds among budget categories in excess of 10 percent. We determined that the cumulative difference between category expenditures and approved budget category totals was not greater than 10 percent.

## Drawdowns

Grant 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.

For both grants, the Pennsylvania DOH requested drawdowns on a reimbursement basis. To assess whether the Pennsylvania DOH managed grant receipts in accordance with federal requirements, we compared the

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expend \$1,000,000 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. Prior to October 1, 2024, the threshold for single audit requirements was \$750,000.

<sup>3</sup> While supplies were in the approved grant budgets, the Pennsylvania DOH did not yet have any supply-related grant expenditures between October 2023 and March 2025.

total amount reimbursed to the total expenditures in the accounting records. As of November 18, 2025, the Pennsylvania DOH's drawdown requests totaled \$230,379 for grant 15PBJA-23-GK-05225-PDMP and \$583,501 for grant 15PBJA-23-GK-05232-PDMP. We did not identify significant deficiencies related to the Pennsylvania DOH's process for developing drawdown requests.

### **Federal Financial Reports**

According to the DOJ Grants Financial Guide, recipients shall report the cumulative expenditures incurred on each financial report. To determine whether the Pennsylvania DOH submitted accurate FFRs for each grant, we reviewed the reports for the period ending March 31, 2025, and compared the amount reported as cumulative expenditures on the report to the Pennsylvania DOH's accounting records. We determined that the cumulative expenditures for the reports reviewed matched the accounting records.

## **Conclusion**

As a result of our audit testing, we concluded that the Pennsylvania DOH generally was managing the grants that we reviewed appropriately and was demonstrating progress towards achieving the grants' stated goals and objectives. We found that all tested expenditures were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and the terms and conditions of the grants. Additionally, we did not identify deficiencies with the Pennsylvania DOH's processes for managing the grant budgets, requesting drawdowns, and completing federal financial reports. Therefore, we make no recommendations.

# APPENDIX 1: Objectives, Scope, and Methodology

## Objectives

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

## Scope and Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This was an audit of ongoing Office of Justice Programs (OJP) Bureau of Justice Assistance (BJA) grants awarded to the Pennsylvania DOH under the Harold Rogers Prescription Drug Monitoring Program. The Pennsylvania DOH was awarded a total of \$2,996,801 for awards 15PBJA-23-GK-05225-PDMP and 15PBJA-23-GK-05232-PDMP, and as of November 18, 2025, had drawn down \$813,880 of the total grant funds awarded. Our audit concentrated on, but was not limited to, the period of October 2023 through March 2025.

To accomplish our objectives, we tested compliance with what we consider to be the most important conditions of the Pennsylvania DOH's activities related to the audited grants. We performed sample-based audit testing for grant expenditures including payroll and fringe benefit charges, travel costs, indirect expenses, other direct costs, contract related costs, financial reports, progress reports, drawdowns, and federal financial reports. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grants reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected. The 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 JustGrants system as well as the Pennsylvania DOH's accounting system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

We discussed our audit results with Pennsylvania DOH officials throughout the audit and at a formal exit conference. We also provided the Pennsylvania DOH with a draft of our report and allowed an opportunity

to respond, but the Pennsylvania DOH opted not to provide a written response. OJP BJA provided a written response, which can be found in Appendix 2.

## 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 Pennsylvania DOH to provide assurance on its internal control structure as a whole. The Pennsylvania DOH's management is responsible for the establishment and maintenance of internal controls in accordance with OMB Circular A-123 and 2 C.F.R. § 200. Because we do not express an opinion on the Pennsylvania DOH's internal control structure as a whole, we offer this statement solely for the information and use of the Pennsylvania DOH and BJA.<sup>4</sup>

We assessed the Pennsylvania DOH's management's design, implementation, and operating effectiveness of relevant internal controls and identified deficiencies that we believe could affect the Pennsylvania DOH's ability to effectively operate, ensure compliance with laws and regulations, and/or comply with grant terms and conditions. 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.

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<sup>4</sup> This restriction is not intended to limit the distribution of this report, which is a matter of public record.

# APPENDIX 2: The Office of Justice Programs Response to the Draft Audit Report



U.S. Department of Justice

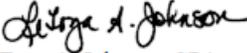
Office of Justice Programs

*Office of Audit, Assessment, and Management*

Washington, DC 20531

**February 23, 2026**

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

FROM:   
LeToya A. Johnson, CPA  
Acting Deputy Director  
Audit and Review Division

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs' Bureau of Justice Assistance's Harold Rogers Prescription Drug Monitoring Program Grants Awarded to the Pennsylvania Department of Health, Harrisburg, Pennsylvania*

This memorandum is in response to your correspondence dated January 16, 2026, transmitting the above-referenced draft audit report for the Pennsylvania Department of Health. The draft audit report does not contain any recommendations directed to OJP. OJP has reviewed the draft audit report and does not have any comments.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact me on (202) 353-5744.

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