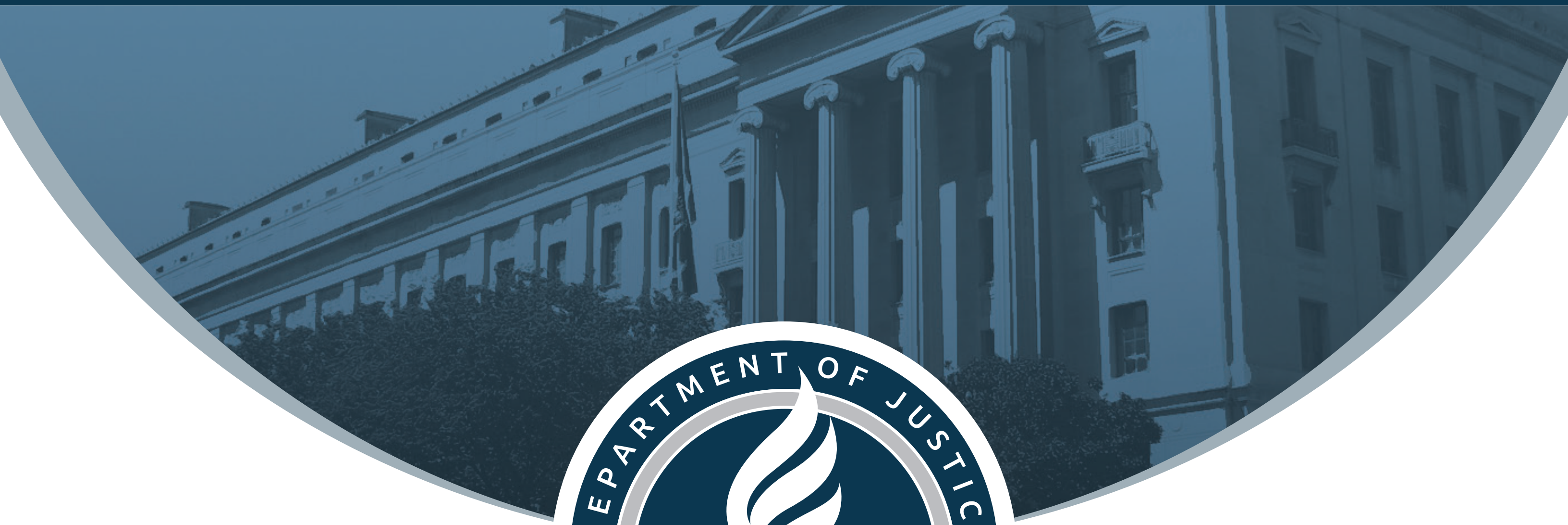

Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Mississippi State Department of Health to the Gulf Coast Center for Nonviolence, Inc., Biloxi, Mississippi

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AUDIT DIVISION

26-087

SEPTEMBER 2026

EXECUTIVE SUMMARY

Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Mississippi State Department of Health to the Gulf Coast Center for Nonviolence, Inc., Biloxi, Mississippi

Background

The U.S. Department of Justice (DOJ), Office of Justice Programs (OJP) provided funds to the Mississippi State Department of Health (Mississippi DOH) to make subawards to support victim assistance programs in Mississippi. The Mississippi DOH awarded $1,798,654 in crime victim assistance funds to the Gulf Coast Center for Nonviolence, Inc. (Gulf Coast), under one subaward. The purpose of Gulf Coast's subaward was to provide services to victims of domestic violence, sexual assault, human trafficking, and survivors of homicide. As of December 2025, the Mississippi DOH had reimbursed Gulf Coast $912,335 for the subaward we reviewed.

Audit Objective

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

Recommendations

Our report contains two recommendations to OJP to work with the Mississippi DOH to assist Gulf Coast in improving its subaward management and administration. Gulf Coast, the Mississippi DOH, and OJP officials provided responses to our draft audit report, which can be found in Appendices 3, 4, and 5, respectively. Our analysis of those responses can be found in Appendix 6.

Audit Results

Program Performance

We concluded that Gulf Coast provided services to victims of domestic violence, sexual assault, human trafficking, and survivors of homicide in southern Mississippi.

Gulf Coast received VOCA funding to create or provide a crisis phone line, shelter, counseling, childcare, court advocacy services, forensic medical examinations, and public education and training. We found that Gulf Coast completed all but one program activity that we tested.

Financial Management

Gulf Coast's personnel expenditures were generally allowable and supported, but we determined that $7,763 in reimbursements received for travel, computers, and associated indirect costs were unallowable.

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Introduction

The Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of victim assistance funds received by the Gulf Coast Center for Nonviolence, Inc. (Gulf Coast), in Biloxi, Mississippi. The Office of Justice Programs (OJP) Office for Victims of Crime (OVC) provided this funding to the Mississippi State Department of Health (Mississippi DOH), which serves as the State Administering Agency (SAA) for Mississippi and makes subawards to direct service providers. As a direct service provider, Gulf Coast received a subaward with a 2-year performance period from the Mississippi DOH totaling $1,798,654, as shown in Table 1. These funds originated from two separate federal grants to the Mississippi DOH; however, our audit only concentrated on the $927,832 in funds subawarded to Gulf Coast for the second year of the performance period.

Table 1

Funds Subawarded to Gulf Coast from the Mississippi DOH

SAA Subaward Identifier	OJP Prime Award Number	Performance Start Date	Performance End Date	Subaward Amount
SG-1194-R9/10 (Year 1)	2020-V2-GX-0021	10/01/2023	09/30/2024	$870,821[a]
SG-1194-R11/12 (Year 2)	15POVC-23-GG-00447-ASSI	10/01/2024	09/30/2025	$927,832
Total				**$1,798,654**[b]

[a] This amount reflects Gulf Coast's first-year subaward expenditures. Originally, Gulf Coast was awarded $887,636 for the first year. However, because Gulf Coast had a $16,815 balance after the first year, the Mississippi DOH rolled the remaining balance into the funds available for the second year of the award. The Mississippi DOH subsequently reduced the amount available in the first year of the award to $870,821.

[b] Differences are due to rounding.

Source: JustGrants, Mississippi DOH

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

[1] The VOCA Victim Assistance Formula Grant Program is funded under 34 U.S.C. § 20101 (2026). Federal criminal fees, penalties, forfeited bail bonds, gifts, donations, and special assessments support the CVF. The total amount of funds that the OVC may distribute each year depends upon the amount of CVF deposits made during the preceding years and limits set by Congress.

Gulf Coast Center for Nonviolence, Inc.

Gulf Coast's mission is to foster a secure, nurturing, and empowering atmosphere for individuals and families impacted by interpersonal violence and trauma. Gulf Coast seeks to provide services or programs to victims and survivors of domestic violence, sexual assault, survivors of homicide, and human trafficking. Gulf Coast operates in six locations in southern Mississippi.

OIG Audit Approach

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

To gain a further understanding of victim assistance subaward oversight, as well as to evaluate subrecipient performance and administration of VOCA-funded programs, we solicited feedback from Mississippi DOH officials regarding Gulf Coast's record of delivering crime victim services, accomplishments, and compliance with Mississippi DOH subaward requirements.

We tested compliance with what we considered to be the most important conditions of the subawards. The DOJ Grants Financial Guide; VOCA Guidelines and Final Rule; 2 C.F.R. § 200 (2026), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Mississippi DOH and Gulf Coast guidance; and the OVC and SAA award documents contain the primary criteria we applied during this audit. The results of our analysis are discussed in detail in the following sections of this report. Appendix 1 contains additional information on this audit's objective, scope, and methodology. Appendix 2 presents the audit's Schedule of Dollar-Related Findings.

Audit Results

Program Performance and Accomplishments

As established by the VOCA legislation, VOCA subawards are available to subrecipients for the purpose of providing direct services to victims. Gulf Coast received its VOCA funding from the Mississippi DOH to create or provide a crisis phone line, shelter, counseling, childcare, court advocacy services, forensic medical examinations, and public education and training. We obtained an understanding of Gulf Coast's standard operating procedures in relation to the subaward-funded services. We also compared the subaward agreement to supporting documentation of Gulf Coast's accomplishments to determine whether Gulf Coast provided the services for which it was funded. Overall, we concluded that Gulf Coast provided victim services and executed all but one of the program activities that we tested.

Program Implementation

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

To obtain an understanding of its standard operating procedures in relation to the audited victim services, we interviewed Gulf Coast's Chief Executive Officer, Chief Financial Officer, and Chief Clinical Officer. We also reviewed Gulf Coast's written policies and procedures governing its VOCA-funded program. We determined Gulf Coast's policies and procedures lacked guidance for compiling and retaining supporting documentation of subaward performance data. Adequate policies and procedures promote effective and efficient operations, reliable reporting, and compliance with federal grant requirements. In response, Gulf Coast created and implemented procedures for compiling and retaining performance data. We found that these procedures addressed our concerns; therefore, we make no recommendation.

Program Services

The subaward agreement required Gulf Coast to provide services to adult and child victims of domestic violence, sexual assault, sex trafficking, and survivors of homicide victims in six southern Mississippi counties. We tested the accomplishment of these activities by judgmentally selecting five activities and reviewing Gulf Coast's supporting documentation. We found that Gulf Coast executed the funded services with one exception; it did not provide forensic medical examinations. According to Gulf Coast, the intended facility where the examinations were to be performed did not open until October 2025, which was after the subaward ended.

According to Mississippi DOH's subaward agreement, subrecipients must submit a subgrant modification request to the SAA when there is a change in program scope, to include changes to established objectives and deliverables. Although Gulf Coast experienced a delay in providing forensic examinations during the subaward performance period and was making progress toward this activity as of October 2025, we believe it should have communicated its inability to provide the examinations during the subaward period to the Mississippi DOH via a subgrant modification. In May 2026, Mississippi DOH confirmed that it agreed with our assessment that a subgrant modification was needed. Prompt notification of such changes is necessary to ensure funding agencies are made aware of developments impacting program performance. Therefore, we recommend that OJP work with the Mississippi DOH to ensure that Gulf Coast develops and implements a control to ensure the Mississippi DOH is notified of events impacting the accomplishment of subaward objectives, such as changes in program scope, performance period, duration, or other activities.

Financial Management

According to the DOJ Grants Financial Guide, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records to accurately account for awarded funds. Written policies and procedures are essential for the establishment of internal controls and to ensure those controls are understood and consistently implemented. Management is responsible for the design and implementation of these policies and procedures.

As part of our audit work, we toured some of Gulf Coast's facilities, conducted interviews with program and financial officials, examined policies and procedures, reviewed subaward documents, and performed expenditure testing to determine whether Gulf Coast adequately accounted for the subaward funds we audited. We found that Gulf Coast's policies, procedures, and financial management system were generally sufficient to account for federal funds and track expenditures. Further, our audit concluded that tested personnel expenditures were generally allowable and supported. However, as described below, we found $7,763 in travel, computers, and indirect reimbursements that were unallowable.

Subaward Expenditures and Matching Costs

Gulf Coast requested reimbursement from the Mississippi DOH using monthly reimbursement request forms. For the subaward we audited, Gulf Coast's approved budget included costs for personnel, employee benefits, travel, supplies, contractual services, repairs, equipment, victim assistance, and indirect costs. As of December 2025, we found that the Mississippi DOH paid a total of $912,335 of the $927,832 for the second year of the audited VOCA subaward to Gulf Coast.

We reviewed a sample of Gulf Coast's transactions to determine whether the costs charged to the project and paid with VOCA funds were accurate, allowable, supported, and in accordance with the VOCA program requirements. We judgmentally selected 153 transactions totaling $105,385 in costs for personnel, travel, repairs, and equipment. We also reviewed all indirect costs charged to the subaward. As described below, we found issues in costs reimbursed for travel, computers, and indirect costs, resulting in $7,763 in questioned costs. Unless noted below, the transactions tested were allowable and adequately supported.

Personnel Costs

The largest cost area for which Gulf Coast received reimbursement was personnel costs. We determined that the Mississippi DOH reimbursed Gulf Coast $557,384 of $912,335 (approximately 61 percent) for personnel under the subaward. We judgmentally sampled Gulf Coast's January 2025 transactions, including three bi-weekly employee payments totaling $49,282 and $3,248 in employee benefits for health insurance and retirement. We determined that all transactions tested were accurate, allowable, and supported.

Other Costs

The subaward budget allowed Gulf Coast to claim reimbursement for 50 percent of VOCA-related travel expenses. Overall, we tested 95 travel transactions and determined that 58 transactions exceeded the allowable rate of 50 percent approved in the subaward agreement, while 37 transactions were under the allowable rate. The net result amounted to a $2,433 overpayment. Gulf Coast acknowledged the discrepancy and stated that the organization used a different method from the subaward agreement to calculate these costs related to mileage reimbursements for local travel. We recommend that OJP and the Mississippi DOH remedy $2,433 in unallowable travel reimbursements.

Further, Gulf Coast's approved budget allowed for the replacement of a single computer, but VOCA funds were used to purchase six computers because officials believed multiple workstations were necessary. We determined that Gulf Coast was reimbursed $4,318 for the additional computers not included in the approved budget. As a result, we recommend that OJP and the Mississippi DOH remedy $4,318 in unapproved computer purchases.

Lastly, we question $1,012 in unallowable indirect costs because Gulf Coast received that amount in indirect cost reimbursements for the $6,751 in direct costs we questioned above.

Matching Requirement

VOCA Guidelines generally require that subrecipients match 20 percent of each subaward unless the OVC waives this requirement. The purpose of the match requirement is to increase the amount of resources available to VOCA projects, prompt subrecipients to obtain independent resources to leverage federal funding and encourage local investment and engagement in VOCA-funded projects. Match contributions must come from non-federal sources and can be either cash or an in-kind match.[2] According to Gulf Coast's subaward agreement, phone and Internet access, software, copier services, insurance, and janitorial services are allowable match expenses. The SAA is primarily responsible for ensuring subrecipient compliance with match requirements.

Gulf Coast used cash-match contributions from non-federal funds to satisfy its match requirement, which we calculated to be $228,083 based on the amount of total federal funds expended in the period we reviewed. To review the provision of matching funds, we reviewed Gulf Coast's accounting records and judgmentally selected 22 transactions to test. We determined that the 22 match transactions were allowable and supported. However, we found that Gulf Coast contributed only $213,948, a difference of $14,136.[3] This shortfall impacts the goal of leveraging federal funding and encouraging local investment in VOCA projects. However, in March 2026, Gulf Coast was granted a match waiver. As a result, we make no recommendation.

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

[3] Differences are due to rounding.

Conclusion and Recommendations

As a result of our audit testing, we concluded that Gulf Coast provided victim services for which it was funded and met all but one of the program activities that we tested. In response to the deficiency we noted during our audit, Gulf Coast established new procedures for compiling and retaining performance documentation. We also found $7,763 in reimbursements that Gulf Coast received for travel, equipment, and indirect costs that were unallowable. We provide two recommendations to OJP to work with the Mississippi DOH to address these deficiencies.

We recommend that OJP work with the Mississippi DOH to:

1. Ensure that Gulf Coast develops and implements a control to ensure the Mississippi DOH is notified of events impacting the accomplishment of subaward objectives, such as changes in program scope, performance period, duration, or other activities.

2. Remedy $7,763 in unallowable costs reimbursed for travel ($2,433), computers ($4,318), and indirect costs ($1,012).

APPENDIX 1: Objective, Scope, and Methodology

Objective

The objective of this audit was to review how the Gulf Coast Center for Nonviolence, Inc. (Gulf Coast) used Victims of Crime Act (VOCA) funds received through a subaward from the Mississippi State Department of Health (Mississippi DOH) to assist crime victims and assess whether it accounted for VOCA funds in compliance with select award requirements, terms, and conditions. To accomplish this objective, we assessed Gulf Coast's program performance and accomplishments and grant financial management.

Scope and Methodology

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

This was an audit of one subaward to Gulf Coast. This subaward, which had a 2-year performance period and totaled $1,798,654, was funded by the Mississippi DOH from VOCA grant numbers 2020-V2-GX-0021 and 15POVC-23-GG-00447-ASSI, awarded by the Office of Justice Programs (OJP) Office for Victims of Crime (OVC) from October 1, 2023, through September 30, 2025. Our audit concentrated on $927,832 in funds subawarded to Gulf Coast for the second year of the performance period. As of December 2025, the Mississippi DOH had reimbursed Gulf Coast $912,335 in subaward funds for the same period.

Our audit concentrated on, but was not limited to, the period of October 1, 2024, through September 30, 2025. The Department of Justice (DOJ) Grants Financial Guide; the VOCA Guidelines and Final Rule; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Mississippi DOH award documents and guidance; and OVC award documents contain the primary criteria we applied during the audit.

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

During our audit, we obtained information from DOJ's JustGrants, as well as from Gulf Coast's grant management systems, payroll system, and financial system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems; therefore, any findings identified involving information from those systems were verified with documentation from other sources.

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objective. We did not evaluate the internal controls of Gulf Coast to provide assurance on its internal control structure as a whole. Gulf Coast 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 Gulf Coast's internal control structure as a whole, we offer this statement solely for the information and use of Gulf Coast and OJP.[4]

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

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

APPENDIX 2: Schedule of Dollar-Related Findings

Description	OJP Prime Number	SAA Subaward Identifier	Amount	Page
Questioned Costs:[5]				
Unallowable Travel Expenses	15POVC-23-GG-00447-ASSI	SG-1194-R11/12	$2,433	5
Unallowable Equipment (Computer Workstations)			4,318	5
Unallowable Indirect Costs			1,012	5
Total Unallowable Costs			$7,763	4
TOTAL DOLLAR-RELATED FINDINGS			**$7,763**	

[5] **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 Gulf Coast Center for Nonviolence, Inc. Response to the Draft Report

Gulf Coast Center for Nonviolence, Inc.
P.O. Box 333
Biloxi, MS 39533
Office 228-436-3809 Fax 228-435-0513 Crisis Line 800-800-1396

July 30, 2026

Sean Relay
Acting Regional Audit Manager
U.S. Department of Justice
Office of the Inspector General
75 Ted Turner Drive, Suite 1130
Atlanta, Georgia 30303

Re: Response to Draft Audit Report

Dear Mr. Relay:

The Gulf Coast Center for Nonviolence (GCCFN) appreciates the professionalism and cooperation demonstrated by the Office of the Inspector General throughout this audit process. We also appreciate the opportunity to review and respond to the draft audit report.

GCCFN is committed to maintaining the highest standards of stewardship, accountability, and compliance in administering federal grant funds. We are pleased that the audit concluded GCCFN successfully provided victim services for which the organization was funded, found that our personnel expenditures were generally allowable and supported, and recognized that our financial management system and internal controls are generally sufficient to account for federal funds. We also appreciate the acknowledgment that GCCFN implemented corrective procedures during the audit to strengthen performance documentation practices.

Below are GCCFN's responses to each recommendation.

Recommendation 1
Recommendation: Ensure that GCCFN develops and implements a control to ensure the Mississippi Department of Health is notified of events impacting the accomplishment of subaward objectives, including changes in program scope, performance period, duration, or other activities.

GCCFN Response: GCCFN concurs with this recommendation.

The delay in implementing forensic medical examination services resulted from circumstances outside of GCCFN's control, specifically the delayed opening of the intended forensic examination facility, which ultimately opened after the grant performance period concluded. Although GCCFN continued working toward implementation of this activity, we acknowledge that a formal subgrant modification request should have been submitted to the Mississippi Department of Health once it became apparent that the activity could not be completed within the award period.

To address this recommendation, GCCFN has implemented additional grant management procedures requiring program directors and grant management staff to immediately notify executive leadership of any circumstance that could affect grant objectives, deliverables, timelines, or scope of work. These procedures include:

- Periodic review of program progress against grant deliverables.
- Documentation of potential changes affecting grant performance.

- Timely communication with the State Administering Agency regarding any necessary program modifications.

<u>**Recommendation 2**</u>

Recommendation: Remedy $7,763 in questioned costs consisting of travel, computer purchases, and associated indirect costs.

GCCFN Response: GCCFN respectfully concurs with the recommendation to work with the Mississippi Department of Health and the Office of Justice Programs to resolve the questioned costs.

<u>Travel Costs</u>

GCCFN respectfully disagrees that the travel reimbursement methodology used was inconsistent with the requirements of the Mississippi Department of Health. The organization calculated travel reimbursement based on the percentage of each employee's time allocated to the VOCA grant, which is the methodology required by the Mississippi Department of Health for allocating personnel-related expenses. GCCFN applied this same allocation methodology to local mileage reimbursements in good faith and consistently throughout the grant period.

The audit interprets the approved budget narrative as limiting reimbursement to 50 percent of total travel expenditures based on the proportion of the travel budget within the agency's overall budget. GCCFN believes the differing conclusions result from the wording contained in the budget narrative rather than from an inappropriate allocation of costs.

GCCFN will work cooperatively with the Mississippi Department of Health and the Office of Justice Programs to resolve this matter and determine the appropriate disposition of the questioned costs. To eliminate any future ambiguity, GCCFN will revise the language in future VOCA budget narratives to clearly state that local travel costs are allocated based on each employee's approved percentage of effort charged to the grant, consistent with the allocation methodology required by the Mississippi Department of Health.

This clarification will ensure that future budget narratives accurately reflect the methodology used for allocating travel costs and will promote a common understanding among all parties during future grant monitoring and audit activities.

<u>Computer Purchases</u>

The additional computer workstations were purchased to support increased operational needs and to ensure that staff delivering VOCA-funded services had the supplies necessary to effectively carry out grant activities. These purchases directly benefited the VOCA program and were reasonable, necessary, and allocable to the grant.

GCCFN acknowledges that the approved budget included funding for the replacement of one computer; however, the additional computer needs arose during the final months of the grant period. Under the Mississippi Department of Health's Office Against Interpersonal Violence grant administration policies, budget modifications are not accepted within 90 days of the grant closeout. As a result, GCCFN was unable to submit a budget modification request to obtain prior approval for these necessary supply purchases, despite the purchases being required to support grant-funded personnel and program operations.

GCCFN will continue to work collaboratively with the Mississippi Department of Health and the Office of Justice Programs to resolve the questioned costs associated with these purchases. To reduce the likelihood of similar situations in the future, GCCFN will continue to monitor program needs throughout the grant period and, whenever possible, submit budget modification requests before the 90-day closeout window. When unforeseen operational needs arise within that period, GCCFN will consult with the Mississippi Department of Health regarding the appropriate course of action and maintain documentation supporting the necessity and allocability of the expenditures.

Indirect Costs
Because the questioned indirect costs are associated with the questioned direct expenditures, GCCFN understands these costs will be resolved as part of the final determination regarding the underlying travel and equipment expenditures.

GCCFN will work collaboratively with the Mississippi Department of Health and OJP to resolve these costs in accordance with federal grant requirement

Matching Requirement
GCCFN appreciates the auditors' recognition that no recommendation was warranted regarding the matching requirement because a match waiver was subsequently approved. However, GCCFN would like to provide additional context regarding the apparent match shortfall identified during the audit.

GCCFN respectfully disagrees that it failed to contribute the required level of matching funds during the audit period. The organization incurred eligible non-federal expenditures in excess of the required match. However, a portion of those expenditures was funded through the Mississippi State Victim Services Fund, and the contract for those state funds was executed later than anticipated. As a result, the Mississippi Department of Health did not accept those otherwise eligible expenditures toward the VOCA match requirement during the audit period.

If the contract had been executed in a timely manner, GCCFN would have been able to apply those eligible expenditures to fully satisfy the match requirement. Accordingly, GCCFN believes the identified difference reflects the timing of contract execution rather than a deficiency in the organization's matching contribution.

GCCFN appreciates the approval of the match waiver by the Mississippi Department of Health and the Office for Victims of Crime in March 2026, which resolved this issue. GCCFN remains committed to maintaining complete documentation of eligible match expenditures and will continue working closely with the Mississippi Department of Health to ensure eligible costs are properly documented and recognized when delays in state contract execution occur.

Closing Statement
GCCFN remains fully committed to sound financial management, continuous quality improvement, and compliance with all federal and state grant requirements.

We appreciate that the audit recognized GCCFN's successful delivery of victim services, the general adequacy of its financial management system, and the organization's proactive implementation of improved performance documentation procedures during the audit process.

We value the recommendations provided and have either implemented or initiated corrective actions to strengthen our grant administration processes further. GCCFN looks forward to continuing its partnership with the Office of Justice Programs and the Mississippi Department of Health in providing critical services to victims of crime throughout Mississippi.

Thank you for your consideration.

Sincerely,

Stacey Riley

Stacey Riley, LCSW
Chief Executive Officer

APPENDIX 4: The Mississippi State Department of Health Response to the Draft Report

MISSISSIPPI STATE DEPARTMENT OF HEALTH

August 21, 2026

Sean Relay, Acting Regional Audit Manager
Atlanta Regional Audit Office
Office of the Inspector General

Re: "Audit of the Office of Justice Programs Victim Assistance Funds Sub awarded By the Mississippi State Department of Health to The Gulf Coast Center for Nonviolence, Inc, in Biloxi Mississippi"

The Office Against Interpersonal Violence (OAIV) appreciates the opportunity to provide a response to the recommendations identified in the draft audit report for Subaward #SG-1194 for Gulf Coast Center for Nonviolence for the project period ending September 30, 2025. Additionally, we would also like to note that the Office Against Interpersonal Violence now falls under the organizational structure of the Center for Injury Prevention and Recovery.

The draft report contains two recommendations and $7,763.00 in unallowable questioned costs. The information below represents OAIV's response to each recommendation. For ease of review, the recommendations are restated in bold, followed by OAIV's response. We consider the subject report resolved and respectfully request written acceptance of this action from your office. In response to this audit report, the Mississippi State Department of Health, Office Against Interpersonal Violence agrees with each of the following recommendations:

- **Recommendation 1: Ensure that Gulf Coast Center for Nonviolence (GCCNV) develops and implements a control to ensure Mississippi DOH is notified of events impacting the accomplishment of subaward objectives, such as changes in program scope, performance period, duration, or other activities.**

  Response: OAIV agrees with this recommendation. The Mississippi State Department of Health has revised its Subgrant Manual, and subgrantees will be provided a copy. The department will host and record a subgrant manual training to build capacity on subgrant award modification criteria and submission procedures. In addition, OAIV will conduct an on-site visit on August 24, 2026, due to GCCNV's high-risk status. On July 22, the department requested all policies and procedures related to this project for review by August 13, 2026. In response, the Gulf Coast Center for Nonviolence submitted all requested documents on August 8, 2026.

- **Recommendation 2: Remedy $7,763.00 in unallowable costs reimbursed for the following cost categories: travel ($2,433), computers ($4,318), and indirect costs ($1,012).**

  Response: OAIV agrees with this recommendation, and OAIV will have the GCCNV reimburse the $7,763.00 in unallowable costs. Because this is still an active award, the department will reflect the $7,763 recovery as a reduction on its next SF-425 and corresponding drawdown request. The State will also provide the report and supporting file clearly tying the reduction to the recovered subrecipient repayment (finding number, subaward number, amount, and date received from Gulf Coast).

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Additionally, OAIV will host a series of additional subgrant training courses to support the recommendations: Budget and Workplan Alignment, Subrecipient Match requirements, Performance Reporting and Grant Allowable/Unallowable Costs. Lastly, the subgrantee and the department are working on a corrective action plan to ensure these program deficiencies will not happen again.

We appreciate the opportunity to review and comment on the draft audit report. Should you have any questions or require additional information, please contact through email Dr. Jonathon Hubanks at jonathon.hubanks@msdh.ms.gov or Cerissa Eubanks Neely at cerissa.eubanks@msdh.ms.gov.

Sincerely,

Dr. Daniel Edney, MD, FACP, FASAM
State Health Officer

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

U.S. Department of Justice

Office of Justice Programs

Office of Audit, Assessment, and Management

Washington, DC 20531

August 19, 2026

MEMORANDUM TO: Sean Relay
Acting Regional Audit Manager
Atlanta Regional Audit Office
Office of the Inspector General

Digitally signed by LETOYA JOHNSON
Date: 2026.08.19 07:26:37 -04'00'

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

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Mississippi State Department of Health to the Gulf Coast Center for Nonviolence, Inc., Biloxi, Mississippi*

This memorandum is in reference to your correspondence, dated July 27, 2026, transmitting the above-referenced draft audit report for the Gulf Coast Center for Nonviolence, Inc. (Gulf Coast). Gulf Coast received the subaward funds from the Mississippi State Department of Health (Mississippi DOH) under the Office of Justice Program's (OJP) Office for Victims of Crime (OVC), Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Award Numbers 2020-V2-GX-0021 and 15POVC-23-GG-00447-ASSI. We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains **two** recommendations and **$7,763** in questioned costs. The following is OJP's analysis of the draft audit report recommendations. For ease of review, the recommendations are restated in bold and are followed by OJP's response.

1. **We recommend that OJP work with Mississippi DOH to ensure that Gulf Coast develops and implements a control to ensure Mississippi DOH is notified of events impacting the accomplishment of subaward objectives, such as changes in program scope, performance period, duration, or other activities.**

   OJP agrees with the recommendation. We will coordinate with Mississippi DOH to ensure that Gulf Coast develops and implements a control to ensure Mississippi DOH is notified of events impacting the accomplishment of subaward objectives, such as changes in program scope, performance period, duration, or other activities.

2. **We recommend that OJP work with Mississippi DOH to ensure that Gulf Coast remedy $7,763 in unallowable costs reimbursed for travel ($2,433), computers ($4,318), and indirect costs ($1,012).**

   OJP agrees with the recommendation. We will coordinate with Mississippi DOH to ensure Gulf Coast remedies the $7,763 in unallowable costs reimbursed for travel ($2,433), computers ($4,318), and indirect costs ($1,012), charged to Award Number 15POVC-23-GG-00447-ASSI.

We appreciate the opportunity to review and comment on the draft audit report. Please let us know if you have any questions or require additional information. I can be reached by email at LeToya.Johnson@usdoj.gov or by phone on (202) 353-5744.

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

The U.S. Department of Justice Office of the Inspector General (OIG) provided a draft of this audit report to the Office of Justice Programs (OJP), the Mississippi State Department of Health (Mississippi DOH), and the Gulf Coast Center for Nonviolence (Gulf Coast). Gulf Coast's response is incorporated in Appendix 3, the Mississippi DOH's response is incorporated in Appendix 4, and OJP's response is incorporated in Appendix 5 of this final report. In response to our draft report, OJP agreed with our recommendations, and as a result, the status of the audit report is resolved. The Mississippi DOH agreed with the recommendations, and Gulf Coast concurred with the recommendations. The following provides the OIG analysis of these responses and a summary of actions necessary to close the report.

Recommendations for OJP to work with the Mississippi DOH to:

1. **Ensure that Gulf Coast develops and implements a control to ensure the Mississippi DOH is notified of events impacting the accomplishment of subaward objectives, such as changes in program scope, performance period, duration, or other activities.**

   Resolved. OJP agreed with our recommendation and stated in its response that it will coordinate with the Mississippi DOH to ensure that Gulf Coast develops and implements a control to notify the Mississippi DOH of events impacting the accomplishment of subaward objectives, such as changes in program scope, performance period, duration, or other activities.

   The Mississippi DOH agreed with our recommendation and stated that it revised its subgrant manual, which will be provided to subgrantees. The Mississippi DOH also stated that it will host and record a subgrant manual training to build capacity on subgrant award modification criteria and submission procedures. Additionally, the Mississippi DOH will conduct an on-site visit of Gulf Coast in August 2026.

   Gulf Coast concurred with our recommendation and stated that the delay in implementing forensic medical examination services resulted from circumstances outside its control, specifically the delayed opening of the intended forensic examination facility, which ultimately opened after the grant performance period concluded. Gulf Coast stated that it continued working toward implementing this activity and acknowledged that a formal subgrant modification request should have been submitted to the Mississippi DOH once it became apparent the activity could not be completed within the award period. Gulf Coast stated that it has implemented additional grant management procedures requiring program directors and grant management staff to immediately notify executive leadership of any circumstance that could affect grant objectives, deliverables, timelines, or scope of work. These procedures included a periodic review of program progress against grant deliverables, documentation of potential changes affecting grant performance, and timely communication with the Mississippi DOH regarding any necessary program modifications.

   This recommendation can be closed when we receive evidence that OJP has worked with the Mississippi DOH to ensure Gulf Coast developed and implemented a control to ensure the

Mississippi DOH is notified of events impacting the accomplishment of subaward objectives, such as changes in program scope, performance period, duration, or other activities.

2. **Remedy $7,763 in unallowable costs reimbursed for travel ($2,433), computers ($4,318), and indirect costs ($1,012).**

   Resolved. OJP agreed with our recommendation and stated that it will coordinate with the Mississippi DOH to ensure the Gulf Coast remedies the $7,763 in unallowable costs reimbursed for travel ($2,433), computers ($4,318), and indirect costs ($1,012), charged to Award Number 15POVC-23-GG-00447-ASSI.

   The Mississippi DOH concurred with our recommendation and stated it will have the Gulf Coast reimburse the $7,763 in unallowable costs.

   Gulf Coast concurred with our recommendation. Gulf Coast acknowledged that the approved budget included funding for the replacement of one computer and that it will work with the Mississippi DOH and OJP to resolve the questioned costs associated with the additional purchases. Gulf Coast stated that to reduce the likelihood of a similar situation in the future, it will continue to monitor program needs throughout the grant period and, whenever possible, submit budget modification requests before the 90-day closeout window. Gulf Coast further noted that it will consult with the Mississippi DOH regarding the appropriate course of action when unforeseen operational needs arise within the 90-day closeout window and will maintain documentation supporting the necessity and allocability of the expenditures.

   However, Gulf Coast disagreed that its travel reimbursement methodology was inconsistent with the Mississippi DOH's requirements. Gulf Coast stated that it calculated travel reimbursements based on the percentage of each employee's time allocated to the Victims of Crime Act (VOCA) grant. Gulf Coast stated that it will revise the language in future VOCA budget narratives to clearly state that local travel costs are allocated based on each employee's approved percentage of effort charged to the grant, consistent with the allocation methodology required by the Mississippi DOH.

   As discussed in the report, the subaward budget limited travel reimbursement claims to 50 percent of each VOCA-related travel expense and Gulf Coast's travel reimbursement exceeded the allowable rate approved in the subaward agreement. During our audit, Gulf Coast acknowledged the discrepancy and stated that it used a different method from the subaward agreement to calculate these costs related to mileage reimbursements for local travel.

   Gulf Coast further stated that it understands that the indirect questioned costs will be resolved as part of the final determination regarding the underlying travel and equipment expenditures and that it will work collaboratively with the Mississippi DOH and OJP to resolve those costs in accordance with federal grant requirements.

   This recommendation can be closed when we receive evidence that OJP has remedied the $7,763 in unallowable costs.