



Audit of the Office of Justice Programs
Victim Assistance Funds Subawarded by
the Oregon Department of Justice to
the Center for Hope and Safety,
Salem, Oregon



AUDIT DIVISION

26-105

SEPTEMBER 2026



Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Oregon Department of Justice to the Center for Hope and Safety, Salem, Oregon

Background

The U.S. Department of Justice (DOJ) Office of Justice Programs (OJP) provided funds to the Oregon Department of Justice (Oregon DOJ), the state administering agency (SAA) for Oregon, to make subawards to provide services to victims of crime.

Table 1

Audited Subawards to the Center for Hope and Safety (CHS)

Subaward	Subaward Period	Subaward Amount	Amount Expended
2024 Subaward	10/01/2024 – 09/30/2026	\$146,000	\$146,000
2025 Subaward	10/01/2025 – 09/30/2026	\$479,921	\$212,396
Total		\$625,921	\$358,396

Source: Oregon DOJ

Established by the Victims of Crime Act (VOCA) of 1984, the Crime Victims Fund (CVF) supports crime victims through DOJ programs and state and local victim assistance and compensation initiatives.¹

Audit Objective

The objective of this DOJ Office of the Inspector General (OIG) audit was to review how the CHS used the VOCA funds received through subawards from the Oregon DOJ to assist crime victims and assess whether the CHS accounted for VOCA funds in compliance with select award requirements, terms, and conditions.

Center for Hope and Safety

The CHS is a 501(c)(3) non-profit organization with a mission to provide a safe environment for victims and survivors of domestic violence, sexual assault, stalking, and human trafficking, and to provide education to the public regarding victimization in Marion County and Polk County, Oregon.

Founded in 1973, the CHS has been a VOCA subrecipient since at least 2013. The CHS provides advocacy, safety planning, support groups, and emergency shelter. The CHS operates offices in Salem and Woodburn, Oregon, a shelter for up to 30 households, affordable permanent housing, and a 24-hour crisis hotline in English and Spanish.

Conclusion

We found that the CHS provided the services to victims of domestic violence, sexual assault, stalking, and human trafficking for which its VOCA funds were awarded. However, we identified a deficiency in that the CHS reported inaccurate performance data and did not separately track federal award funds as required. We also identified areas where the CHS could improve its subaward management, including compliance with an award condition related to background checks.

We make six recommendations to OJP to work with the Oregon DOJ and the CHS to address these deficiencies and one recommendation for OJP to help the Oregon DOJ improve its VOCA program administration.

We requested responses to our draft audit report from the CHS, the Oregon DOJ, and OJP officials, which can be found in Appendices 2, 3, and 4, respectively. Our analysis of those responses is included in Appendix 5.

¹ Authorized by 34 U.S.C. § 20101, the CVF receives money from federal criminal fines, penalties, forfeited bail bonds, gifts, donations, deferred prosecution and non-prosecution agreements, and special assessments. The Office for Victims of Crime's annual distribution depends on the prior years' CVF deposits and limits set by Congress.

Audit Results

Program Performance

The CHS supports victims of domestic violence, sexual assault, stalking, and human trafficking through various services. Clients can access assistance through a 24-hour crisis hotline, advocacy offices, mail, email, or at the Oregon Department of Human Services office. Services include court accompaniment, financial assistance, and emergency shelter at a CHS-operated facility or hotels. While in shelter, clients are required to meet regularly with advocates to maintain program engagement.

Figure 1

Children's Playroom at the CHS-Operated Facility



Source: OIG photograph (May 2026)

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

We reviewed the CHS's written policies, observed its performance reporting system, and interviewed relevant staff to understand its program performance procedures. We determined that the CHS had adequate internal controls in place to appropriately deliver services to victims. However, the CHS did not submit accurate performance reports and did not comply with an award condition requiring suitability checks for individuals interacting with minors, as described below.

Subaward Goals and Objectives

According to the CHS's application for the 2024 subaward, the CHS was to provide services to survivors to navigate through immigration barriers. For the 2025 subaward, the CHS was to provide general victim services. Based on staff

interviews, client file reviews, and a tour of the CHS's facilities, we determined that the CHS delivered the services for which it was funded.

Performance Reporting

As a VOCA subrecipient, the CHS is required to submit quarterly performance metrics directly to the Office for Victims of Crime (OVC) via the Performance Measurement Tool (PMT). To verify the performance data included in its reports, we traced a judgmental sample of two performance metrics from two quarterly PMT reports to the support maintained by the CHS. The CHS's reported data represented a prorated portion of relevant activity because its VOCA funds were administered in tandem with other funds from non-VOCA sources.² Our review of the reported prorated data revealed that the CHS did not submit accurate performance metrics to reflect its VOCA-funded activities.

Table 2

Tested Performance Metrics

Quarter	CHS Reported	OIG Determined	Difference
Total number of individuals who received services during the reporting period.			
Oct – Dec 2025	146	154	(8)
Jan – Mar 2026	192	166	26
Number of times emergency shelter or safe house services provided during the reporting period.			
Oct – Dec 2025	313	333	(20)
Jan – Mar 2026	3,528	338	3,190

Source: PMT and OIG analysis

According to the OVC's prorating guidance, grant recipients and subrecipients should apply an appropriate strategy for prorating activity so that a reasonable portion is allocated to the VOCA victim assistance subgrants and reported in the PMT. A CHS official explained that they prorated based on the VOCA funds' proportional share of the CHS's total annual budget. However, our review of supporting documentation found that the prorating methodology applied by the CHS was inconsistent. Specifically, the CHS used an estimated budget that did not reflect actual VOCA subaward amounts, applied a base that did not reflect the total victim services budget, and inappropriately included state funds in its prorating calculation. Furthermore, we found that the CHS did not prorate the number of times emergency shelter or safe

² The CHS funding sources include VOCA, federal funds other than VOCA, state funds, local government funds, and donations.

house services were provided in the second quarter. Due to these inconsistencies in its prorating methodology, the CHS underreported its metrics in one quarter and overreported in another quarter.

A CHS official stated that they train staff to prepare PMT data. However, we found that the CHS does not have policies and procedures for this process and instead relies on institutional knowledge. Without a documented process to ensure a consistent methodology is applied when prorating its performance data, the CHS risks submitting performance reports that do not accurately reflect VOCA-funded activities. Therefore, we recommend that OJP work with the Oregon DOJ to ensure the CHS develops and implements written policies and procedures for consistent and accurate prorating of VOCA performance data.

Determination of Suitability Requirement

Determination of Suitability is an award condition requiring relevant recipients and all tiers of subrecipients to evaluate the suitability of individuals who may interact with participating minors. Determinations must be based on information from required searches of: (1) applicable fingerprint-based criminal history registries, (2) applicable child abuse websites/public registries, (3) applicable sex offender websites/public registries, and (4) the Dru Sjodin National Sex Offender Public Website (NSOPW).³ According to the award condition, which was included in the Oregon DOJ's awards and passed on in its subawards, the determination must be completed before any interaction with minors and updated at least every 5 years. For the CHS subawards we reviewed, award activities included interactions with minors.

We reviewed the CHS documentation for a judgmental sample of 13 individuals (10 employees and 3 volunteers) and found that, although the CHS conducted the required fingerprint-based criminal history and state of Oregon sex offender searches, it did not conduct Dru Sjodin NSOPW searches for any of the 13 individuals.⁴ The Oregon DOJ provided guidance on the Determination of Suitability requirements—including the Dru Sjodin NSOPW search requirement—in the subaward packages and on its website, but the responsible CHS official stated being

unaware of this guidance. Further, we found that the CHS's internal handbook, while requiring background checks, did not specifically identify Dru Sjodin NSOPW searches. Because the CHS did not conduct Dru Sjodin NSOPW searches, its suitability determinations were not appropriately informed by the results of those searches and did not meet the requirements established by the condition of the subawards.⁵ However, in August 2026, after being informed of the missing searches, the CHS completed the Dru Sjodin NSOPW search for individuals working with minors. We confirmed the searches were completed and did not yield negative results.

We recommend that OJP work with the Oregon DOJ to ensure that the CHS updates its written policies and procedures to require Dru Sjodin NSOPW searches for all individuals who may interact with participating minors.

Financial Management

According to the DOJ Grants Financial Guide, grant recipients and subrecipients must establish and maintain adequate accounting systems and financial records to accurately account for awarded funds. To determine whether the CHS adequately safeguarded the \$358,396 expended, we reviewed written policies and procedures, interviewed relevant officials, and evaluated reimbursement requests, invoices, receipts, and the CHS's accounting records for a sample of transactions. We identified concerns related to the CHS's financial management of subaward funds, as described below.

Tracking Federal Expenditures

According to the Uniform Guidance, the financial management system of each non-federal recipient entity must provide identification of all federal awards received and expended and the federal programs under which they were received. The DOJ Grants Financial Guide also states that the accounting system must use a fund and account structure and be able to account for award funds separately.

We found that the CHS recorded client-related costs in a VOCA-designated fund within its accounting system. However, the CHS recorded its personnel costs in its general fund and then used a separate, standalone

³ According to its website, the Dru Sjodin NSOPW is the only U.S. government site that links public state, territorial, and tribal sex offender registries in a single national search and provides the most up-to-date information by querying databases of jurisdictions in real time.

⁴ The Determination of Suitability award condition indicates the required child abuse search should be of reasonably accessible websites/public registries. Oregon Background Check Unit officials told us Oregon does not have a public child abuse registry. Therefore, this element of the requirements was not applicable.

⁵ The CHS background searches included a check of the Federal Bureau of Investigation's sex offender listings for each individual. However, we note that the criteria specifically require Dru Sjodin NSOPW searches and states that individuals listed as a sex offender on the Dru Sjodin NSOPW may not be determined suitable to work with participating minors.

spreadsheet to identify VOCA-related personnel costs. We did not identify any issues with the spreadsheet or how VOCA-related personnel costs were identified, but we observed no journal entries transferring VOCA-related personnel costs from the general fund to the VOCA fund. While the CHS properly differentiated its grant-funded personnel costs from other personnel costs on its spreadsheet, we found that the CHS lacked documented policies and procedures for subaward financial management such as the procedures for identifying and recording VOCA-specific personnel costs. Without appropriate policies documenting its grant accounting process, should key personnel leave the organization, its processes could be compromised, leading to potential misuse of funds. As a result, we recommend that OJP work with the Oregon DOJ to ensure the CHS appropriately documents its procedures establishing how it captures its use of grant funds within its accounting system, including its personnel costs.

Additionally, we found that the CHS did not track expenditures by individual federal award, despite each VOCA subaward agreement clearly identifying the different sources of funding.⁶ The CHS recorded expenditures under a single account in its accounting system and distributed costs among its funding sources on an allocation spreadsheet, but did not separate costs by each federal funding award. A CHS official stated that they were unaware that passed-through federal funds must be tracked separately by award. As previously mentioned, the CHS's policies did not include procedures for subaward financial management.

An Oregon DOJ official stated that they communicate the requirements of Uniform Guidance and DOJ Grants Financial Guide within the grant agreement to ensure VOCA funding is tracked separately from other federal awards. However, the Oregon DOJ official also confirmed that it did not require subrecipients to track federal funding by year because Oregon DOJ unilaterally allocated expenditures to the VOCA funding sources for each subaward during the reimbursement process. The Oregon DOJ official further stated that they misunderstood the federal requirements and believed their internal tracking was sufficient. However, according to an August 2025 OVC bulletin, subrecipients should be

able to identify which funding source will cover an expense before obligating funds for that expense.⁷ The bulletin further states that it is insufficient to notify a subrecipient of the funding source for an expense only upon reimbursement. We determined that the Oregon DOJ did not provide the CHS appropriate guidance to comply with the Uniform Guidance and DOJ Grants Financial Guide, which impacted the CHS's ability to establish adequate accounting systems of record to track the federal funding sources separately. We recommend that OJP require the Oregon DOJ to develop and implement a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to funding sources and adequate controls for ensuring subrecipients account for transactions by funding source at the time of execution. We also recommend that OJP work with the Oregon DOJ to ensure that the CHS establishes controls to account for all federal award funds separately in its accounting system.

Subaward Expenditures

To test the CHS's VOCA subaward expenditures for accuracy, support, and compliance with VOCA requirements, we judgmentally selected personnel transactions from nine pay periods for the 2024 subaward and six pay periods for the 2025 subaward. Our sample totaled \$53,359 of the \$263,726 in personnel-related costs under the audited subawards. We also judgmentally selected 13 client-related direct cost transactions for the 2024 subaward, totaling \$14,219 of \$94,670 in client-related costs (e.g., hotel costs, gift cards, and other program-specific fees).

Our testing identified two isolated issues that indicated a need for stronger financial controls:

- **Out-of-Period Personnel Costs** - The CHS allocated hours worked before the start of the subaward period (October 1) to the audited VOCA subawards, contrary to the Oregon DOJ subaward handbook, which prohibits obligating funds prior to the start of the subaward period. We identified out-of-period personnel costs because the CHS's payroll allocation process did not ensure that hours worked before the start of the subaward were excluded.

⁶ The 2024 subaward included VOCA funds from Oregon DOJ's FY 2023 and 2024 VOCA awards from OJP. The 2025 subaward included VOCA funds from Oregon DOJ's FY 2024 and 2025 VOCA awards from OJP, Violence Against Women Act (VAWA) funds from Oregon DOJ's FY 2025 VAWA award from OJP, and state funds.

⁷ In response to the OIG Management Advisory Memorandum 25-046, OVC issued a bulletin to the State Administering Agencies entitled "VOCA Victim Assistance Subaward Allocations with Multiple Funding Streams A Reminder of the Requirements under 2 CFR Part 200" in August 2025. See U.S. Department of Justice Office of the Inspector General [Notification of Concerns Identified in State Administering Agencies' Administration of Victims of Crime Act Victim Assistance Formula Grant Funds](https://oig.justice.gov/reports/notification-concerns-identified-state-administering-agencies-administration-victims-crime), Management Advisory Memorandum 25-046 (March 2025), oig.justice.gov/reports/notification-concerns-identified-state-administering-agencies-administration-victims-crime.

- **Outstanding Check** - We found that 1 of 13 sampled client-related transactions was never fully executed. The check remained outstanding for nearly 500 days, from February 2025 until our inquiry in June 2026. Although the CHS performed monthly bank reconciliations, it did not have procedures to address outstanding checks. A CHS official stated that this was an oversight and subsequently reversed the transaction, stopped payment on the check in June 2026.

Although the dollar amounts of the identified issues are de minimis, both issues point to control weaknesses. We recommend that OJP work with the Oregon DOJ to ensure that the CHS implements controls to prevent out-of-period costs from being included in VOCA reimbursement requests. We also recommend that OJP work with the Oregon DOJ to ensure that the CHS strengthens its monthly bank reconciliation procedures to identify, follow up on, and promptly resolve outstanding checks.

Recommendations

We recommend that OJP work with the Oregon DOJ to:

1. Ensure the CHS develops and implements written policies and procedures for consistent and accurate prorating of VOCA performance data.
2. Ensure that the CHS updates its written policies and procedures to require Dru Sjodin NSOPW searches for all individuals who may interact with participating minors.
3. Ensure the CHS appropriately documents its procedures establishing how it captures its use of grant funds within its accounting system, including its personnel costs.
4. Ensure that the CHS establishes controls to account for all federal award funds separately in its accounting system.
5. Ensure that the CHS implements controls to prevent out-of-period costs from being included in VOCA reimbursement requests.
6. Ensure that the CHS strengthens its monthly bank reconciliation procedures to identify, follow up on, and promptly resolve outstanding checks.

We recommend that OJP:

7. Require the Oregon DOJ to develop and implement a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to funding sources and adequate controls for ensuring subrecipients account for transactions by funding source at the time of execution.

APPENDIX 1: Audit Scope and Methodology

Scope and Methodology

As shown in Table 3, our audit scope focused on, but was not limited to, the period from October 2024 through June 2026, and included two subawards to the Center for Hope and Safety (CHS), totaling \$625,921. These subawards were funded by the Oregon Department of Justice (Oregon DOJ) from primary VOCA grants awarded by the Office of Justice Programs (OJP) Office for Victims of Crime (OVC). As of June 2026, the Oregon DOJ reimbursed the CHS \$358,396 for the subawards we reviewed.⁸

Table 3

Audited Subawards to the CHS from the Oregon DOJ

SAA Subaward Identifier	OJP Prime Award Numbers	Subaward Amount
VOCA-CS-2024-CenterHopeSafety-00005 (2024 subaward)	15POVC-23-GG-00410-ASSI 15POVC-24-GG-00716-ASSI	\$146,000
Joint-2025-CenterHopeSafety-00006 (2025 subaward)	15POVC-23-GG-00410-ASSI 15POVC-24-GG-00716-ASSI 15POVC-25-GG-00353-ASSI	\$479,921
Total:		\$625,921

Source: JustGrants and Oregon DOJ

To accomplish our objective, we tested compliance with what we considered to be the most important conditions of the CHS's activities related to the audited subawards. We primarily applied criteria from the Department of Justice (DOJ) Grants Financial Guide; the VOCA Guidelines and Final Rule; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Oregon DOJ guidance; and the OVC and Oregon DOJ award documents. Our work included interviewing the CHS financial staff, examining policies and procedures, and reviewing subaward documentation and financial records. We performed sample-based audit testing for performance metrics, personnel costs, and other direct costs. We employed a judgmental sampling design for broad exposure to numerous facets of the subawards reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected.

During our audit, we obtained information from DOJ's JustGrants System, data from the Oregon DOJ specific to

the management of VOCA funds during the audit period, as well as the CHS financial and programmatic records. We did not test the overall reliability of those systems, therefore any findings involving information from these systems were verified with other source documentation.

Throughout the audit, we obtained from responsible officials their feedback on our preliminary audit results; as appropriate, these views are reflected in our report.

Statement on Compliance with Generally Accepted Government Auditing Standards

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.

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 the CHS to provide assurance on its internal control structure as a whole. The CHS 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 CHS's internal control structure as a whole, we offer this statement solely for the information and use of the CHS, the Oregon DOJ, and OJP.⁹

In planning and performing our audit, we identified internal control components and underlying internal control principles as significant to the audit objective. Specifically, we assessed the design and implementation of the CHS's policies and procedures. We also tested the implementation and 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.

⁸ Based on subaward documentation, the Oregon DOJ waived the match requirement for the CHS for the audited subawards. Therefore, we did not perform testing in this area except for verifying that the Oregon DOJ provided match waivers to subrecipient for the two subawards.

⁹ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

APPENDIX 2: The Center for Hope and Safety's Response to the Draft Audit Report



September 9, 2026

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

Re: Center for Hope and Safety, Audit Draft

Report Issue Date: August 21, 2026

Dear Mr. Gaschke,

The U.S. Department of Justice (DOJ), Office of the Inspector General (OIG), San Francisco Regional Audit Office, issued a draft audit report, dated August 21, 2026, to our organization. The audit is of Sub-Award Numbers VOCA-CS-2024-CenterHopeSafety-00005 and Joint-2025-CenterHopeSafety-00006, made by the Oregon Department of Justice (Oregon DOJ), to Center for Hope and Safety (CHS), under OJP's Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 15POVC-23-GG-00410-ASSI, 15POVC-24-GG-00716-ASSI, and 15POVC-25-GG-00353-ASSI.

The draft report contains six recommendations for CHS. We understand that as a subgrantee of Oregon DOJ, we will work with them to address each of the recommendations. The point of contact for each of the follow-up items for CHS is Ashley Carson, Executive Director, email: ashley@hopeandsafety.org and phone: 503-378-1572.



605 Center St. NE, Salem, OR 97301
Web: hopeandsafety.org Phone: 503-378-1572
...because everyone deserves a life free of violence

1. The OIG recommended that CHS develops and implements written policies and procedures for consistent and accurate prorating of VOCA performance data.
 - a. CHS concurs with this recommendation.
 - b. Brief Response: CHS takes great pride in our work to serve survivors of domestic violence and sexual assault. Accuracy in prorating is important. For many years it has been our understanding that the way we were performing the prorating was the preferred way through guidance from Oregon DOJ. We used to prorate on an annual basis but had not updated our numbers while we were waiting on final VOCA award amounts for the year. Moving forward, our policy will be to look at quarterly VOCA and total expenditures and prorate statistics appropriately.
 - c. Action Plan: CHS will establish written policies and procedures related to consistent and accurate prorating of programmatic progress tracking and reporting. We plan to complete this within 60 days.
2. The OIG recommended that CHS updates its written policies and procedures to require Dru Sjodin NSOPW searches for all individuals who may interact with participating minors.
 - a. CHS concurs with this recommendation.
 - b. Brief Response: CHS takes the safety and security of the minors we work with in our offices and at our shelter extremely seriously. We have been conducting comprehensive fingerprint background checks through the State of Oregon's Background Check Unit, the entity responsible for background checks for Oregon's Child Welfare and other Department of Human Services programs and the Oregon Health Authority as well as for many providers of services (long-term care, childcare, state hospital, etc.) and other organizations interacting with some of the most vulnerable minors in our state for years. We were unfortunately unaware of the *additional* requirement to run the names through the Dru Sjodin NSOPW site.
 - c. Action Plan: CHS has already conducted the search for all current staff and volunteers with no issues identified. We will provide written, updated policies and procedures to include the Dru Sjodin search within 60 days.
3. The OIG recommends that CHS appropriately documents its procedures establishing how it captures its use of grant funds within its accounting system, including its personnel costs.
 - a. CHS concurs with this recommendation.
 - b. Brief Response: CHS has a decades long history of accurate documentation of grant allocation related to both personnel and direct survivor support. In this most recent OIG, comprehensive and detailed audit process, no questioned costs were found. However, we agree that it is best practice and beneficial for CHS to have clear written procedures establishing how we capture our use of grant funds within our accounting system.



605 Center St. NE, Salem, OR 97301

Web: hopeandsafety.org Phone: 503-378-1572

...because everyone deserves a life free of violence

- c. Action Plan: CHS will create detailed written procedures related to this recommendation within 60 days.
- 4. The OIG recommends that CHS establishes controls to account for all federal award funds separately in its accounting system.
 - a. CHS concurs with this recommendation.
 - b. Brief Response: For many cycles of funding through Oregon DOJ, it has not been required that CHS track federal award funds separately when they fell under one award from the Oregon DOJ. We have been tracking these funds in a manner that has been sufficient and were unaware of the need to be tracking them separately. However, we are happy to comply with this recommendation.
 - c. Action Plan: CHS will work with Oregon DOJ as they provide guidance to all Oregon subgrantees on how to track federal award funds included in our joint grants and apply their proposed method to our accounting system.
- 5. The OIG recommends that CHS implements controls to prevent out-of-period costs from being included in VOCA reimbursement requests.
 - a. CHS concurs with this recommendation.
 - b. Brief Response: CHS has been very diligent in our expenditure reimbursement requests for decades. The out-of-period cost included three working days of payroll (due to our monthly payroll ending on the 25th of the prior month) that was not within the Oct. 1st start date of a grant period.
 - c. Action Plan: CHS will create a procedure within 60 days to address the payroll vs. grant period issue to ensure accuracy moving forward.
- 6. The OIG recommends that OR DOJ work with CHS to ensure that CHS strengthens its monthly bank reconciliation procedures to identify, follow-up on, and promptly resolve outstanding checks.
 - a. CHS concurs with this recommendation.
 - b. Brief Response: CHS reconciles bank statements every month in alignment with accounting best practices. This one check had been identified and accounted for; however, we recognize that it's very important to strengthen procedures to identify, follow-up on and resolve outstanding checks. Often, checks like this are held by attorneys, for particular filing fees, for quite some time. However, we recognize that the length of time this check went uncashed was too long. When talking with the OIG about this particular check, CHS agreed and immediately cancelled the check and talked with the Oregon DOJ grant monitor to resolve the issue.
 - c. Action Plan: CHS will create a written policy and procedure for strengthening controls related to outstanding checks.

Sincerely,



Ashley Carson, JD
Executive Director, Center for Hope & Safety



605 Center St. NE, Salem, OR 97301

Web: hopeandsafety.org Phone: 503-378-1572

...because everyone deserves a life free of violence

Cc:

Melonie Threatt
Acting Team Leader, Audit Coordination Branch
Audit and Review Division
Office of Audit, Assessment, and Management
Office of Justice Programs

Shannon Sivell
Director
Crime Victim and Survivor Services Division (CVSSD)
Oregon Department of Justice



605 Center St. NE, Salem, OR 97301
Web: hopeandsafety.org Phone: 503-378-1572
...because everyone deserves a life free of violence

APPENDIX 3: The Oregon Department of Justice's Response to the Draft Audit Report

DAN RAYFIELD
Attorney General



BENJAMIN GUTMAN
Deputy Attorney General

DEPARTMENT OF JUSTICE CRIME VICTIM AND SURVIVOR SERVICES DIVISION

September 15, 2026

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

Re: Center for Hope and Safety, Audit Draft
Report Issue Date: August 21, 2026

Dear Mr. Gaschke,

The U.S. Department of Justice (DOJ), Office of the Inspector General (OIG), San Francisco Regional Audit Office, issued a draft audit report, dated August 21, 2026, to the Office of Justice Programs (OJP), related to an audit of Sub-Award Numbers VOCA-CS-2024-CenterHopeSafety-00005 and Joint-2025-CenterHopeSafety-00006, made by the Oregon Department of Justice (Oregon DOJ), to Center for Hope and Safety (CHS), under OJP's Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 15POVC-23-GG-00410-ASSI, 15POVC-24-GG-00716-ASSI, and 15POVC-25-GG-00353-ASSI.

The draft report contains six recommendations for CHS. We understand that as the direct recipient of OJP grant funds, Oregon DOJ is required to work directly with CHS to address each of the recommendations.

1. The OIG recommended that Oregon DOJ work with CHS to ensure that CHS develops and implements written policies and procedures for consistent and accurate prorating of VOCA performance data.
 - a. Oregon DOJ concurs with this recommendation.
 - b. Name and number of contact person responsible for working CHS on their corrective plan:
Marjorie Glick, 971-239-8338
 - c. Specific steps taken to comply with the recommendation:
CHS will establish written policies and procedures related to consistent and accurate prorating of programmatic progress tracking and reporting. CHS plans to complete this within 60 days. CHS will provide Oregon DOJ with

documentation supporting the completion of this action. Upon receipt of CHS documentation of completion, Oregon DOJ will review and forward information to OIG.

2. The OIG recommended that Oregon DOJ work with CHS to ensure that CHS updates its written policies and procedures to require Dru Sjodin NSOPW searches for all individuals who may interact with participating minors.
 - a. Oregon DOJ concurs with this recommendation.
 - b. Name and number of contact person responsible for working CHS on their corrective plan:
Marjorie Glick, 971-239-8338
 - c. Specific steps taken to comply with the recommendation:
CHS has already conducted the search for all current staff and volunteers with no issues identified. CHS will update written policies and procedures to include the Dru Sjodin search within 60 days. CHS will provide Oregon DOJ with documentation supporting the completion of this action. Upon receipt of CHS documentation of completion, Oregon DOJ will review and forward information to OIG.
3. The OIG recommends that OR DOJ work with CHS to ensure that CHS appropriately documents its procedures establishing how it captures its use of grant funds within its accounting system, including its personnel costs.
 - a. Oregon DOJ concurs with this recommendation.
 - b. Name and number of contact person responsible for working CHS on their corrective plan:
Marjorie Glick, 971-239-8338
 - c. Specific steps taken to comply with this recommendation:
CHS will create detailed written procedures related to this recommendation within 60 days. CHS will provide Oregon DOJ with documentation supporting the completion of this action. Upon receipt of CHS documentation of completion, Oregon DOJ will review and forward information to OIG.
4. The OIG recommends that OR DOJ work with CHS to ensure that CHS establishes controls to account for all federal award funds separately in its accounting system.
 - a. Oregon DOJ concurs with this recommendation.
 - b. Name and number of contact person responsible for working CHS on their corrective plan:
Marjorie Glick, 971-239-8338
 - c. Specific steps taken to comply with this recommendation:
CHS will work with Oregon DOJ as they provide guidance to all Oregon subrecipients on how to track federal award funds included in subawards and apply CVSSD's proposed method to their accounting system. CHS will provide Oregon DOJ with documentation supporting the completion of this action. Upon receipt of CHS documentation of completion, Oregon DOJ will review and forward information to OIG.

5. The OIG recommends that OR DOJ work with CHS to ensure that CHS implements controls to prevent out-of-period costs from being included in VOCA reimbursement requests.
 - a. Oregon DOJ concurs with this recommendation.
 - b. Name and number of contact person responsible for working CHS on their corrective plan:
Marjorie Glick, 971-239-8338
 - c. Specific steps taken to comply with this recommendation:
CHS will create a procedure within 60 days to address the payroll vs. award period costs to ensure accuracy in financial reporting moving forward. CHS will provide Oregon DOJ with documentation supporting the completion of this action. Upon receipt of CHS documentation of completion, Oregon DOJ will review and forward information to OIG.
6. The OIG recommends that OR DOJ work with CHS to ensure that CHS strengthens its monthly bank reconciliation procedures to identify, follow-up on, and promptly resolve outstanding checks.
 - a. Oregon DOJ concurs with this recommendation.
 - b. Name and number of contact person responsible for working CHS on their corrective plan:
Marjorie Glick, 971-239-8338
 - c. Specific steps taken to comply with this recommendation:
CHS will create a written policy and procedure within 60 days for strengthening controls related to outstanding checks. CHS will provide Oregon DOJ with documentation supporting the completion of this action. Upon receipt of CHS documentation of completion, Oregon DOJ will review and forward information to OIG.
7. The OIG recommends that OJP require the Oregon DOJ to develop and implement a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to funding sources and adequate controls for ensuring subrecipients account for transactions by funding source at the time of execution.
 - a. Oregon DOJ concurs with this recommendation.
 - b. Name and number of contact person responsible for working CHS on their corrective plan:
Marjorie Glick, 971-239-8338
 - c. Specific steps taken to comply with this recommendation:
Oregon DOJ will update written policies and procedures with a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to funding sources and adequate controls for ensuring subrecipients account for transaction by funding source at the time of execution. In order to implement a compliant process, Oregon DOJ will take the following steps: 1) update Oregon DOJ written policies and procedures; 2) develop a process within the EGrants financial reporting system that clearly identifies subrecipient expenditures by federal award year; 3) develop training and written resources for subrecipients to ensure a compliant process; 4) update Oregon DOJ monitoring

September 15, 2026
Page 4

policy to include a review of the subrecipient policies and procedures and financial report verification of compliant tracking of expenditures; 5) implement this requirement for all federal subawards issued on or after July 1, 2027.

Oregon DOJ will complete this corrective action by July 1, 2027. Oregon DOJ will provide OJP with documentation supporting the completion of this action.

If you have any questions related to this response, please contact Marjorie Glick, ODOJ, CVSSD, VOCA Fund Coordinator, at 971-239-8338 or Marjorie.glick@doj.state.or.us

Sincerely,



Shannon Sivell
Director
Oregon Department of Justice, CVSSD

Enclosure

cc:

Melanie Threatt
Audit Liaison Specialist
Office of Audit, Assessment, and Management Office of Justice Programs
Office of Justice Programs
U.S. Department of Justice

Ashley Carson
Executive Director
Center for Hope and Safety

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, DC 20531

September 23, 2026

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

FROM: ANDERA HAWKINS Digitally signed by ANDERA HAWKINS
DN: cn=ANDERA HAWKINS, o=U.S. DEPARTMENT OF JUSTICE
For: 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 Oregon Department of Justice to the Center for Hope and Safety, Salem, Oregon*

This memorandum is in reference to your correspondence, dated August 21, 2026, transmitting the above-referenced draft audit report for Center for Hope and Safety (CHS). CHS received subaward funds from the Oregon Department of Justice (Oregon DOJ), under the Office of Justice Programs' (OJP), Office for Victims of Crime (OVC), Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 15POVC-23-GG-00410-ASSI, 15POVC-24-GG-00716-ASSI, and 15POVC-25-GG-00353-ASSI. We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains seven recommendations and no 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 the Oregon DOJ to ensure the CHS develops and implements written policies and procedures for consistent and accurate prorating of VOCA performance data.**

OJP agrees with this recommendation. We will work with Oregon DOJ to obtain documentation to support that CHS implemented written policies and procedures for consistent and accurate prorating of VOCA performance data.
2. **We recommend that OJP work with the Oregon DOJ to ensure that the CHS updates its written policies and procedures to require Dru Sjodin NSOPW searches for all individuals who may interact with participating minors.**

OJP agrees with this recommendation. We will work with Oregon DOJ to obtain documentation to support that CHS updated its policies and procedures to require Dru Sjodin National Sex Offender Public Website (NSOPW) searches for all individuals who may interact with participating minors.

3. **We recommend that OJP work with the Oregon DOJ to ensure the CHS appropriately documents its procedures establishing how it captures its use of grant funds within its accounting system, including its personnel costs.**

OJP agrees with this recommendation. We will work with Oregon DOJ to obtain documentation to support that CHS implemented written policies and procedures to document how it captures its use of grant funds within its accounting system, including its personnel costs.

4. **We recommend that OJP work with the Oregon DOJ to ensure that the CHS establishes controls to account for all Federal award funds separately in its accounting system.**

OJP agrees with this recommendation. We will work with Oregon DOJ to obtain documentation to support that CHS implemented written policies and procedures to account for all Federal award funds separately in its accounting system.

5. **We recommend that OJP work with the Oregon DOJ to ensure that the CHS implements controls to prevent out-of-period costs from being included in VOCA reimbursement requests.**

OJP agrees with this recommendation. We will work with Oregon DOJ to obtain documentation to support that CHS implemented written policies and procedures to prevent out-of-period costs from being included in VOCA reimbursement requests.

6. **We recommend that OJP work with the Oregon DOJ to ensure that the CHS strengthens its monthly bank reconciliation procedures to identify, follow-up on, and promptly resolve outstanding checks.**

OJP agrees with this recommendation. We will work with Oregon DOJ to obtain documentation to support that CHS updated its written policies and procedures to strengthen its monthly bank reconciliation procedures to identify, follow-up on, and promptly resolve outstanding checks.

7. **We recommend that OJP require the Oregon DOJ to develop and implement a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to funding sources and adequate controls for ensuring subrecipients account for transactions by funding source at the time of execution.**

OJP agrees with this recommendation. We will work with the Oregon DOJ to obtain documentation to support that it implemented a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to

funding sources and adequate controls for ensuring subrecipients account for transactions by funding source at the time of execution.

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.

cc: Maureen A. Henneberg
Deputy Assistant Attorney General
for Operations and Management
Office of Justice Programs

Katherine Darke Schmitt
Acting Director
Office for Victims of Crime

Phillip Merkle
Acting Director
Office of Communications

Rachel Johnson
Chief Financial Officer
Office of Justice Programs

Andera Hawkins
Management Analyst
Office of Audit, Assessment and Management

Louise Duhamel
Assistant Director, Audit Liaison Group
Office of Compliance and Review
Justice Management Division

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

OJP Executive Secretariat
Control Number OCOM0022328

APPENDIX 5: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the 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 Oregon Department of Justice (Oregon DOJ), and the Center for Hope and Safety (CHS). The CHS's response is incorporated in Appendix 2, the Oregon DOJ's response is incorporated in Appendix 3, and OJP's response is incorporated in Appendix 4 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 Oregon DOJ concurred with all of our recommendations, and the CHS concurred with the six recommendations directed to the CHS. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendations for OJP to work with the Oregon DOJ to:

- 1. Ensure the CHS develops and implements written policies and procedures for consistent and accurate prorating of Victims of Crime Act (VOCA) performance data.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will work with the Oregon DOJ to obtain documentation to support that the CHS implemented written policies and procedures for consistent and accurate prorating of VOCA performance data. As a result, this recommendation is resolved.

The Oregon DOJ concurred with our recommendation and stated in its response that it will work with the CHS to establish written policies and procedures related to consistent and accurate prorating of programmatic progress tracking and reporting.

The CHS concurred with our recommendation and stated in its response that it will establish written policies and procedures related to consistent and accurate prorating of programmatic progress tracking and reporting. The CHS plans to complete this within 60 days.

This recommendation can be closed when we receive documentation that the CHS has developed and implemented written policies and procedures for consistent and accurate prorating of VOCA performance data.

- 2. Ensure that the CHS updates its written policies and procedures to require Dru Sjodin National Sex Offender Public Website (NSOPW) searches for all individuals who may interact with participating minors.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will work with the Oregon DOJ to obtain documentation to support that the CHS updated its policies and procedures to require Dru Sjodin NSOPW searches for all individuals who may interact with participating minors. As a result, this recommendation is resolved.

The Oregon DOJ concurred with our recommendation and stated in its response that it will work with the CHS to update written policies and procedures to include the Dru Sjodin NSOPW search.

The CHS concurred with our recommendation and stated in its response that it will provide written, updated policies and procedures to include the Dru Sjodin NSOPW search within 60 days.

This recommendation can be closed when we receive documentation that the CHS has updated its written policies and procedures to require Dru Sjodin NSOPW searches for all individuals who may interact with participating minors.

3. Ensure the CHS appropriately documents its procedures establishing how it captures its use of grant funds within its accounting system, including its personnel costs.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will work with the Oregon DOJ to obtain documentation to support that the CHS implemented written policies and procedures to document how it captures its use of grant funds within its accounting system, including its personnel costs. As a result, this recommendation is resolved.

The Oregon DOJ concurred with our recommendation and stated in its response that it will work with the CHS to create detailed written procedures for how it captures its use of grant funds within its accounting system.

The CHS concurred with our recommendation and stated in its response that it will create detailed written procedures for establishing how it captures its use of grant funds within its accounting system within 60 days.

This recommendation can be closed when we receive documentation that the CHS has appropriately documented its procedures establishing how it captures its use of grant funds within its accounting system, including its personnel costs.

4. Ensure that the CHS establishes controls to account for all federal award funds separately in its accounting system.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will work with the Oregon DOJ to obtain documentation to support that the CHS implemented written policies and procedures to account for all federal awards separately in its accounting system. As a result, this recommendation is resolved.

The Oregon DOJ concurred with our recommendation and stated in its response that it will work with the CHS as it provides guidance to all Oregon subrecipients on how to track federal award funds included in subawards and apply the Oregon DOJ's proposed method to the CHS's accounting system.

The CHS concurred with our recommendation and stated in its response that it will work with the Oregon DOJ to track federal award funds separately and apply the Oregon DOJ's proposed method to the CHS's accounting system.

This recommendation can be closed when we receive documentation that the CHS has established controls to account for all federal award funds separately in its accounting system.

5. Ensure that the CHS implements controls to prevent out-of-period costs from being included in VOCA reimbursement requests.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will work with the Oregon DOJ to obtain documentation showing that the CHS implemented written policies and procedures to prevent out-of-period costs from being included in VOCA reimbursement requests. As a result, this recommendation is resolved.

The Oregon DOJ concurred with our recommendation and stated in its response that it will work with the CHS to create a procedure to address the issue related to requesting reimbursement for payroll costs incurred outside of the grant period.

The CHS concurred with our recommendation and stated in its response that it will, within 60 days, create a procedure to address the issue related to requesting reimbursement for payroll costs incurred outside of the grant period.

This recommendation can be closed when we receive documentation that the CHS has implemented controls to prevent out-of-period costs from being included in VOCA reimbursement requests.

6. Ensure that the CHS strengthens its monthly bank reconciliation procedures to identify, follow up on, and promptly resolve outstanding checks.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will work with the Oregon DOJ to obtain documentation showing that the CHS updated its written policies and procedures to strengthen its monthly bank reconciliation procedures to identify, follow up on, and promptly resolve outstanding checks. As a result, this recommendation is resolved.

The Oregon DOJ concurred with our recommendation and stated in its response that it will work with the CHS to create a written policy and procedure for strengthening controls related to outstanding checks.

The CHS concurred with our recommendation and stated in its response that it will create a written policy and procedure for strengthening controls related to outstanding checks.

This recommendation can be closed when we receive documentation that the CHS has strengthened its monthly bank reconciliation procedures to identify, follow up on, and promptly resolve outstanding checks.

Recommendation for OJP:

7. **Require the Oregon DOJ to develop and implement a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to funding sources and adequate controls for ensuring subrecipients account for transactions by funding source at the time of execution.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will work with the Oregon DOJ to obtain documentation to support that the Oregon DOJ implemented a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to funding sources and adequate controls for ensuring subrecipients account for transactions by funding source at the time of execution. As a result, this recommendation is resolved.

The Oregon DOJ concurred with our recommendation and stated in its response that it will update written policies and procedures with a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to funding sources and adequate controls for ensuring subrecipients account for transactions by funding source at the time of execution. Specifically, the Oregon DOJ stated that it will update written policies and procedures; develop a process within the financial reporting system that clearly identifies subrecipient expenditures by federal award year; develop training and written resources for subrecipients; and update its monitoring policy to include a review of subrecipient policies and procedures and financial report verification for compliant tracking of expenditures. The Oregon DOJ further stated that it will implement this requirement for all federal subawards issued on or after July 1, 2027.

This recommendation can be closed when we receive documentation that the Oregon DOJ has developed and implemented a compliant process for subaward reimbursement that includes subrecipient autonomy over tracking expenditures to funding sources and adequate controls for ensuring subrecipients account for transactions by funding source at the time of execution.