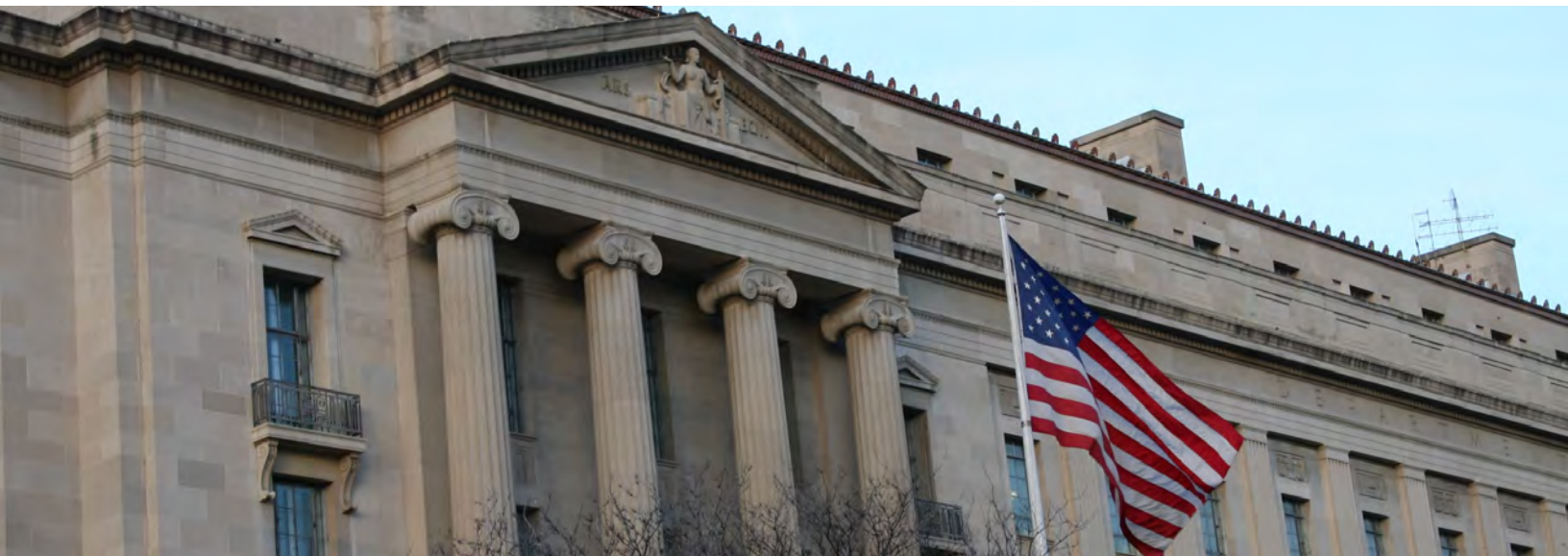




Office of the Inspector General U.S. Department of Justice

OVERSIGHT ★ INTEGRITY ★ GUIDANCE



Audit of the Office on Violence Against Women Training and Technical Assistance Program



Executive Summary

Audit of the Office on Violence Against Women Training and Technical Assistance Program

Objectives

Each year, millions of women are victims of domestic violence, dating violence, sexual assault, and stalking. To address these issues, the U.S. Congress passed the 1994 Violence Against Women Act, which resulted in the Department of Justice (DOJ) creating the Office on Violence Against Women (OVW). As part of its work, OVW administers the Training and Technical Assistance Program (TA Initiative), which provides direct training and technical assistance (TA) to existing OVW award recipients, potential recipients, and the public in order to improve overall responses to violence against women. Since 2010, OVW has awarded over \$300 million through the TA Initiative.

The DOJ Office of the Inspector General (OIG) conducted an audit of the TA Initiative to determine whether OVW: (1) ensures applicants meet eligibility requirements and awards are made in accordance with applicable policies and procedures; (2) appropriately monitors awards to prevent project overlap, award duplication, and unallowable costs; and (3) ensures that recipients are appropriately progressing on the objectives of the awards.

Results in Brief

We found that the majority of TA Initiative recipients in our review were successful in completing the goals and objectives of their awards, and that OVW has, or is in the process of, taking steps intended to improve its TA Initiative. However, we also identified deficiencies related to the pre-award process, award implementation, staff training, and potentially excessive use of the DOJ maximum consultant rate. Finally, we found that resources created under the TA Initiative are not effectively distributed for national use and that OVW does not have a process in place to comprehensively assess the value and effectiveness of the TA Initiative.

Recommendations

Our report contains 13 recommendations to assist OVW in improving administration and oversight of the TA Initiative. We discussed the results of our audit with OVW and provided a copy of the draft audit report for review and response. OVW's response can be found in Appendix 2, and our analysis of those responses is included in Appendix 3.

Audit Results

Our audit focused on 146 awards totaling approximately \$72 million made in fiscal years (FY) 2015 and 2016. These were, in our judgment, the most recent years for which recipient accomplishments would be measurable.

Pre-Award Process – OVW awards hundreds of millions of dollars in grant and cooperative agreement funding each year. To effectively safeguard those funds, a comprehensive pre-award review is critical. A clearly written solicitation and thorough vetting of applications responsive to that solicitation can help to ensure that taxpayer funds are used appropriately, and that awards are made in accordance with applicable laws, regulations, and agency policies.

To evaluate OVW's oversight in this area, we reviewed TA Initiative solicitations, inspected application and award materials, examined the peer review process, evaluated financial clearance timeframes, interviewed OVW staff, and surveyed TA Initiative award recipients and OVW staff. We found that OVW generally conducted thorough and detailed reviews of award budgets within the scope of this audit. Additionally, we found that OVW was in compliance with all solicitation requirements mandated by the Code of Federal Regulations.

However, we also found that 95 percent of TA awards in our review did not receive final financial clearance prior to the project start date, which hinders a recipient's ability to commence substantive work on the award. Additionally, we found that over 40 percent of TA Initiative awards receive final financial clearance over 5 months after the project start date, substantially delaying meaningful progress on awards. While the OIG recognizes the critical nature of a detailed and thorough financial review, we believe that proactive measures should be implemented in order to expedite the financial clearance process while maintaining effective oversight.

Additionally, we found that OVW did not effectively enforce its peer review guidelines, resulting in five separate conflicts of interest between peer reviewers and organizations selected for awards in FY 2015 and FY 2016 peer reviews.

Award Oversight – After an award has been made, OVW must provide efficient and effective oversight to ensure recipients are progressing on the goals and



Executive Summary

Audit of the Office on Violence Against Women Training and Technical Assistance Program

objectives of the awards and using federal funds responsibly and appropriately. We found that many program specialists are tasked with oversight of far more awards than OVW deems appropriate. Additionally, we determined that OVW can improve its internal training to place a higher emphasis on reviewing products for quality and value. Furthermore, we identified areas for administrative improvement related to the streamlining of TA Initiative areas of focus, including improved data collection and increased collaboration between OVW and award recipients.

We also found that awards and supplemental awards were made far in advance of the recipient's ability to commence work on the project due to the recipient's ongoing work on a prior OVW award. Specifically, in FYs 2015 and 2016, we identified over \$7.2 million in funding (approximately 10 percent of the total amount audited) that OVW awarded to a recipient but kept "frozen" in the recipient's account for over 1 year, as the recipient completed work on a prior OVW award.

Similar issues exist in the provision of supplemental funding. Generally, a recipient can receive a "supplement" to an original award which provides additional time and funding to continue and expand work on a project so long as the recipient is appropriately progressing on the goals and objectives of the original award. We identified instances in which supplements ranging from \$400,000 to over \$1,000,000 were made when one third or less of the original award amount had been put to use; in one case, we identified a supplement exceeding \$400,000 made to an award from which less than 1 percent of the original funding had been used.

Finally, we identified areas for improvement in OVW's review and use of DOJ's maximum consultant rate, which is currently set at \$650 per day, or \$81.25 per hour. Specifically, we identified recipients paid a salary of approximately \$55,000 from an OVW award who would then consult for a different recipient's OVW award

at the \$650 per day rate. We also identified awards that were approved with \$650 per day consultant rates for note takers, translators, or other services that may not warrant use of the maximum consultant rate when benchmarked against a locality's average compensation for similar jobs.

Program Outcomes – Finally, we conducted a review of resources developed by TA Initiative recipients, OVW's distribution of those resources, and OVW's assessment of the value and effectiveness of the TA Initiative as a whole.

We found that the TA Initiative recipients in our review were generally successful at completing the goals and objectives of their awards. These recipients produce a wide range of resources that includes, but are not limited to, live trainings, web-based trainings, and written guidance intended to improve the national response to violence against women.

We did identify areas for improvement in the distribution of those products. In our judgment, for the TA Initiative to have the maximum possible impact, resources produced under the program should be widely distributed for use. We found that while OVW funded the creation, and currently funds the maintenance, of a website intended to function as the primary distribution point for TA resources, the website is not effectively promoted by OVW. Additionally, many resources were not posted to the website as required by the terms and conditions of the award, limiting their availability and value to recipients of OVW awards.

Finally, we found that OVW does not have a process in place to conduct a comprehensive assessment of the effectiveness or value of resources produced under the TA Initiative. OVW staff have noted this as a concern, and are considering options such as additional collection and review of feedback from those who utilize TA Initiative resources. Through our analysis, surveys, and interviews with OVW staff, we identified multiple areas for potential improvement in this process.

AUDIT OF THE OFFICE ON VIOLENCE AGAINST WOMEN
TRAINING AND TECHNICAL ASSISTANCE PROGRAM

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AUDIT OF THE OFFICE ON VIOLENCE AGAINST WOMEN TRAINING AND TECHNICAL ASSISTANCE PROGRAM

INTRODUCTION

Each year, millions of women are victims of domestic violence, dating violence, sexual assault, and stalking. To address these issues, the U.S. Congress passed the 1994 Violence Against Women Act (VAWA), which resulted in the Department of Justice (DOJ) creating the Office on Violence Against Women (OVW). The OVW provides federal leadership in developing the national capacity to reduce violence against women and administer justice for, and strengthen services to, victims of these crimes. To this end, OVW administers financial and technical assistance to communities across the country that are developing programs, policies, and practices aimed at responding to this crisis.

The Training and Technical Assistance Program

As part of OVW's work, it administers the Training and Technical Assistance Program (TA Initiative). The primary purpose of the TA Initiative is to provide direct training and technical assistance (TA) to existing OVW award recipients, potential recipients, and others – such as law enforcement officers and legal personnel – situated to improve overall responses to violence against women. Resources developed under the program include, but are not limited to, in-person and online educational opportunities, peer-to-peer consultations, site visits, and guidance developed to assist in combating violence against women. The TA Initiative is one of OVW's largest discretionary grant programs, representing an average of approximately 8 percent of OVW's total annual award funding. Since 2010, OVW has awarded over \$300 million through the TA Initiative.

TA INITIATIVE FUNDING

YEAR	AMOUNT	NO. OF AWARDS	% OF TOTAL OVW AWARD FUNDING
2014	\$31,113,843	56	7.9 %
2015	\$34,464,739	71	8.6 %
2016	\$37,938,222	75	8.4 %
2017	\$32,951,780	67	7.3 %
2018	\$32,572,054	62	7.0 %

Source: OVW public website

Audit Objectives

Based on programmatic and financial concerns identified through the OIG's external audit work and the significant size of the TA Initiative, we determined that an audit of the program was timely and appropriate. Our scope for this audit includes all TA Initiative awards made in Fiscal Years (FY) 2015 and 2016. In our

judgment, these were the most recent years for which recipient accomplishments would be auditable. Our audit objectives were to determine whether OVW's controls are effective to ensure: (1) its applicants meet eligibility requirements and awards are made in accordance with applicable agency policies and procedures; (2) it appropriately monitors awards to prevent project overlap, award duplication, and unallowable costs; and (3) that recipients are appropriately progressing on the objectives of the awards.

In conducting our audit, we tested compliance with what we consider to be the most important conditions of the award process. Unless otherwise stated in this report, the criteria we used to evaluate compliance are contained in the 2013 VAWA, the Code of Federal Regulations (C.F.R.), the DOJ Grants Financial Guide, the OVW Grant Monitoring Manual, and the Training and Technical Assistance solicitation documents. To accomplish our objectives, we interviewed key employees at the awarding agencies in Washington, D.C., surveyed 48 TA Initiative award recipients, 22 OVW program specialists, and conducted numerous follow-up interviews with OVW staff charged with financial and programmatic oversight of awards. We also examined internal training processes and OVW reports to the U.S. Congress. Finally, we reviewed financial and programmatic documentation related to 146 TA Initiative awards including, but not limited to, recipient budget and project narratives, summary data sheets, progress reports, financial clearance memorandum, award special conditions, grant adjustment notices (GAN), award monitoring documentation, and products distributed through the TA Initiative.

AUDIT RESULTS

We found that the majority of TA Initiative recipients in our review were generally successful in completing the goals and objectives of their awards. However, we also identified deficiencies related to the OVW's peer review, the provision of final financial clearance, staff training, project overlap and the provision of supplemental funding, and potentially excessive use of the DOJ maximum consultant rate. We further found that resources created under the TA Initiative are not effectively distributed for national use, and that OVW does not have a process in place to assess the value and effectiveness of those products. OVW has taken, or is in the process of taking, steps intended to improve its TA Initiative. In 2016, OVW hired a TA Team Lead who has begun developing comprehensive training for OVW staff to include enhanced review of TA Initiative products. Additionally, OVW made one recent addition to its Grants Financial Management Division (GFMD) in order to better expedite review and approval of financial matters.

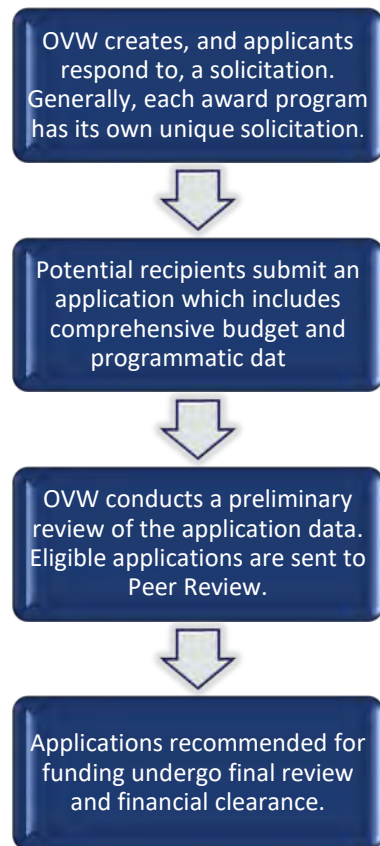
The Pre-Award Process

OVW awards hundreds of millions of dollars in grant and cooperative agreement funding each year. To effectively safeguard those funds, a comprehensive pre-award review is critical. A clearly written solicitation, and thorough vetting of applications responsive to that solicitation, can help to ensure that taxpayer funds are used appropriately, and that awards are made in accordance with applicable laws, regulations, and agency policies.

To evaluate OVW's actions and oversight during the pre-award process, we: (1) reviewed TA Initiative solicitations from FYs 2015 through 2018, (2) examined OVW's peer review process, (3) evaluated the budget approval process, and (4) reviewed a sample of TA Initiative award recipients to determine if they met eligibility requirements.

To accomplish these objectives, we reviewed solicitation and award documentation, including guidelines established in the C.F.R., interviewed OVW staff, and surveyed TA Initiative award recipients and OVW program specialists. We found that OVW was in compliance with all solicitation requirements mandated by the C.F.R., and we did not identify issues related to recipient eligibility. However, we identified areas for improvement in: (1) the peer review process, (2) the timeliness of budget review

Figure 1:
Highlights of the Pre-Award Process



and approval, and (3) the disclosure of potentially duplicative funding. The results of our review are detailed below.

The Solicitation Period

A government solicitation details the requirements for preparing an award application, and the 2 C.F.R. § 200.521, Appendix I, defines posting requirements. We reviewed the FY 2015 and 2016 TA Initiative solicitations and found that OVW was in compliance with the posting requirements detailed in the C.F.R.

The C.F.R. also includes guidance regarding the length of time for which a solicitation must be made available. Specifically, 2 C.F.R. § 200.203 part (b) states:

The Federal awarding agency must generally make all funding opportunities available for application for at least 60 calendar days. The Federal awarding agency may make a determination to have a less than 60 calendar day availability period but no funding opportunity should be available for less than 30 calendar days unless exigent circumstances require as determined by the Federal awarding agency head or delegate.

We reviewed each TA Initiative solicitation for FYs 2015 through 2018, and found that solicitations were posted as follows:

Table 1
Solicitation Posting Timeframes

SOLICITATION FY	DATE POSTED	DATE CLOSED	TOTAL DAYS POSTED
2015	02/26/2015	04/09/2015	43
2016	01/12/2016	03/01/2016	50
2017	01/30/2017	03/14/2017	44
2018	01/03/2018	02/15/2018	44

Source: OVW public website; OIG analysis

We provided our preliminary results to OVW and asked for additional detail regarding the posting periods for the TA solicitations. OVW officials first noted that the 60 day solicitation open period is recommended and not required. Further, OVW officials stated that, upon release of the new circular, OVW management carefully reviewed the provisions and assessed how best to meet each. OVW determined that the 60 day recommendation would be a goal, but 42 days (six weeks) would remain the minimum requirement, which OVW met for each year we reviewed.

Peer Review

OVW policy states that it will not allow an individual to serve as a peer reviewer for an award program if the individual has a pending application to that specific award program. Specifically:

OVW makes every attempt not to consult, as peer reviewers, individuals who are employed by an applicant for grant funding, employed by a Memorandum of Understanding partner of an applicant, or otherwise situated to gain financially from a submitted application. As a general rule, an individual with such a relationship to an application is considered to have a conflict of interest and cannot serve as a peer reviewer for the grant program under which they have a pending application

As OVW amends its guidance in order to ensure the integrity of the peer review process, it should consider:

- Updates to its public call for peer reviewers and peer review application form, neither of which fully details the circumstances under which OVW determines a peer reviewer to have a conflict of interest.
- Ensuring greater scrutiny of the list of approved peer reviewers is applied before the peer review process to eliminate potential conflicts of interest.
- Including a final written disclosure during the peer review itself, to ensure reviewers are aware of all policies and have the opportunity to recuse themselves from specific panels, if necessary.

We obtained a list of all peer reviewers who served on the FY 2015 or 2016 panels, and compared that list to all staff, contractors, and consultants who received OVW TA funding in 2015 and 2016. In total, we identified five separate violations of OVW's peer review guidelines:

- For 2015, we identified two peer reviewers who were budgeted as consultants in competing awards, therefore situated to gain financially from a submitted application.
- For 2016, we identified three peer reviewers who were budgeted in competing awards, and therefore situated to gain financially from a submitted application. This includes one consultant, one employee of a subrecipient, and one Project Coordinator of a long-time OVW TA recipient.

Again, we shared our preliminary results with OVW and requested comment. OVW officials stated that, in some cases, consultants may be unaware that they have been included in an applicant's budget. OVW officials also stated that peer reviewers are selected well in advance of the actual peer review, meaning a conflict could develop between OVW's selection of that individual as a reviewer and the actual peer review. We

acknowledge that these situations are possible, particularly for consultants. However, this does not relieve OVW of the obligation to enforce its own policies and procedures in order to ensure the integrity of the peer review process.

We recommend that OVW update its existing peer review guidance to clearly address issues related to conflicts of interest and develop and implement policies to improve the enforcement of peer review guidelines.

Budget Review and Approval

As part of an award application package, potential recipients submit detailed budget information to OVW for review. This includes costs related to: (1) salary; (2) fringe; (3) travel; (4) equipment; (5) supplies; (6) construction; (7) contractors, consultants, and subawards; (8) other costs; and (9) indirect costs. Budgets are reviewed to ensure the costs are reasonable, allowable under the terms and conditions of the award, and correctly calculated. This review is conducted by the six employees in OVW's GFMD, who, in FY 2018, were responsible for the review and approval of 639 awards. In addition to budget review, OVW GFMD employees are tasked with:

- pre-award risk assessments;
- conference cost review and approval;
- development of financial grants administration policy for OVW;
- TA and training for award recipients, including on-site visits;
- review and approval of grant adjustments;
- indirect cost rate negotiations;
- excess cash reviews;
- audit confirmations;
- closeout of awards; and
- OIG audit resolution.

RECIPIENT PERSPECTIVE

In response to our survey, TA Initiative award recipients commended the dedication of OVW's GFMD staff, their thorough reviews, and the addition of charts in the solicitation which help to clarify application requirements.

The OIG found that GFMD staff generally conducted thorough and detailed reviews of award budgets within the scope of this audit. However, we identified lengthy delays between award start date and final financial clearance of award budgets.

Most awards are made with a project start date of October 1. Ideally, final financial clearance would occur before this date, as this approval is required in order for the recipient to be able to commence substantive work on their award. In fact, we found that 95 percent of OVW TA awards in our review did not receive final financial clearance prior to the project start date, which hinders a recipient's ability to commence substantive work on the award. This results in most OVW awards being made with a "conditional clearance," which allows the recipient to spend up to \$10,000 in award funds on OVW mandated training, but generally prohibits substantive activity until final clearance has been granted.

We asked OVW officials if internal goals are set for the provision of financial clearance. Those officials reported that the target at OVW is by March of the following year – a delay of approximately five months. Again, we reviewed all 146

awards in our scope, and found that approximately 40 percent exceeded OVW's 5-month goal for final financial clearance. Such delays challenge award recipients in many ways, as they may be unable to make hiring decisions, purchase necessary supplies and equipment, or contract with vendors and consultants.

We shared our preliminary results with OVW. OVW officials stated that the financial clearance process is a concern for the agency and agreed that areas for improvement exist. However, OVW officials also told us that, to ensure that each budget is approved according to the solicitation requirements, federal statutes and regulations, and OVW policy, OVW "cannot reduce the level of effort given to individual budget reviews," as "hasty reviews can result in the approval of statutorily or programmatically unallowable costs."

The OIG recognizes the importance of the financial clearance process, and our review did not identify any indication that OVW's GFMD significantly overlooked items that may adversely impact award recipients or lead to the potential waste or misuse of TA Initiative funds. The OIG agrees that a reduction in the level of effort of budget reviews could ultimately have an adverse impact on the financial integrity of the final award. However, based on the rate of final financial clearances that occur beyond the project start date, and in excess of OVW's internal goals, as well as the burden such delays can place on OVW recipients, we believe improvements in this area should be a priority for OVW.

To identify common areas of confusion and potential areas for improvement, we: (1) interviewed members of OVW's GFMD, and (2) surveyed TA Initiative award recipients. Our survey questions focused on concerns with the TA solicitation itself, as well as the budget review and approval process more broadly. In total, 11 respondents (23 percent of total respondents) reported concerns with the budget review process. Regarding the solicitation, 11 respondents noted that some areas of the OVW TA Initiative solicitation were unclear, or could be better defined.

GFMD staff stated that common areas of confusion include misunderstandings of the differences between contractors and consultants, application of indirect cost rates, cost allocation methodology, and general confusion regarding the allowability of some costs.

TA Initiative recipients echoed OVW's concerns regarding misunderstandings between contractors and consultants, and also noted redundancy between areas of the solicitation.¹ In our judgment, recipient confusion during the solicitation and application process may lead to the submission of budgets that ultimately require more effort on behalf of OVW's GFMD later in the process.

Proactive improvements to the OVW TA Initiative solicitation and pre-award process may improve the quality of budgets received by GFMD, potentially reducing the time required for review. Additionally, a more efficient financial clearance process may alleviate potential hardship amongst OVW TA Initiative recipients. Such improvements may include: (1) the identification of common areas of confusion among recipients, resulting in the creation and distribution of a glossary of key terms and their definitions, and (2) increased participation in trainings and solicitation open-calls by OVW's GFMD staff in the pre-award phase.²

Once created, new guidance should be prominently featured in the OVW TA Initiative solicitation and Solicitation Companion Guide, and should be updated as necessary. We recommend that OVW prioritize areas for improvement it has previously undertaken, distribute guidance related to common issues with the award solicitation, and review the

Survey Responses from TA Initiative Recipients:

"It can be challenging to stay on target with deliverables and grant activities when the budget is approved after the project period begins."

"In at least two instances...the long delays resulted in postponing the start of projects for 6 months. This puts us in a bind when staff expected to be on the project have other commitments."

"In our experience the budget review process can be lengthy and there is not consistent direction, recommendations, etc. across all U.S. DOJ components."

"The process takes too long, often resulting in lags in funding of a couple months which is difficult for small organizations."

"We always try to adapt our latest budget or conference request based on previous feedback received and the latest financial management guide. However, expectations seem to change dependent on the reviewer. Is there any way to streamline this in order to make it more efficient?"

"For [some terms], we created internal definitions based on the very vague definitions included in [the solicitation]. We hope our definitions are the same as the definitions OVW had in mind for those terms, but there is no way to tell."

¹ In some cases, recipient statements or concerns were not reportable matters. However, we shared additional information regarding these statements and concerns with OVW over the course of this audit.

² In FY 2017, OVW began implementing new processes to address budget review and approval delays. These processes include additional training for and increased communication between OVW's GFMD staff and award recipients, and the hiring of one new staff member. OVW has piloted this enhanced training and communication through its Transitional Housing program; such initiatives for the TA Initiative have not yet begun. Therefore, as these processes were not in place at the time of our audit and are not specifically relevant to TA, we cannot comment on their efficacy.

recipient concerns and OIG issues presented in our report in order to identify and implement additional improvements to the financial clearance process.

Improved Disclosure of Duplicative Funding

Each award application requires the submission of a Summary Data Sheet, which tracks information pertinent to the applicant and application. On the Summary Data Sheet, applicants are required to include a list of other federal grant programs from which the applicant organization currently receives funding, or for which it has applied for funding to do similar work. The Summary Data Sheet also requires that applicants include a summary of all current and recent OVW projects. However, our review of the Summary Data Sheet, and our subsequent communication with OVW officials, revealed that recipients are not required to disclose the receipt of non-federal funding that also address the goals and objectives of an OVW award.

In response to our survey, two OVW TA Initiative award recipients (4 percent of survey respondents) stated that they receive funding from private foundations that partially address the goals and objectives of their OVW TA Initiative awards. While the OIG recognizes that this is a small percentage, in our judgment, all funding that may contribute to overlap and duplication should be reported to OVW in order to ensure that award decisions are reached through the most informed and thorough process possible.

We discussed this issue with OVW officials, who stated that OVW does not wish to dis-incentivize recipients from obtaining private funding to supplement OVW-funded activities. Those officials also noted that private funding may permit grantees to engage in activities that are out of scope from the federal award or unallowable under federal statute or rules. Finally, OVW officials stated that the receipt of private funding should not prohibit recipients from receiving OVW funds. The OIG agrees that potential recipients should be encouraged to apply for sources of funding that may supplement, rather than duplicate or supplant, funds provided by OVW. Additionally, the OIG agrees that receipt of such funding should not prevent OVW from providing funding so long as the funding is not expressly duplicating that being provided by OVW. However, given the critical nature of OVW's mission and the competitive nature of most OVW grant programs, funding decisions should be made in consideration of all relevant information. We recommend that OVW develop and implement policies and procedures to require that recipients disclose any funding that expressly duplicates the funding being requested from OVW.

Award Monitoring

After an award has been made, OVW must provide efficient and effective oversight to ensure recipients remain in compliance with award terms and conditions. To evaluate OVW's actions and oversight in this area, we examined: (1) OVW staff training, (2) OVW mandated training for TA Initiative award recipients, (3) project period overlap and award implementation delays, (4) recipient use of the DOJ maximum consultant rate, and (5) TA Initiative

Purpose Areas. We did not identify issues related to OVW mandated training for award recipients, nor did we identify significant issues of project duplication within the scope of this audit. However, we did identify areas for improvement related to OVW staff training, project overlap and award implementation delays, OVW approval and recipient use of the DOJ maximum consultant rate, and TA Initiative purpose areas.

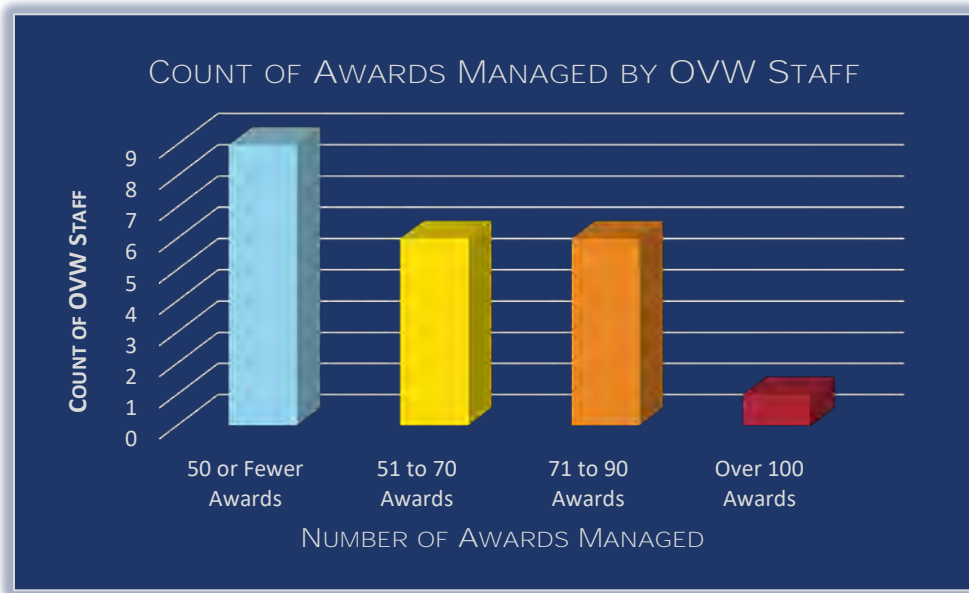
Background: OVW Staff Workload

During our interviews, we learned that staffing at OVW has been adversely impacted by attrition and the inability to fill some positions due in part to hiring freezes at the DOJ from 2011 through 2014, and for a three month period in 2017.³ Generally, OVW considers 45 awards to be an appropriate workload for a program specialist.⁴ However, due to these longstanding staffing constraints, OVW program specialists oversee, on average, more than 45 awards. In our staff survey, we asked how many total awards each employee is charged with overseeing. As shown below, we found that 60 percent of program specialists manage more than 50 awards. Additionally, we found that those tasked with fewer than 40 awards were generally in senior positions, and have a reduced grant load due to increased duties in other areas, or had been at OVW for two years or less.

³ In 2018, the Council of Inspectors General on Integrity and Efficiency released the first ever report of [Top Management and Performance Challenges Facing Multiple Federal Agencies](#). The report identified Human Capital issues, including funding and staffing, as one of those challenges. Specifically, the report indicated that the lack of adequate, predictable funding and staffing can negatively affect an agency's ability to meet its mission. The report also indicated that hiring freezes can lead to delayed hiring actions and overworked agency staffs.

⁴ OVW determined 45 awards to be appropriate based on its review of activities that take place during the active award period. Contributing factors included how many GANs a program specialist can be expected to review, or how much monitoring is expected. OVW reviewed different units and different program specialists, and ultimately determined that 45 awards per program specialist was a reasonable workload.

Figure 2
Survey Result: OVW Staff Workload



Source: OIG survey of OVW staff

Considering the high award to employee ratio, we asked OVW staff if they felt they were able to effectively oversee the awards assigned to them. As shown below, 68 percent of OVW staff stated that they do feel able to provide effective oversight.

Table 2
Survey Result: Program Specialist Assessment of Their Ability to Provide Effective Oversight

<i>I am able to effectively monitor the TA Initiative awards assigned to me.</i>				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
23%	45%	18%	9%	5%

Source: OIG survey of OVW program specialists

^a Of the program specialists who responded "Neither Agree nor Disagree," "Disagree," or "Strongly Disagree," all narrative responses included references to understaffing at OVW or a high grant load.

We also surveyed TA Initiative recipients to determine if they had any concerns regarding communication with their OVW program specialist. In total, 81 percent of respondents reported no concerns regarding communication with their assigned program specialist. These respondents characterized the frequency of their communication as shown below.

Table 3

Survey Result: Communication Between Award Recipients and OVW Program Specialists

<i>How often do you communicate with your OVW TA Initiative program specialist?</i>			
Daily	Weekly	Monthly	Other
0%	21%	33%	44%

Source: OIG Survey of TA Initiative award recipients

- ^a In our survey, we requested that recipients answering “Other” provide a narrative response with additional detail. Those respondents overwhelmingly reported that communication took place on either a biweekly basis, or on an as-needed basis.
- ^b Generally, the respondents who reported concerns with program specialist communication expressed the desire for faster feedback. Many respondents also stated that they believe their program specialist to be overworked. Some respondents who reported no concern with program specialist communication also provided positive feedback regarding thoughtful guidance from and overall accessibility of program specialists.

While the OIG has not conducted a broad assessment of staffing at OVW and is therefore not making recommendations related to staffing, we believe the award to program specialist ratio may present challenges that could affect the ability of program specialists to provide comprehensive oversight of all awards assigned to them. However, our review of TA Initiative recipient accomplishments, which is discussed in detail in the following section of this report, did not identify indicators that a lack of oversight had a significant or adverse effect on the TA Initiative overall. While that section of the report contains recommendations related to improved review of TA resources for value and overall effectiveness, we make no recommendations here related to day-to-day oversight of TA Initiative awards.

OVW Staff Training

OVW staff are charged with ensuring recipient adherence with programmatic, administrative, and financial requirements of awards, verification that program activities are carried out in a manner consistent with the grantee’s approved project goals and objectives, and the promotion of responsible stewardship of award funds. To carry out these duties, staff must receive training that adequately prepares them for all facets of award management. In some cases, OVW staff expressed the

need for additional training for new employees, additional regular, scheduled training, and additional focus on value and effectiveness of TA Initiative products.⁵

To assess the current training environment at OVW, we surveyed OVW program specialists to measure the effectiveness, from the employee staff viewpoint, of internal training. As shown below, just over 54 percent of respondents to our survey stated that they agreed, or strongly agreed, that they had received the training necessary in order to perform their job duties effectively.

Table 4
Survey Result: Training Provided to
OVW Program Specialists

<i>I have received the training necessary to do my job effectively.</i>				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
18%	36%	27%	9%	9%

Source: OIG Survey of OVW staff

Additionally, some employees who answered “strongly agree” or “agree” provided narrative comments summarizing concerns or suggesting additional areas for improvement. Common suggestions from all respondents included additional training for new employees (41 percent of respondents), increased regular, scheduled training (27 percent of respondents), and increased training specific to the TA Initiative (18 percent of respondents).

The TA Initiative Team Lead has identified the need for additional training as a priority, and is in the process of developing comprehensive training for staff. Specifically, the Team Lead intends to develop and implement a four to six module series of trainings that will address increased planning between OVW and TA Initiative award recipients, increased communication with those recipients, the proper use of agency GANs, and guidance on how to review TA Initiative deliverables for quality and value.

STAFF PERSPECTIVE

Multiple respondents to our survey stated that they feel they can always go to their more experienced colleagues, supervisors, or OVW’s GFMD staff when questions arise.

⁵ Similarly, in September 2018, the Government Accountability Office (GAO) issued a report describing areas for improvement in regards to internal training across the federal government. Specifically, GAO found that sub-agencies at the Department of Health and Human Services, the United States Department of Agriculture, and the Department of Education lack monitoring and oversight to ensure that sub-agencies are sufficiently training the grants workforce to ensure they have the necessary knowledge, skills, and abilities to properly manage, administer, and monitor the billions of dollars that the federal government spends on grants annually.

In our judgment, such training would address many of the program specialist concerns reported to us, particularly if the knowledge and expertise of experienced TA program specialists are leveraged in order to potentially assist the Team Lead and all staff charged with oversight of the TA Initiative. Additional areas for consideration may include more hands-on training by the Team Lead and other experienced staff, and sharing of TA Initiative trainings or products that OVW deems to represent "best practices" in that they contain significant achievements in terms of content, display, or distribution. We recommend that OVW prioritize the development and implementation of training for program specialists and ensure new guidance addresses the unique challenges of TA, including stressing accountability for the value of products and trainings developed under the program.

Project Overlap – Programmatic Delays

In our 2015 OIG audit of OVW grants awarded to the Dawson County Domestic Violence Project, the OIG identified examples of OVW awards that were made over 1 year before the recipient was ready or able to commence work on the project.⁶ In this audit, we identified programmatic delays indicating that similar issues exist with TA Initiative awards.⁷ Therefore, we reviewed all awards in our scope, and compared the original project start date with the date substantive work was cleared to commence. In total, we identified 71 awards with a delayed start date, including 13 awards for which substantive work did not commence until over a year after the award was made, as shown below.

Survey Responses from OVW Program Specialists

"...I have received adequate training to do the paperwork shuffle required in making and managing the documentation on the TA awards. However, I have received little to no training on working with the TA providers to develop the projects in a way that is helpful [in] meeting the grantees' needs."

"It would help to have a regular training schedule on the basics of TA, and I think it would help to pair up more senior program managers experienced in managing TA with newer staff as a form of additional support."

"I am sure there are many things I could do differently. I am sure newer staff would benefit. I am sure that the grantees would appreciate greater consistency from OVW staff, especially providers that have more than one TA award managed by different OVW staff."

"A comprehensive training that reviews the goals and priorities of the Office and the TA program, its implementation and evaluation would be effective every 2-3 years and/or with changes to the legislation."

⁶ [Audit of the OVW Grants Awarded to the Dawson County Domestic Violence Program, Glendive, Montana](#), Audit Report GR-60-16-002, November 2015.

⁷ Due to the issuance of 2 C.F.R. and changes made to the DOJ Grants Financial Guide, OVW largely suspended the practice of making supplemental awards in FYs 2014 and 2015. This resulted in some awards being made with a special condition prohibiting most activity on the new award until the activities funded under the prior award were complete. We used this special condition to isolate instances in which awards were made far in advance of a recipient's ability to commence work.

Table 5
Delays in Award Implementation

FY	PROJECT START BETWEEN 1 179 DAYS	FUNDS AFFECTED	PROJECT START BETWEEN 180 364 DAYS	FUNDS AFFECTED	PROJECT START OVER 1 YEAR	FUNDS AFFECTED
2015	9	\$5,244,836	22	\$10,309,880	8	\$5,279,766
2016	13	\$7,748,977	14	\$6,686,867	5	\$1,946,480
Total:	22	\$12,993,813	36	\$16,996,747	13	\$7,226,246

Source: OVW; The Office of Justice Programs' (OJP) Grants Management System

We then expanded our review into OVW awards of supplemental funding to determine if recipients appeared to be in need of supplemental funding at the time those funds were granted.⁸ Specifically, we identified five 2016 supplements that OVW awarded in advance of the recipient's ability to use the funding, as shown below.

Table 6
The Provision of Supplemental Funding

AWARD NUMBER	DATE FUNDING WAS INITIALLY OBLIGATED	AMOUNT OF INITIAL OBLIGATION	DATE SUPPLEMENTAL FUNDING WAS OBLIGATED	AMOUNT OF SUPPLEMENTAL OBLIGATION	PERCENT OF INITIAL OBLIGATION USED AT THE TIME THE AWARD WAS SUPPLEMENTED	TIME (IN YEARS) UNTIL INITIAL FUNDING WAS FULLY DRAWN
2015-TA-AX-K004	09/16/15	\$1,269,836	09/13/16	\$417,470	0.20%	2.35
2015-TA-AX-K072	09/16/15	\$450,000	09/14/16	\$500,000	2.22%	1.84
2015-TA-AX-K023	09/18/15	\$750,000	09/09/16	\$1,600,000	33.44%	1.70
2015-TA-AX-K055	09/16/15	\$500,000	09/13/16	\$600,000	2.00%	1.55
2015-TA-AX-K042	09/16/15	\$400,000	09/13/16	\$600,000	28.05%	1.30

Source: OVW; The Office of Justice Programs' (OJP) Grants Management System

We shared our preliminary results with OVW in an effort to better understand why awards are made before work is able to commence. OVW stated that, if an identified TA need is being addressed by an existing project, staff assess that existing project's remaining funds to determine if the existing project has sufficient funds to deliver TA through the next funding cycle. The OIG recognizes that, in some cases, it may be necessary to provide awards or supplements to organizations who have not yet fully completed prior goals and objectives in order to ensure the continuity of service provision. However, awards that had an implementation delay in excess of 1 year, whether funded through the TA Initiative or one of OVW's other discretionary award programs, indicate that the funding

⁸ Generally, a recipient can receive a "supplement" to an original award, which provides additional time and funding to continue and expand work on a project so long as the recipient is appropriately progressing on the goals and objectives of the original award.

could have been provided to an organization ready and able to provide services to combat violence against women.

Finally, we asked OVW officials if funds remaining on prior awards are taken into consideration during application review. OVW officials stated that generally, a detailed review is not conducted unless 60 percent or more in funding remains on a prior award at the time the applicant has applied for a new award. Additionally, the TA Team Lead has started to review remaining funds prior to issuance of the TA Initiative solicitation in order to proactively remove any purpose areas that may, if refunded, result in project overlap.

Our review of implementation delays and the provision of supplemental funding demonstrate that room for improvement exists in ongoing monitoring of activity under prior awards in order to ensure responsible and effective use of taxpayer funds. In our judgment, this issue could be improved with increased monitoring of prior awards by OVW staff as well as additional review of remaining funds during the application process. Based on the issues identified and summarized here, we recommend that OVW amend its current review process to: (1) enhance the review of funds remaining on prior awards, and (2) ensure that applicants who are not ready and able to commence work within a reasonable timeframe do not receive a new award or supplemental funding.

Additionally, the provision of large amounts of funding prior to a recipient’s ability to use the funding may indicate that the TA Initiative is broadly overfunded. We asked OVW program specialists to provide their opinion regarding current funding levels of the TA Initiative. Those responses are shown below.

Table 7
Survey Result: Program Specialist Viewpoint
on TA Initiative Funding Levels

<i>In my opinion, the TA Initiative is currently:</i>			
Overfunded	Appropriately Funded	Underfunded	No Basis to Judge
29%	48%	0%	24% ^a

Source: OIG Survey of OVW staff

^a Staff who selected this option generally reported a lack of familiarity with funding levels agency-wide, or stated that they were too new to provide a knowledgeable response.

We also reviewed data demonstrating the percent of applications by grant program that OVW funds each year. Some OVW programs are extremely competitive, with less than 10 percent of all applications ultimately being approved for funding. We found that, between FYs 2015 and 2017, the TA Initiative was one

of OVW's least competitive programs, with between 52 percent and 63 percent of applications approved for funding.⁹

As shown on page one of this report, funding for the TA program in the last 5 years has ranged from a low of \$31.1 million in 2014 to a high of \$37.9 million in 2016. Funding has declined since 2016, with approximately \$32.6 million awarded in 2018. The OIG recognizes OVW's efforts in this area. However, based on the issues related to fund utilization identified above, we believe that additional review of TA Initiative funding is warranted. We recommend that OVW review and address our recommendation related to the provision of original or supplemental funding, and subsequently conduct an assessment of the necessary funding levels for the TA Initiative overall.

Recipient Use of the DOJ Maximum Consultant Rate

The DOJ Grants Financial Guide requires that compensation for individual consultant services be reasonable and consistent with that paid for similar services in the marketplace. The Financial Guide also establishes \$650 as the maximum rate a consultant can be paid per day (\$81.25 per hour) before prior agency approval is required. In order to assess use of the maximum consultant rate, and determine if that use may be unnecessary or inappropriate, we: (1) surveyed TA Initiative recipients, (2) reviewed approved budget narratives for the awards in our scope, and (3) reviewed OIG audits of OVW TA Initiative recipients for calendar years 2015, 2016, and 2017.

We found 54 percent of respondents to our survey reported that they pay consultants at or above DOJ's maximum rate. We reviewed award budgets for recipients in our scope, and found that in some cases, use of the maximum rate appeared to be justified. For example, use of the maximum consultant rate to fund judges, attorneys, and medical professionals may be reasonable because even that maximum rate is below what they may be paid in the marketplace. However, we also identified areas for potential improvement. Specifically, we found:

- Individuals who are paid a salary from an OVW budget (between \$55,000 and \$75,000 per year), but who were budgeted to "consult" for each other at a rate of \$650/day.
- One instance in which OVW requested justification for the \$650/day rate (proof that the consultant had been paid a similar rate in the past). The invoice provided to and accepted by OVW demonstrated payment from a different OVW award.
- Multiple budgets with "note takers" approved at \$650/day.
- Multiple budgets with translators approved at or above \$650/day; our review of GSA schedule rates for English to Spanish translation indicate that rates are available from approximately \$40 to \$45 per hour.

⁹ The only OVW programs with a higher percent of funded applications were OVW's Tribal Government programs.

Finally, we reviewed 7 external audits of OVW TA awards made in CY 2015, 2016, and 2017. Of those seven, we found that four (57 percent) identified reportable issues related to consultant costs, including nearly \$14,000 in unallowable questioned costs. Specifically, the OIG identified recipients that:

- Did not comply with requirements pertaining to the justification and documentation of consultant rates, and paid a consultant at the maximum rate until the recipient executed a consulting agreement which set the consultant's rate at \$400/day. The OIG found that the services provided at the two different rates "appeared to be consistent throughout the award period."
- Contracted with a consulting firm at hourly rates exceeding the maximum permitted rate without prior OVW approval, resulting in \$6,133 in unallowable questioned costs.
- Did not have a formal procedure for hiring or monitoring consultants, and hired one of its board members as a consultant, which the OIG determined was a conflict of interest resulting in \$7,772 in unallowable questioned costs.
- Paid a contractor at \$110/hour, which exceeded the maximum allowable rate.

OVW officials stated that they are taking steps to better inform recipients that \$650 per day is the maximum, and not the "OVW rate." In our judgment, the provision of additional guidance, combined with enhanced scrutiny during the budget review process, would assist OVW in preventing potential waste and abuse. Areas for improvement may include: (1) suggested rates for commonly used services, (2) directing entities who may be eligible GSA schedule users to the services and rates available through those contracts, (3) the provision of guidance requiring that an individual's consultant rate be generally commensurate with their salary, and/or obtaining justification when consulting services are provided at a rate significantly higher than the individual's actual salary, (4) increasing the rate at which OVW requests documentation supporting justification for the maximum consultant rate, and (5) enhanced monitoring and oversight of consultants during the active award period. We recommend that OVW develop and implement guidance to prevent unnecessary or inappropriate use of the DOJ maximum consultant rate.

TA Initiative Purpose Areas

Each year, OVW issues its TA Initiative solicitation with multiple "purpose areas." These purpose areas are created to solicit applications that address specific areas in which OVW determines TA is needed in order to build and enhance the capacity of OVW's other grant programs. Generally, OVW TA Initiative purpose areas fall under one of two categories:

Targeted: Discrete issue areas intended to provide in-depth TA on a narrow topic within one or more of the issues addressed by OVW grant programs. For example, an award focused on the specific challenges faced by LGBTQ individuals in the justice system.

Comprehensive: Broader areas intended to promote the consistent delivery of TA for certain grant programs, professions, and core/critical areas. For example, an award to provide large-scale TA for OVW's Consolidated Youth Grant Program.

Table 8
TA Initiative Purpose Areas

FY	NO. OF TARGETED PURPOSE AREAS	NO. OF COMP. PURPOSE AREAS	TOTAL NUMBER OF PURPOSE AREAS
2015	49	4	53
2016	32	18	50
2017	44	12	56
2018	43	6	49

Source: OVW TA Initiative solicitations

Examples of purpose areas in the FY 2018 TA Initiative solicitation include:

- Provide TA to OVW-funded attorneys on the confidentiality and privacy needs of victims of sexual assault, domestic violence, dating violence, and stalking (targeted).
- Provide TA to attorneys, advocates, and prosecutors on access to legal services, as well as the criminal and civil justice systems, for sexual assault, domestic violence, dating violence, and stalking victims who identify as LGBTQ (targeted).
- Provide TA to OVW grantees to build their capacity to serve Latina victims of sexual assault, domestic violence, dating violence, and stalking (targeted).
- Provide comprehensive TA to OVW Tribal Coalitions Program grantees. Proposals must address all program statutory purpose areas, organizational capacity, outreach strategies, and topics related to sexual assault, domestic violence, dating violence, stalking, and sex trafficking of American Indian and Alaska Native women and girls (comprehensive).

As shown above, recent OVW TA Initiative solicitations have included approximately 50 distinct purpose areas under which potential recipients may apply for funding. These purpose areas evolve from year to year as older needs are met and newer needs emerge. In our discussions regarding the use of purpose areas, OVW staff stated that TA Initiative awards used to be more comprehensive, but emerging issues – the need for additional focus on dating violence, elder violence, or assistance to the LGBTQ community, for example – have led OVW to the use of more specific, defined areas of need. While OVW's TA Team Lead has been working to consolidate and reduce the number of purpose areas in the TA Initiative solicitation, OVW is also cautious of merging purpose areas in ways that may ultimately limit competition.

Adequately defining purpose areas is necessary to ensure applicants are responsive to OVW's priorities and goals. However, continued focus on

consolidation and reduction in purpose areas may reduce burdensome processes for both TA Initiative recipients and OVW staff. For example, if an organization applies for and receives funding under multiple different purpose areas, OVW makes separate awards for each application, resulting in many organizations receiving multiple TA Initiative awards each year. As a result, each phase in the lifecycle of an award, summarized in the chart below, must be completed multiple times.

Figure 3
The Lifecycle of an Award



Source: DOJ Grants Financial Guide; OVW Grant Monitoring Manual

In our judgment, more effective consolidation of TA Initiative purpose areas, when appropriate, may alleviate recordkeeping and reporting requirement burdens for recipients, and may also assist OVW staff in consolidating the review, oversight, and closeout of TA Initiative awards.

Currently, those charged with oversight of the TA Initiative do solicit feedback from other OVW staff regarding the need for particular purpose areas. Additionally, those in the field can note “emerging issues” or other areas of need in their semi-annual progress reports, which can assist OVW in identifying, including,

or removing purpose areas. However, our interviews with OVW officials and our TA recipient and OVW program specialist surveys indicate that areas for improvement may exist.

While our survey of TA Initiative recipients did not request feedback related to OVW's use of purpose areas, seven recipients (15 percent of respondents) independently expressed areas for potential improvement.¹⁰ Generally, these recipients noted the need for: (1) more information regarding purpose areas earlier in the process, and (2) increased collaboration with OVW regarding the selection and inclusion of upcoming purpose areas.

In regards to the first point, the OIG agrees that TA Initiative applicants may be adversely affected if there is a lack of transparency regarding OVW's areas of interest prior to issuance of the TA Initiative solicitation, particularly if the TA Initiative solicitation is only posted for six weeks. As noted in the Pre-Award Process section of this report, TA Initiative applicants in recent years have had between 43 and 50 days to review and respond to the TA Initiative solicitation. A valid application must include a complete budget and detailed description of proposed programmatic activities, as well as additional administrative documents. Award recipients must assign, and in some cases negotiate agreements with new staff, contractors, or consultants who will assist in accomplishing the goals and objectives of the awards. In other cases, partnerships must be created, and in some cases formalized through Memorandums of Understanding. Increased communication

Survey Responses from TA Initiative Recipients

"...it would be helpful if OVW was more transparent about the priority areas and the decision process. It is somewhat confusing to know how to provide information about our experience as a TA provider and how that information could be useful in designating the priority areas."

"There is something disorienting about not knowing from year to year what OVW will be interested in, and especially in not being able to prepare to respond to the Request for Proposal accordingly...It is extremely difficult to solicit meaningful partnerships, and then have to draft Memoranda of Understanding, which then must be officially signed by the legal departments of various proposed partners, within a six week period of time."

"Solicitations have grown increasingly specific about what OVW wants to fund for TA without sufficient explanation about the changes and/or adequate on-going feedback to current TA providers about how to improve our work and/or build on our successes."

"It would be helpful to the field if it were better understood how OVW decides on its priorities for funding each year and if there are ways for us to provide input into that process."

¹⁰ Generally, this was in response to a comprehensive question which asked "Do you have any other comments, concerns, or feedback regarding the OVW Technical Assistance Program? If yes, please describe."

Survey Responses from OVW Program Specialists

"There are too many purpose areas, and from my vantage point there is not always a compelling reason to include them all. Purpose area identification is done through OVW's good-faith effort to target what OVW perceives to be critical training and knowledge gaps among our grantees, but I'm not certain that OVW's perception invariably matches the reality of what grantees' most pressing TA needs are."

"We are annually told to submit our TA purpose areas with a very short turnaround time that doesn't seem to account for the sheer volume of other work being done, time people are on travel, on leave, want to discuss, etc. It feels very rushed each year."

"...program staff don't typically see the big picture of what could be duplicative, or the opportunity to discuss what is essential, what is missing in TA, and what subject areas need to take priority over other areas. It sometimes feels like a rushed and fractured process."

"...OVW needs to provide opportunities to hear new ideas from the field - meaning we should hear from grantees what they want/need, and hear from the TA providers about what they are seeing and what is needed. Right now, OVW is the primary source of identifying purpose areas. It's important that we be able to do so, but not to the exclusion of new ones from the outside."

"We need to do a better job of coordinating the development of the purpose areas across OVW Units."

from OVW to potential TA Initiative applicants may assist in increasing the quality of applications received.

Regarding point two, the need for greater collaboration between OVW and its recipient community was shared by OVW program specialists, who we surveyed on this issue. Specifically, 60 percent of respondents to our survey stated that they believe that changes should be made to the process of identifying, including and/or removing purpose areas. Areas of consensus amongst program specialists included: (1) a desire to reduce the overall number of purpose areas, (2) the need for additional time and guidance in the development of purpose areas, and (3) the need to more effectively involve OVW award recipients in the purpose area identification process.

Because the TA Initiative purpose areas evolve from year to year, the OIG cannot make recommendations pertaining to specific areas that should be targeted for consolidation or removal. However, in our judgment, a continued focus on consolidation and removal of purpose areas should remain a priority for OVW. This may include amending the OVW progress reports in order to specifically ask for input regarding future purpose areas, creating a page on OVW's TA Initiative focused-website to enhance the collaborative process, or increasing discussion on the topic during annual TA provider meetings. We recommend that OVW develop and implement policies and procedures to: (1) reduce or consolidate TA Initiative purpose areas when feasible, and (2) enhance the purpose area review and collaboration process to effectively obtain feedback from OVW program specialists and OVW's TA community.

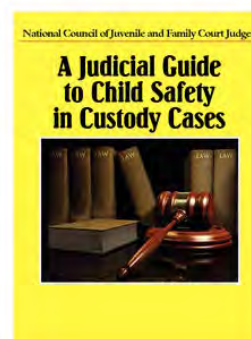
Program Outcomes

The TA Initiative is one of OVW's largest discretionary grant programs, representing an average of approximately 8 percent of OVW's total annual award funding. To assess the overall value and effectiveness of the TA Initiative, we reviewed: (1) recipient accomplishments under FY 2015 and 2016 awards, (2) the distribution of the resources produced under those awards, and (3) the overall value of the TA Initiative itself. The results of our review, and our methodology for each area of our analysis, are presented below.¹¹

Recipient Accomplishments

TA Initiative award recipients provide a wide variety of products and services under the TA Initiative. For example, award recipients create and host New Grantee Orientation trainings, annual conferences related to domestic violence and sexual assault, webinars, roundtable discussions, and detailed guides intended to provide assistance to the larger OVW recipient community, and the public.

As part of our review, we surveyed TA Initiative award recipients to determine if those recipients had concerns regarding their ability to complete the goals and objectives of their awards. While some recipients mentioned the need for a no-cost extension, respondents overwhelmingly reported no concerns regarding their ability to complete their goals and objectives.



¹¹ Each year, the OIG issues its [Top Management and Performance Challenges Facing the DOJ](#) report. These reports regularly identify award oversight as a top challenge and have described the need to better measure and ensure positive program outcomes in order to enhance overall taxpayer value.

Table 9

Survey Result: Recipient Concerns Regarding their Ability to Complete Award Goals and Objectives

<i>Do you have concerns regarding your ability to complete the TA Initiative goals and objectives?</i>	
No	Yes ^a
93%	7%

Source: OIG survey of OVW TA Initiative award recipients

^a Of the recipients who answered “Yes” to this question, two stated that the conference request form has caused delays in implementing award goals and objectives, and one discussed difficulties in growing and sustaining projects.

We also conducted independent verification of TA Initiative recipient accomplishments. Specifically, we reviewed all awards in our scope, and determined that 18 awards had reached their project end date, meaning all goals and objectives should have been completed.¹² Within those 18 awards, we identified 63 goals and objectives that were measurable.¹³ In order to verify completion of award goals and objectives, we reviewed: (1) recipient progress reports, (2) GANs, (3) recipient public websites, (4) events and publications posted to ta2ta.org (TA2TA), and (5) data collected by the National Council for Juvenile and Family Court Judges (NCJFCJ), one of OVW’s primary TA recipients.¹⁴ When we were unable to independently verify completion of award goals and objectives through one of these methods, we conducted additional outreach to the OVW program specialist charged with oversight of the award.

For the majority of awards in our review, we found that TA Initiative recipients had met, or partially met, the goals and objectives of their awards.¹⁵ This generally echoed the results of the OIG’s prior external audit work, which has

¹² We used March 31, 2018 as the cutoff date for this analysis. This date was selected to ensure the recipient’s 90 day closeout period had passed, and to allow the time necessary to conduct our extensive analysis. Additionally, we initially identified 20 awards that closed before March 31, 2018; however, we determined that funds from one award had been deobligated and re-obligated to a different recipient, and that the second award had been closed with no funds drawn.

¹³ Generally, we did not attempt to verify objectives such as phone calls, website maintenance, the provision of on-site assistance, the distribution of brochures, or others objectives that were likely to lack documentation sufficient for audit.

¹⁴ The OIG did not audit the NCJFCJ, and makes no recommendations to the NCJFCJ. Statements in this report should not be interpreted as weaknesses pertaining to the NCJFCJ or their system of internal controls. Our communication with NCJFCJ was limited to our assessment of OVW’s review and distribution of resources created under the TA Initiative.

¹⁵ For example, if the objective was to produce six webinars and the recipient ultimately produced five, we categorized the objective as partially met.

not identified systemic issues with TA Initiative recipients meeting or progressing towards goals and objectives of their awards.

However, we did find that, in many cases, award deliverables or modifications to award goals and objectives were approved informally, through email or other methods lacking a sufficient audit trail. Currently, the OVW Grant Monitoring Manual requires that when products are developed with the support of a cooperative agreement, and hence there is substantial federal involvement in the project, the program specialist must review and approve those products, and approval must occur via a GAN. The lack of GANs for many of the items in our review demonstrates a lack of compliance with internal policies, and can complicate effective oversight of awards as modifications, reviews, and approvals are not sufficiently documented – particularly in cases where oversight of an award transfers from one program specialist to another.



We discussed this issue with OVW staff charged with oversight of the TA Initiative, who are aware that final deliverables are not consistently submitted through a GAN, and believe additional training in this area may be necessary. In order to ensure compliance with internal policies, and maintain an audit and review trail sufficient to document modifications and approval on TA Initiative awards, we recommend that OVW enforce its existing policy requiring that final deliverables be submitted and approved through a GAN.

Distribution of TA Products

As noted, the purpose of the TA Initiative is to provide direct TA to existing and potential grantees and sub-grantees to enhance and support their efforts to successfully implement projects supported by OVW grant funds. Additionally, the program is designed to build and enhance the capacity of civil and criminal justice system professionals and victim service providers across the nation to respond effectively to sexual assault, domestic violence, dating violence, and stalking, and to foster partnerships among organizations that have not traditionally worked together to address violence against women. For example, TA Initiative award recipients have developed the following resources:

Figure 4
Resources Produced Under the TA Initiative

Victims of Domestic Violence	Victims of Sexual Assault	Victims of Dating Violence	Victims of Stalking
<ul style="list-style-type: none"> • A guide intended to assist prosecutors in dealing with protection orders for victims of domestic violence • A state and local law compendium regarding housing rights of domestic violence survivors • A guide for developing tribal shelter and transitional housing programs 	<ul style="list-style-type: none"> • Guidance for University Discipline Panels on sexual violence issues • A training video for law enforcement on bringing sexual assault offenders to justice • Articles and online curriculum covering medical forensic sexual assault examinations 	<ul style="list-style-type: none"> • Educational materials covering orders of protection for victims of teen dating violence for judges, courts, schools, and parents • Resource sheets focused on holding teen dating violence offenders accountable • Information addressing LGBTQ issues in teen dating violence 	<ul style="list-style-type: none"> • A stalking incident and behavior log to assist victims in creating evidence of stalking crimes • A model policy to assist universities and colleges create or revise campus policy on stalking • Guidance providing stalking response tips for victim advocates

Source: OIG Review of TA Initiative Award Recipient Accomplishments

To maximize the value of the TA Initiative, and effectively improve the nationwide responses to violence against women, it is imperative that these products be easily accessible and widely disseminated. To this end, OVW funds TA2TA, a website created and maintained by the NCJFCJ and funded through the TA Initiative. Established in 2013, TA2TA serves to store and centralize written products and resources developed with TA Initiative funds, to announce upcoming events, and to serve as a centralized location for TA providers, grantees, potential grantees, the public, and OVW to access those products and resources. In order to assess the effectiveness of the distribution of products developed under the TA Initiative, we reviewed: (1) recipient posting of required events and products, and (2) OVW's promotion of the site itself.

Recipient Postings

Posting content to TA2TA is generally required. Each OVW TA Initiative award contains a special condition requiring recipients to include all project events – meetings, trainings, webinars, and roundtables, as well as other developed products – to the site for national use. To assess recipient compliance and OVW oversight of this requirement, we reviewed all goals and objectives discussed in the

previous section of this report and attempted to locate the final products or event announcement on TA2TA.

To ensure the results of our review were complete and accurate, we also interviewed NCJFCJ officials, obtained posting statistics from TA2TA, and conducted outreach to individual OVW program specialists. Ultimately, of the 98 goals and objectives in our review, we determined that 47 related resources should have been included on TA2TA.¹⁶ After our extensive review, we were able to verify complete posting for only 22 resources; for an additional 8, we were able to verify partial posting.¹⁷ However, for the remaining 17 resources, we located no posting on TA2TA. We discussed this issue with TA Initiative staff and reviewed survey responses from other OVW program specialists. Staff reported that they are aware that some TA providers do not post their content to TA2TA, and have noted this as a concern. OVW staff also noted that it is the recipient's responsibility to upload required content to TA2TA. While the OIG does not dispute that it is the recipient's responsibility to post developed content, it is also OVW's responsibility to ensure compliance with the established terms and conditions of the award.

The analysis presented above was based on the special condition included in all award documentation which, as noted, requires posting of project events. However, during our follow up with OVW staff, we learned that OVW may determine that some content should not be posted publicly as additional TA is necessary in order to effectively implement developed guidance. For example, in one case OVW determined that several developed products providing legal guidance uniquely specific to particular states should not be publicly posted in order to avoid potential confusion regarding the nuance of state-specific laws.¹⁸ While the OIG maintains that room for improvement exists in ensuring that products and other items produced under the TA Initiative be posted for public use, we acknowledge the need for OVW to exercise discretion with regards to certain postings.

However, as the TA Initiative exists to provide benefit to OVW's larger recipient community, and ultimately the public, the value of the program is inherently limited if trainings, webinars, and other products are not made widely available for use. Therefore, we recommend that OVW develop and implement

¹⁶ Some goals, such as an in-person training events, curriculum, or hotline calls, do not require posting on TA2TA.

¹⁷ For example, the goal was to host 5-6 training events, and the recipient actually held four events.

¹⁸ In this case, a TA Initiative recipient produced one model bench guide and four state-specific bench guides covering international child abduction cases involving battered respondents. OVW elected not to publicly post the state-specific bench guides, but did post the model bench guide. However, the model guide did not disclose that complete guides had been developed for California, Texas, New York, and New Jersey. To reduce the likelihood of eventual project duplication, we asked that the model bench guide be updated to disclose the existence of the four previously developed state-specific guides. OVW staff made the update two days after our initial outreach.

policies to ensure that all content produced under the TA Initiative is made available to the recipient community, and the public, as appropriate.

Promotion and Maintenance of TA Initiative Resources

As previously noted, staff charged with oversight of the TA Initiative are aware that not all content produced under the program is posted to TA2TA as required. Respondents to our survey of OVW program specialists echoed this concern. Specifically, staff noted that while the site can be effective in regards to product distribution, and while staff have been working on improving this process, additional actions may further enhance overall value. Noted obstacles included an overall lack of awareness regarding TA2TA and limited use by award recipients.

We asked officials at OVW and NCJFCJ to detail the ways in which awareness of TA2TA is spread to the larger OVW recipient community. OVW staff stated that information is provided to award recipients at New Grantee Orientation sessions, and informally during calls and site visits. The NCJFCJ has also created postcards promoting the website for distribution at TA events and site visits to grantees. Additionally, a link to TA2TA is included on OVW's website.

STAFF PERSPECTIVE

"... We do not have [staff] to manage the kind of outreach needed for disseminating TA products. This is unfortunate, because a great deal of the webinars and publications our TA providers produce can be useful well beyond our grantee community."

While these are positive steps, OVW staff also reported that room for improvement exists in the effective promotion and distribution of products created under the TA Initiative. Our review of data maintained by NCJFCJ and reported to OVW generally confirmed the validity of this concern. For example, in the progress report covering July through December 2017, NCJFCJ reported that TA2TA experienced 7,110 unique page views, and that 1,681 (24 percent) were to register for a webinar from one organization. Written products uploaded to the TA library were downloaded 192 times, while posted webinar recordings were viewed 128 times over the six month reporting period. This may indicate that increased awareness of the site would assist in ensuring resources developed under the TA Initiative reach a wider audience, thereby enhancing the value of the TA initiative overall.

Minor modifications to TA2TA may also assist in increasing the utilization of developed resources. For example, items posted to TA2TA's Resource Library were generally accessible. A visitor to TA2TA can search for available guidance by "target audiences," which include groups such as sexual assault coalitions, transitional housing services, Tribal Governments, judges, and health professionals; this type of search returns products developed to assist those specific audiences, regardless of when the resource was posted to TA2TA.

However, the TA2TA calendar, which serves to announce and catalogue webinars, trainings, conferences, and other events, may be of limited use once an event has passed, even if resources are maintained on TA2TA or on a recipient's own website.¹⁹ While visitors to TA2TA again have the option of narrowing a search by target audience, those searches can only be conducted on a monthly basis.²⁰ This makes locating content that may benefit existing grant programs a laborious process, as posted events date back to 2013.

As online trainings such as webinars have become an important part of OVW's TA Initiative, we believe that more effective cataloguing of such events could increase the impact of TA Initiative funding, as well as assist the OVW recipient community and the general public in more effectively implementing strategies to combat violence against women.

STAFF PERSPECTIVE

"The diversity of OVW TA providers is a strength - it provides for expert knowledge from different perspectives and allows the information to be grounded in survivors' experiences and needs. The challenge is then how to help all of that information flow to a more centralized dissemination point."

In summary, OVW could improve the value of the TA Initiative by more effectively increasing awareness of its existence and more effectively showcasing content that has been developed. This may include increasing knowledge of the site itself, sending periodic reminders to the OVW community featuring content that OVW determines to represent best practices or other

significant achievement, more effectively highlighting information regarding TA2TA in solicitations or award packages for OVW's other grant programs, and ensuring that developed products and other events are effectively catalogued on TA2TA. We recommend that OVW develop and implement practices to increase awareness of the TA Initiative products that have been made available for recipient and public use. We also recommend that OVW develop and implement policies to ensure that resources funded by the TA Initiative are effectively catalogued for future use.

Measuring the Value of TA

Finally, we conducted a review to determine how OVW assesses the value and effectiveness of the TA Initiative overall. To accomplish this objective, we: (1) reviewed data submitted to the US Congress, (2) reviewed content developed under the TA Initiative, (3) surveyed TA Initiative award recipients, (4) surveyed OVW program specialists, and (5) interviewed additional OVW staff.

¹⁹ Recorded webinars on TA2TA are generally those hosted by OVW or TA2TA specifically for TA providers; content developed in order to provide assistance to the OVW recipient community, or the public, are generally hosted on the TA providers' own website.

²⁰ For example, if an OVW Transitional Housing award recipient wanted to search for webinars addressing the Transitional Housing program, she would need to select that program as her "target audience," and then scroll back through years of content on the calendar, one month at a time. As noted, the website was created in 2013.

The VAWA requires OVW to submit to the U.S. Congress, on a biennial basis, a report summarizing the effectiveness of grant programs. The 2016 biennial report, the most recent available at the time of our audit included data submitted by recipients of 23 current and formerly authorized discretionary grant programs administered by OVW.²¹

For the TA Initiative, OVW utilizes statements from grantees describing the benefits of TA as well as ongoing or emerging needs in the field. OVW also aggregates qualitative data from recipient progress reports to identify common needs across the country, as well as dangers facing victims of sexual assault and domestic violence. Finally, in regards to program achievements, OVW primarily relies on aggregate quantitative data in order to report on items such as the number of full time staff funded under the TA Initiative, as well as the number of training events held, projects funded, and the number of people who received TA during the two year period.

For some OVW programs, quantitative data can be a valuable tool for measuring program effectiveness. For example, under the Arrest Program, OVW reported that law enforcement officials made 66,095 arrests during the two year period covered by the report. During the same period, OVW reported that the Transitional Housing Program provided a total of 1,363,499 bed nights to victims, children, and other dependents.²² Due to the nature of these programs, and the specific types of services they provide, aggregate quantitative data, if appropriately vetted for accuracy, can provide meaningful insight as to the effectiveness of the program overall.

***TA Funded Activities Included
in the 2016 Biennial Report to
Congress***

223 Projects

Between July 1, 2013 and June 30, 2015, the TA Program funded 223 projects.

100,660 TA Activities

Grantees provided a total of 52,550 consultations, and responded to 38,072 requests for information.

244,133 People Trained

Grantees trained a total of 244,133 people.

Source: OVW's 2016 Biennial Report to Congress

²¹ The 2016 report covered activities that took place between July 1, 2013 and June 30, 2015. The OIG has not audited the data included in OVW's report.

²² Funds under the Arrest Program can be used to implement pro-arrest programs and policies in police departments. Funds from the Transitional Housing Program can be used to provide short-term housing assistance for victims of sexual assault, domestic violence, dating violence, or stalking. In 2015, OVW changed the working title of the Arrest Program to the Improving Criminal Justice Responses Program to "more accurately reflect the program's scope." Funding for pro-arrest policies remains.

Due to the nature of the TA Initiative, which largely reports effectiveness based on the number of projects, activities, and people trained, quantitative data may not be as strong an indicator of program effectiveness. Rather, a true measure of program effectiveness should begin with a comprehensive review of the value of the resources produced under the program. Without assessing the resources for value, the number of people who consume those resources may not be an effective tool for measuring program success.

Currently, OVW does not measure the effectiveness or value of roundtables, conferences, and other in-person trainings in any consistent or systemic way, and has noted this as a concern. Similarly, online content such as webinars does not include a uniform mechanism such as a survey in order to collect and aggregate user feedback. Additionally, OVW does not establish baselines to measure improvement or progress in the grant programs the TA Initiative is expected to enhance. Finally, as noted in the OVW Staff Training section of this report, some program specialists have expressed reservations regarding their ability to effectively review content funded under the TA Initiative in terms of its overall value. To address these issues, we considered potential improvements from the standpoint of both TA Initiative recipients and OVW.

The OIG recognizes that conducting a broad assessment of TA Initiative value and effectiveness is a long-term endeavor. However, additional action in the following areas would, in our judgment, assist in ensuring that the TA Initiative, and the resources developed under it, provide high-impact assistance needed by the OVW recipient community, as well as others across the country working to combat domestic violence, dating violence, sexual assault, and stalking. To address our recommendation regarding value and effectiveness, included at the end

STAFF PERSPECTIVE

"...one consistent challenge with monitoring TA awards is assessing their effectiveness. Compliance is fairly straightforward, but effectiveness is not."

of this report section, we believe OVW should review and consider the following action items:

- ✓ More effectively solicit input from TA Initiative recipients regarding program effectiveness and value. TA Initiative recipients expressed the desire for additional ways to report on overall program value and effectiveness, as excerpted in the highlight box on the following page. OVW has taken proactive steps in this area, including hosting sessions designed to assist award recipients in developing comprehensive and meaningful narratives in their progress reports. However, additional room for improvement in OVW TA Initiative progress reports may exist. Currently, the last question in an OVW TA Initiative progress report is as follows: *“Provide any additional information that you would like us to know about your TA Cooperative Agreement and/or the effectiveness of your program.”* Due to its placement as the last question on the progress report, its general nature, and because it is the only question listed as “optional,” OVW may not be receiving responses that could assist with a comprehensive review of program effectiveness and value. In our judgment, specifically identifying data or outcomes OVW is interested in tracking or reviewing, and requiring a response to that question, may assist in OVW’s efforts to conduct a long-term value assessment.
- ✓ Increase efforts to obtain feedback on resources developed under the TA Initiative. OVW officials recognize the need to collect consistent and uniform feedback on resources created under the TA Initiative. Currently, while some TA Initiative

Survey Responses from TA Initiative Recipients

“...it is important to have TA providers report on intended impact and/or unintended outcomes, both successes and challenges, of the project. A concern is that unless there is more emphasis on impact and assessment of TA providers’ tools, resources and approaches, we will not be as effective as possible and could continue practices that are out dated. There needs to be more emphasis on how TA providers are measuring their effectiveness and how providers change in order to integrate new and promising approaches.”

“We have meaningful interactions with our TA recipients and they report high satisfaction with our services, yet it’s challenging to know how to represent the value of our work to OVW since everything gets reduced to numbers on the report. There are insufficient mechanisms to describe and report on the impact of our work for communities or organizations since there is only a small section at the end of the reports asking about what else we would like to tell OVW.”

“...there is no emphasis on evaluation of the impact of the trainings conducted; only questions [are] about the number of people who attended training or who received technical assistance.”

“We conduct evaluations of in-person and webinar trainings that provide valuable information and feedback on content, training organization, faculty expertise, changes in knowledge, skills and practice. It also functions to provide further insight on emerging needs and future TA support that helps inform future TA activities and would be valuable to OVW.”

recipients do solicit and review feedback for the content created under their awards, the process is not required or reviewed by OVW. To assist in a comprehensive value assessment, OVW should require that TA Providers prompt consumers of developed content to review, rate, or otherwise provide feedback on resources developed under the TA Initiative. Ideally, OVW should work to create a uniform survey in order to ensure consistency, and would use the feedback to conduct ongoing reviews of program-wide achievements, and broadly assess program weakness.

- ✓ Review the statistical data maintained by the NCJFCJ on a semi-annual basis. Currently, NCJFCJ website facilitators track content that is in high demand, as well as areas that appear to be of low interest. The NCJFCJ also maintains statistics on overall page views and resource downloads. However, there is not a formalized process for sharing that information with OVW. In our judgment, stronger utilization of the data analytics currently being conducted by NCJFCJ may assist OVW in assessing value through the identification of areas requiring additional TA, while also identifying areas that may not require additional funding. Review of such metrics would also reveal which TA Providers are producing content that is in high demand, and which TA providers produce content that may not be of interest or value to the OVW community as a whole.
- ✓ Encourage additional communication between OVW staff charged with oversight of TA awards. OVW program specialists may review content produced under their own awards that is uniquely innovative, in high demand, or otherwise represents best practices. Formalized sharing of such information, through staff meetings or a “best practices” page on TA2TA may not only assist program specialists in their oversight of awards, but also provide guidance to TA Providers that would benefit future resource development.
- ✓ Consider assembling a centralized review board of subject matter experts to assess resources for overall value and effectiveness. Each year, OVW issues a call for peer reviewers to join its pool of subject-matter experts to participate in its peer review process to review applications for award funding. These reviewers, who are compensated at a rate of \$125 per application reviewed, may include victim advocates, judges, prosecutors, police officers, legal professionals, and others with expertise on issues such as tribal communities, colleges and universities, rural areas, urban areas, disabled and elderly populations, and service provision to victims, including those provided by the faith community, as they relate to violence against women. Assembling a similar board of independent reviewers for assessment of products produced under the TA Initiative may provide cost-effective assistance in both a short and long term evaluation of program effectiveness.

- ✓ Structure future TA Initiative purpose areas and award terms and conditions to more clearly identify expected outcomes, and with an increased focus on effectiveness. Currently, some goals and objectives included in TA Initiative awards are difficult to evaluate in terms of overall value or effectiveness. For example, objectives in our sample included “Conduct presentations at OVW TA and Grantee events on stalking issues,” or “Provide webinar trainings and other e-learning modules for coalitions.” While the OIG recognizes the need for some latitude in defining activities scheduled to take place over, possibly, the next three years, ensuring that goals and objectives are clearly defined and measurable may assist program specialists in their oversight of awards, and promote additional accountability on the part of the TA Provider.
- ✓ Consider using available research and evaluation funding to grant or contract with an independent entity skilled in conducting value assessments to do a comprehensive, multi-year review of TA effectiveness. Currently, OVW works with an independent entity to assist with the collection, analysis, and evaluation of data reported by award recipients in semi-annual progress reports. A similar grant or contract with an independent entity skilled in conducting comprehensive value assessments may again assist OVW in ensuring taxpayer value while not placing additional burden on OVW staff. Our interviews with OVW staff indicate that such funding is currently available to OVW, and that staff have, or are in the process of, presenting the idea to senior leadership. In our judgment, such an endeavor may be an effective use of funds that could be implemented in the near future.

Again, the OIG recognizes that implementing a strategy to assess program value and effectiveness is a long-term endeavor. However, such review is necessary in order to ensure that taxpayer funds are being utilized in necessary and impactful methods. Therefore, we recommend that OVW develop and implement a strategy to assess the overall effectiveness and value of resources produced under the TA Initiative.

CONCLUSION AND RECOMMENDATIONS

We found that the majority of TA Initiative recipients in our review were generally successful in completing the goals and objectives of their awards. However, we also identified deficiencies related to the OVW's peer review, the provision of final financial clearance, staff training, project overlap and the provision of supplemental funding, and potentially excessive use of the DOJ maximum consultant rate. Most importantly, we found that resources created under the TA Initiative are not effectively distributed for national use, and that OVW does not have a process in place to assess the value and effectiveness of those products. OVW has, or is in the process of, taking steps intended to improve its TA Initiative. In 2016, OVW hired a TA Team Lead who has begun developing comprehensive training for OVW staff to include enhanced review of TA Initiative products. Additionally, OVW made one recent addition to its GFMD in order to better expedite review and approval of financial matters.

We believe that making the following enhancements to the TA Initiative, and to OVW processes in general, are reasonable and necessary in consideration of the critical responsibility that OVW has to ensure effective fiscal stewardship and programmatic oversight.

We recommend that OVW:

1. Update its existing peer review guidance to clearly address issues related to conflicts of interest, and develop and implement policies to improve the enforcement of peer review guidelines.
2. Prioritize areas for improvement it has previously undertaken, distribute guidance related to common issues with the award solicitation, and review the recipient concerns and OIG issues presented in our report in order to identify and implement additional improvements to the financial clearance process.
3. Require that recipients disclose any funding that expressly duplicates the funding being requested from OVW.
4. Prioritize the development and implementation of training for program specialists, and ensure new guidance addresses the unique challenges of TA, including stressing accountability for the value of products and trainings developed under the program.
5. Amend its current review process to: (1) enhance the review of funds remaining on prior awards, and (2) ensure that applicants who are not ready and able to commence work within a reasonable timeframe do not receive a new award or supplemental funding.

6. Conduct an assessment of the necessary funding levels for the TA Initiative overall.
7. Develop and implement guidance to prevent unnecessary or inappropriate use of the DOJ maximum consultant rate.
8. Develop and implement policies and procedures to: (1) reduce or consolidate TA Initiative purpose areas when feasible, and (2) enhance the purpose area review and collaboration process to effectively obtain feedback from OVW program specialists and OVW's TA community.
9. Enforce its existing policy requiring that final deliverables be submitted and approved through a GAN.
10. Develop and implement policies to ensure that all content produced under the TA Initiative is made available to the recipient community, and the public, as appropriate.
11. Develop and implement practices to increase awareness of the TA Initiative products that have been made available for recipient and public use.
12. Develop and implement policies to ensure that resources funded by the TA Initiative are effectively catalogued for future use.
13. Develop and implement a strategy to assess the overall effectiveness and value of resources produced under the TA Initiative.

STATEMENT ON INTERNAL CONTROLS

As required by *Government Auditing Standards*, we tested, as appropriate, internal controls significant within the context of our audit objectives. A deficiency in an internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect in a timely manner: (1) impairments to the effectiveness and efficiency of operations, (2) misstatements in financial or performance information, or (3) violations of laws and regulations. Our evaluation of OVW's internal controls was not made for the purpose of providing assurance on its internal control structure as a whole. OVW's management is responsible for the establishment and maintenance of internal controls.

As noted in the Audit Results section of this report, we identified deficiencies in OVW's internal controls that are significant within the context of the audit objectives and based upon the audit work performed we believe adversely affect OVW's ability to properly oversee and administer the TA Initiative.

Because we are not expressing an opinion on OVW's internal control structure as a whole, this statement is intended solely for the information and use of OVW. This restriction is not intended to limit the distribution of this report, which is a matter of public record.

STATEMENT ON COMPLIANCE WITH LAWS AND REGULATIONS

As required by the *Government Auditing Standards*, we tested, as appropriate given our audit scope and objectives, records, procedures, and practices to obtain reasonable assurance that OVW's management complied with federal laws and regulations for which noncompliance, in our judgment, could have a material effect on the results of our audit. OVW's management is responsible for ensuring compliance with applicable federal laws and regulations. In planning our audit, we identified the following laws and regulations that concerned the operations of OVW that were significant within the context of the audit objectives:

- Public Law 113-4, the Violence Against Women Reauthorization Act of 2013
- 2 C.F.R. § 200.203, Appendix I, Notice of Funding Opportunities
- 2 C.F.R. § 200.521, Management Decision

Our audit included examining, on a test basis, OVW's compliance with the aforementioned laws and regulations that could have a material effect on OVW's operations, through analyzing data, assessing internal control procedures, and examining procedural practices by interviewing auditee personnel. Nothing came to our attention that caused us to believe that OVW was not in compliance with the aforementioned laws and regulations.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our audit objectives were to determine whether the Office on Violence Against Women's (OVW) controls are effective to ensure: (1) its applicants meet eligibility requirements and awards are made in accordance with applicable agency policies and procedures; (2) it appropriately monitors awards to prevent project overlap, award duplication, and unallowable costs; and (3) that recipients are appropriately progressing on the objectives of the awards.

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

In conducting our audit, we tested compliance with what we consider to be the most important conditions of the TA Initiative. Unless otherwise stated in this report, the criteria we used to evaluate compliance are contained in the 2013 Violence Against Women Act, the C.F.R., the Department of Justice Grants Financial Guide, the OVW Grant Monitoring Manual, and the Training and Technical Assistance solicitation documents.

Our audit generally covered, but was not limited to, OVW TA Initiative awards made in FYs 2015 and 2016. These were, in our judgment, the most recent years for which recipient accomplishments would be auditable. To accomplish our objectives, we interviewed key employees at the awarding agencies in Washington, D.C., surveyed 48 TA Initiative award recipients, 22 OVW program specialists, and conducted numerous follow-up interviews with OVW staff charged with financial and programmatic oversight of awards. We also examined internal training processes and OVW reports to the U.S. Congress. Finally, we reviewed financial and programmatic documentation related to 146 TA Initiative awards including, but not limited to, recipient budget and project narratives, summary data sheets, progress reports, financial clearance memorandum, award special conditions, GANs, award monitoring documentation, and products distributed through the TA Initiative.

OFFICE ON VIOLENCE AGAINST WOMEN'S RESPONSE TO THE
DRAFT AUDIT REPORT



U.S. Department of Justice

Office on Violence Against Women

Washington, DC 20530

January 24, 2019

MEMORANDUM

TO: Jason R. Malmstrom
Assistant Inspector General for Audit

THROUGH: Katherine T. Sullivan
Acting Director

Nadine M. Neufville *NMN*
Deputy Director for Grants Development and Management

Donna Simmons *DS*
Associate Director, Grants Financial Management Unit

FROM: Rodney Samuels *RS*
Audit Liaison/Staff Accountant

SUBJECT: Draft Audit Report – The Audit of the Office on Violence Against
Women Training and Technical Assistance Program

This memorandum is in response to your correspondence dated December 12, 2018, transmitting the above draft audit report for the Office on Violence Against Women Training and Technical Assistance Program. OVW has addressed each recommendation and with this memo, we are requesting closure of each recommendation and the entire report. The following is our analysis of each OVW Recommendations.

1. Update its existing peer review guidance to clearly address issues related to conflicts of interest, and develop and implement policies to improve the enforcement of peer review guidelines.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It should be noted that the data collected for this audit covers a 2-year period that precedes the TA Team Lead assuming her role. Prior to FY 2017, day-to-day responsibility for oversight of the TA Initiative was handled by the OVW TA Management Team (TAM), which consists of the Deputy Director for Tribal Affairs, Deputy Director for Grant Development and Management,

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and the Associate Directors who supervise OVW's program units. The TAM was initiated in 2006 and over the following 10 years, the TA Initiative grew significantly, corresponding with the growth in OVW grant programs, and outgrew the bandwidth of the TAM. In FY 2015, the TAM identified the need for a single point-of-contact responsible for day-to-day and year-to-year administration and development of the TA Initiative with oversight from the TAM.

Because TA cuts across all six OVW program units and 18 grant programs, the TA Team Lead plays a crucial role in coordinating TA needs and identifying areas for collaboration, as well as possible areas of overlap.

The TA Team Lead has the following responsibilities:

- **Administering the TA Initiative, including preparing the TA program plan, drafting the solicitation, managing TA peer review, developing and presenting the TA funding recommendations, and overseeing processing of TA awards.**
- Collecting and coordinating proposed TA purpose areas for each solicitation, including assessing remaining funds in current TA awards.
- Developing and delivering internal training for OVW Program Division staff.
- Instructing employees in specific tasks and job techniques related to OVW TA and making available written instructions, policies, procedures, and reference materials.
- Developing and interpreting grants management policies, regulations, procedures, and practices for soliciting, reviewing, recommending, and managing grant awards and cooperative agreements consistent with OVW policy.
- Designing and coordinating external training for OVW TA Providers, including TA-specific new grantee orientations.
- Promoting appropriate dissemination of OVW TA products.
- Managing the TA2TA project, including the TA website that houses TA products and the TA Calendar.

In FY 2017, the TA Team Lead updated the OVW TA Potential Peer Reviewer Save-the-Date Informational card to provide enhanced guidance regarding potential conflicts of interest. In addition, the OVW TA Team Lead updated the TA Basic Minimum Requirements Review (BMR) form, which captures project partners and consultants to ensure none such partners or consultants are selected to be peer reviewers. Attached is a copy of the FY 2018 TA Peer Reviewer Save the Date form, the FY 2018 TA BMR form, and the Peer Reviewer Conflict of Interest form.

OVW requests closure of this recommendation.

2. Prioritize areas for improvement it has previously undertaken, distribute guidance related to common issues with the award solicitation, and review the recipient concerns and OIG issues presented in our report in order to identify and implement additional improvements to the financial clearance process.

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OVW concurs. Each fiscal year OVW GFMD financial analysts complete a review of over 600 discretionary budgets. It is OVW GFMD's fiduciary responsibility to ensure that all costs included in a grantees budget are allowable, reasonable, necessary, and allocable to the specific project. OVW GFMD understands that a delay on our grantees budget approval could potentially affect their ability to complete the goals and objectives of the OVW grant program. OVW has identified areas of improvement and developed guidance to distribute to applicants for pre-application submission that will address our recipient concerns and OIG issues.

- **Improvement:**

Specifically responding to the two proactive improvements suggested on page 8 of the report:

- Glossary of Terms: There is an existing glossary of key terms and definitions for the Department of Justice that OVW uses for the consistency of terms across all DOJ grant-making components. This glossary is in the DOJ Financial guide (<https://www.justice.gov/ovw/page/file/1116786/download>, at page 155) as well as in the Uniform Guidance at the following link: <https://www.ecfr.gov/cgi-bin/text-idx?SID=bb3b4bb68b49269145b4d124d3d7f1e&mc=true&node=sp2.1.200.a&rgn=div6>
- Pre Application Calls: Prior to the start of the Technical Assistance audit, OVW GFMD had already begun an improvement in our budget review process by distributing guidance to applicant's submission by participating in many of the FY 2018 pre-application calls. OVW GFMD had identified specific items from prior year reviews of applications that potentially increased the amount of time it took to review and approve an applicant's budget. OVW GFMD provided specific guidance on those items that could help with expediting the budget review process during the pre-application calls. Starting in FY 2019, OVW GFMD has and will be included in all pre-application calls/webinars for OVW solicitations.

- **Distribute Guidance:**

- Webinar: For all FY 2019 OVW applicants, OVW GFMD developed an online "Creating a Budget" training webinar. OVW GFMD determined that specific guidance for budget development was ancillary for applicants in order to expedite the OVW GFMD budget review process. This webinar discusses systematic guidance on how applicants can create their budgets, it provides an understanding of the things applicants should be thinking of when developing their budget for the OVW application. This webinar will help reduce any challenges that applicants may face when creating a budget, as well as support what OVW GFMD looks for when we review an applicant's budget. The webinar is located on OVW's website under Resources for Applicants: <https://www.justice.gov/ovw/video/ovw-grants-financial-management-division-training-creating-budget-fy2019-applicants>.

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- Financial Training: OVW GFMD in coordination with the TA Team Lead is creating a 1 ½-day in-person financial management training for Technical Assistance providers. While GFMD has the opportunity to introduce some key points at the OVW new grantee TA training, OVW GFMD determined before the start of the audit a more intensive process was needed. The training, completed January 16-17, 2019, provides an in-depth training on OVW grants financial management for our TA providers financial staff. The following are some areas discussed during the in-person training (agenda attached):
 - Source documentation requirements to support personnel funded by OVW grant programs (Uniform Guidance)
 - Differentiating between a Consultant/contractor vs. Subrecipient - This helps explain the difference between the two, and what requirements each type of agreement carries and will assist the grantees in making the appropriate determination. It is important for them to understand that the substance of the relationship they have with the organization and the nature of the services they provide is more important than the name of the agreement.
 - Submissions of Federal Financial Reports – process of submitting the FFRs, what should be reported (actual expenditures vs. drawdowns) and when it should be submitted
 - Discussion on what types of source documentation is required in order to substantiate expenditures charged to Federal grants
- **Identify and implement improvements (Recipient concerns/OIG issues):**
 - In prior years, OVW GMFD staff were given a deadline of when budgets would need to be completed within OVW GFMD as a whole versus individual goals. OVW GFMD cannot reduce the level of effort given to the individual budget reviews; however, we believe that setting individual goals versus group goals could help improve the timeliness of reviews. Starting with the FY 2018 budget review process, each financial analyst was provided an individual weekly goal of total budget reviews that needed to be completed and with this, it has shown an increase in budget reviews across OVW GFMD.
 - Some of the recipient concerns identified as part of the audit were budget review consistency across DOJ components. Although we can only speak to the budget reviews completed in OVW, OVW GFMD is going to complete a budget review refresher training for all financial analysts for FY 2019 budget reviews. This will help address any discrepancies noted in budgets reviewed by financial analysts to ensure OVW GFMD is consistent in reviews and guidance provided to applicants/grantees.

OVW has identified additional guidance and improvements to our budget review process and requests closure of this recommendation.

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3. Require that recipients disclose any funding that expressly duplicates the funding being requested from OVW.

In FY 2019, OVW’s TA solicitation will require that the summary data sheet include a list of non-federal grants, such as grants from foundations, corporations, and state governments, from which the applicant currently receives funding or for which it has applied for funding in FY 2019 to do the same work. Attached is the sample Summary of Non-Federal Grants to Do the Same Work that will be provided as a link in the solicitation.

OVW requests closure of this recommendation.

4. Prioritize the development and implementation of training for program specialists, and ensure new guidance addresses the unique challenges of TA, including stressing accountability for the value of products and trainings developed under the program.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It should be noted that the data collected for this audit covers a 2-year period that precedes the TA Team Lead assuming her role. Prior to FY 2017, day-to-day responsibility for oversight of the TA Initiative was handled by the OVW TA Management Team (TAM), which consists of the Deputy Director for Tribal Affairs, Deputy Director for Grant Development and Management, and the Associate Directors who supervise OVW’s program units. The TAM was initiated in 2006 and over the following 10 years, the TA Initiative grew significantly, corresponding with the growth in OVW grant programs, and outgrew the bandwidth of the TAM. In FY 2015, the TAM identified the need for a single point-of-contact responsible for day-to-day and year-to-year administration and development of the TA Initiative with oversight from the TAM.

Because TA cuts across all six OVW program units and 18 grant programs, the TA Team Lead plays a crucial role in coordinating TA needs and identifying areas for collaboration, as well as possible areas of overlap.

The TA Team Lead has the following responsibilities:

- Administering the TA Initiative, including preparing the TA program plan, drafting the solicitation, managing TA peer review, developing and presenting the TA funding recommendations, and overseeing processing of TA awards.
- Collecting and coordinating proposed TA purpose areas for each solicitation, including assessing remaining funds in current TA awards.
- **Developing and delivering internal training for OVW Program Division staff.**
- **Instructing employees in specific tasks and job techniques related to OVW TA and making available written instructions, policies, procedures, and reference materials.**
- **Developing and interpreting grants management policies, regulations, procedures, and practices for soliciting, reviewing, recommending, and managing grant awards and cooperative agreements consistent with OVW policy.**
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- Designing and coordinating external training for OVW TA Providers, including TA-specific new grantee orientations.
- **Promoting appropriate dissemination of OVW TA products.**
- Managing the TA2TA project, including the TA website that houses TA products and the TA Calendar.

As stated in the audit, OVW program specialists carry a higher grant load than OVW has identified as ideal, which includes managing multiple TA awards. OVW recognizes the necessity of providing TA management training for program specialists so that TA projects are managed in a consistent manner. Since assuming her role in FY 2017, the TA Team Lead has developed and provided one-on-one and group training to staff on the processing and management of TA awards. In calendar year 2019, the TA Team Lead proposes a series of trainings and corresponding resources for the program division on managing and monitoring TA projects, which will include training on best practices for reviewing and documenting TA products. A draft schedule of these trainings is attached.

OVW requests closure of this recommendation.

5. Amend its current review process to: (1) enhance the review of funds remaining on prior awards, and (2) ensure that applicants who are not ready and able to commence work within a reasonable timeframe do not receive a new award or supplemental funding.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It should be noted that the data collected for this audit covers a 2-year period that precedes the TA Team Lead assuming her role. Prior to FY 2017, day-to-day responsibility for oversight of the TA Initiative was handled by the OVW TA Management Team (TAM), which consists of the Deputy Director for Tribal Affairs, Deputy Director for Grant Development and Management, and the Associate Directors who supervise OVW's program units. The TAM was initiated in 2006 and over the following 10 years, the TA Initiative grew significantly, corresponding with the growth in OVW grant programs, and outgrew the bandwidth of the TAM. In FY 2015, the TAM identified the need for a single point-of-contact responsible for day-to-day and year-to-year administration and development of the TA Initiative with oversight from the TAM.

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- **Collecting and coordinating proposed TA purpose areas for each solicitation, including assessing remaining funds in current TA awards.**
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Starting in FY 2017 and again in FY 2018 the TA Team Lead analyzed OVW's existing TA projects and the program division's proposed TA solicitation purpose areas. These analyses included assessing remaining funds on existing awards and identifying purpose areas that are already being addressed, and therefore could be removed from the solicitation. In addition, OVW's TA Summary Data Sheet, which applicants complete during the open solicitation process, requests information/justification about remaining funds on all federally funded or private grant-funded projects for the same work. The TA Team Lead works with OVW program specialists to assess remaining funds during the programmatic review process, which takes place prior to the funding recommendation process. The TA Team Lead also conducts her own assessment of remaining funds and advises OVW leadership of potential areas for reduction during the recommendation process. These combined steps have resulted in a reduction in the number of purpose areas for which OVW has requested applications and a reduction in the amount of funding directed to the TA initiative. As a result, in FY 2018 OVW solicited for 49 competitive purpose areas and recommended applications for 40 of those purpose areas, as well as identifying two existing noncompetitive comprehensive projects that could continue work for another fiscal year with existing funding, therefore eliminating the need to support those projects in FY 2018. In FY 2019 OVW will also begin to assess applicants' past performance across all open TA awards, which will ensure that applicants who are not ready and able to commence work within a reasonable timeframe do not receive a new award or supplemental funding. Attached is a copy of the Programmatic Review Form for FY 2018.

OVW requests closure of this recommendation.

6. Conduct an assessment of the necessary funding levels for the TA Initiative overall.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It should be noted that the data collected for this audit covers a 2-year period that precedes the TA Team Lead assuming her role. Prior to FY 2017, day-to-day responsibility for oversight of the TA

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Initiative was handled by the OVW TA Management Team (TAM), which consists of the Deputy Director for Tribal Affairs, Deputy Director for Grant Development and Management, and the Associate Directors who supervise OVW's program units. The TAM was initiated in 2006 and over the following 10 years, the TA Initiative grew significantly, corresponding with the growth in OVW grant programs, and outgrew the bandwidth of the TAM. In FY 2015, the TAM identified the need for a single point-of-contact responsible for day-to-day and year-to-year administration and development of the TA Initiative with oversight from the TAM.

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Since assuming her role in FY 2017, the TA Team Lead has worked with each OVW Program Unit to more accurately assess each program's Training and Technical Assistance needs and funding allocation. As a result, and as cited in the audit, funding under the OVW TA initiative has decreased from \$37.9 million in FY 2016 to \$31 million in FY 2018. The existence of the TA Team Lead as the staff person with the designated responsibility to analyze and assess TA across the office should ensure that the funding level for the TA Initiative overall will continue to accurately reflect needs and minimize overlapping purpose areas and over-funded TA awards.

OVW requests closure of this recommendation.

7. Develop and implement guidance to prevent unnecessary or inappropriate use of the DOJ maximum consultant rate.

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With the following clarification, OVW concurs. Specifically, OVW would like to clarify that the DOJ consultant rate is not a maximum rate which consultants can be paid for work performed under DOJ grant awards. It is a threshold amount used for approval purposes only, per DOJ policy. OVW concurs that consultants should be paid a rate appropriate for the services they will provide, their personal level of expertise, the going rate for the services, their rate of compensation under their normal business operations, and other reasonable documented factors. Award recipients are responsible for ensuring that any rate paid to a consultant, whether \$150, \$650, or \$1650 is appropriate, necessary, and properly documented. Regardless of whether a consultant is being paid the threshold \$650/day amount or less, as part of the conference approval process OVW mandates TA providers complete a spreadsheet with each consultant, what services they will be performing, and their rate. This spreadsheet is assessed prior to approval of the expenditure of funds. Thus, OVW has the opportunity to review every consultant rate. If a TA provider is seeking to pay a consultant MORE than the threshold \$650 per day or \$81.25 per hour, they must provide additional documentation to OVW to demonstrate that the proposed consultant has received that rate or higher doing the same type of work. Acceptable documentation may include invoices, contracts, and paystubs. OVW then must provide approval through a program office GAN prior to the TA provider expending funds for the consultant rate.

OVW provides policy guidance and support services to their recipients in the areas of grants and financial management to help assist applicants/grantees in fulfilling their fiduciary responsibility to safeguard grant funds and ensure that funds are used for the purposes for which they were awarded. To receive a Federal award applicants/grantees must have policies and procedures in place that ensure they can effectively manage Federal funds. OVW GFMD provides pre- and post-award guidance to award applicants and recipients on grants financial management issues, including appropriate application of consultant rates.

The technical assistance program was designed to build and enhance the capacity of the civil and criminal justice system professionals and victim service providers across the nation in order to respond effectively to the VAWA crimes. Therefore, applicants/grantees submit budgets based on reasonable estimates to help complete the goals and objects of their projects. Contractors/Consultants normally operate in a competitive environment. They provide goods and services within their normal business operations to many different purchasers, and the goods and services are generally ancillary to the operation of the Federal program. The main purpose of contracting with them is to obtain goods and services for the applicants/grantees own use or benefit. Obtaining their services should allow free and open competition while following the applicant's/grantee's procurement policies. A consultant rate can include salary, fringe, travel costs, and other overhead items that are needed in order to support the work to be completed. It is not necessarily limited to salary and fringe, particularly if the consultant's employing agency will be reimbursed for the consultant's time. **The \$650/day or \$81.25/hour rate is not a standard rate applicants/grantees should pay a contractor/consultant, rather each contractor/consultant's rate should be evaluated on a case-by-case basis for reasonableness and determined based on consistency with market rates and should not be \$650 per day across the board.**

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During the OVW GFMD budget review process, financial analysts look at costs identified in an applicant's budget to ensure that they are allowable, reasonable, and necessary to be charged to an OVW grant program. Part of this review is to look at different aspects of the budget, including reviewing proposed consultants and consultant rates. At the time of submitting their proposals, applicants/grantees do not always know the specific consultants they might use, particularly if OVW will assist in identifying potential experts. In such cases, applicants must estimate consultant rates for budgetary purposes until they have identified the specific consultant and followed their procurement policies and procedures to obtain the consultant services. Therefore, many budgets will include the DOJ consultant rate as a reasonable estimate. Although these are estimates, financial analysts still review rates for the relationships identified and whether the identified consultants/contractors are current OVW grantees.

OVW agrees that the use of the \$650/day or \$81.25/hour rate appears to be excessive; however, the rate is still low in terms of consulting fees, particularly because OVW encourages the use of active or recently retired professionals in their fields as consultants to ensure the up-to-date relevance of their expertise.

Training – Providing Guidance

OVW provides guidance to grantees on appropriate use of consultants and consultant rates in writing, through routine customer service, and in trainings. During the review of the OVW applicant/grantee budgets, financial analysts provide prospective grantees guidance on the relationships and rates which consultants are paid. OVW GFMD has also created a slide deck to help identify the differences between a sub-recipient and a consultant/contractor. When there are consultants identified in a budget that are current OVW grantees, OVW GFMD reaches out to the program specialists to ensure that the proposed consultant work is not already covered by the other OVW TA grant and therefore available at no cost. In some instances, the time under the other OVW TA is completely spoken for, and therefore the organization must be reimbursed for the additional work, or in other instances, at the time of application, the applicant was not aware that a TA provider is able to offer the service through another OVW award at no additional charge.

- (1) suggested rates for commonly used services - OVW cannot provide suggested rates for commonly used services because rates for services differ across the country and for the services provided. Grantees are required to have a procurement policy and procedure to procure for goods and services under Federal awards.
- (2) directing entities who may be eligible GSA schedule users to the services and rates available through those contracts - while OVW can add this to our companion guide, we are hesitant because our work is specific to the VAWA crimes. Language interpretation is nuanced at best and a sensitive matter for survivors of sexual assault and domestic violence. Some languages do not have terms for the words needed in a sexual assault prosecution. Finding out that an interpreter was inexperienced for the case, can cause lasting damage in a domestic violence or sexual assault case. The GSA Schedule is not always a best use of the funds.

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- (3) the provision of guidance requiring that an individual’s consultant rate be generally commensurate with their salary, and/or obtaining justification when consulting services are provided at a rate significantly higher than the individual's actual salary - OVW does not agree with this recommendation because a consultant rate includes more than salary as described earlier in our response.
- (4) increasing the rate at which OVW requests documentation supporting justification for the maximum consultant rate, and Program - In 2010 OVW changed the consultant rate from \$450/day to \$650/day. This was done only after careful assessment of rates used by other federal agencies and the frequency of requests to exceed the former threshold, including the frequency of denials and approvals.
- (5) enhanced monitoring and oversight of consultants during the active award period. We recommend that OVW develop and implement guidance to prevent unnecessary or inappropriate use of the DOJ maximum consultant rate - We believe that we have already done so. The consultant rate was included among the topics addressed during the in-person financial training. Our current staffing shortages prevent us from increasing our one-on-one grantee oversight at this time. However, we are working on ways to increase our broader instructional engagement with award recipients. In January 2019, OVW held its first financial management training specifically for OVW TA providers.

OVW requests closure of this recommendation.

8. Develop and implement policies and procedures to: (1) reduce or consolidate TA Initiative purpose areas when feasible, and (2) enhance the purpose area review and collaboration process to effectively obtain feedback from OVW program specialists and OVW’s TA community.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It should be noted that the data collected for this audit covers a 2-year period that precedes the TA Team Lead assuming her role. Prior to FY 2017, day-to-day responsibility for oversight of the TA Initiative was handled by the OVW TA Management Team (TAM), which consists of the Deputy Director for Tribal Affairs, Deputy Director for Grant Development and Management, and the Associate Directors who supervise OVW’s program units. The TAM was initiated in 2006 and over the following 10 years, the TA Initiative grew significantly, corresponding with the growth in OVW grant programs, and outgrew the bandwidth of the TAM. In FY 2015, the TAM identified the need for a single point-of-contact responsible for day-to-day and year-to-year administration and development of the TA Initiative with oversight from the TAM.

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The TA Team Lead has the following responsibilities:

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- **Administering the TA Initiative; including preparing the TA program plan, drafting the solicitation, managing TA peer review, developing and presenting the TA funding recommendations, and overseeing processing of TA awards.**
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- Managing the TA2TA project, including the TA website that houses TA products and the TA Calendar.

In response to the OVW Team Lead's responsibilities, the number of competitive purpose areas was reduced from 56 in FY2017 to 49 in FY2018 and discussions are currently underway to further reduce and consolidate the purpose areas in the FY2019 TA solicitation. The OVW TA Team Lead collaborates with all program specialists to solicit their feedback on TA purpose areas. OVW cannot solicit direct feedback on purpose areas from recipients, as it is a conflict of interest. However, OVW is in constant and close communication with TA grantees and receives regular feedback regarding the training and technical assistance needs of all OVW grantees through the semi-annual progress reports, as well as through the grantee monitoring process during which program specialists inquire about both TA needs and the effectiveness of TA received. Additionally, the OVW biennial conferral process statutorily mandates that OVW inquire about TA needs across the nation. Finally, the Acting Director of OVW and the Deputy Assistant Secretary of the Administration for Children and Families (ACF) at the Department of Health and Human Services initiated a series of meetings with OVW, OVC, and ACF leadership and staff to identify areas of potential duplication with TA projects between the offices. A process is in development to annually assess potential TA overlap and maximize the bandwidth of TA resources in the field.

OVW requests closure of this recommendation.

9. Enforce its existing policy requiring that final deliverables be submitted and approved through a GAN.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It should be noted that the data collected for this audit covers a 2-year period that precedes the TA Team Lead assuming her role.

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As stated above in OVW's response to recommendation #4, the OVW TA Team Lead will be delivering a series of trainings in calendar year 2019. Included in the training topics will be the appropriate review and approval of TA products in the Grant Management System (GMS). The OVW TA Team Lead also includes training on the submission of final deliverables in the annual TA Initiative orientation for new TA providers.

OVW requests closure of this recommendation.

10. Develop and implement policies to ensure that all content produced under the TA Initiative is made available to the recipient community, and the public, as appropriate.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It should be noted that the data collected for this audit covers a 2-year period that precedes the TA

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Team Lead assuming her role. Prior to FY 2017, day-to-day responsibility for oversight of the TA Initiative was handled by the OVW TA Management Team (TAM), which consists of the Deputy Director for Tribal Affairs, Deputy Director for Grant Development and Management, and the Associate Directors who supervise OVW's program units. The TAM was initiated in 2006 and over the following 10 years, the TA Initiative grew significantly, corresponding with the growth in OVW grant programs, and outgrew the bandwidth of the TAM. In FY 2015, the TAM identified the need for a single point-of-contact responsible for day-to-day and year-to-year administration and development of the TA Initiative with oversight from the TAM.

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Per the TA cooperative agreement special conditions, all OVW TA products are required to be uploaded on www.ta2ta.org/. The OVW TA Team Lead has also included the submission of deliverables on the TA2TA website in the annual TA Initiative orientation for new TA providers. The TA Team Lead has developed a excel workbook to catalogue all FY 2018 TA award products produced under the award, GAN number and final approval date, and if the final product was uploaded on TA2TA. A copy of the draft excel chart is attached.

OVW requests closure of this recommendation.

11. Develop and implement practices to increase awareness of the TA Initiative products that have been made available for recipient and public use.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It

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In 2016, OVW expanded use of the TA2TA website to all OVW grantee recipients and for public use. The website was originally developed to support OVW TA providers; however, OVW determined that it could also serve as a place for grantees to access OVW TA products and information about TA opportunities. OVW recently released all deliverables on the website. Furthermore, the OVW TA Team Lead has increased outreach to grantees regarding the TA2TA website by sharing information about the website at grantee orientations, at TA training events, and at grantee site visits. Attached is the template presentation script for grantee orientations, as well as the notecard distributed to grantees at orientations, TA events, and site visits. Additionally, OVW has scheduled introductory TA2TA website webinars for grantees in March and July 2019.

OVW requests closure of this recommendation.

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12. Develop and implement policies to ensure that resources funded by the TA Initiative are effectively catalogued for future use.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It should be noted that the data collected for this audit covers a 2-year period that precedes the TA Team Lead assuming her role. Prior to FY 2017, day-to-day responsibility for oversight of the TA Initiative was handled by the OVW TA Management Team (TAM), which consists of the Deputy Director for Tribal Affairs, Deputy Director for Grant Development and Management, and the Associate Directors who supervise OVW's program units. The TAM was initiated in 2006 and over the following 10 years, the TA Initiative grew significantly, corresponding with the growth in OVW grant programs, and outgrew the bandwidth of the TAM. In FY 2015, the TAM identified the need for a single point-of-contact responsible for day-to-day and year-to-year administration and development of the TA Initiative with oversight from the TAM.

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In addition to hosting all OVW TA resources on the TA2TA website, the TA Team Lead has developed a excel workbook to catalogue all FY 2018 TA award products produced under the award, GAN number and final approval date, and if the final product was uploaded on TA2TA. A copy of the draft excel chart is attached. OVW will replicate this chart for future fiscal years. OVW is also working on revisions to the TA2TA website to include more search options for the website's library so that the resources are effectively catalogued, as well as reviewing the search

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options selected by TA recipients for each resource. The revisions will make the website more effective for grantees and the general public to search for and access these resources.

OVW requests closure of this recommendation.

13. Develop and implement a strategy to assess the overall effectiveness and value of resources produced under the TA Initiative.

OVW concurs. In FY 2017 to address many of the same concerns cited by this OIG Audit, OVW hired a Training and Technical Assistance (TA) Team Lead to oversee the OVW TA Initiative. It should be noted that the data collected for this audit covers a 2-year period that precedes the TA Team Lead assuming her role. Prior to FY 2017, day-to-day responsibility for oversight of the TA Initiative was handled by the OVW TA Management Team (TAM), which consists of the Deputy Director for Tribal Affairs, Deputy Director for Grant Development and Management, and the Associate Directors who supervise OVW's program units. The TAM was initiated in 2006 and over the following 10 years, the TA Initiative grew significantly, corresponding with the growth in OVW grant programs, and outgrew the bandwidth of the TAM. In FY 2015, the TAM identified the need for a single point-of-contact responsible for day-to-day and year-to-year administration and development of the TA Initiative with oversight from the TAM.

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- **Developing and delivering internal training for OVW Program Division staff.**
- **Instructing employees in specific tasks and job techniques related to OVW TA and making available written instructions, policies, procedures and reference materials.**
- **Developing and interpreting grants management policies, regulations, procedures, and practices for soliciting, reviewing, recommending, and managing grant awards and cooperative agreements consistent with OVW policy.**
- Designing and coordinating external training for OVW TA Providers, including TA-specific new grantee orientations.
- **Promoting appropriate dissemination of OVW TA products.**
- **Managing the TA2TA project, including the TA website that houses TA products and the TA Calendar.**

OVW has identified the following methods to assess the overall effectiveness and value of resources produced under the TA Initiative:

MEMEORANDUM

Subject: Draft Audit Report – The Audit of the Office on Violence Against Women Training and Technical Assistance Program

- (1) To garner additional information about the impact of OVW TA, OVW is developing an annual grantee survey to assess OVW TA, including delivery mechanisms and individualized technical assistance.
- (2) The University of Southern Maine, Muskie School of Public Policy has included in their OVW grantee training on progress reports instructions on utilizing the final question in the progress report form to capture information on the TA and training received during the course of the reporting period, as well as continued gaps for TA. Attached is the PowerPoint slides included in the grantee training.
- (3) In collaboration with TA2TA, OVW will include a customer satisfaction survey for users of the website to provide feedback on the website.
- (4) TA2TA will continue to provide reports to OVW on the number of times a product in the website library is “clicked” or accessed.
- (5) OVW will include a new term in the Recipient Responsibilities section of TA cooperative agreements requiring all TA providers to send their post event evaluation results to OVW.

OVW requests closure of this recommendation.

We appreciate the opportunity to review and comment on the draft report. If you have any questions or require additional information, please contact Rodney Samuels at (202) 514-9820.

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OFFICE OF THE INSPECTOR GENERAL ANALYSIS AND SUMMARY OF ACTIONS NECESSARY TO CLOSE THE REPORT

The Office of the Inspector General (OIG) provided a draft of this audit report to the Office on Violence Against Women (OVW). The OVW's response is incorporated in Appendix 2 of this final report.²³ The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Analysis of OVW's Response

In its response to our draft report, OVW concurred with and/or proposed actions it has implemented, or will implement, in response to our findings. For recommendations 1, 2, 5, and 11, we determined that the actions implemented to date are sufficient to address our recommendations, and we have closed those recommendations accordingly. For the remaining recommendations, the proposed actions have yet to be implemented or require additional action by OVW; those recommendations remain resolved.

Additionally, OVW stated that it hired a Technical Assistance (TA) Team Lead in FY 2017 to address many of the same concerns cited by our audit. The OIG acknowledged this hire on pages 3 and 35 of this report, and further discussed actions planned or implemented by the Team Lead on pages 13, 14, 16, and 19. OVW also noted that "the data collected for this audit covers a 2-year period that precedes the TA Team Lead assuming her role." While the cooperative agreements in the scope of this audit were awarded in FYs 2015 and 2016, OVW's statement that "the data collected for this audit covers a 2-year period that precedes the TA team lead assuming her role" is not fully accurate. The OIG extensively analyzed financial documentation, programmatic support, and performance outcomes including, but not limited to, recipient budget and project narratives including revisions made throughout the award period, recipient progress reports, recipient compliance with award special conditions, grant adjustment notices (GANs), award monitoring documentation, and products distributed through the Training and Technical Assistance Program (TA Initiative). We also interviewed OVW staff, surveyed additional OVW staff and TA Initiative cooperative agreement recipients, and evaluated OVW's primary method of distributing content created through the TA Initiative. As noted on page 24 of this report, our scope of review for these items included awards that ended through March 31, 2018.

²³ Attachments to this response were not included in this final report.

Recommendations for the OVW:

1. Update its existing peer review guidance to clearly address issues related to conflicts of interest, and develop and implement policies to improve the enforcement of peer review guidelines.

Closed. OVW concurred with our recommendation. In response to our draft report, OVW provided evidence that it had developed policies to improve the enforcement of its peer review guidelines. Specifically, OVW provided updated guidance included in its TA Initiative Basic Minimum Requirement Review Form, its *Save the Date* for the Training and Technical Assistance Peer Review form, and its Disclosure of Conflict of Interest checklist for peer reviewers. Additionally, OVW provided documentation demonstrating that the new policies had been implemented during OVW's FY 2019 peer review.

We reviewed the policies provided by OVW and determined that they adequately addressed our recommendation. Therefore, this recommendation is closed.

2. Prioritize areas for improvement it has previously undertaken, distribute guidance related to common issues with the award solicitation, and review the recipient concerns and OIG issues presented in our report in order to identify and implement additional improvements to the financial clearance process.

Closed. The OVW concurred with our recommendation. In response to our draft report, OVW stated that, in FY 2019, OVW's Grants Financial Management Division (GFMD) began participating, and will continue to participate, in all pre-application calls and webinars for OVW solicitations. GFMD staff have identified specific items from prior year reviews of applications that potentially increased the amount of time it took to review and approve applicant budgets, and has provided specific guidance on those items that OVW believes will assist in expediting the budget review process. Beginning in FY 2019, GFMD has been included in all pre-application calls and webinars for OVW solicitations.

OVW also created and publicly posted an online "Creating a Budget" training webinar. The webinar addresses creation and submission of budgets responsive to OVW solicitations, including the correct placement of costs in OVW budget categories, allowable costs, and costs that may be unallowable based on federal and state regulations, program requirements, other legal authorities, or organization policies. Additionally, OVW's GFMD partnered with OVW's TA Team Lead to create an in-person financial management training for TA providers. The training was first conducted on January 16-17 2019, and covered source documentation requirements, the clarification of certain key terms for which recipients responsive to the OIG's survey noted confusion, and submission of Federal Financial Reports.

Additionally, beginning in FY 2018, OVW's GFMD provided each financial analyst with individual weekly goals, rather than GFMD-wide goals, in order

to assist in improving the timeliness of budget reviews. While the OIG did not audit the timeliness of individual GFMD employees, we believe individual goals could have a positive impact on the timeliness of the budget review process.

Finally, OVW's GFMD plans to complete a budget review refresher training for all financial analysts for FY 2019 budget reviews. OVW's GFMD believes such a review will further assist in ensuring consistent and timely budget reviews.

The OIG reviewed documentation of the FY 2019 training events that had been conducted at the time OVW submitted its response, viewed OVW's newly developed "Creating a Budget" webinar, and considered all other information contained in OVW's response to our draft report. We determined that the actions taken adequately addressed our recommendation. Therefore, this recommendation is closed.

3. Require that recipients disclose any funding that expressly duplicates the funding being requested from OVW.

Resolved. OVW did not indicate concurrence or non-concurrence with this recommendation, but did provide evidence that it had updated its summary data sheet to require a list of non-federal grants, such as grants from foundations, corporations, and state governments, from which the applicant currently receives funding, or for which it has applied for FY 2019 funding to do the same work.

At the time OVW submitted its response, the FY 2019 TA solicitation had not been released. Therefore, we were unable to review and verify that the new guidance was included. Additionally, in its response, OVW mentioned only the FY 2019 solicitation and 2019 awards. The disclosure of funding that expressly duplicates funding being requested from OVW should not be limited to FY 2019, but should be disclosed for all OVW awards going forward. For these reasons, this recommendation cannot be closed.

This recommendation can be closed when we receive evidence that the new guidance has been developed and implemented, and when we receive assurance that the new guidance will be included in all future OVW solicitations.

4. Prioritize the development and implementation of training for program specialists, and ensure new guidance addresses the unique challenges of TA, including stressing accountability for the value of products and trainings developed under the program.

Resolved. OVW concurred with the recommendation. In response to our draft report, OVW stated that it recognizes the necessity of providing TA management training for program specialists to ensure TA projects are managed in a consistent manner. Additionally, OVW provided a proposed series of trainings and corresponding resources for the program division on managing and monitoring TA projects, and noted that those trainings would

include best practices for reviewing and documenting TA products. OVW also provided a draft schedule of the proposed trainings.

We reviewed the draft schedule and believe that the areas of focus are likely to improve oversight and administration of the TA Initiative. However, as the trainings and associated resources have yet to actually be developed and implemented, this recommendation cannot be closed.

This recommendation can be closed when we receive evidence that OVW has developed and implemented the trainings, or a reasonable portion of the trainings, outlined in its 2019 Program Division Training Schedule.

5. Amend its current review process to: (1) enhance the review of funds remaining on prior awards, and (2) ensure that applicants who are not ready and able to commence work within a reasonable timeframe do not receive a new award or supplemental funding.

Closed. OVW concurred with our recommendation. In response to our draft report, OVW stated that the TA Team Lead has worked to improve the review of funds remaining on prior awards. Specifically, OVW stated that the Team Lead: (1) works with OVW program specialists to assess remaining funds during the programmatic review process, and (2) conducts her own assessment of remaining funds and advises OVW leadership of potential areas for reduction during the recommendation process. Additionally, OVW provided copies of its FY 2018 programmatic and financial review forms which request disclosure of funds remaining on prior awards, and request input from program specialists regarding scope or budget modifications or reductions. Finally, OVW noted that, in FY 2019, it will begin to assess applicants' past performance across all open TA awards, which will ensure that applicants who are not ready and able to commence work within a reasonable timeframe do not receive a new award or supplemental funding.

We reviewed the actions taken and determined that they adequately address our recommendation. Therefore, this recommendation is closed.

6. Conduct an assessment of the necessary funding levels for the TA Initiative overall.

Resolved. OVW concurred with our recommendation. In response to our draft report, OVW stated that the TA Team Lead has, since FY 2017, worked with the OVW Program Unit to more accurately assess needs and funding allocations. OVW also noted that, as cited in our audit, funding has decreased since FY 2016. OVW stated that the existence of the TA Team Lead as the staff person with the designated responsibility to analyze and assess TA across the office should ensure that the funding level for the TA Initiative overall will continue to accurately reflect needs and minimize overlapping purpose areas and over-funded TA awards.

The OIG recognizes the progress made since FY 2016 in terms of overall funding for the TA Initiative. However, as noted on page 16 of this report, nearly 30 percent of OVW program specialists who manage TA believed the program to be overfunded at the time of our 2018 staff survey. In our judgment, the additional communication with and training of OVW program specialists discussed as part of OVW's response to recommendation number 4 will likely have a positive impact on this issue. Additionally, OVW's review of past performance should also assist in developing a longer term assessment of necessary funding levels for the TA Initiative overall. Finally, as previously noted, the FY 2019 TA solicitation had not been made public at the time OVW provided its response to our draft report. Therefore, the OIG was unable to confirm continued progress in assessing the necessary funding levels of the TA initiative. For these reasons, this recommendation cannot be closed.

This recommendation can be closed when we receive evidence that OVW has continued its efforts to assess and, when possible, reduce the funding levels for the TA initiative overall.

7. Develop and implement guidance to prevent unnecessary or inappropriate use of the DOJ maximum consultant rate.

Resolved. OVW concurred with our recommendation, while noting that the \$650 per day rate is not necessarily a "maximum" rate, but a threshold amount used for approval purposes only. We do not dispute that higher rates may be paid if additional approvals are granted, and we use the term "maximum" rate as this is the term generally used in the DOJ Grants Financial Guide.

In response to our draft report, OVW stated that OVW's GFMD provides pre- and post-award guidance to award applicants and recipients on grants financial management issues, including appropriate application of consultant rates. Additionally, OVW noted that a consultant rate can include salary, fringe, travel costs, and other overhead items that are needed in order to support the work to be completed. The OIG does not dispute that, in some cases, a flat consultant rate may appear higher than an industry standard because it includes fringe, travel, and other costs not included in a standard hourly rate. However, the example cited on page 17 of this report indicates that, in some cases, individuals who are paid a reasonable salary from one OVW grant may in turn "consult" for other entities at a rate that exceeds their salary by significant amounts, while additional costs for consultant travel expenses are also incurred. This indicates that additional review and inspection during the application and award period are warranted.

Further, OVW stated that it: (1) cannot provide suggested rates for commonly used services because rates differ across the country and for the services provided; (2) is hesitant to direct entities who may be eligible GSA schedule users to the services and rates available through those contracts as

those contracts may not be adequate for the needs of victims of domestic violence and sexual assault; (3) cannot provide guidance requiring that an individual's consultant rate be generally commensurate with their salary and/or obtain justification when consulting services are provided at a rate significantly higher than the individual's actual salary; and (4) believes that it already has developed and implemented guidance to prevent unnecessary or inappropriate use of the DOJ maximum consultant rate, as it was among the topics addressed during in-person financial training. OVW did state that it continues to work on ways to increase broader instructional engagement with award recipients.

The OIG maintains that providing options such as awareness of the GSA schedule may assist in reducing costs associated with consultant services while not mandating the use of any particular entity who may not be experienced in the unique needs of victims of domestic violence and sexual assault. Additionally, and perhaps most importantly, the OIG contends that OVW should increase the rate at which it requires, requests, and reviews documentation supporting the consultant rates it approves. Again, the examples identified in this report and provided to OVW over the course of this audit, and the findings and recommendations in the OIG's prior work demonstrate that the development and implementation of guidance to prevent unnecessary or inappropriate use of the DOJ maximum consultant rate is reasonable and appropriate.

OVW specifically concurred that "consultants should be paid a rate appropriate for the services they will provide, their personal level of expertise, the going rate for the services, their rate of compensation under normal business operations, and other reasonable documented factors." OVW further stated that "Award recipients are responsible for ensuring that any rate paid to a consultant, whether \$150, \$650, or \$1,650 is appropriate, necessary, and properly documented." While the OIG agrees that the direct recipient bears responsibility for the allowability and reasonability of rates it pays, OVW is ultimately responsible for the allowability and reasonability of rates it approves. In our judgment, more proactive guidance and increased review of supporting documentation will assist OVW in ensuring that its grant and cooperative agreement funding is used responsibly and in order to provide the greatest possible impact to victims of domestic violence, dating violence, sexual assault, and stalking. For these reasons, this recommendation cannot be closed.

This recommendation can be closed when we receive evidence that OVW has developed and implemented guidance to prevent unnecessary or inappropriate use of the DOJ maximum consultant rate.

8. Develop and implement policies and procedures to: (1) reduce or consolidate TA Initiative purpose areas when feasible, and (2) enhance the purpose area review and collaboration process to effectively obtain feedback from OVW program specialists and OVW's TA community.

Resolved. OVW concurred with our recommendation. In response to our draft report, OVW noted that: (1) the number of competitive purpose areas was reduced from 56 in FY 2017 to 49 in FY 2018, and discussions are currently underway to further reduce and consolidate the purpose areas in the FY 2019 TA solicitation; (2) the TA Team Lead collaborates with all program specialists to solicit their feedback on TA purpose areas; (3) while it cannot solicit direct feedback on purpose areas from recipients as such outreach may constitute a conflict of interest, it remains in close communication with TA grantees and receives regular feedback regarding the TA needs of all OVW grantees through progress reports and grant monitoring; (4) the OVW biennial conferral process statutorily mandates that OVW inquire about TA needs across the nation; and (5) the Acting Director of OVW and the Deputy Assistant Secretary of the Administration for Children and Families (ACF) at the Department of Health and Human Services (HHS) initiated a series of meetings with OVW, the Office for Victims of Crime, and ACF leadership and staff to identify areas of potential duplication with TA projects between the offices. OVW stated that a process is in development to annually assess potential TA overlap and maximize the bandwidth of TA resources in the field.

As previously noted, at the time OVW submitted its response, the FY 2019 TA solicitation had not been released. Therefore, we were unable to review OVW's most recent progress regarding potential reduction and consolidation of purpose areas. Additionally, while the OIG commends OVW's outreach to HHS, no documentation was provided to support actions that are underway to identify and reduce areas of potential duplication with TA projects between the offices. Finally, while the OIG believes that some of the training events discussed in recommendation number 4 will assist in obtaining OVW program specialist feedback, the actual training sessions have not yet been developed or implemented. For these reasons, this recommendation cannot be closed.

This recommendation can be closed when we receive evidence that OVW has continued its efforts to reduce or consolidate purpose areas when feasible, and enhance the purpose area review and collaboration process to effectively obtain feedback from OVW program specialists and the TA community.

9. Enforce its existing policy requiring that final deliverables be submitted and approved through a GAN.

Resolved. OVW concurred with our recommendation. In its response to this recommendation and recommendation number 4, OVW officials stated that the TA Team Lead will be delivering a series of trainings in calendar year

2019. One of those trainings is intended to address the appropriate review and approval of TA products in the Grant Management System. OVW officials also stated that the TA Team Lead includes training on the submission of final deliverables in the annual TA Initiative orientation for new TA providers. As noted in our analysis of OVW's response to recommendation number 4, OVW's new training has yet to be fully developed and implemented. Therefore, this recommendation cannot be closed.

This recommendation can be closed when we receive evidence that OVW has developed and implemented training to enforce existing policy requiring that final deliverables be submitted and approved through a GAN.

10. Develop and implement policies to ensure that all content produced under the TA Initiative is made available to the recipient community, and the public, as appropriate.

Resolved. OVW concurred with our recommendation. In response to our draft report, OVW stated that: (1) all OVW TA products are required to be uploaded on ta2ta.org (TA2TA), (2) the OVW TA Team Lead has included the submission of deliverables on TA2TA in the annual TA Initiative orientation for new TA providers, and (3) the TA Team Lead has developed an excel workbook to catalogue all FY 2018 TA award products produced under the award to include the GAN number and final approval date as well as if the final product was actually uploaded to TA2TA as required. OVW included a draft of the excel chart with its response to the report.

Regarding points one and two, the requirement that TA providers post content to TA2TA has been in existence throughout the scope of this audit. However, as this report demonstrates, the existing guidance was not sufficient to ensure that TA providers met that requirement. The OIG does believe that OVW's spreadsheet tracking deliverables and whether or not those deliverables are posted to TA2TA as required is likely to assist OVW in ensuring that all content produced under the TA initiative is posted in accordance with the terms and conditions of the award. However, we are not able to verify this progress from the draft spreadsheet provided. Therefore, this recommendation cannot be closed.

This recommendation can be closed when we receive evidence that OVW has developed and implemented policies to ensure that all content produced under the TA Initiative is made available to the recipient community, and the public, as appropriate.

11. Develop and implement practices to increase awareness of the TA Initiative products that have been made available for recipient and public use.

Closed. OVW concurred with our recommendation. In response to our draft report, OVW stated that, in 2016, it expanded the use of TA2TA to all grant recipients and for public use, and recently released all deliverables on the website. Additionally, OVW stated that it has increased outreach to grantees

regarding TA2TA by sharing information at grantee orientations, TA training events, and at grantee site visits. Finally, OVW noted that it has scheduled introductory TA2TA website webinars for grantees in March and July 2019. With its response, OVW included a template presentation script for grantee orientations as well as the notecard distributed to grantees at previous orientations, TA events, and site visits.

We reviewed the statements and additional documentation provided by OVW and determined that it sufficiently addressed our recommendation. Therefore, this recommendation is closed.

12. Develop and implement policies to ensure that resources funded by the TA Initiative are effectively catalogued for future use.

Resolved. OVW concurred with our recommendation. In response to our draft report, OVW stated that in addition to hosting all TA resources on TA2TA, the TA Team Lead has developed an excel workbook to catalogue all FY 2018 TA products produced under the award, including GAN number and final approval date, and if the final product was uploaded on TA2TA. This portion of OVW's comment is not specifically responsive to recommendation 12. However, OVW further stated that it is working on revisions to the TA2TA website to include more search options for the website's library so resources are effectively catalogued, as well as reviewing the search options selected by TA recipients for each resources. OVW stated that these revisions will make the website more effective for grantees and the general public to search for and access TA resources. As these actions are not yet implemented, this recommendation cannot be closed.

This recommendation can be closed when we receive evidence that OVW has developed and implemented policies to ensure that resources funded by the TA Initiative are effectively catalogued for future use.

13. Develop and implement a strategy to assess the overall effectiveness and value of resources produced under the TA Initiative.

Resolved. OVW concurred with our recommendation. In response to our draft report, OVW identified methods to assess the overall effectiveness and value of resources produced under the TA Initiative, including: (1) the development of an annual grantee survey to assess OVW TA, including delivery mechanisms and individualized TA; (2) additional training by an OVW partner for OVW TA recipients regarding appropriate and effective utilization of questions already included in OVW's TA progress reports; (3) a customer satisfaction survey for users of TA2TA in order to obtain feedback on the website; (4) continued provision of reports documenting product usage from TA2TA to OVW; and (5) a new term in the recipient responsibilities of TA cooperative agreements requiring all TA providers to send their post event evaluation results to OVW.

As part of the response to our draft report, OVW officials attached documentation which supports progress made towards increasing the

effective utilization of questions already included in OVW's TA progress report. The remaining actions discussed by OVW are pending, and therefore this recommendation cannot be closed.

This recommendation can be closed when we receive evidence that OVW has developed and implemented a strategy to assess the overall effectiveness and value of resources produced under the TA Initiative.



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