



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

**OVERSIGHT ★ INTEGRITY ★ GUIDANCE**



**Audit of the Office on Violence  
Against Women Grants to  
Encourage Arrest Policies and  
Enforcement of Protection Orders  
Awarded to the Fairfax County  
Domestic Violence Action Center,  
Fairfax, Virginia**



# Executive Summary

*Audit of the Office on Violence Against Women Grants to Encourage Arrest Policies and Enforcement of Protection Orders Awarded to the Fairfax County Domestic Violence Action Center, Fairfax, Virginia*

## Objectives

The Office on Violence Against Women (OVW) awarded the Fairfax County Domestic Violence Action Center (DVAC), Fairfax, Virginia two grants totaling \$1,800,000 for the Grants to Encourage Arrest Policies and Enforcement of Protection Orders Program. The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the award; and to determine whether the grantee demonstrated adequate progress towards achieving program goals and objectives.

## Results in Brief

We concluded that Fairfax County generally managed the grant funds appropriately and did not identify significant concerns regarding Fairfax County's budget management, drawdowns, or financial reporting. However, due to lack of either measurable outcomes or milestones, we were not able to assess whether the DVAC achieved or was on track to achieve the specific objectives of the grant. In addition, we found that progress reports included unsupported and unverifiable data. Further, we found that Fairfax County could improve grant financial management of subrecipient invoices.

## Recommendations

Our report contains three recommendations to the OVW to assist Fairfax County in improving its grant management and administration. We requested responses to our draft audit report from Fairfax County and the OVW, and their responses are appended to this final report in Appendices 3 and 4, respectively. Our analysis of those responses is included in Appendix 5.

## Audit Results

The purpose of the Encourage Arrest Policies and Enforcement of Protection Orders Program (Arrest Program) is to enhance victim safety and offender accountability in cases of domestic violence, dating violence, sexual assault, and stalking by encouraging jurisdictions to implement pro-arrest intervention policies as part of a coordinated community response. In addition, the Arrest Program seeks to build partnerships between criminal justice agencies, victim services providers, and community organizations.

The OVW awarded two grants under the Arrest Program with a project period from October 2014 through September 2020. As of February 2019, Fairfax County drew down a total of \$1,036,285 for the grants.

**Program Goals and Accomplishments** – We found that the established objectives in the program narratives did not include specific timelines or measurable deliverables. As a result, we could not assess whether the DVAC achieved or was on track to achieve the specific objectives of the grants. Therefore, we recommend that the OVW works with Fairfax County to evaluate, establish, and report quantifiable deliverables and milestones for each objective of the ongoing grant.

**Required Performance Reports** – Our sample of three quantifiable measures found that the DVAC could not support performance measure data pertaining to specific award goals and objectives regarding protection orders and training. To ensure that the reported data is consistent and accurate, we recommend that the OVW coordinates with Fairfax County to ensure that progress reports are accurate and fully supported.

**Subrecipient Costs** – We found that grant funds paid for subrecipient costs included charges inaccurately supported by the recorded work hours. Therefore, we recommend that the OVW works with Fairfax County to reconcile subrecipient salaries to hourly rates and ensure subrecipient invoices accurately reflect actual hours worked on the grant projects by its personnel.

**AUDIT OF THE OFFICE ON VIOLENCE AGAINST WOMEN  
GRANTS TO ENCOURAGE ARREST POLICIES AND ENFORCEMENT  
OF PROTECTION ORDERS AWARDED TO THE FAIRFAX COUNTY  
DOMESTIC VIOLENCE ACTION CENTER, FAIRFAX, VIRGINIA**

**TABLE OF CONTENTS**

INTRODUCTION ..... 1

Fairfax County, Virginia ..... 1

The Domestic Violence Action Center ..... 1

OIG Audit Approach ..... 2

AUDIT RESULTS..... 3

Program Performance and Accomplishments ..... 3

Program Goals and Objectives ..... 3

Required Performance Reports ..... 3

Compliance with Special Conditions ..... 5

Grant Financial Management ..... 5

Grant Expenditures ..... 6

Personnel Costs ..... 6

Consultants and Contracts Costs ..... 7

Travel and Other Costs ..... 8

Budget Management and Control ..... 8

Drawdowns ..... 8

Federal Financial Reports ..... 9

CONCLUSION AND RECOMMENDATIONS ..... 10

APPENDIX 1: OBJECTIVES, SCOPE, AND METHODOLOGY ..... 11

APPENDIX 2: FAIRFAX COUNTY RESPONSE TO THE DRAFT AUDIT REPORT..... 12

APPENDIX 3: OFFICE ON VIOLENCE AGAINST WOMEN RESPONSE TO THE  
DRAFT AUDIT REPORT ..... 14

APPENDIX 4: OFFICE OF THE INSPECTOR GENERAL ANALYSIS AND SUMMARY  
OF ACTIONS NECESSARY TO CLOSE THE AUDIT REPORT ..... 16

# AUDIT OF THE OFFICE ON VIOLENCE AGAINST WOMEN GRANTS TO ENCOURAGE ARREST POLICIES AND ENFORCEMENT OF PROTECTION ORDERS AWARDED TO THE FAIRFAX COUNTY DOMESTIC VIOLENCE ACTION CENTER, FAIRFAX, VIRGINIA

## INTRODUCTION

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of two grants awarded by the Office on Violence Against Women (OVW) under the Encourage Arrest Policies and Enforcement of Protection Orders Program (Arrest Program) to the Fairfax County Domestic Violence Action Center (DVAC) in Fairfax, Virginia.<sup>1</sup> The total amount the OVW awarded to the DVAC through the two grants was \$1,800,000, as shown in Table 1.

**Table 1**  
**OVW Grants Awarded to the DVAC**

AWARD NUMBER	AWARD DATE	PROJECT PERIOD START DATE	PROJECT PERIOD END DATE	AWARD AMOUNT
2014-WE-AX-0014	9/17/2014	10/01/2014	4/30/2018	\$ 900,000
2017-WE-AX-0046	9/26/2017	05/01/2018	9/30/2020	\$ 900,000
<b>Total:</b>				<b>\$1,800,000</b>

Source: DOJ Grants Management System

The purpose of the Arrest Program is to enhance victim safety and offender accountability in cases of domestic violence, dating violence, sexual assault, and stalking by encouraging jurisdictions to implement pro-arrest intervention policies as part of a coordinated community response. In addition, the Arrest Program seeks to build partnerships between criminal justice agencies, victim services providers, and community organizations.

### Fairfax County, Virginia

Fairfax County spans over 400 square miles in Northern Virginia and has over 1.1 million residents. Its Department of Family Services (DFS) includes the Domestic and Sexual Violence Services (DSVS) office, which offers state-accredited programs to a wide-array of victims of domestic and sexual violence, stalking, and human trafficking.

### The DVAC

The DVAC is a part of the DSVS and is staffed by Fairfax County and community non-profit partners. The DVAC seeks to provide culturally responsive

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<sup>1</sup> Fairfax County's Department of Family Services (DFS) provides the DVAC with financial and human resources support. Specifically, DFS manages electronic records of clients receiving social services. Additionally, Fairfax County's Department of Procurement and Material Management assists the DVAC with procurement matters and helps to monitor a DVAC grant subrecipient.

information and support to Fairfax County victims of domestic and sexual violence, dating violence, and stalking. The DVAC also seeks to promote offender accountability through specialized prosecution and monitoring. Personnel from 16 different partner agencies comprise the DVAC's Advisory Team, which meets quarterly to review the progress of grant-funded projects, address challenges and successes, and enhance the quality of services.<sup>2</sup> One of these 16 agencies, The Women's Center, received 2014-WE-AX-0014 (2014 grant) funds as a subcontractor and 2017-WE-AX-0046 (2017 grant) funds as a subrecipient.<sup>3</sup>

## **OIG Audit Approach**

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

We tested compliance with what we considered to be the most important conditions of the grants. The OVW Financial Grants Management Guide, the DOJ Financial Guide, and the award documents contained the primary criteria we applied during the audit.<sup>4</sup>

This report details the results of our analysis. Appendix 1 contains additional information on this audit's objectives, scope, and methodology.

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<sup>2</sup> DVAC collaborative partners include: (1) A Way Forward, (2) Ayuda, (3) Bethany House of Northern Virginia, (4) Commonwealth's Attorney, (5) Court Services Unit of the Juvenile and Domestic Relations District Court, (6) Fairfax County Sheriff's office, (7) Fort Belvoir SHARP, (8) INOVA Forensic Assessment and Consultation Teams, (9) Jewish Coalition Against Domestic Abuse, (10) Legal Services of Northern Virginia, (11) Northern Virginia Family Services, (12) Office for Women and Domestic and Sexual Violence Services, (13) Shelter House, (14) Tahirih Justice Center, (15) Victim Services Section of Fairfax County Police Department, and (16) The Women's Center.

<sup>3</sup> Despite also receiving funds as a subcontractor, this report will consistently refer to The Women's Center as a subrecipient.

<sup>4</sup> The OVW Financial Grants Management Guide applied to the 2014 grant, and the subsequently issued DOJ Financial Guide applied to the 2017 grant.

# AUDIT RESULTS

## Program Performance and Accomplishments

To determine whether the DVAC demonstrated adequate progress towards achieving the program goals and objectives, we reviewed performance reports, grant solicitations, grant documentation, and interviewed Fairfax County officials and several DVAC partner agencies. We assessed the accuracy and timeliness of progress reports and reviewed DVAC's compliance with a selection of special conditions of the grants.

### *Program Goals and Objectives*

The goals for both awards included sustaining and building the capacity of the DVAC while promoting offender accountability throughout Fairfax County. The DVAC and its partners sought to expand specific types of victim services with the grants, including: (1) crisis intervention and options counseling, (2) victim advocacy, such as safety planning and court accompaniment, (3) information and referrals to shelters, counseling, legal and social services, (4) protection order filing assistance, and (5) court and job interview attire.

The DVAC set 22 specific objectives for the 2014 grant and 23 specific objectives for the 2017 grant. We reviewed the DVAC progress reports, tested overall program activities and accomplishments, and determined that progress reports appeared to align with actual grant activity. However, we found that the established objectives did not include specific timelines or measurable deliverables. Thus, we were not able to assess whether the DVAC achieved or was on track to achieve the specific objectives of the grant.

In our opinion, the lack of either measurable outcomes or milestones made it difficult for: (1) Fairfax County to report and measure the goals of the award, and (2) the OVW to assess grant performance. Considering that the 2017 grant's period of performance ends in September 2020, we recommend that the OVW works with Fairfax County to evaluate, establish, and report quantifiable deliverables and milestones for each of the objectives of Grant Number 2017-WE-AX-0046.

### *Required Performance Reports*

According to both the OVW Financial Guide and the DOJ Grant Financial Guide, funding recipients must support all data collected for each performance measure specified in the program solicitation. The DVAC Project Coordinator gathers data from various systems and sources, including data maintained by DVAC partners outside of Fairfax County, to report various program deliverables. The Fairfax County submitted its progress reports within 30 days after the end of each semiannual reporting periods, as required. To verify progress report information, we selected a sample of three quantifiable performance measures from the two

most recent progress reports of each award.<sup>5</sup> We traced these measures to supporting documents maintained by Fairfax County and DVAC partner agencies.

#### Number of Clients Served

The DVAC Project Coordinator collected the number of victims served from the DVAC demographic report for that same reporting period. The DVAC demographic report details the total number of clients served in the DVAC, including grant funded and in-kind staff. We compared the reported number of clients served with the numbers included in the source data and we were able to validate the numbers DVAC included in the source data. Additionally, using the source data, we were able to validate the same number of grant-funded clients served. Therefore, we determined the total number of clients served by grant-funded staff matched the reported number on the progress report.

#### Number of Protection Orders

One of the DVAC's partner agencies, the Juvenile and Domestic Relations District Court (JDRDC), provides the DVAC Project Coordinator a summary of the: (1) number of preliminary protection orders filed, granted, denied, and dismissed, and (2) total number of final protection orders filed, granted, denied, and dismissed at the end of each reporting period. To verify the accuracy of the number of reported protection orders, we asked the submitting office for a list of cases, to review a sample of supporting documents. We found that the JDRDC office captures its service numbers in a working, routinely updated spreadsheet that is not archived for a given period of time. JDRDC personnel confirmed that the DSVS never asked for a detailed spreadsheet or any other supporting documentation of protection orders provided, prior to our request.

We selected a sample of 18 protection orders, from the most recent available spreadsheet, and we were generally able to validate the cases by reviewing the Juvenile Secured Viewing System and associated client intake files for the sampled protection orders. Following our inquiry, the DVAC Project Coordinator stated that the JDRDC will include the supporting detailed information with its future protection order summaries. This process began for the January 2019 to June 2019 reporting period.

#### Training

To increase partner agency community outreach and collaboration capacity, the DVAC provides and reports training as part of its semiannual performance measures. For the reporting period reviewed, the DVAC offered nine training events.

We requested support for the provided training, including but not limited to

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<sup>5</sup> These semiannual progress reports ranged from July 2017 to December 2018. The final progress report for the 2014 grant covered January 2018 to April 2018, due to a 7-month, no-cost extension. The first progress report for the 2017 grant covered May 2018 to June 2018.



training materials and attendance rosters. The DVAC was able to provide complete and adequate support for one training event. However, for six of the nine training events, the DVAC could not provide either all the training material or an attendance roster, and for two of the nine trainings, the DVAC could provide neither the training material nor attendance roster. The DVAC Project Coordinator stated that training recordkeeping could be improved and reported taking steps to improve the DVAC training tracking. The DVAC Project Coordinator also stated that Fairfax County maintains a training database that can be used to track DVAC trainings.

Additionally, based on its progress reports, the DVAC provided no training during the period of May 2018 through December 2018; however the Assistant Commonwealth Attorney – funded by the 2017 grant – mentioned that at least three trainings related to domestic violence were provided during this period of time. Therefore, the DVAC progress reports do not capture accurately the trainings supported by the 2017 grant for that period.

According to the DOJ Grants Financial Guide, the grantee should ensure that valid and auditable source documentation is available to support all data collected for each performance measure included in the semiannual progress reports. Nevertheless, our sample of three quantifiable performance measures found that the DVAC could not support performance measure data pertaining to specific award goals and objectives of the provision of protection orders and training events. To ensure that the reported data is consistent and accurate, we recommend that the OVW coordinates with Fairfax County to ensure that progress reports are accurate and fully supported.

### *Compliance with Special Conditions*

We evaluated the special conditions that the OVW included for each grant and selected a judgmental sample of the requirements we deemed significant to performance under the grants but we did not address in another section of this report. We evaluated 10 special conditions for the 2014 grant and 2 special conditions for the 2017 grant.

Based on our sample, other than the one instance mentioned in the Federal Financial Report section below, we did not identify any instances of the DVAC not meeting special conditions reviewed.

### **Grant Financial Management**

According to both the OVW Financial Guide and the DOJ Grant Financial Guide, all grant recipients and subrecipients must establish and maintain adequate accounting systems and financial records and to account for award funds. To assess Fairfax County's financial management of both grants, we interviewed with financial staff, examined policies and procedures relevant to the management of the grants, and inspected supporting documents to determine whether Fairfax County adequately safeguarded award funds. We also reviewed the Fairfax County's Single Audit Report for its fiscal year 2018 to identify internal control weaknesses and significant non-compliance issues related to federal awards.

Finally, we performed testing in the areas that were relevant for the management of this grant, as discussed throughout this report.

The testing found that Fairfax County could improve grant financial management of subrecipient invoices. Specifically, we found that grant funds paid for subrecipient costs included charges inaccurately supported by the recorded work hours.<sup>6</sup>

## Grant Expenditures

For the grants under review, Fairfax County's approved budgets included personnel, fringe benefits, travel, supplies, consultants and contracts, and other direct cost, as detailed in Table 2.

**Table 2**  
**Expenditures by Grant**

COST ELEMENTS	2014 GRANT	2017 GRANT <sup>a</sup>
Personnel	\$ 373,060	\$ 72,689
Fringe	152,280	33,325
Travel	6,594	746
Supplies	664	-
Other Costs <sup>b</sup>	14,479	3,356
Consultants and Contracts	349,761	85,424
<b>Totals</b>	<b>\$ 896,838<sup>c</sup></b>	<b>\$ 195,540</b>

<sup>a</sup> Costs as of March 2019.

<sup>b</sup> Other Direct Cost included Practical Assistance, Printing, and Language Line cost.

<sup>c</sup> The OVW deobligated the remaining \$3,162 at the end of the period of performance.

Source: Fairfax County

To determine whether costs charged to the awards were allowable, supported, and properly allocated in compliance with award requirements, we tested a sample of 194 transactions representing \$138,411 of the total expenditures in both grants. These transactions included personnel and fringe, travel costs, translation services, and consultants and contracts (subrecipient) cost. For each tested transaction, we reviewed supporting documents, accounting records, and performed verification testing related to grant expenditures.

### *Personnel Costs*

Approved budgets for both grants included salaries for two Fairfax County employees associated fringe benefits: (1) one Assistant Commonwealth Attorney to prosecute domestic violence and stalking matters, and (2) one Probation Counselor to monitor civil protection orders. Salaries and associated fringe benefits charges must also be approved by grantee officials in accordance with the established policies and practices of the organization. Additionally, whenever an

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<sup>6</sup> The "Consultants and Contracts" section of this report discusses in more detail related to the Fairfax County's procedures for approving subrecipient invoices.

employee whose salary is supported by a grant works on multiple programs or activities, the award recipient must apply a reasonable allocation of costs between each activity performed by that employee.

We obtained the payroll cost detail for employees supporting both grants. Based on the payroll cost detail information we judgmentally selected seven non-consecutive pay periods for the 2014 grant – which included \$39,774 in salary and \$15,846 in fringe benefit expenditures. In addition, we judgmentally selected three non-consecutive pay periods for the 2017 grant – which included \$9,982 in salary and \$4,512 in fringe benefit expenditures. We found that Fairfax County properly computed, authorized, and recorded the tested salary expenses and associated fringe benefit costs for labor categories approved in the grants budgets.

#### *Consultants and Contracts Costs*

Fairfax County partnered with The Women’s Center as a subrecipient to provide victim advocacy, safety planning, crisis intervention, emotional support, court accompaniment, and assistance to help connect victims to other county and community resources. For the 2014 grant, the subrecipient received \$349,761 and, as of March 2019, the subrecipient has charged \$85,424 to the 2017 grant.

To verify subrecipient costs in both grants, we reviewed a judgmental sample of expenses listed in Fairfax County’s accounting records and traced costs to supporting documents. The sample expenses totaled \$64,484, or 15 percent of charges as of March 2019 to both grants. The sampled invoices included labor costs for all services provided by the subrecipient. We found that all sampled expenses were appropriate and supported.

Nonetheless, for the 2017 grant, the subrecipient invoiced salary for each labor category in the same amount each month. However, the actual work effort – as reflected on the provided timesheets – changed from period to period. Therefore, the invoiced salary for each labor category does not reflect the actual hours worked by subrecipient employees in each period. The 2015 DOJ Grant Financial Guide states that charges to the grant must be supported by records that accurately reflect the work performed.

For example, the subrecipient charged the “VP, Operations” labor category a fixed amount each month, but the supporting timesheet reflected several months in which there was no work performed by the labor category to the grant. The approved 2017 grant budget had this labor category incur charges based on an hourly rate. While we did not identify what we considered a material difference to date, the invoiced salary for employees that work under the grant should accurately reflect the work performed by all subrecipient personnel.

Charging of salary based on actual hours worked will provide both the subrecipient and the DVAC with an adequate reflection of the work effort being performed by the subrecipient and ensure the billings are accurate. Therefore, we recommended that the OVW works with Fairfax County to reconcile the subrecipient salaries to hourly rates.

### Travel and Other Costs

We tested a sample of seven transactions in both grant budgets related to travel and translation services, totaling \$3,814. We reviewed supporting documents and associated required approvals for the expenses charged to the grant. We determined the costs are allowable, supported, and allocable to our grants.

### Budget Management and Control

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

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

### Drawdowns

According to both the OVW Financial Guide and the DOJ Grant Financial Guide, award recipients must support all receipts of federal funds. If, at the end of the grant award, recipients have drawn down funds in excess of federal expenditures, unused funds must be returned to the awarding agency. As detailed on Table 3, as of February 2019, Fairfax County had drawn down a cumulative amount of \$1,036,285 under both grants.

**Table 3**  
**Grant Drawdown History as of March 2019**

AWARD NUMBER	TOTAL AWARD	AMOUNT DRAWDOWN	AMOUNT REMAINING
2014-WE-AX-0014	\$ 900,000	\$ 896,838	\$ - <sup>a</sup>
2017-WE-AX-0046	\$ 900,000	\$ 139,447	\$ 760,553
<b>Totals</b>	<b>\$ 1,800,000</b>	<b>\$ 1,036,285</b>	<b>\$ 760,553</b>

<sup>a</sup> The OVW deobligated \$3,162 in December 2018.

Source: Office of Justice Programs' Grants Management System

Fairfax County performs quarterly drawdowns of grant expenses based on actual costs incurred related to the grant efforts. The Fairfax County accounting system has a specific reference number for each grant to allow the system to allocate the costs adequately to each grant and Fairfax County reviews this allocation periodically.

To assess whether Fairfax County managed grant receipts in accordance with federal requirements, we compared the total amount reimbursed to the total

expenditures in the accounting records. We did not identify significant deficiencies related to the recipient's process for developing drawdown requests.

### **Federal Financial Reports**

According to both the OVW Financial Guide and the DOJ Grants Financial Guide, recipients need to report actual expenditures and unliquidated obligations incurred for the reporting period on each financial report as well as cumulative expenditures. To determine whether Fairfax County submitted accurate Federal Financial Reports (FFRs), we compared the four most recent reports to Fairfax County's accounting records for each grant. We determined that quarterly and cumulative expenditures for the reports reviewed matched Fairfax County accounting records.

We noted that the OVW froze Fairfax County's access to 2014 grant funds in January 2015, May 2015, and July 2016 due to late submission of FFRs. We identified that Fairfax County submitted three FFRs for the 2014 grant late. Since August 2016, we found that Fairfax County has submitted all subsequent FFRs on time. Because Fairfax County has taken action to submit FFRs for the grants on time, we do not make a recommendation.

## CONCLUSION AND RECOMMENDATIONS

Fairfax County generally managed the grant funds appropriately. While we did not identify significant issues regarding Fairfax County's overall budget management, drawdowns, and financial reporting, we concluded that Fairfax County did not adhere to all of the tested grant requirements. Due to a lack of measurable grant outcomes and milestones, we could not assess Fairfax County's progress towards achieving the grants' stated goals and objectives. We found that Fairfax County, in consultation with the OVW, needs to evaluate the current deliverables and timelines set as grant goals to ensure such goals are measurable. In addition, Fairfax County should ensure that progress reports are accurate and supported. Fairfax County and its grant subrecipient should also work to ensure that salary costs allocated to the grant reflect actual hourly work performed by subrecipient personnel. We provide three recommendations to the OVW to assist Fairfax County in improving its grant management and administration in these aforementioned areas.

We recommend that the OVW:

1. Works with Fairfax County to evaluate, establish, and report quantifiable deliverables and milestones for each of the objectives of Grant Number 2017-WE-AX-0046.
2. Coordinates with Fairfax County to ensure that progress reports are accurate and fully supported.
3. Works with Fairfax County to reconcile the subrecipient salaries to hourly rates.

## **OBJECTIVES, SCOPE, AND METHODOLOGY**

### **Objectives**

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

### **Scope and Methodology**

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

This was an audit of the Office on Violence against Women (OVW) grants awarded to Fairfax County under the Arrest Program. The 2014 grant was awarded for \$900,000 and the 2017 grant for \$900,000. As of February 2019, Fairfax County had drawn down \$1,036,285 million of the total grant funds awarded. Our audit concentrated on, but was not limited to October 2014, the award date for the 2014 grant, through September 2019, the last day of our audit work. The 2014 grant has been fully expended and closed.

To accomplish our objectives, we tested compliance with what we considered to be the most important conditions of Fairfax County's activities related to the audited grants. We performed sample-based audit testing of expenditures for both grants including payroll and fringe benefit charges, financial reports, and progress reports. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grants reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected. We applied the 2014 OVW Financial Guide and the 2015 DOJ Grants Financial Guide and the award documents as the primary criteria.

We obtained information from the Office of Justice Programs' Grants Management System as well as Fairfax County's accounting system specific to the management of DOJ funds during the audit period. In addition, we relied on other Fairfax County electronic systems used to support grant goals and objectives. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

FAIRFAX COUNTY RESPONSE TO THE DRAFT AUDIT REPORT



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

October 16, 2019

John Manning  
Regional Audit Manager  
Washington Regional Audit Office  
Office of the Inspector General  
U.S. Department of Justice  
Jefferson Plaza, Suite 900  
Washington, D.C. 20530

Dear Mr. Manning:

Fairfax County Department of Family Services, Domestic and Sexual Violence Services (DSVS) is in receipt of the draft audit report issued by the U.S. Department of Justice (DOJ), Office of the Inspector General (OIG) Audit Division. The audit is related to the Office on Violence Against Women (OVW) grant for the Grants to Encourage Arrest Policies and Enforcement of Protection Order Program (Arrest Program) for awards, 2014-WE-AX-0014 and 2017-WE-AX-0046.

This letter serves as DFS-DSVS' response to the three recommendations within the draft audit report.

**DOJ OIG recommendation #1:** DOJ OIG recommends that OVW works with Fairfax County to evaluate, establish, and report quantifiable deliverables and milestones for each of the objectives of Grant Number 2017-WE-AX-0046.

Fairfax County concurs with this recommendation. OVW and Fairfax County are working together to develop measurable deliverables with specific timelines for the remainder of Grant Number 2017-WE-AX-0046. These updated objectives once approved by OVW will be forwarded to the OIG within 90 days for approval and closure of this recommendation.

**DOJ OIG recommendation #2:** DOJ OIG recommends that OVW coordinates with Fairfax County to ensure that progress reports are accurate and fully supported.

Fairfax County has already remedied this recommendation as of the January 2019 to June 2019 reporting period. For data not routinely captured in DSVS database, subrecipients and grant funded staff are now required to provide de-identified source and supporting documentation along with their monthly progress reports. In the case of working spreadsheets, grant funded staff now submit an archived spreadsheet as of the date of the report. Fairfax County will also begin tracking Tier I and Tier II trainings that are delivered



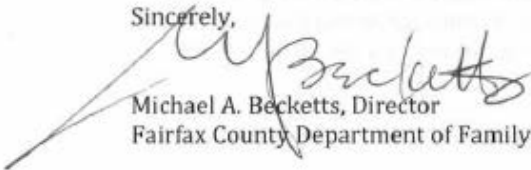
by DVAC grant funded staff in the DSVS training database. For ease of tracking and reporting, DSVS will create an identifier in the database for grant funded staff.

**DOJ OIG recommendation #3:** DOJ OIG recommends that OVW works with Fairfax County to reconcile the subrecipient salaries to hourly rates.

Fairfax County concurs with this recommendation and has met with the subrecipient and now requires subrecipient to invoice actuals. When requesting reimbursements, subrecipient will now provide documentation that support actual salary expenditures to ensure costs are allowable and supported. Fairfax County will complete a reconciliation of the subrecipient's salary expenditures for the grant 2017-WE-AX-0046 within 90 days and will work with subrecipient to remedy any discrepancies between actuals and invoiced.

Fairfax County thanks the DOJ OIG team for their professionalism during the audit. We look forward to working with OIG and OVW to resolve the recommendations outlined on the draft audit report. Please let me know if you need additional information.

Sincerely,



Michael A. Becketts, Director  
Fairfax County Department of Family Services

OFFICE ON VIOLENCE AGAINST WOMEN RESPONSE TO THE  
DRAFT AUDIT REPORT



U.S. Department of Justice

Office on Violence Against Women

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Washington, DC 20530

October 15, 2019

MEMORANDUM

TO: John Manning  
Regional Audit Manager

FROM: Nadine M. Neufville *NMN*  
Deputy Director, Grants Development and Management

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

Rodney Samuels *RS*  
Audit Liaison/Staff Accountant

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grants to Encourage Arrest Policies and Enforcement of Protection Orders Awarded to the Fairfax County Domestic Violence Action Center, Fairfax, Virginia

This memorandum is in response to your correspondence dated September 17, 2019 transmitting the above draft audit report for Fairfax County. We consider the subject report resolved and request written acceptance of this action from your office.

The report contains three recommendations with no Questioned Costs. OVW is committed to addressing and bringing the open recommendations identified by your office to a close as quickly as possible. The following is our analysis of each recommendation.

**1. Works with Fairfax County to evaluate, establish, and report quantifiable deliverables and milestones for each of the objectives of Grant Number 2017-WE-AX-0046.**

OVW concurs: We will work with Fairfax County to evaluate, establish, and report quantifiable deliverables and milestones for each of the objectives of Grant Number 2017-WE-AX-0046.

MEMORANDUM

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grants to Encourage Arrest Policies and Enforcement of Protection Orders Awarded to the Fairfax County Domestic Violence Action Center, Fairfax, Virginia

**2. Coordinates with Fairfax County to ensure that progress reports are accurate and fully supported.**

OVW concurs: We will work with Fairfax County to ensure that their progress reports are accurate and fully supported.

**3. Works with Fairfax County to reconcile the subrecipient salaries to hourly rates.**

OVW concurs: We will work with Fairfax County to reconcile their subrecipient salaries to hourly rates.

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.

cc Louise M. Duhamel, Ph.D.  
Acting Assistant Director, Audit Liaison Group  
Internal Review and Evaluation Office  
Justice Management Division

Aisha Battle  
Program Manager  
Office on Violence Against Women

Thelma Bailey  
Program Manager  
Office on Violence Against Women

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

The OIG provided a draft of this audit report to Fairfax County's Department of Family Services (Fairfax County) and the Office on Violence Against Women (OVW) for review and official comment. The Fairfax County's response is incorporated in Appendix 2, and the OVW's response is incorporated in Appendix 3 of this final report. In response to the draft report, the OVW concurred with our recommendations. Fairfax County also concurred with the recommendations and provided additional information. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

**Recommendations for the OVW:**

- 1. Work with Fairfax County to evaluate, establish, and report quantifiable deliverables and milestones for each of the objectives of Grant Number 2017-WE-AX-0046.**

Resolved. The OVW concurred with our recommendation. The OVW stated in its response that it will work with Fairfax County to evaluate, establish, and report quantifiable deliverables and milestones for each of the objectives of Grant Number 2017-WE-AX-0046.

Fairfax County concurred with our recommendation and stated that it is working with the OVW to develop measurable deliverables with specific timelines for the remainder of the 2017 grant.

This recommendation can be closed when we receive documentation demonstrating that the OVW and Fairfax County updated the deliverables and milestones to capture measurable objectives and timelines to meet the grant goals.

- 2. Coordinate with Fairfax County to ensure that progress reports are accurate and fully supported.**

Resolved. The OVW concurred with our recommendation. The OVW stated in its response that it will work with Fairfax County to ensure that the progress reports submitted are accurate and fully supported.

Fairfax County started taking measures to ensure that the subrecipient and grant-funded staff maintain proper supporting documents for progress report data. Fairfax County now requires that subrecipients and grant-funded staff provide de-identified source and supporting documents along with the monthly progress report. It reports grant-funded staff have begun archiving copies of the working spreadsheets of the date they submit their reports to the County. Fairfax County states it will also begin tracking trainings that are delivered by grant funded staff in the DSVS training database.

This recommendation can be closed once we receive documentation demonstrating that Fairfax County has implemented the aforementioned protocols for subrecipient and grant-funded staff. In addition, Fairfax County should provide support of the implemented training tracking system within its appropriate training database.

**3. Work with Fairfax County to reconcile the subrecipient salaries to hourly rates.**

Resolved. The OVW concurred with our recommendation. The OVW stated in its response that it will work with Fairfax County to reconcile the subrecipient salaries to hourly rates.

Fairfax County concurred with our recommendation and has required the subrecipient to invoice actuals. In addition, Fairfax County has requested documentation from the subrecipient to support actual salary expenditures and thus ensure costs are allowable. For previously invoiced expenditures, Fairfax County is working with its subrecipient to reconcile actual costs to invoiced amounts and states it will remedy any resulting discrepancy.

This recommendation can be closed when we receive the results of Fairfax County's reconciliation of the subrecipient invoices to actual costs and the remedies taken. In addition, Fairfax County needs to provide support that it's subrecipient now invoices costs based on actual expenditures.



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