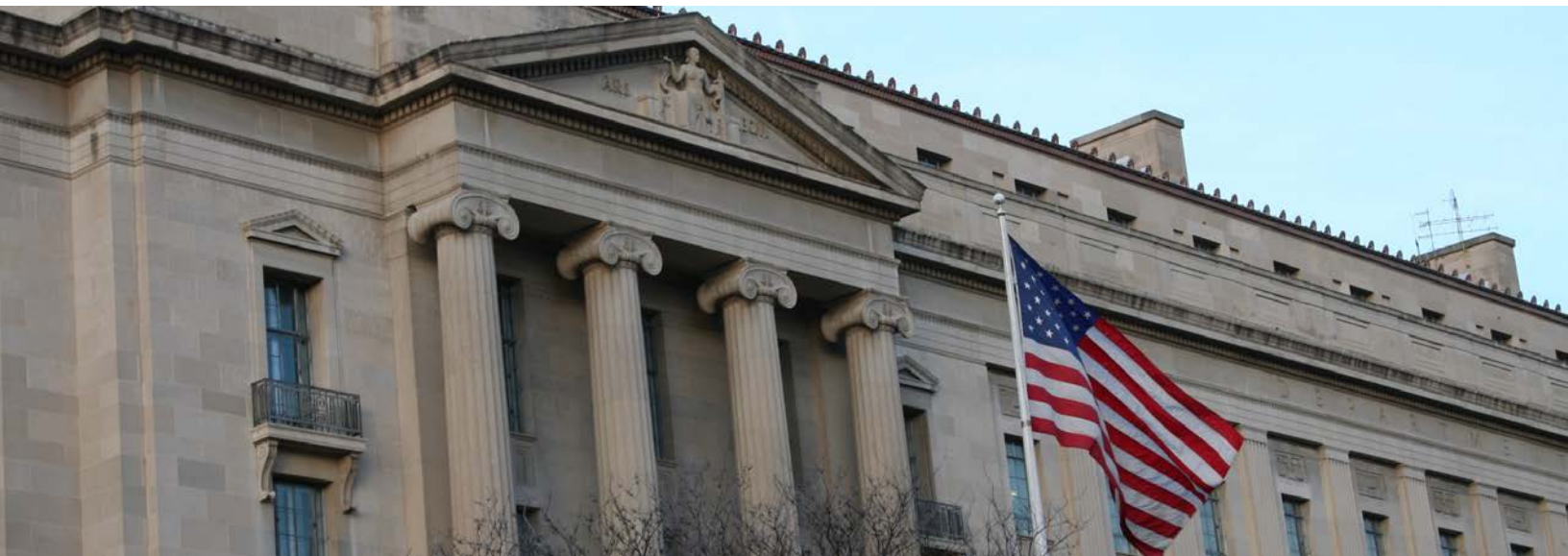




Office of the Inspector General
U.S. Department of Justice

OVERSIGHT ★ INTEGRITY ★ GUIDANCE



**Audit of the Office of Justice
Programs Comprehensive Tribal
Victim Assistance Program
Cooperative Agreements Awarded
to the Choctaw Nation of
Oklahoma, Durant, Oklahoma**



Executive Summary

Audit of the Office of Justice Programs Comprehensive Tribal Victim Assistance Program Cooperative Agreements Awarded to the Choctaw Nation of Oklahoma, Durant, Oklahoma

Objectives

The Office of Justice Programs (OJP) awarded the Choctaw Nation of Oklahoma (CNO) two cooperative agreements totaling \$898,972 for Comprehensive Tribal Victim Assistance. The objectives of this audit were to determine whether costs claimed under the awards 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

As a result of our audit, we concluded that the CNO demonstrated adequate progress towards achieving the awards' stated goals and objectives, and we did not identify significant concerns regarding the CNO's drawdowns and federal financial reports.

However, we identified noncompliance with essential award conditions related to performance reports, award special conditions, and use of funds. Specifically, we determined that the CNO did not adequately track all performance measures in semi-annual progress reports or comply with all award special conditions; and charged unallowable or unsupported other direct costs, travel, and supply costs to the awards. As a result of these deficiencies, we identified \$11,125 in unallowable costs and \$40,352 in unsupported costs. After issuing the draft report, the CNO provided sufficient documentation to support \$32,263 in initially unsupported costs. Therefore, our final report questions \$8,089 in unsupported costs.

Recommendations

Our report contains eight recommendations to OJP. We requested a response to our draft audit report from the OJP and the CNO, which can be found in Appendices 4 and 3, respectively. Our analysis of those responses is included in Appendix 5.

Audit Results

The purpose of the two OJP, Office for Victims of Crime (OVC) awards we reviewed were to support the Choctaw Nation Tribal Victim Assistance Program. The project period for the grants was from October 2014 through September 2020. The CNO drew down a cumulative amount of \$487,457 as of August 2018 for all of the awards we reviewed.

Program Goals and Accomplishments - The audit concluded that the CNO demonstrated adequate achievement of the award's stated goal and objectives under Grant Number 2014-VR-GX-K013. For example, the program worked collaboratively with stakeholders and met minimum objectives to provide direct services to victims of crime and their families. As of October 2018, the program was on track to accomplish a similar goal and objectives under Grant Number 2017-VR-GX-K011.

Compliance with Special Conditions - Special conditions are terms and conditions that are included in the grant award documentation. We found that the CNO did not comply with all special conditions we tested. This included the CNO expending grants funds although it was prohibited until it satisfied certain special conditions. For instance, the CNO was required to submit proof of OJP financial management training before expending funds, but the CNO did not timely submit the documentation resulting in \$11,125 in unallowable grant expenditures.

Grant Expenditures - We identified \$8,089 in unsupported other direct costs related to victim assistance. Additionally, we identified unallowable travel and supply costs.

**AUDIT OF THE OFFICE OF JUSTICE PROGRAMS
COMPREHENSIVE TRIBAL VICTIM ASSISTANCE PROGRAM
COOPERATIVE AGREEMENTS AWARDED TO THE
CHOCTAW NATION OF OKLAHOMA,
DURANT, OKLAHOMA**

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**AUDIT OF THE OFFICE OF JUSTICE PROGRAMS
 COMPREHENSIVE TRIBAL VICTIM ASSISTANCE PROGRAM
 COOPERATIVE AGREEMENTS AWARDED TO THE
 CHOCTAW NATION OF OKLAHOMA,
 DURANT, OKLAHOMA**

INTRODUCTION

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of two cooperative agreements awarded by the Office of Justice Programs (OJP), Office for Victims of Crime (OVC), Comprehensive Tribal Victim Assistance Program to the Choctaw Nation of Oklahoma (CNO) in Durant, Oklahoma.¹ The grants totaled \$898,972, as shown in Table 1.

**Table 1
 Grants Awarded to the Choctaw Nation of Oklahoma**

Award Number	Program Office	Award Date	Project Period Start Date	Project Period End Date	Award Amount
2014-VR-GX-K013	OVC	9/22/2014	10/1/2014	9/30/2017	\$ 448,973 ^a
2017-VR-GX-K011	OVC	9/28/2017	10/1/2017	9/30/2020	\$ 449,999
Total:					\$898,972

Source: OJP Grants Management System (GMS)

^a As of April 2018, \$52,649 was deobligated under Grant Number 2014-VR-GX-K013 when the award was officially closed.

Funding for the awards originated from the Crime Victims Fund (CVF), which is administered by the OVC for the purpose of enhancing crime victim services. The CVF is derived from fines, penalty assessments, and bond forfeitures of convicted federal criminal offenders. The grants were awarded through the DOJ’s Coordinated Tribal Assistance Solicitation (CTAS) that allows federally-recognized tribes and tribal consortia to submit a single application for most DOJ tribal grant programs. The CTAS provides the tribal entity the opportunity to develop a comprehensive and coordinated approach to public safety and victimization issues under nine individual purpose areas.² Specifically, Grant Numbers 2014-VR-GX-K013 and 2017-VR-GX-K011 were funded through CTAS Purpose Area 7, the Comprehensive Tribal Victim Assistance Program that supported the Choctaw Nation Tribal Victim Assistance Program (CNTVA), which was based in Hugo,

¹ Cooperative Agreements are a type of grant award used when substantial involvement is anticipated between the awarding agency and the recipient during the performance period.

² CTAS purpose areas encompass the following DOJ components: Office of Community Oriented Policing Services (COPS Office); OJP, Bureau of Justice Assistance; Office on Violence Against Women (OVW); OJP, Office for Victims of Crime; and OJP, Office of Juvenile Justice and Delinquency Prevention.

Oklahoma and is a component of Choctaw Nation Victim Services (CNVS).³ The CNTVA provides comprehensive victim services to Native American victims of crime. These services included, but were not limited to intervention; accompaniment to medical examinations; emergency food, clothing, transportation, and shelter; development of victim-centered individualized safety plans; case management; legal assistance; and other holistic offerings to support victim recovery. The CNTVA also assists victims by accompanying them to criminal justice offices and court, restitution advocacy, and assistance with victim impact statements.

The Grantee

The CNO is a federally recognized Indian Tribe with a tribal jurisdictional area. The CNO is defined as an extremely rural territory spanning 10,613 square miles and roughly 10.5 counties in southeastern Oklahoma, which encompasses about 15 percent of the state's total area. The CNO's service area includes Atoka, Bryan, Choctaw, Coal, Haskell, Hughs, Latimer, LeFlore, McCurtain, Pittsburg, and Pushmataha counties and is the second largest tribal service area in the contiguous United States. The CNO service area is home to 52,351 Native Americans, accounting for as much as 50 percent of the population in some communities, 41,616 of which are reported as Choctaw by the Choctaw Tribal Membership Office. The remaining Native American population in the CNO service area consists of members from as many as 29 different tribes.

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 grantee demonstrated adequate progress towards achieving the program goals and objectives.⁴ 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 consider to be the most important conditions of the grants. The OJP Financial Guide, DOJ Grants Financial Guide, and the award documents contain the primary criteria we applied during the audit.

The results of our analysis are discussed in detail later in this report. Appendix 1 contains additional information on this audit's objectives, scope, and methodology; and the Schedule of Dollar-Related Findings appears in Appendix 2.

³ CNVS manages several programs besides CNTVA including Project EMPOWER, Elder Advocacy, Project HOUSE, Project SERV, and VOCA Set-a-side funds. Additionally, CNVS received the *Award for Professional Innovation in Victim Services* from the U.S. Attorney General in April 2016.

⁴ This audit was done in conjunction with the audits of OVW and COPS Office grants awarded to the CNO. We assessed DOJ funded victim assistance and law enforcement activities across multiple programs and components at the CNO to gain a deeper understanding of DOJ grant management. This report details the results of our audit of two OJP grants awarded to the CNO.

AUDIT RESULTS

Program Performance and Accomplishments

We reviewed required performance reports, grant solicitations, and grant documentation, and interviewed CNO officials to determine whether the CNO demonstrated adequate progress towards achieving the program goals and objectives and, for the ended grant, demonstrated adequate achievement of the program goals and objectives. We also reviewed the progress reports, to determine if the required reports were accurate. Finally, we reviewed the CNO's compliance with the special conditions identified in the award documentation.

Program Goals and Objectives

Generally, the goal of Grant Number 2014-VR-GX-K013 was to develop a comprehensive victim assistance program that provided coordinated collaborative multidisciplinary responses that were trauma-informed, culturally-competent holistic services to victims of crime, their families, and the community. The objectives of the program were to: (1) identify critical needs of victims of crime and gaps in response as evidenced by development of a written needs assessment and Strategic Plan/Logic model that describe priorities and a clear path to ensure comprehensive service for victims; (2) work collaboratively with stakeholders to implement a comprehensive program for a minimum of 50 victims per year as evidenced by case records, trainings, services provided, and satisfaction surveys; and (3) develop services for child victims of crime including the use of data collection that effectively measures the implementation and impact of the new efforts. Policies and procedures for the CNTVA Program clarified that those eligible for victim services under the program must have a Certificate of Degree of Indian Blood (CDIB). However, if a child did not have a CDIB, a parent, or grandparents CDIB would be accepted.

Since Grant Number 2014-VR-GX-K013 ended on September 30, 2017, we verified whether the goal and objectives were completed under the program. Based on our review, there were no indications that the CNTVA program did not adequately achieve the stated goal and objectives of the grant.

Grant Number 2017-VR-GX-K011 supports the same award program as Grant Number 2014-VR-GX-K013. Therefore, the award goal and objectives under Grant Number 2017-VR-GX-K011 are similar to the former award. However, the goal was adapted to enhance and sustain the comprehensive victim assistance program for only identifiable Native American victims of crime, with an emphasis on child victims. The objectives of the program were to: (1) maintain and enhance collaborations with the community and key stakeholders to achieve a coordinated, collaborative, multidisciplinary, victim-centered response to crime that emphasizes adopting a trauma-informed approach to the delivery of crime victim services; (2) identify the critical needs of crime victims of all ages and further develop the program to fill these gaps; (3) advocate for the development and implementation of written trauma-informed response protocols, drafting tribal codes to define or expand crime victims' rights and crimes against persons, and increasing access to

services; and (4) provide comprehensive, culturally competent direct services to 75 victims of crime and their families per year.

Grant Number 2017-VR-GX-K011 was ongoing at the time of our review. To assess whether the program was on track to accomplish its goal and objectives, we verified a sample of five project timeline milestones to be completed before October 1, 2018. Specifically, we verified that CNTVA updated its data tracking system, reviewed and updated program policies and procedures, provided direct assistance to a minimum of 75 victims of crime, attended an annual DOJ required training, and conducted a community needs assessment. Based on our review, there were no indications that the CNTVA program was not adequately achieving the stated timeline milestones of the grant.

Required Performance Reports

According to the OJP Financial Guide and the DOJ Grants Financial Guide, the funding recipient must ensure that valid and auditable source documentation is available to support all data collected for each performance measure specified in the program solicitation or award. In order to verify the information in the progress reports, we selected a judgmental sample of 10 performance measures from the 2 most recent progress reports submitted for each grant for a total sample size of 20. We then traced the items to supporting documentation maintained by the CNTVA program.

We found that the progress reports contained highly summarized information that was compiled from a CTAS Performance Measure Data Collection Tool developed by an OJP Training and Technical Assistance provider, and maintained by the CNTVA program. This data collection tool is divided by month over the 6-month reporting period and details the type of victimization and the type of service provided to victims of crime. Additionally, it lists the monthly collaborative partnerships. As part of our examination, we judgmentally sampled 1 month of the period from the data collection tool, selecting months with higher than average victim and victim service counts. Of the 20 performance measures that we selected, 12 were from the data collection tool. We then traced the items to victim files maintained by the CNTVA program.

As shown in Table 2, we reviewed a judgmental sample of quantifiable performance measures and identified issues with the documentation provided to support the measures and the accuracy of the information reported in the progress reports.

Table 2
Summary of Progress Report and Performance Metric Testing

Award Number	Period	Number of Performance Metrics Sampled	Number of Performance Metrics Verified	Results
2014-VR-GX-K013	January through September 2017	10	7	<ul style="list-style-type: none"> The CNO did not support 2 performance measures for February 2017. The CNO reported inaccurate information for 1 performance measure for September 2017.
2017-VR-GX-K011	October 2017 through June 2018	10	5	<ul style="list-style-type: none"> The CNO did not support 1 performance measure for November 2017, and 2 performance measures for June 2018. The CNO reported inaccurate information for 1 performance measure in November 2017, and 1 performance measure in June 2018.
Total:		20	12	

Sources: OJP GMS and the CNO

Of the metrics that were inadequately supported and that were materially inaccurate, all were compiled from the data collection tool. The Victim Advocate stated that the metrics in the data collection tool were obtained from the narratives in the victim files. To improve the tracking of services, she started to use keywords in the narratives such as *crisis intervention*, *home visit*, and *referral* beginning September 2017. However, she also stated that this tracking process is in development as she coordinates with her supervisor, the Project Director, and the OJP grant manager assigned to the program. Additionally, the Project Director stated that some numbers regarding victim assistance are tracked by financial transaction.

For the performance metrics that were not fully supported in February 2017, the Victim Advocate, who started in March 2017, stated that the former Victim Advocate counted each type of victimization rather than the count of each victim when determining the number of victims served, which caused the numbers to be overstated before March 2017.

For the performance measure that was not fully supported in November 2017, the Victim Advocate stated that there were no transaction records from October 2017 through December 2017 as grant financial records did not start until March 2018. Therefore, victim services such as emergency food, clothing, household items, and hygiene items that were typically recorded by transaction could not be located by CNO officials. Additionally, these services were not documented in the casefile narratives. As a result, the CNO could not locate any documentation of victim assistance to support these services that were reported in the data collection tool.

Additionally, for the count of services provided by type in November 2017 and June 2018, we identified several instances where services such as transports, court advocacy, assistance with relocation and social security, and job search assistance that were typically recorded in the narratives could not be supported.

Overall we determined that we could not verify 8 of the 20 reported performance metrics. Based on our interviews with grant program officials and our review of CNO policies and procedures, we determined that the CNO can improve its policies and procedures to more accurately track grant performance measures. Therefore, we recommend that OJP coordinate with the CNO to enhance its policies and procedures to ensure that progress reports are accurate and supported.

Compliance with Special Conditions

Special conditions are the terms and conditions that are included with the awards. We evaluated the special conditions for each grant and selected a judgmental sample of the requirements that are significant to performance under the grants and are not addressed in another section of this report. We evaluated two special conditions under each grant for a total of four special conditions. We identified two instances where the CNO was not in compliance with the special conditions, totaling \$11,125 in unallowable questioned costs.

Grant Number 2014-VR-GX-K013 had a special condition that required the CNO to submit to the OVC within 90 days of the date of award: (1) its policies and procedures to maintain the confidentiality of victims' names, addresses, telephone numbers, or any other identifying information, and its policies and procedures relating to information sharing between partners for review and approval by the OJP; and (2) a signed, written certification that data privacy and sharing protocols comport with the confidentiality and privacy rights and obligations of federal law or the grantee jurisdiction's laws, court rules, or rules of professional conduct applicable to the work performed by the grantee.

The grant was awarded on September 22, 2014. Therefore, this special condition was due by December 21, 2014. CNO officials submitted draft policies and procedures on December 23, 2014, but the OJP did not approve the policies and procedures until January 29, 2015. Additionally, CNO officials submitted a draft privacy certificate on April 30, 2015 and a signed privacy certificate on May 18, 2015, but OJP did not approve the privacy certificate until May 26, 2015. Therefore, CNO officials did not complete the full requirement until more than 4 months after the deadline, and was not in compliance with this special condition between December 22, 2014 and May 18, 2015.

Additionally, Grant Number 2017-VR-GX-K011 had a withholding special condition that prohibited the obligation, expense, and draw down of award funds until: (1) OJP determined that the CNO's Point of Contact (POC) and all Financial Points of Contact (FPOCs) for the award had successfully completed an "OJP financial management and grant administration training" on or after January 1, 2015; and (2) OJP issued a Grant Adjustment Notice (GAN) to modify or remove this special condition. The special condition clarified that, once both the POC and all FPOCs have successfully completed the training, the recipient may contact the designated grant manager for the award to request initiation of a GAN to remove this condition.

The CNO POC and a FPOC completed the required training in November 2017, and OJP removed the special condition on December 11, 2017. However, the CNO expended grant funds from October 7, 2017 through December 10, 2017, totaling \$11,125 before the special condition was removed. Additionally, the GAN did not retroactively approve the prior expenditures. Therefore, we recommend the OJP remedy the \$11,125 in unallowable grant expenditures that were incurred before the related special condition was removed under Grant Number 2017-VR-GX-K011. Further, based on our testing of special conditions, we determined that the CNO does not have adequate policies and procedures to ensure compliance with award special conditions. Therefore, we recommend that OJP coordinate with the CNO to develop and implement procedures to ensure compliance with all award special conditions.

Grant Financial Management

According to the OJP Financial Guide and DOJ Grants Financial Guide, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. To assess the CNO's financial management of the grants covered by this audit, we conducted interviews with financial staff, examined policy and procedures, and inspected grant documents to determine whether the CNO adequately safeguarded the grant funds we audited. We also reviewed the CNO's Single Audit Reports for fiscal years (FY) 2013 through 2017 to identify issues related to federal awards, but we did not find any significant deficiencies or material weaknesses related to grant administration. Finally, we performed testing in the areas that were relevant for the management of this grant, as discussed throughout this report.

We identified deficiencies with CNOs financial policies. The OJP Financial Guide and DOJ Grants Financial Guide state that charges made to federal awards for salaries, wages, and fringe benefits must be based on records that accurately reflect the work performed and comply with the established policies and practices of the organization. Additionally, charges must be supported by a system of internal controls that provides reasonable assurance that the charges are accurate, allowable, and properly allocated. Although we were able to determine how employees recorded and supervisors approved time and effort, leave, and compensatory time charged to the awards, CNO officials stated that there is no documented policy or procedure for the electronic timekeeping system. Therefore, we recommend that the OJP coordinate with the CNO to develop polices related to how employee time and effort, leave, and compensatory time is recorded and approved.

Based on our review, we identified additional weaknesses in the CNO grant financial management related to victim assistance. Concerns related to maintaining source documentation for victim assistance is discussed in more detail in the "Other Direct Costs" section of this report.

Grant Expenditures

For Grant Numbers 2014-VR-GX-K013 and 2017-VR-GX-K011, the CNO's approved budgets included personnel and fringe benefits, travel, supplies, other direct costs, and indirect costs. To determine whether costs charged to the awards were allowable, supported, and properly allocated in compliance with award requirements, we tested a judgmental sample of 75 transactions totaling \$62,396. This included 50 transactions under Grant Number 2014-VR-GX-K013 and 25 transactions under Grant Number 2017-VR-GX-K011. Additionally, for payroll testing, we judgmentally selected three non-consecutive pay periods for each award. Finally, we tested all indirect costs.

We reviewed documentation, accounting records, and performed verification testing related to grant expenditures. Based on this testing, we identified \$40,352 in unsupported costs. The following sections describe the results of that testing. We did not identify any material issues related to our testing of personnel and fringe costs, and indirect costs.

Other Direct Costs

According to the OJP Financial Guide and the DOJ Grants Financial Guide, award recipients must retain all financial records, supporting documents, statistical records, and all other records pertinent to the award for a period of 3 years from the date of submission of the final expenditure report when the program has been closed. The retention requirement includes books of original entry, source documents, supporting accounting transactions, the general ledger, subsidiary ledgers, cancelled checks, and related documents and records.

Similarly, CNO victim assistance guidance approved by OJP in a GAN stated that the program would retain all financial records, supporting documents, statistical records, and all other records for at least 3 years following notification by the grant authorizing agency that the grant has been programmatically and fiscally closed. Further, the policy states that the program will maintain the required documentation including Payment Request Forms; case logs; and all monthly, quarterly, and semi-annual progress reports.

The CNTVA program is a component of Choctaw Nation Victim Services (CNVS). The CNVS has an agreement with the CNO Finance Department to provide victim assistance with a minimum of financial supporting documentation to protect victim confidentiality. This agreement requires CNVS programs to only retain Direct Service Request Forms and Payment Guarantees for victim assistance as it relates to utility and rental assistance. Additionally, the CNO Payment Guarantee for victim assistance contained further guidance stating that the payee is required to mail the original receipt within 30 days after the goods are delivered or services are completed, except for landlords, rent and/or security deposits and utility deposits.

Our work indicated that CNO staff under the CNTVA program only maintained the Direct Service Request Form, Payment Guarantee, and email approval from the Project Director for utility and rental assistance. The Project Director stated that

the Payment Guarantee is the only type of receipt that was obtained by the CNTVA program and that the original receipt was not required. Although, these documents were relevant to victim assistance, we were unable to assess whether the documentation was valid and reliable as no invoices, original receipts of payment, or rental agreements were maintained by grantee officials. Therefore, we determined that the victim assistance related to rental and utility assistance was unsupported. In all, we identified 40 instances or \$40,352 in unsupported utility and rental assistance under the awards.

Subsequent to the issuance of the draft report, the CNO provided additional documentation, which we determined supported \$32,263 of the previously unsupported costs. After receiving OJP's official response to the draft report, we confirmed with OJP that it agreed that \$32,263 of the previously unsupported costs were now supported and remedied. As a result, we consider these costs totaling \$32,263 to be remedied. Therefore, we recommend that OJP remedy the remaining \$8,089 in unsupported other direct costs related to victim assistance, specifically \$5,592 under Grant Number 2014-VR-GX-K013, and \$2,497 under Grant Number 2017-VR-GX-K011. Additionally, we recommend that the OJP coordinate with the CNO to ensure that the CNTVA program retain all financial records, supporting documents, statistical records, and all other records pertinent to the award for a period of 3 years from the date of submission of the final expenditure report.

Travel Costs

To verify travel costs, we reviewed travel authorizations and travel vouchers with required invoices, agendas, and related transactions to determine whether the CNO appropriately charged travel to the award. We identified two transactions totaling \$306 in unallowable travel expenditures. Specifically, we identified one instance or \$36 in excess Meals and Incidental Expenses (M&IE) reimbursement related to furnished meals at conferences, and we found one instance or \$270 in excess M&IE and lodging related to unnecessary travel days. While, we are not questioning the amounts since the dollar threshold is immaterial, we recommend OJP coordinate with the CNO to enhance its travel procedures to ensure employees on official travel: (1) deduct from their M&IE meals furnished to them at conferences paid with registration fees; and (2) do not include excess travel days.

Supply Costs

According to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, unallowable advertising and public relations costs include the costs of promotional items and memorabilia, including models, gifts, and souvenirs. The budget for Grant Number 2014-VR-GX-K013 included outreach and awareness items such as brochures and information handouts. However, we identified \$79 for the purchase of 157 lanyards that were not in the approved award budget and appeared to be prohibited promotional items. While, we are not questioning the amount since the dollar threshold is immaterial, we recommend that OJP coordinate with the CNO to enhance its procurement

procedures to ensure federal funds are only used for allowable outreach and awareness items and services.

Budget Management and Control

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

We compared grant expenditures to the approved budgets to determine whether the CNO 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 the OJP Financial Guide and DOJ Grants Financial Guide, an adequate accounting system should be established to maintain documentation to 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. According to CNO financial procedures, drawdowns are to be performed once a week or when necessary for reimbursement of operational funds for the upcoming week. Each drawdown request is to be reviewed by accounting staff and approved by the Executive Director of Finance. After the drawdown request, the remaining grant fund balance is reconciled and verified, and the deposit of funds is verified by accounting staff. Additionally, the procedures state that it is the organization's policy to minimize the time elapsing between advanced funds and the expense. Therefore, federal funds advanced are only for the immediate cash needed to carry out program activity. As of August 2018, the CNO had drawn down \$487,457. To assess whether the CNO managed grant receipts in accordance with federal requirements, we compared the total amount reimbursed to the total expenditures in the accounting records, as shown in Table 3.⁵

⁵ As of April 2018, Grant Number 2014-VR-GX-K013 was officially closed, and \$52,649 was deobligated under the program.

Table 3

Total Drawdowns Compared to Expenditures as of August 2018

Award Number	Program Office	Award Amount	Total Drawdowns	Total Expenditures	Drawdowns Less Expenditures
2014-VR-GX-K013	OVC	\$ 448,973	\$ 396,324	\$ 396,324	\$ 0
2017-VR-GX-K011	OVC	\$ 449,999	\$ 91,133	\$ 92,867	\$ (1,734)
	Total:	\$898,972	\$487,457	\$489,191	\$ (1,734)

Sources: OJP and the CNO

During this audit, we did not identify significant deficiencies related to the recipient's process for developing drawdown requests under the two awards, Grant Numbers 2014-VR-GX-K013 and 2017-VR-GX-K011.

Federal Financial Reports

According to the OJP Financial Guide and the DOJ Grants Financial Guide, recipients shall report the actual expenditures and unliquidated obligations incurred for the reporting period on each financial report as well as cumulative expenditures. To determine whether the CNO submitted accurate FFRs, we compared the four most recent reports to the CNO's accounting records for Grant Number 2014-VR-GX-K013 and the three most recent reports for Grant Number 2017-VR-GX-K011.

We determined that quarterly and cumulative expenditures for the reports reviewed matched the accounting records.

CONCLUSION AND RECOMMENDATIONS

As a result of our audit testing, we conclude that the CNO demonstrated adequate achievement of the grant's stated goal and objectives under Grant Number 2014-VR-GX-K013 and adequate progress towards achieving the grants' stated goal and objectives under Grant Number 2017-VR-GX-K011. Additionally, we did not identify significant issues regarding the CNO's drawdowns and federal financial reports. However, we found that the CNO did not comply with essential award conditions related to performance reports, award special conditions, and use of funds. As a result of these deficiencies, we questioned \$19,214 in grant expenditures. We provide eight recommendations to the OJP to address these deficiencies.⁶

We recommend that OJP:

1. Coordinate with the CNO to enhance its policies and procedures to ensure that progress reports are accurate and supported.
2. Remedy the \$11,125 in unallowable grant expenditures that were expended before the related special condition was removed under Grant Number 2017-VR-GX-K011.
3. Coordinate with the CNO to develop and implement procedures to ensure compliance with all award special conditions.
4. Coordinate with the CNO to develop policies related to how employee time and effort, leave, and compensatory time is recorded and approved.⁶
5. Coordinate with the CNO to ensure that the CNTVA program retain all financial records, supporting documents, statistical records, and all other records pertinent to the award for a period of 3 years from the date of submission of the final expenditure report.
6. Remedy the remaining \$8,089 of the \$40,352 in unsupported other direct costs related to victim assistance, specifically:
 - a. \$5,592 of the \$30,350 under Grant Number 2014-VR-GX-K013, and
 - b. \$2,497 of the \$10,002 under Grant Number 2017-VR-GX-K011.⁷
7. Coordinate with the CNO to enhance its travel procedures to ensure employees on official travel: (1) deduct from their M&IE meals furnished to

⁶ Our project consisted of audits of grants awarded to the CNO by OJP, OIW, and the COPS Office, on which we completed separate audit reports. Where we identified similar issues, we make similar recommendations to these granting agencies. The OIG will provide the three agencies a list of overlapping recommendations and ensure that the agencies coordinate their resolution of the issues.

⁷ As discussed previously, the CNO provided additional documentation supporting \$32,263 of previously unsupported questioned costs.

them at conferences paid with registration fees, and (2) do not include excess travel days.

8. Coordinate with the CNO to enhance its procurement procedures to ensure federal funds are only used for allowable outreach and awareness items and services.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

The objectives of this audit were to: (1) determine whether costs claimed under the grants are allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the award; and (2) determine whether the grantee demonstrated adequate progress towards achieving program goals and objectives. To accomplish these objectives, we assessed performance in the following areas of grant management: program planning and execution, program requirements and performance reporting, 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 audit of the Office of Justice Programs (OJP) grants awarded to the Choctaw Nation of Oklahoma (CNO) was done in conjunction with the audits of Office on Violence Against Women and Office of Community Oriented Policing Services grants awarded to the CNO. We assessed DOJ funded victim assistance and law enforcement activities across multiple programs and components at the CNO to gain a deeper understanding of DOJ grant management. This report details the results of our audit of two OJP cooperative agreements awarded to the CNO under the Comprehensive Tribal Victim Assistance Program.

The OJP awarded \$448,973 through Grant Number 2014-VR-GX-K013, of which \$52,649 was deobligated when the award was programmatically and fiscally closed, and \$449,999 through Grant Number 2017-VR-GX-K011. As of August 2018, the CNO had drawn down \$487,457 of the total grant funds awarded. Our audit concentrated on, but was not limited to September 22, 2014, the award date for Grant Number 2014-VR-GX-K013, through May 14, 2019, the last day of our audit work.

To accomplish our objectives, we tested compliance with what we consider to be the most important conditions of the CNO's activities related to the audited grants. We performed sample-based audit testing for grant expenditures 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. In general, we selected our judgmental sample based on high-dollar transactions from each cost category. The OJP Financial Guide, DOJ Grants Financial Guide, and the award documents contain the primary criteria we applied during the audit.

During our audit, we obtained information from OJP's Grants Management System as well as the CNO's accounting system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

APPENDIX 2

SCHEDULE OF DOLLAR-RELATED FINDINGS

<u>Description</u>	<u>Amount</u>	<u>Page</u>
Questioned Costs:		
Noncompliance with Special Conditions	<u>\$11,125</u>	6
Unallowable Costs	\$11,125	
Other Direct Costs associated with Victim Assistance	<u>\$40,352</u>	9
Unsupported Costs	\$40,352	
<i>Gross Amount</i> ⁸	\$51,477	
Less Remedied Unsupported Costs ⁹	<u>(32,263)</u>	9
Net Questioned Costs	\$19,214	

⁸ **Questioned Costs** are expenditures that do not comply with legal, regulatory, or contractual requirements; are not supported by adequate documentation at the time of the audit; or are unnecessary or unreasonable. Questioned costs may be remedied by offset, waiver, recovery of funds, the provision of supporting documentation, or contract ratification, where appropriate.

⁹ Prior to the issuance of the final report, the CNO provided additional documentation supporting \$32,263 of previously unsupported costs.

**CHOCTAW NATION OF OKLAHOMA
RESPONSE TO THE DRAFT AUDIT REPORT¹⁰**



Choctaw Nation of Oklahoma

Healthcare Finance
P.O. Box 1210 • Durant, OK 74702
1 (800) 522-6170 • (580) 924-8280

Gary Batton
Chief

Jack Austin, Jr.
Assistant Chief

June 25, 2019

David M. Sheeren
Regional Audit Manager
Denver Regional Audit Office
Office of Inspector General
U.S. Department of Justice
1120 Lincoln Street, Suite 1500
Denver, CO 80203

Re: 2014-VR-GX-K013, 2017-VR-GX-K011

Mr. Sheeren:

Please see below, responses to the draft report for grants 2014-VR-GX-K013 and 2017-VR-GX-K011:

- 1. OJP will coordinate with Choctaw Nation to enhance its policies and procedures to ensure that progress reports are accurate and supported.**

Choctaw Nation concurs and has undertaken a review of its process to see if there were areas that could be improved. As such, CNO will work to enhance the Standard Operating Procedure (SOP) to increase data accuracy and verification of supporting documents for progress reports. We will assign a contact person that will collect all submitted reports and retain with backup. Upon completion of the revised SOP a copy will be forwarded to OIG and OJP within 90 days for approval and closure of recommendation.

- 2. Remedy the \$11,125 in unallowable grant expenditures that were obligated before the related special condition was removed under Grant Number 2017-VR-GX-K011.**
- 3. OJP will coordinate with Choctaw Nation to develop and implement procedures to ensure compliance with all award special conditions.**

Choctaw Nation will work with OJP to remedy the \$11,125 in potential unallowable expenditures. In review of GAN's for release of budget, the GAN's do not contain language to state the award period was revised to reflect budget release date as start of obligation period. Choctaw Nation feels we satisfied the special condition as we did not draw funds until the budget was released.

¹⁰ Attachments referenced in the grantee's response were not included in this final report.

Choctaw Nation will enhance the Standard Operating Procedure (SOP) to ensure compliance with all special award conditions. Upon completion of the SOP a copy will be forwarded to OIG and OJP within 90 days for approval and closure of recommendation.

4. **OJP will coordinate with the CNO to develop policies related to how employee time and effort, leave, and compensatory time is recorded and approved.**

Choctaw Nation concurs and will develop and or enhance a Standard Operating Procedure (SOP) related to how employee time and effort, leave and compensatory time is recorded and approved. Upon completion of the SOP a copy will be forwarded to OIG and OJP within 90 days for approval and closure of recommendation.

5. **OJP will coordinate with the Choctaw Nation to ensure that the CNTVA program retains all financial records, supporting documents, statistical records, and all other records pertinent to the award for a period of 3 years from the date of submission of the final expenditure report.**

Choctaw Nation concurs and will develop a Standard Operating Procedure (SOP) in coordination with the CNTVA program to enhance the requirement for retention of documents. Choctaw Nation is implementing a new division to Grants Accounting that will be a Post Award Quality and Compliance. This area will house all programmatic and financial reports as well as source documentation. Upon completion of the SOP a copy will be forwarded to OIG and OJP within 90 days for approval and closure of recommendation.

6. **Remedy \$40,352 in unsupported other direct costs related to victim assistance, specifically:**

- a. **\$30,350 under Grant Number 2014-VR-GX-K013**

Please see attachment 1 2014-VR-GX-K013 for additional source documentation for review.

- b. **\$10,002 under Grant Number 2017-VR-GX-K011**

Please see attachment 2 2017-VR-GX-K011 for additional source documentation for review.

Choctaw Nation Accounting will coordinate with CNTVA to enhance the program Standard Operating Procedure (SOP) to list documentation that will be required to submit for payment processing. Upon completion of the SOP a copy will be forwarded to OIG and OJP within 90 days for approval and closure of recommendation.

7. **Coordinate with the CNO to enhance its travel procedures to ensure employees on official travel: (1) deduct from their M&IE meals furnished to them at conferences paid with registration fee, and (2) do not include excess travel days.**

Choctaw Nation will review internal travel policies and make updates to ensure that the documentation is provided to make all meal adjustments for grant travel. Agendas will be required on all grant travel for review.

Due to Choctaw Nation's geographical area and the distance to the nearest airport our travel department takes into consideration the number of airline flights available, weather conditions and other pertinent practical issues that should be addressed during the decision process. The traveler and approving supervisor determine the appropriate departure and return dates and time to ensure attendance and purpose of said trip. Choctaw Nation feels prior day travel was necessary due to the mandatory requirement of this training.

8. **OJP will coordinate with the Choctaw Nation to enhance its procurement procedures to ensure federal funds are only used for allowable outreach and awareness items and services.**

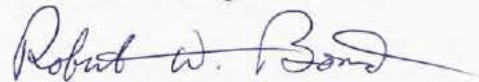
Choctaw Nation concurs and will enhance the grant kick off meeting by updating the presentation to include a slide of all allowable outreach items per grant. Program Director, a representative from Procurement and a representative of Accounting will be present to ensure all rules and regulations are discussed and the budget and narrative are reviewed in detail.

Please let me know if you need additional information and I look forward to working in coordination with OIG and OJP to clear all recommendations.

Sincerely,



Sonya K. Diggs
Director of Accounting, Grants



Robert Bond
Executive Officer, Finance

**OFFICE OF JUSTICE PROGRAMS
RESPONSE TO THE DRAFT AUDIT REPORT**



U.S. Department of Justice


Office of Justice Programs

Office of Audit, Assessment, and Management

Washington, D.C. 20531

JUL - 3 2019

MEMORANDUM TO: David M. Sheeren
Regional Audit Manager
Denver Regional Audit Office
Office of the Inspector General

FROM: Ralph E. Martin
Director 

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs, Comprehensive Tribal Victim Assistance Program Cooperative Agreements Awarded to the Choctaw Nation of Oklahoma, Durant, Oklahoma*

This memorandum is in reference to your correspondence, dated June 4, 2019, transmitting the above-referenced draft audit report for the Choctaw Nation of Oklahoma (CNO). We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains **eight** recommendations and **\$51,477** in questioned costs. The following is the Office of Justice Programs' (OJP) analysis of the draft audit report recommendations. For ease of review, the recommendations are restated in bold and are followed by our response.

- 1. We recommend that OJP coordinate with the CNO to enhance its policies and procedures to ensure that progress reports are accurate and supported.**

OJP agrees with the recommendation. We will coordinate with the CNO to obtain a copy of its revised policies and procedures, developed and implemented, for ensuring that progress reports are accurate and supported; and that auditable source documentation is maintained to support the information included in its progress reports.

2. **We recommend that OJP remedy the \$11,125 in unallowable grant expenditures that were expended before the related special condition was removed under Grant Number 2017-VR-GX-K011.**

OJP agrees with the recommendation. We will review the \$11,125 in questioned costs, related to unallowable grant expenditures that were charged to Grant Number 2017-VR-GX-K011 before removal of an award special condition, and will work with CNO to remedy, as appropriate.

3. **We recommend that OJP coordinate with the CNO to develop and implement procedures to ensure compliance with all award special conditions.**

OJP agrees with the recommendation. We will coordinate with the CNO to obtain a copy of written policies and procedures, developed and implemented, to ensure compliance with all award special conditions.

4. **We recommend that OJP coordinate with the CNO to develop policies related to how employee time and effort, leave, and compensatory time is recorded and approved.**

OJP agrees with the recommendation. We will coordinate with the CNO to obtain a copy of written policies and procedures, developed and implemented, to ensure that employee time and effort, leave, and compensatory time is properly approved, and accurately recorded in its electronic timekeeping system.

5. **We recommend that OJP coordinate with the CNO to ensure that the CNTVA program retain all financial records, supporting documents, statistical records, and all other records pertinent to the award for a period of three years from the date of submission of the final expenditure report.**

OJP agrees with the recommendation. We will coordinate with the CNO to obtain a copy of written policies and procedures, developed and implemented, to ensure that the Choctaw Nation Tribal Victim Assistance Program retains all financial records, supporting documents, statistical records, and other records pertinent to the award, for a period of three years from the date of submission of the final expenditure report.

6. **We recommend that OJP remedy the \$40,352 in unsupported other direct costs related to victim assistance, specifically:**

- a. **\$30,350 under Grant Number 2014-VR-GX-K013, and**

- b. **\$10,002 under Grant Number 2017-VR-GX-K011.**

OJP agrees with the recommendation. We will review the \$40,352 in questioned costs related to unsupported other victim assistance direct costs that were charged to Grant Numbers 2014-VR-GX-K013 and 2017-VR-GX-K011, and will work with CNO to remedy, as appropriate.

7. **We recommend that OJP coordinate with the CNO to enhance its travel procedures to ensure employees on official travel: (1) deduct from their M&IE meals furnished to them at conferences paid with registration fees, and (2) do not include excess travel days.**

OJP agrees with the recommendation. We will coordinate with the CNO to obtain a copy of revised travel procedures, developed and implemented, to ensure that employees on official travel: (1) deduct the cost of meals from their M&IE expenses, for those meals furnished to them at conferences paid with registration fees, and (2) do not include excess travel days.

8. **We recommend that OJP coordinate with the CNO to enhance its procurement procedures to ensure Federal funds are only used for allowable outreach and awareness items and services.**

OJP agrees with the recommendation. We will coordinate with the CNO to obtain a copy of revised procurement procedures, developed and implemented, to ensure that Federal funds are only used for allowable outreach and awareness items and services.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact Jeffery A. Haley, Deputy Director, Audit and Review Division, on (202) 616-2936.

cc: Katharine T. Sullivan
Principal Deputy Assistant Attorney General

Maureen A. Henneberg
Deputy Assistant Attorney General
for Operations and Management

LeToya A. Johnson
Senior Advisor
Office of the Assistant Attorney General

Jeffery A. Haley
Deputy Director, Audit and Review Division
Office of Audit, Assessment and Management

Darlene L. Hutchinson
Director
Office for Victims of Crime

Tracey Trautman
Principal Deputy Director
Office for Victims of Crime

cc: Allison Turkel
Deputy Director
Office for Victims of Crime

Katherine Darke-Schmitt
Deputy Director
Office for Victims of Crime

Kathrina S. Peterson
Acting Deputy Director
Office for Victims of Crime

James Simonson
Associate Director for Operations
Office for Victims of Crime

Yolanda Curtis-Gibson
Victim Justice Program Specialist
Office for Victims of Crime

Charlotte Grzebien
Assistant General Counsel
Office of the General Counsel

Robert Davis
Acting Director
Office of Communications

Leigh A. Benda
Chief Financial Officer

Christal McNeil-Wright
Associate Chief Financial Officer
Grants Financial Management Division
Office of the Chief Financial Officer

Joanne M. Suttington
Associate Chief Financial Officer
Finance, Accounting, and Analysis Division
Office of the Chief Financial Officer

Aida Brumme
Manager, Evaluation and Oversight Branch
Grants Financial Management Division
Office of the Chief Financial Officer

cc: Louise Duhamel
Acting Assistant Director, Audit Liaison Group
Internal Review and Evaluation Office
Justice Management Division

OJP Executive Secretariat
Control Number: IT20190606114924

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

The OIG provided a draft of this audit report to the Choctaw Nation of Oklahoma (CNO) and OJP for review and official comment. The CNO's response is incorporated in Appendix 3, and OJP's response is incorporated in Appendix 4 of this final report. In response to our draft report, OJP agreed with our recommendations and, as a result, the status of the audit report is resolved. In its response, the CNO concurred with four recommendations and neither agreed nor disagreed with four recommendations. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendations for OJP:

- 1. Coordinate with the CNO to enhance its policies and procedures to ensure that progress reports are accurate and supported.**

Resolved. The OJP agreed with our recommendation and stated in its response that it will coordinate with the CNO to obtain a copy of its revised policies and procedures for ensuring progress reports are accurate and supported with auditable source documentation.

The CNO concurred with our recommendation and stated in its response that it will enhance the Standard Operating Procedure (SOP) to increase data accuracy and verification of supporting documents for progress reports. Additionally, the CNO will assign a contact person that will collect all submitted reports and retain with backup.

This recommendation can be closed when we receive documentation that the CNO has enhanced its policies and procedures to ensure that progress reports are accurate and supported.

- 2. Remedy the \$11,125 in unallowable grant expenditures that were expended before the related special condition was removed under Grant Number 2017-VR-GX-K011.**

Resolved. The OJP agreed with our recommendation and stated in its response that it will review the \$11,125 in questioned costs related to unallowable grant expenditures that were charged to the grant before removal of an award special condition, and that it will work with the CNO to remedy.

The CNO did not state whether it concurred with our recommendation, but stated that it will work with OJP to remedy the \$11,125 in unallowable grant expenditures. The CNO stated that the GAN to release the budget did not revise the award period or the obligation period. Additionally, CNO officials

stated that they satisfied the special condition as it did not draw funds until the budget was released.

As stated in the body of the report, the grant had a withholding special condition that prohibited the obligation, expense, and draw down of award funds until the CNO satisfied this special condition. The CNO did not draw down funds until after the special condition was met. However, the CNO did expend grant funds from October 7, 2017 through December 10, 2017 before the special condition was removed totaling \$11,125 in unallowable grant expenditures.

This recommendation can be closed when we receive documentation that the OJP has remedied the \$11,125 in unallowable grant expenditures that were expended before the related special condition was removed under Grant Number 2017-VR-GX-K011.

3. Coordinate with the CNO to develop and implement procedures to ensure compliance with all award special conditions.

Resolved. The OJP agreed with our recommendation and stated in its response that it will coordinate with the CNO to obtain a copy of written policies and procedures to ensure compliance with award special conditions.

The CNO did not state whether it concurred with our recommendation, yet stated that it will enhance SOP to ensure compliance with all award special conditions.

This recommendation can be closed when we receive documentation that the CNO has developed and implemented procedures to ensure compliance with all award special conditions.

4. Coordinate with the CNO to develop policies related to how employee time and effort, leave, and compensatory time is recorded and approved.

Closed. The OJP agreed with our recommendation and stated in its response that it will coordinate with the CNO to obtain written policies and procedures to ensure employee time and effort, leave, and compensatory time is properly approved and accurately recorded in its electronic timekeeping system.

In its response, the CNO did not state whether it concurred with our recommendation, yet stated that it will develop or enhance its SOP related to how employee time and effort, leave, and compensatory time is recorded and approved.

Subsequent to its official response, the CNO provided copies of its SOP. OJP reviewed the SOP and stated to us that it believed the SOP adequately addressed CNO employee timekeeping. We also reviewed the SOP and determined that it sufficiently addressed how employee time and effort,

leave, and compensatory time is recorded and approved. As a result, this recommendation is now closed.

5. **Coordinate with the CNO to ensure that the CNTVA program retain all financial records, supporting documents, statistical records, and all other records pertinent to the award for a period of 3 years from the date of submission of the final expenditure report.**

Resolved. The OJP agreed with our recommendation and stated in its response that it will coordinate with the CNO to obtain written policies and procedures to ensure the Choctaw Nation Tribal Victim Assistance Program retains all financial records, supporting documents, statistical records, and other pertinent records for a period of 3 years from the date of submission of the final expenditure report.

The CNO concurred with our recommendation and stated in its response that it will develop a SOP in coordination with the CNTVA program to enhance the requirement for retention of documents. Additionally, the CNO stated that it is implementing a new division to Grants Accounting that will be Post Award Quality and Compliance and will house all programmatic and financial reports as well as source documentation.

This recommendation can be closed when we receive documentation that the OJP has coordinated with the CNO to ensure that the CNTVA program retain all financial records, supporting documents, statistical records, and all other records pertinent to the award for a period of 3 years from the date of submission of the final expenditure report.

6. **Remedy the remaining \$8,089 of the \$40,352 in unsupported other direct costs related to victim assistance, specifically:**
 - a. **\$5,592 of the \$30,350 under Grant Number 2014-VR-GX-K013, and**
 - b. **\$2,497 of the \$10,002 under Grant Number 2017-VR-GX-K011.**

Resolved. The OJP agreed with our recommendation and stated in its response that it will review the \$40,352 in unsupported other victim assistance direct costs that were charged to the grants, and that it will work with the CNO to remedy.

The CNO did not state whether or not it concurred with our recommendation. However, the CNO provided additional source documentation to support the questioned costs and stated that Choctaw Nation Accounting will coordinate with the CNTVA to enhance the program SOP to list documentation that will be required to submit for payment processing.

We reviewed the additional source documentation and determined that it was sufficient to support \$24,758 under Grant Number 2014-VR-GX-K013 and \$7,505 under Grant Number 2017-VR-GX-K011 of the previously unsupported costs. After receiving OJP's official response to the draft report,

we confirmed with OJP that it agreed that \$32,263 of the previously unsupported costs are now supported and remedied.

However, some of the documentation that CNO submitted to address the remaining questioned costs was not signed by the landlord and dated, contemporaneous to the assistance provided, or was altered. Further, some documentation did not fully support the amount of assistance. Therefore, \$5,592 under Grant Number 2014-VR-GX-K013 and \$2,497 under Grant Number 2017-VR-GX-K011 remains unsupported.

This recommendation can be closed when we receive documentation that the OJP has remedied \$8,089 in unsupported other direct costs related to victim assistance, specifically \$5,592 under Grant Number 2014-VR-GX-K013 and \$2,497 under Grant Number 2017-VR-GX-K011.

7. **Coordinate with the CNO to enhance its travel procedures to ensure employees on official travel: (1) deduct from their M&IE meals furnished to them at conferences paid with registration fees, and (2) do not include excess travel days.**

Resolved. The OJP agreed with our recommendation and stated in its response that it will coordinate with the CNO to obtain a copy of revised travel procedures to ensure that employees on official travel: (1) deduct from their M&IE meals furnished to them at conferences paid with registration fees, and (2) do not include excess travel days.

The CNO did not state whether or not it concurred with our recommendation. CNO stated in its response that it will review and update internal travel policies to ensure that the documentation is provided to make all meal adjustments for grant travel and that agendas will be required on all grant travel for review. Additionally, the CNO stated that its travel department considers the distance of travel, available flights, weather conditions, and other practical issues in its decision process. Also, the traveler and approving supervisor determine the appropriate departure and return dates. In close, the CNO stated that it feels the prior day travel was necessary because the training was mandatory.

This recommendation can be closed when we receive documentation that the CNO has enhanced its travel procedures to ensure employees on official travel: (1) deduct from their M&IE meals furnished to them at conferences paid with registration fees, and (2) do not include excess travel days.

8. Coordinate with the CNO to enhance its procurement procedures to ensure federal funds are only used for allowable outreach and awareness items and services.

Resolved. The OJP agreed with our recommendation and stated in its response that it will coordinate with the CNO to obtain a copy of revised procurement procedures to ensure that federal funds are only used for allowable outreach and awareness items and services.

The CNO concurred with our recommendation and stated that it will enhance the grant kick off meeting by including information of all allowable outreach items per grant. Additionally, the CNO stated that the Program Director and representatives from both Procurement and Accounting would discuss all rules and regulations and review the budget and narrative in detail.

This recommendation can be closed when we receive documentation that the CNO has enhanced its procurement procedures to ensure federal funds are only used for allowable outreach and awareness items and services.



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U.S. DEPARTMENT OF JUSTICE OFFICE OF THE INSPECTOR GENERAL

950 Pennsylvania Avenue, Northwest
Suite 4706
Washington, DC 20530 0001

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