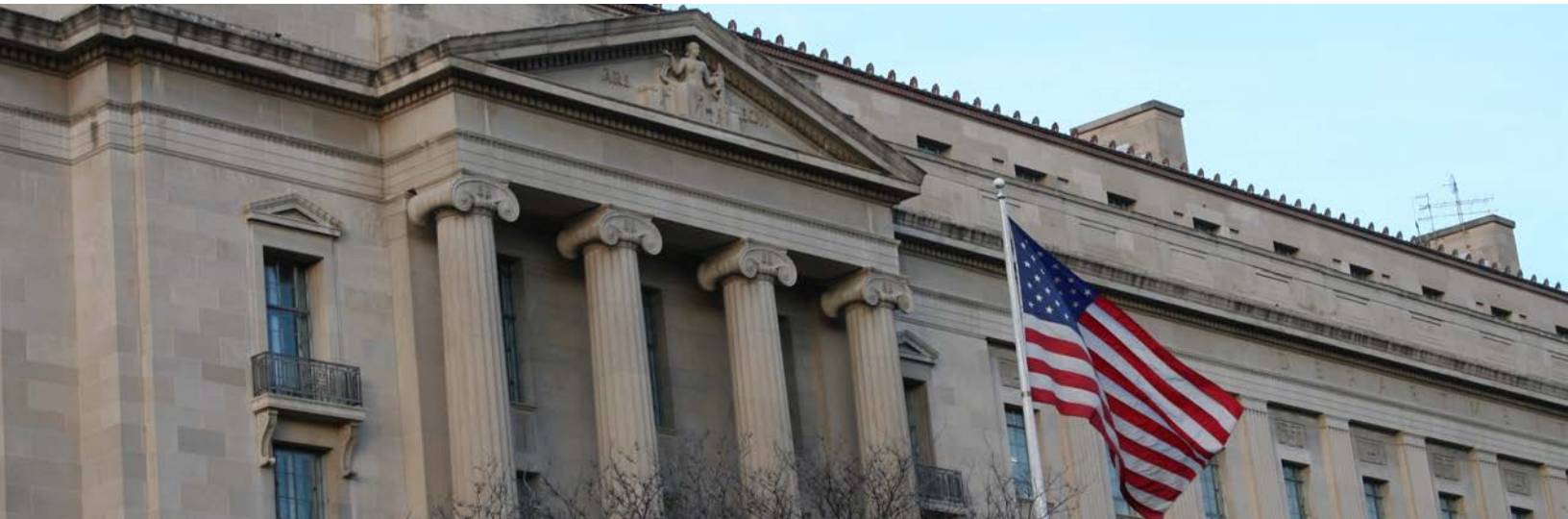




**Office of the Inspector General**  
U.S. Department of Justice

**OVERSIGHT ★ INTEGRITY ★ GUIDANCE**



**Audit of the Office of Justice Programs  
Victim Assistance Grants Awarded to  
the Idaho Department of Health and  
Welfare, Boise, Idaho**

**REDACTED FOR PUBLIC RELEASE**

Redactions were made to the full version of this report for privacy reasons. The redactions are contained only in Appendix 3, the grantee's response, and are of individuals' names.

Audit Division GR-60-19-011

September 2019



# Executive Summary

*Audit of the Office of Justice Programs Victim Assistance Grants  
Awarded to the Idaho Department of Health and Welfare, Boise, Idaho*

## Objective

The objective of the audit was to evaluate how the Idaho Department of Health and Welfare (IDHW) designed and implemented its crime victim assistance program. To accomplish this objective, we assessed performance in the following areas of grant management: (1) grant program planning and execution, (2) program requirements and performance reporting, (3) grant financial management, and (4) monitoring of subrecipients.

## Results in Brief

As a result of our audit, we concluded that the IDHW's Council on Domestic Violence and Victim Assistance (Council) used its Victims of Crime Act (VOCA) funding to provide services to crime victims. This audit did not identify significant concerns regarding the Council's matching requirements or with its Federal Financial Reports. However, we identified areas of the Council's grant management that could be improved. Specifically, we identified concerns with the Council's grant program planning, execution, program requirements, and performance reports. Given the Council's processes, we also found significant delays in using VOCA funding. In addition, the Council did not adhere to internal policies and procedures, did not have drawdown policies and procedures, and did not properly monitor its subrecipients. As a result, we identified \$56,414 in total questioned costs and made 17 recommendations to the Office of Justice Programs (OJP) to improve the administration of the victim assistance grants provided to Idaho.

## Recommendations

Our report contains 17 recommendations to OJP to assist the Council in improving its grant management and administration and to remedy questioned costs. We requested a response to our draft audit report from the Council and OJP, which can be found in Appendices 3 and 4, respectively. Our analysis of those responses is included in Appendix 5.

## Audit Results

The U.S. Department of Justice Office of the Inspector General completed an audit of three VOCA victim assistance formula grants awarded by the OJP, Office for Victims of Crime (OVC) to the IDHW's Council in Boise, Idaho. The OVC awarded these formula grants, totaling \$39,223,106 for fiscal years (FY) 2016 through 2018, from the Crime Victims Fund to enhance crime victim services throughout Idaho. As of June 2019, the Council drew down a cumulative amount of \$10,408,560 for all of the grants we reviewed.

***Grant Program Planning and Execution*** – The Council used its VOCA funding to provide services to victims. However, the Council did not adequately plan its funding distribution, potentially putting at risk its ability to meet the needs of crime victims. Further, its process for subrecipient selection potentially puts VOCA funds at risk of fraud, waste, and abuse. The Council also did not timely use VOCA award funds and did not sufficiently communicate applicable VOCA requirements to its subrecipients.

***Program Requirements and Performance Reporting*** – The Council did not allocate VOCA funds to comply with distribution requirements to priority victim groups. Additionally, the Council did not implement adequate procedures to ensure accurate annual performance reports and submitted late and inaccurate Subgrant Award Reports.

***Grant Financial Management*** – We identified unallowable administrative expenditures and unallowable and unsupported subrecipient expenditures. We also identified IDHW drawdown activity that resulted in excess cash on hand.

***Monitoring of Subrecipients*** – The Council's monitoring policies were not always followed or working as intended which resulted in unallowable and unsupported financial reimbursements to subrecipients. The Council's monitoring of subrecipient performance reporting did not include a check of data accuracy. Further, we found that the Council did not identify that its subrecipients reported non-VOCA services in their performance reports.

**AUDIT OF THE OFFICE OF JUSTICE PROGRAMS  
VICTIM ASSISTANCE GRANTS AWARDED TO  
THE IDAHO DEPARTMENT OF HEALTH AND WELFARE,  
BOISE, IDAHO**

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**AUDIT OF THE OFFICE OF JUSTICE PROGRAMS  
VICTIM ASSISTANCE GRANTS AWARDED TO  
THE IDAHO DEPARTMENT OF HEALTH AND WELFARE,  
BOISE, IDAHO**

**INTRODUCTION**

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of three victim assistance formula grants awarded by the Office of Justice Programs (OJP), Office for Victims of Crime (OVC) to the Idaho Department of Health and Welfare (IDHW) in Boise, Idaho. The OVC awards victim assistance grants annually from the Crime Victims Fund (CVF) to state administering agencies. As shown in Table 1, from fiscal years (FY) 2016 to 2018, these OVC grants totaled \$39,223,106.

**Table 1  
Audited Grants  
Fiscal Years 2016 – 2018**

<b>Award Number</b>	<b>Award Date</b>	<b>Award Period Start Date</b>	<b>Award Period End Date</b>	<b>Award Amount</b>
2016-VA-GX-0060	09/08/2016	10/01/2015	09/30/2019	\$ 11,652,588
2017-VA-GX-0056	09/28/2017	10/01/2016	09/30/2020	9,867,400
2018-V2-GX-0002	08/09/2018	10/01/2017	09/30/2021	17,703,118
<b>Total:</b>				<b>\$ 39,223,106</b>

Note: Grant funds are available for the fiscal year of the award plus 3 additional fiscal years.

Source: OJP Grants Management System

Established by the Victims of Crime Act (VOCA) of 1984, the CVF is used to support crime victims through DOJ programs, and state and local victim services.<sup>1</sup> The CVF is supported entirely by federal criminal fees, penalties, forfeited bail bonds, gifts, donations, and special assessments. The OVC annually distributes proceeds from the CVF to states and territories. The total amount of funds that the OVC may distribute each year depends upon the amount of CVF deposits made during the preceding years and limits set by Congress.

In FY 2015, Congress significantly raised the previous year’s cap on CVF disbursements, which more than quadrupled the available funding for victim assistance grants from \$455.8 million to \$1.96 billion. In FY 2016, Congress raised the cap again, increasing the available funding for victim assistance to \$2.22 billion. The OVC allocates the annual victim assistance program awards based on the amount available for victim assistance each year and the states’ population. As

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<sup>1</sup> The VOCA victim assistance formula program is funded under 34 U.S.C. § 20103.

such, the annual VOCA victim assistance grant funds available to the Council increased from \$2.7 million in FY 2014 to \$17.7 million in FY 2018.

VOCA victim assistance grant funds support the provision of direct services – such as crisis intervention, assistance filing restraining orders, counseling in crises arising from the occurrence of crime, and emergency shelter – to victims of crime. The OVC distributes these assistance grants to states and territories, which in turn fund subawards to public and private nonprofit organizations that directly provide the services to victims. Eligible services are efforts that: (1) respond to the emotional and physical needs of crime victims, (2) assist primary and secondary victims of crime to stabilize their lives after a victimization, (3) assist victims to understand and participate in the criminal justice system, and (4) provide victims of crime with a measure of safety and security.

## **The Grantee**

The IDHW is the designated state administering agency. Within the IDHW, the Idaho Council on Domestic Violence and Victim Assistance (Council) serves as the advisory body for programs affecting victims of crimes and is the granting agency to programs state-wide that provide direct services to crime victims under the VOCA victim assistance program. The Council's mission is to fund, promote, and support quality services to victims of crime throughout Idaho. Established in 1982, the Council is composed of seven governor-appointed council members (Council Board) from the seven regions within Idaho and three Council officials. The three Council officials include an Executive Director, a Grants/Contracts Officer, and a Grants/Contracts Operations Analyst.

Prior to the start of our audit, the Council's previous Executive Director, who held that position for more than 10 years, tendered her resignation. In addition, according to a Council official, within the last 3 years, four members have left their positions on the Council. We believe this staff turnover has impacted the effectiveness of the Council's management of the VOCA funds. As a result, we identified several areas of the crime victim assistance program that need enhancement due to these issues which we discuss throughout the report.

## **OIG Audit Approach**

The objective of the audit was to evaluate how the IDHW's Council designed and implemented its crime victim assistance program. To accomplish this objective, we assessed performance in the following areas of grant management: (1) grant program planning and execution, (2) program requirements and performance reporting, (3) grant financial management, and (4) monitoring of subrecipients.

We tested compliance with what we considered the most important conditions of the grants. Unless otherwise stated in our report, we applied the authorizing VOCA legislation, the VOCA victim assistance program guidelines (VOCA Guidelines) and Final Rule, and the DOJ Grants Financial Guide (Financial Guide) as our primary criteria. We also reviewed relevant policy and procedures and

interviewed Council personnel to determine how they administered VOCA funds. We interviewed Council and subrecipient personnel and further obtained and reviewed Council and subrecipient records reflecting grant activity.<sup>2</sup> We conducted site visits at six VOCA-funded subrecipients located throughout the state of Idaho.

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<sup>2</sup> Appendix 1 contains additional information on the audit's objective, scope, and methodology, as well as further detail on the criteria we applied for our audit. Appendix 2 presents a schedule of our dollar-related findings.

# AUDIT RESULTS

## Grant Program Planning and Execution

The main purpose of the VOCA victim assistance grants is to enhance crime victim services. The Council, which is the primary recipient of victim assistance grants at the state level in Idaho, must distribute the majority of the funding to organizations that provide direct services to victims, such as domestic violence shelters, centers for abused children, and other community-based victim coalitions and support organizations. As the state administering agency, the Council has the discretion to select subrecipients from among eligible organizations, although the VOCA Guidelines require state administering agencies give priority to victims of sexual assault, domestic abuse, and child abuse. State administering agencies must also make funding available for previously underserved populations of violent crime victims.<sup>3</sup> As long as a state administering agency allocates at least 10 percent of available funding to victim populations in each of these victim categories, it has the discretion in determining the amount of funds each subrecipient receives.

As part of our audit, we assessed the Council's overall plan to allocate and award the victim assistance funding. We reviewed how the Council planned to distribute its available victim assistance grant funding, made subaward selection decisions, and informed its subrecipients of necessary VOCA requirements. As discussed below, in our overall assessment of grant program planning and execution, we determined that the Council did not adequately plan its funding distribution, potentially putting at risk its ability to meet the needs of crime victims. We also identified concerns with its process to select subrecipients, and found that the Council did not sufficiently communicate applicable VOCA requirements to its subrecipients.

### *Subaward Allocation Plan*

In response to the significant increase in CVF funds in FY 2015, OVC encouraged states to develop strategic plans and to conduct surveys or needs assessments to determine service gaps and maximize resources. Since the FY 2015 increase, the VOCA Victim Assistance Formula Solicitations have required states to submit a subrecipient funding plan detailing its efforts to spend the increase in VOCA funds. The OVC's FY 2016 VOCA Victim Assistance Formula Solicitation also required that state and territory applicants submit a subrecipient funding plan that detailed efforts to identify additional victim service needs, as well as subaward strategies to spend the substantial increase in available VOCA funding. In response to this requirement, the Council provided a proposed plan with its

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<sup>3</sup> The VOCA Guidelines state these underserved victims may include, but are not limited to, victims of federal crimes; survivors of homicide victims; victims of assault, robbery, gang violence, hate and bias crimes, intoxicated drivers, bank robbery, economic exploitation and fraud, and elder abuse. The VOCA Guidelines also indicate that in defining underserved victim populations, states should also identify gaps in available services by victims' demographic characteristics.



FY 2016 grant application. However, as discussed later, the Council was unable to provide documentation to verify that all of the proposed actions had been taken.

The Council's FY 2016 proposed plan was to: (1) utilize a formal Request for Proposal (RFP) process (which will be described in more detail in the next section); (2) utilize data collected from a 2015 needs assessment; (3) utilize information from grantee training; and (4) utilize data from funded program responses to a yearly questionnaire.

In 2013, the Council contracted with a local university to complete a year-long state-wide Crime Victim Services Needs Assessment, which was completed in 2015. The needs assessment concluded on several different areas including:

- data limitations;
- the need for outreach and services for victims of specific crime types, specific victim characteristics, and availability;
- the accessing and providing services to all crime victims;
- the need for training and education for direct victim service providers; and
- funding for direct victim services.

Within the FY 2016 application's proposed plan, the Council explained it would use the data collected from the needs assessment completed in 2015 and that it would utilize a formula for distributing VOCA funding. The formula would allow the Council the ability to continue to fund programs for additional years if the funding were to expire. In addition, the Council stated in the proposed plan it held a meeting where subrecipients were given the opportunity to discuss services available to crime victims, gaps in service provision, and the needed service within the community. The plan also stated that each year, subrecipients would provide responses to a series of questions that provide insight into trends, needs and issues facing victims across the state. That information, the data collected from the needs assessment, along with the applications received from subrecipients would be used to determine unmet needs and gaps in services. As such, the proposed plan detailed that funding would be directed towards those areas.

Within the grant application proposed plan, the Council also stated that with the increase in FY 2015 VOCA funding it would be able to grant an additional \$3 million to existing programs and provide funding to three new programs that provide direct services to underserved populations. We found that the Council did fund three additional programs with the FY 2015 VOCA funds and granted an additional \$3 million using FY 2016 VOCA funds. However, when we inquired about the written allocation plan documenting the information detailed within the FY 2016 application's proposed plan, we determined no documented allocation plan existed. Furthermore, Council officials were unaware as to how the needs assessment or formula used for distributing VOCA funds were employed to distribute the FY 2015 and 2016 funds.

The Executive Director stated that the Council plans to conduct another needs assessment and utilize that to create an allocation plan. In our judgment, as

part of this effort, the Council should assess how to provide subawards to new recipients and work with current subrecipients to implement projects and efforts that address the needs unique to that area and the state. This assessment should help position the Council to more effectively use any increase in VOCA funds for the expansion of victim services in the future. Therefore, we recommend that OJP work with the Council to develop and implement a plan to identify additional victim needs throughout the state so that it can effectively implement its grant program and meet the needs of victims.

### *Subaward Selection Process*

To assess how the Council granted its subawards, we identified the steps that the Council took to inform, evaluate, and select subrecipients for VOCA funding. According to the Council's Awarding to Subrecipient Policy and Procedure, the Council solicits for new subrecipients annually by issuing an RFP during the first 2 weeks of December for the grant cycle that will begin July 1st, ending June 30th the following calendar year. The RFP is published in legal notices, as well as posted on the Council's website. The completed applications, due by the third week in March, are then forwarded to the Council for a risk assessment.

The risk assessment for existing programs is based on the following criteria: (1) compliance with state and federal rules and regulations; (2) fiscal management; (3) facility inspection; (4) program performance goals; (5) timely and accurate quarterly reports; and (6) compliance with requests from the Council in a timely manner. New programs' risk assessments are determined based on an initial site visit where factors such as the program's capability to provide services, as well as the program's ability to comply with rules and regulations set forth by the VOCA Guidelines and the Council, are considered.

The applications are then scored by Council officials. The Council's Awarding to Subrecipient Policy and Procedure goes on to describe that once the allocation amounts are determined, all programs are notified immediately by email and a posting on the Council website. The Council also holds an annual conference where the subrecipients who received funding are announced and the subrecipient's contracts are established.<sup>4</sup>

We discussed the process with the Council officials and they explained that they scored the applications individually, but then all score sheets were sent to the Executive Director, who would then review all of the score sheets, compile the scores, and determine the award amount.

We reviewed the decisions made by the former Executive Director and do not take exception to any of the awards made to subrecipients during the scope of this audit. However, we believe that concentrating funding decisions with one person potentially puts VOCA funds at increased risk of fraud, waste, and abuse. A better practice would be to establish a more transparent, collaborative process in reaching funding decisions. In an effort to address this concern, the new Executive Director

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<sup>4</sup> Each subrecipient contract runs from July 1 through June 30.

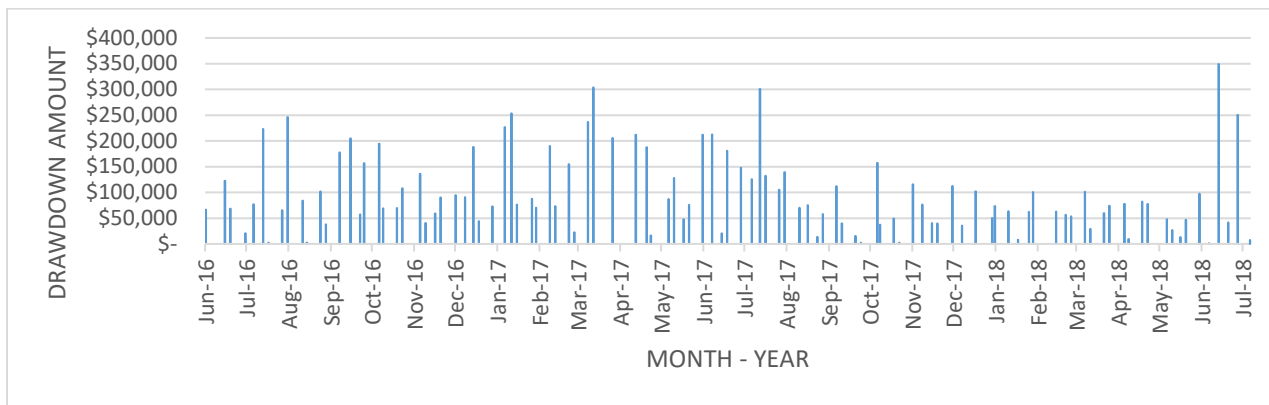
explained that she is focused on updating and restructuring the written policy to include subrecipient soliciting, awarding, and the distributing of VOCA funds. Therefore, we recommend OJP ensure that the Council develop, implement, and adhere to written policies and procedures that include subrecipient soliciting, awarding, and distributing of VOCA funds and ensure proper oversight of all aspects.

Timely Utilization of VOCA Funds

When we examined the amount of VOCA funding utilized by the Council for the grants in our review, we found that as of June 2019, the Council had spent \$10.8 million (or 28 percent) of the \$39.2 million it received between FYs 2016 through 2018.<sup>5</sup> The Council has increased its drawdowns of FY 2016 funds significantly in the last year, however; as of June 2019, approximately \$838,000 remained with 3 months left until the FY 2016 award expires in September 2019.<sup>6</sup>

We reviewed subrecipient award files and accounting records for the FYs 2015 and 2016 VOCA awards and determined that the Council did spend the VOCA funding within the award periods. However, we found that the Council increased its drawdowns of VOCA funds significantly towards the end of the award periods, as shown below in Figures 1 and 2.

**Figure 1**  
**FY 2015 VOCA Funds Drawn Down Over Award Period**  
**Through August 2018**



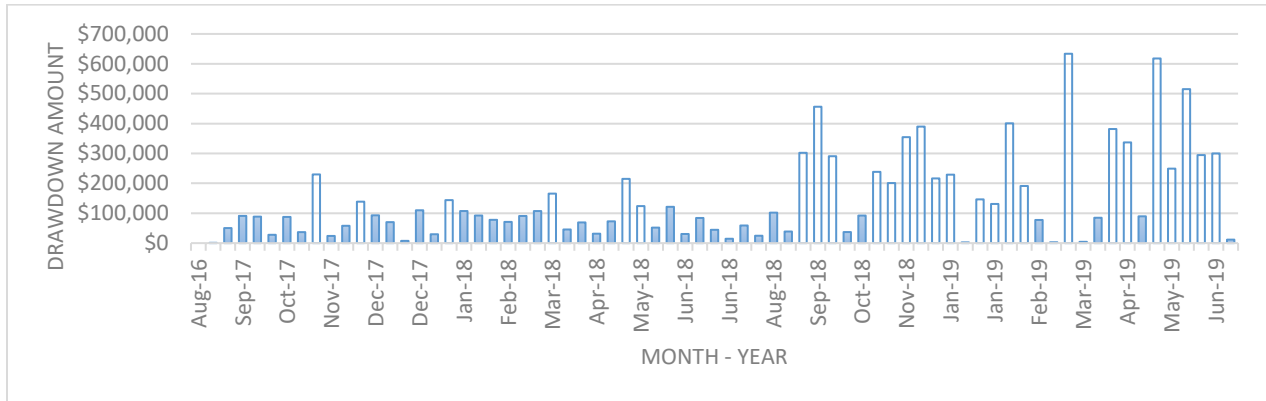
Note: The FY 2015 VOCA award period was from October 2014 through September 2018.

Source: OJP Drawdowns

<sup>5</sup> Of the \$10.8 million, \$4.9 million was expended in 6 months.

<sup>6</sup> The remaining FY 2016 VOCA grant funds, approximately \$838,000, is based on the Council's accounting records as of June 2019.

**Figure 2**  
**FY 2016 VOCA Funds Drawn Down Over Award Period**  
**Through June 2019**



Note: The FY 2016 VOCA award period was from October 2015 through September 2019.

Source: OJP Drawdowns

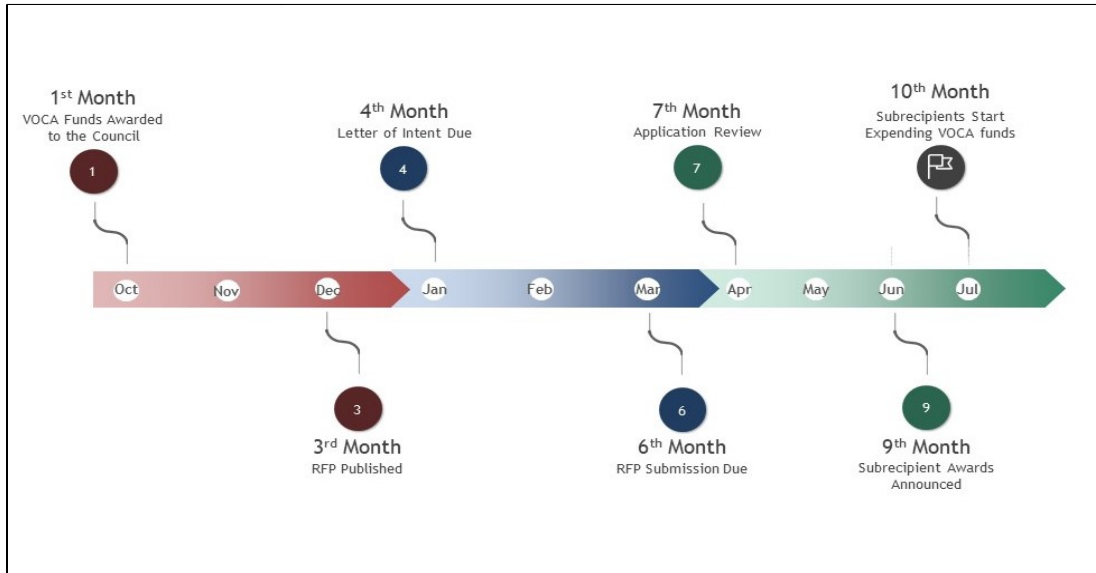
Additionally, we are concerned that significant unused balances remain on the FYs 2017 and 2018 VOCA awards. Specifically, as of June 2019, the balances of the FY 2017 and FY 2018 VOCA grants were \$9.9 million and \$17.7 million, respectively. In our judgment, maintaining these large balances of unused VOCA funds increases the risk of using funds inefficiently or inappropriately because award recipients might feel pressured to expend significant amounts of funds in a short time before the grant end dates.

We discussed this area of concern with Council officials who explained that in addition to managing the increase in VOCA funding, the Council has to obtain spending authority from the Idaho Legislature Joint Finance Appropriations Committee (JFAC), which can also defer the use of VOCA funds. The JFAC reviews state agency budget requests and is the authority on approving agency budgets. Because VOCA funds are a part of the Council's annual budget, the Council must include what it believes will be awarded into the appropriation request to the JFAC. The budget process occurs 18 months in advance of the next state FY. When the budget is set, the dollar amount is the spending authority. According to the current Executive Director, if the Council receives additional funding outside of the budget setting process or the agency exceeds the spending authority, the Council must request an increase to the spending authority. Obtaining an increase request can only occur during the Legislative session, which begins in January each year and runs approximately 90 days.

Additionally, we also believe the Council's subrecipient awarding process has contributed to the delay in using the VOCA funding, as illustrated in Figure 3.

Figure 3

Annual Subrecipient Award Timeline



Note: VOCA grants are awarded with a 4 year award period and the “1<sup>st</sup> Month” shown in the chart is the award period start date that begins the 4 year period.

The RFP, or Request for Proposal, notifies applicants that they may start submitting the subaward applications. The letter of intent is a document completed by the subrecipient and serves as a notification that the subrecipient intends to submit an application for funds administered by the Council.

Source: Council’s Awarding to Subrecipient Policy and Procedure

As shown in Figure 3, due to the Council’s annual subrecipient awarding process, the RFPs are published in December and the letter of intent is due in January. The potential subrecipients have until March to submit the completed proposal, or application. The applications are reviewed by the Council from April until June and the subrecipients awarded VOCA funds may start expending the funds in July. Therefore, VOCA funds are not expended by the subrecipients for at least 10 months after the funds have been received by the Council from OVC. In addition, instead of having the entire 4 year award period tied to each VOCA grant to expend the funds, the Council has 3 years and 2 months.

In our judgment, given that the state’s budget and subawarding processes are contributing to the significant delays in expending VOCA funding, we believe that OJP should coordinate with the Council to provide guidance on appropriate and responsible spending of any remaining CVF funds, and also provide guidance to the Council that returning funds to the CVF is an acceptable outcome versus awarding funds at a faster rate than the state of Idaho’s subrecipients can responsibly manage. In July 2019, the OIG issued a *Review of OJP’s Efforts to Address Challenges in Administering the Crime Victims Fund Programs*.<sup>7</sup> In that report, the

<sup>7</sup> U.S. Department of Justice Office the Inspector General, [Review of the Office of Justice Programs’ Efforts to Address Challenges in Administering the Crime Victims Fund Programs](#), Audit Report 19-34, 55.

OIG recommended that OJP examine States' spending data, comparatively analyze States' spending plans and program execution, assess the causes for any State implementation delays, and apply the results of its review to assist States in developing and executing future spending plans. As a result, we make no additional recommendations in this report.

### *Subaward Requirements*

State administering agencies must adequately communicate VOCA requirements to their subrecipients. To this end, we found that the Council communicated program requirements regarding VOCA-specific award limitations, applicant eligibility requirements, eligible program areas, and reporting requirements to its subrecipients in the subgrant award agreements and posted guidance on its website. However, we found that this guidance did not adequately address the eligible and ineligible uses of funds.

As previously described, the Council solicits for new subrecipients annually by issuing an RFP. Within the RFP, the Council describes the requirements and the eligible and ineligible activities related to the VOCA grant funding. We found several instances within the RFP where information was incorrect. For example, within the RFP's ineligible activities, it details some activities that are allowable per the VOCA Guidelines, including: relocation expenses, public awareness, and legal assistance. The RFP also contains contradicting information regarding eligible costs.

When we reviewed the RFP, we determined that the RFP is not limited to requesting for VOCA funds, but also allows potential subrecipients to apply for other federal and state grants that also provide funding for direct services to victims of crime. As such, when the subrecipient is completing the RFP's budget proposal it does not allow for the subrecipient to distinguish between the different funding sources. Therefore, the subrecipients establish and provide preliminary budgets to the Council for several funding sources. Then, the Council determines and informs the subrecipients of the amounts awarded to them for each funding source. We spoke with several subrecipients who receive VOCA and other funding and they explained that this process is inefficient because it forces them to adjust their internal budgets multiple times. Specifically, subrecipients generate the original budgets based on the estimated funding amounts from the different programs. However, the ultimate awards may not be an accurate representation of those original estimates, and therefore they sometimes must revise their planned budgets. This practice does not lend itself to ensuring the most efficient communication of VOCA funding, nor does it plan for the distribution of funding to subrecipients that help serve victims of crime. After discussing these issues with the Council, the Executive Director explained that the application will likely be redone this year to accommodate all service providers and may separate the applications for the different funding sources.

The Council's current RFP process is providing subrecipients with inaccurate information and is not efficient, which may prevent potential subrecipients from applying. Therefore, we recommend that OJP ensure that the Council update,

implement, and adhere to an RFP process with complete and accurate VOCA requirements.

## **Program Requirements and Performance Reporting**

To determine whether the Council distributed VOCA victim assistance program funds to enhance crime victim services, we reviewed Council subawards to local direct service providers. We also reviewed Council performance measures and performance documents used to track goals and objectives. We further examined OVC solicitations and award documents and verified Council compliance with special conditions governing recipient award activity.

We concluded that the Council used its VOCA funding to provide services to crime victims. However, based on our assessment in the areas of program requirements and performance reporting, we found that the Council: (1) did not fulfill the distribution requirements to priority victim groups, (2) did not implement adequate procedures to compile Annual Performance Reports, and (3) did not comply with all special conditions tested.

### *Priority Areas Funding Requirement*

The VOCA Guidelines require that the Council award a minimum of 10 percent of the total grant funds to programs that serve victims in each of the four following categories: (1) child abuse, (2) domestic abuse, (3) sexual assault, and (4) previously underserved. The VOCA Guidelines give each state administering agency the latitude for determining the method for identifying "previously underserved" crime victims.<sup>8</sup> The Council defines underserved crime victims as those who are victims of the following victimization types: survivors of homicide, assault (nondomestic violence and nonsexual assault related), robbery, adults molested as children, elder abuse, property crimes, stalking, and driving under the influence crashes. Idaho is a very rural state so also taken into account for underserved is geographic poverty, tribal, and limited English proficiency information.

We examined how the Council allocated VOCA subawards to gauge whether it was on track to meet the program's priority areas distribution requirements. However, we found that the Council did not allocate VOCA funds based on priority area requirements. Further, to determine what the Council's VOCA subaward allocation was based on, we: (1) reviewed all of the Council's award documentation and accounting records to determine a complete listing of subrecipients, the subaward amounts, and the amount of VOCA funds expended for each subrecipient, and (2) requested the Council provide the priority area for which each subrecipient would represent. Using that information, we found that the Council was not in compliance with the sexual assault and the previously underserved priority victim categories.

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<sup>8</sup> Methods for identifying "previously underserved" victims may include public hearings, needs assessments, task forces, and meetings with statewide victim services agencies.

The absence of minimum required funding in a designated priority category could adversely impact those victims that are most in need of assistance. We recommend OJP ensure that the Council develop, implement, and adhere to written policies and procedures for ensuring VOCA funds are disbursed in accordance with the priority category funding requirement.

*Annual Performance Reports*

Each state administering agency must annually report activity funded by any VOCA awards active during the federal fiscal year to the OVC through the Grants Management System. As of FY 2016, OVC also began requiring states to submit performance data through the web-based Performance Measurement Tool (PMT).

For the victim assistance grants, the states must report the number of agencies funded, VOCA subawards, victims served, and victim services funded by these grants. Additionally, according to a special condition of the victim assistance grants, the state must collect, maintain, and provide data that measures the performance and effectiveness of activities funded by the award.

We found that the Council submitted annual performance reports to the OVC for FYs 2016, 2017 and 2018. We reviewed the Annual Performance Reports covering the fiscal years within our audit scope. Table 2 presents summary data of selected reported measures from these annual performance reports.

**Table 2**  
**Summary from Idaho State**  
**Victim Assistance Program Annual Performance Report**  
**FYs 2016-2018**

<b>Performance Categories</b>	<b>2016 Data Reported</b>	<b>2017 Data Reported</b>	<b>2018 Data Reported</b>
<b>Total Number of Victims Served</b>	167,284 <sup>a</sup>	26,876	32,111
<b>Total Number of New Victims Served</b>	15,776	21,271	20,164
<b>Number of Instances When Services Provided</b>	382,123	239,801	234,964

<sup>a</sup> While there are many factors that could affect the number of victims reported as served, for example a reduction in crime or more accurate reporting by subrecipients, due to a lack of documentation and high personnel turnover at the Council, the cause of the decline in the reported total number of victims served between 2016 and 2017 could not be determined.

Source: Idaho Annual State Performance Reports

As the Council did not have formal written performance reporting policies and procedures for preparing the Annual Performance Reports, we discussed with a Council official how performance report data is compiled for the annual reports.



While states may provide subrecipients direct access to report quarterly data for state review, the Council collects this information from its subrecipients on a quarterly basis and then enters the data into PMT after reviewing the subgrantee performance reports for issues such as large changes in numbers from one quarter to the next. After the Council has submitted its final quarterly report for the fiscal year, PMT generates a final annual report. A Council employee then downloads this report and uploads it to the OJP Grant’s Management System as the state’s Annual Performance Report.

Based on this description of the process, to determine the validity of the Council’s process for compiling annual reports, we reviewed a judgmental sample of six subrecipients’ performance reports submitted to the Council for one quarter of each fiscal year within the scope of the audit. We compared those reports to PMT to test the accuracy of the Council’s process for entering data into PMT. As shown in Table 3, based on our testing, we found the Council’s data entry process exhibited a low overall error rate for each of the fiscal years reviewed. However, in the *Performance Monitoring* section below, we describe our concerns with the accuracy of the reports that subrecipients submit to the Council.

**Table 3**  
**Council PMT Data Entry Error Rates**  
**For Fiscal Years 2016, 2017 and 2018**

Fiscal Year	Number of Errors Identified	Number of Fields Tested	Error Rate <sup>a</sup>
2016	39	684	6%
2017	9	702	1%
2018	61	708	9%

<sup>a</sup> Percentages are rounded.

Source: OIG Analysis of PMT data and State Annual Performance Reports

Despite the low overall data entry error rate, we determined that the majority of these errors were made entering data from only two subrecipient performance reports, one in FY 2016 and one in FY 2018. In FY 2016, the errors entering one subrecipient’s performance report data accounted for approximately 67 percent of the total errors found. In FY 2018, the errors entering one subrecipient’s performance report data accounted for approximately 72 percent of the total errors found. As previously stated, the Council does not have formal written performance reporting policies and procedures. Additionally, based on our discussions with Council personnel, there is no process in place to ensure that the employee entering data into PMT is correctly inputting the data received from the subrecipients.

We also noted concerns with the performance reports. The reports we received were undated, without any indication of fiscal year and quarter. In one instance, it was determined the Council had provided a draft report to auditors rather than a final report which was later provided by the subrecipient. These

Council report management issues may contribute to data entry errors and the submission of unreliable performance data to the OVC and indicate noncompliance with the Financial Guide's requirement that the award recipient ensure that valid and auditable source documentation is available to support all data collected. We therefore recommend that OJP ensure that the Council develop formal written performance reporting policies and procedures to ensure that it complies with the requirements of the Financial Guide as well as to ensure the accuracy and reliability of data submitted to OVC.

After discussing these issues with the Council, the Executive Director stated that the Council plans on completing performance reporting policies and procedures. The Executive Director also stated that Council staff is working on developing a web-based subrecipient performance report where subrecipient programs will select from a drop down menu, the name of the person submitting the report, the date of submission and the fiscal year and quarter for the report being submitted. We believe implementation of these planned improvements will help ensure that the Council complies with the requirements of the Financial Guide and will better ensure the accuracy and reliability of data submitted to OVC.

#### *Compliance with Special Conditions*

The special conditions of a federal grant award establish specific requirements for grant recipients. In its grant application documents, the Council certified it would comply with these special conditions. We reviewed the special conditions for each of the VOCA victim assistance program grants and identified special conditions that we deemed significant to grant performance, which are not otherwise addressed in another section of this report.

The first special condition we reviewed was the required submission of a Subgrant Award Report (SAR). For each victim assistance grant, the states must provide a SAR to OVC that includes basic information on each subrecipient that receives victim assistance funds within 90 days of the award.

We compared the 2016 VOCA award SARs to the Council's 2017 and 2018 subaward documentation. Table 4 shows the errors we identified from our review of the Council's SARs.

**Table 4**  
**SAR Reporting Compared to Council Records,**  
**2017 Subawards**

Description	Total Awards		Subawards Funded from Federal FY 15 Grant to Council		Subawards Funded from Federal FY 16 Grant to Council	
	Number of Subawards	Value of Subawards	Number of Subawards	Value of Subawards	Number of Subawards	Value of Subawards
Reported in SARs	36	\$6,364,464	13	\$2,676,077	23	\$3,688,387
Supported in OIG Analysis of Council Records	36	6,560,400	36	\$6,560,400	0	\$0
Difference	0	(195,936) <sup>a</sup>	(23)	(\$3,884,323)	23	\$3,688,387

<sup>a</sup> The \$195,936 difference between the value of the subawards funded from the 2015 VOCA award and the value of the subawards supported by documentation resulted from the Council reporting different amounts in its SARs than what was indicated in its award documentation. We discuss this issue below.

Source: OIG analysis of Council Subgrant Award Reports and Council Subaward Documentation

As shown by Table 4, the Council's SARs indicated that \$3,688,387 of its 2017 subawards, or over 50 percent of the total \$6,364,464 reported to OVC as subawarded, used 2016 VOCA funds. However, we reviewed the Council's subaward documentation and found that this documentation indicated that none of the Council's 2017 subawards used 2016 VOCA grant funds, but instead used 2015 VOCA grant funds to fund all 36 awards.<sup>9</sup>

In addition to inaccurate award source information, we also found that the Council was not accurately reporting the total amount it was subawarding in its SARs. A review of the Council's subaward documentation compared to its SARs showed that the total of the amounts included in the 2017 subawards' SARs was \$195,936 less than what was supported by the Council's subaward documentation. We further determined that in 2018 the Council reported \$305,374 less in subawards than what the Council's subaward documentation supported. Based on the incorrect VOCA award source and subaward amount information found in the Council's SARs, we determined that that Council did not comply with this special condition and provided OVC with an inaccurate picture of its VOCA award spending.

This special condition further requires the state to submit the SARs within 90 days of awarding funding to subrecipients. A review of the subaward documentation and the SARs shows that the Council has not timely submitted its SARs to OVC. For its 2017 subawards, the Council submitted 11 of its 36 SARs

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<sup>9</sup> We did not identify any incorrect VOCA grant award source information in the Council's 2018 subaward SARs. All of the Council's 2018 subawards, totaling \$9,515,449, were accurately reported as using 2016 VOCA grant funding in the SARs and the subaward documentation.

beyond the 90 day required timeframe. In its 2018 subaward cycle, the Council subawarded initial awards in July 2018 and then amended these subawards with additional funding in October 2018. We found that the Council submitted the SARs an average of 95 days after the initial subaward date, but within an average of 33 days after the subaward amendment dates. However, the subawards were amended an average of 95 days after the initial award and therefore a SAR should have been submitted before the subawards were amended to comply with this special condition. We therefore determined that the Council has not complied with the special condition that it submit SARs within 90 days of its subawards.

Based on the above, we recommend that OJP ensure that the Council submits accurate and timely SARs to comply with this special condition.

As a condition of these grants, the state agreed to ensure that the primary point of contact and all financial points of contact for VOCA successfully completed an "OJP financial management and grant administration training" 120 days after accepting its VOCA award. We found that the IDHW financial points of contact had successfully completed this training. However, as of May 2019, the Council could not provide documentation that the current primary point of contact had completed this training. After we brought this to the attention of the Council, the current primary point of contact completed this required training.

We also reviewed the Council's compliance with three other special conditions. The Council agreed to: (1) comply with applicable requirements regarding registration with the System for Award Management (SAM) and to comply with applicable restrictions on subawards to first-tier subrecipients that do not acquire and provide a Data Universal Numbering System (DUNS) number, (2) send at least one key grantee official to the annual VOCA National Training Conference, and (3) monitor subrecipient compliance with civil rights laws and nondiscrimination provisions. We determined that Council officials met these three special conditions for the 2016 through 2018 VOCA awards.

## **Grant Financial Management**

Award recipients must establish an adequate accounting system and maintain financial records that accurately account for awarded funds. To assess the adequacy of the Council's financial management of the VOCA grants, we examined expenditures charged to the grants, subsequent drawdown requests, and resulting financial reports. To further evaluate the financial management of the VOCA grants, we also reviewed the Idaho Single Audit Reports for FYs 2015 through 2017 and determined that there were no significant deficiencies or material weaknesses specifically related to the Council. We also interviewed Council personnel who were responsible for financial aspects of the grants, reviewed Council written policies and procedures, inspected award documents, and reviewed financial records.

As discussed below, in our overall assessment of grant financial management, we identified \$82,420 in unallowable and unsupported subrecipient expenditures, \$3,492 in unallowable administrative expenditures, and found that the Council: (1) did not accurately track time that Council personnel spent on the

VOCA program, (2) did not adhere to its internal purchasing policies and procedures, and (3) did not have formal written drawdown policies and procedures.

### *Grant Expenditures*

State administering agency victim assistance expenses fall into two overarching categories: (1) reimbursements to subrecipients – which constitute the vast majority of total expenses, and (2) administrative expenses – which are allowed to total up to 5 percent of each award. To determine whether costs charged to the awards were allowable, supported, and properly allocated in compliance with award requirements, we tested a sample of transactions from each of these categories by reviewing accounting records and verifying support for select transactions.

### Subaward Expenditures

Subrecipients may request payment on a bi-weekly basis using the approved Council reimbursement form. As of January 2019, we found that the Council paid a total of \$6,104,155 in FY 2016 VOCA victim assistance program funds to its subrecipients.

We evaluated the Council's financial controls over VOCA victim assistance grant expenditures by reviewing a sample of subrecipient transactions to determine whether the payments were accurate, allowable, and in accordance with the VOCA Guidelines. We judgmentally selected 6 of 38 subrecipients for our testing. During our site visits to those six subrecipients, we reviewed a total of \$143,175 in reimbursement payments. The transactions we reviewed included costs in the following categories: (1) personnel, (2) fringe benefits, (3) travel, (4) contracts/consultants, (5) supplies, and (6) operating costs. The total payments made to the subrecipients from the Council, the amount of expenditures tested, and the questioned costs identified for each subrecipient are shown in Table 5 below.

**Table 5**  
**Council Subrecipient Expenditures Tested and Questioned Costs**  
**as of January 2019**

Subrecipient	Service Type	Total Payments	Sample Total	Unallowable Questioned Costs	Unsupported Questioned Costs
A	Domestic Abuse	\$ 238,723	\$ 12,018	\$ 4,004	\$ 6,706
B	Child Abuse	234,774	53,589	6,836	9,676
C	Domestic Abuse	696,765	23,478	0	0
D	Child Abuse	147,066	11,818	2,243	6,913
E	Domestic Abuse	486,898	24,239	20,269	21,667
F	Domestic Abuse	133,547	18,033	0	4,108
<b>Total:</b>		<b>\$ 1,937,773</b>	<b>\$ 143,175</b>	<b>\$ 33,351</b>	<b>\$ 49,069</b>

Source: Council Accounting Records

We found \$82,420 in unallowable and unsupported subrecipient expenditures. In our review of the expenditure supporting documentation, we identified the following:

- Five of the six subrecipients had inadequate controls over payroll costs. Specifically, payroll costs did not agree with timecards or payroll reports or payroll costs were not based on actual time spent on VOCA related activities.
- Five of the six subrecipients had unallowable and unsupported expenses based on the subrecipient’s budget or the VOCA Guidelines.
- Two of the six subrecipients utilized and paid contractors, but the subrecipients failed to include the contractors in the budgets approved by the Council.
- One subrecipient received VOCA funds for expenses that were attributed to another funding source.

Based on the results of the subaward expenditure testing, we recommend that OJP remedy \$33,351 in unallowable subrecipient costs and \$49,069 in unsupported subrecipient costs.

Administrative Expenditures

The state administering agency may retain up to 5 percent of each grant to pay for administering its crime victim assistance program and for training. For the victim assistance grant program, we tested the Council’s compliance with the 5 percent limit on the administrative category of expenses, as shown in Table 6.

**Table 6**

**Administrative Expenditures as of January 2019**

<b>Award Number</b>	<b>Total Award</b>	<b>State Administrative Expenditures</b>	<b>Administrative Percentage</b>
2016-VA-GX-0060	\$11,652,588	\$74,036	0.64%
2017-VA-GX-0056	9,867,400	0	0
2018-V2-GX-0002	17,703,118	0	0

Source: Council Financial Records

As of January 2019, we found that with 8 months remaining on the award funds, the Council had used less than 1 percent of the FY 2016 VOCA assistance grant on administrative costs. Therefore, the Council is positioned to comply with the 5 percent limit.

In addition to testing the Council's compliance with the 5 percent administrative allowance, we also tested a sample of these administrative expenditures. We judgmentally selected a total of 88 expenditures totaling \$34,225 for our administrative expenditure sample which included payroll, fringe benefits, travel, and conference costs.

For the salary and fringe benefits testing, we judgmentally selected 63 personnel expenditures associated with 3 Council employees for a total of \$12,130 from 3 nonconsecutive pay periods. We reviewed payroll data reports, timesheets, and accounting records to determine whether the costs charged to the award were properly authorized, allowable, supported, and allocated in compliance with award requirements. VOCA Guidelines and the Financial Guidelines state that if the staff person has other functions, the proportion of their time spent on VOCA programs must be documented. The three Council employees we selected performed functions outside of the victim assistance program. In addition, according to the Financial Guide, documentation must support a reasonable allocation or distribution of costs when work is conducted on multiple grant programs.

Within the Council's application for funding, it detailed Council officials would utilize the VOCA administrative funds and the percentage of time they would work on the VOCA awards. We reviewed the timesheets for the three Council employees and found the Council did not comply with the approved percentage of personnel costs as detailed in the application for VOCA funding. As a result, we questioned \$3,276 in unallowable personnel expenditures that exceeded the approved personnel percentage.

We also tested 25 non-personnel expenditures totaling \$22,095. Again, we reviewed the Council's supporting documentation to determine if costs charged to the award were properly authorized, allowable, supported, and allocated in compliance with award requirements. We found all of the travel costs were

properly authorized, allowable, and supported. We also determined that the Council presents a training conference on crime victim assistance each year for the subrecipients and any other interested parties. We identified \$16,170 of the following conference costs were included as administrative expenses: rental agreements, accommodations, speaker fees, and labor charges. From our review, we found the accommodation and speaker fee costs were not in compliance with award requirements.

The Council expensed room accommodations for 14 rooms ranging from 1 to 3 nights and we found 1 room overcharged the allowable Federal per diem rate by \$15 for 2 nights. The Financial Guide states if the lodging rate is not the Federal per diem rate or less, none of the lodging costs associated with the event are allowable costs to the award. As a result, we are questioning the lodging cost for that room, \$216, as unallowable.

We also found two expenses, each for \$650, for speaker fees. We determined that the speaker's contracts were written and signed by the previous Executive Director, which was not in compliance with the IDHW's Division of Purchasing policies as the Purchasing Department was unaware of the contracts. Based on our review of these contracts, we determined that the speakers fulfilled their contract responsibilities, as a result, we are not questioning these costs. However, we do recommend OJP ensure the Council adheres to its internal purchasing policies and procedures for any future contracts.

#### *Drawdowns*

Award recipients should request funds based upon immediate disbursement or reimbursement needs, and the grantee should time drawdown requests to ensure that the federal cash on hand is the minimum needed for disbursements or reimbursements made immediately or within 10 days. VOCA grant funds are available for the fiscal year of the award plus 3 additional fiscal years. To assess whether the Council managed grant receipts in accordance with these federal requirements, we compared the total amount reimbursed to the total expenditures in the Council's accounting system and accompanying financial records.

Council staff stated that they review subrecipient expenditure documentation and approved subrecipient expenses are then electronically transmitted to IDHW who completes the drawdown requests. Table 7 shows the total amount drawn down for each grant as of June 2019.



**Table 7**  
**Amount Drawn Down for Each Grant as of June 2019**

<b>Award Number</b>	<b>Total Award</b>	<b>Award Period End Date</b>	<b>Amount Drawn Down</b>	<b>Amount Remaining</b>
2016-VA-GX-0060	\$11,652,588	09/30/2019	\$10,408,558	\$1,244,030
2017-VA-GX-0056	9,867,400	09/30/2020	0	9,867,400
2018-V2-GX-0002	17,703,118	09/30/2021	2 <sup>a</sup>	17,703,116
<b>Total:</b>	<b>\$39,223,106</b>		<b>\$10,408,560</b>	<b>\$28,814,546</b>

<sup>a</sup> This \$2 drawdown occurred in September 2018 and was the result of the IDHW's automated cost allocation process which was not timely redirected to the grant that was currently in use.

Source: OJP Drawdown Reports

We reviewed the drawdowns and the accounting records for the FY 2016 VOCA grant award and found that, overall, the IDHW primarily drew down funds on a reimbursement basis. However, we identified instances where the IDHW drew down funds in excess of expenditures. During this audit, we identified two drawdowns where \$24,575 in FY 2016 funds were drawn down within 4 days of each other with no corresponding expenses in the accounting records. These funds were not disbursed within 10 days resulting in excess cash on hand of approximately \$24,575 for 22 days until sufficient expenses occurred.

As stated above, the IDHW does not have formal, finalized drawdown policies and procedures. We believe that a lack of formal, written drawdown policies and procedures contributes to the inaccuracy of the IDHW's drawdowns. We recommend that OJP ensure the IDHW develops formal written drawdown policies and procedures to ensure compliance with the DOJ Grants Financial Guide.

*Matching Requirement*

VOCA Guidelines require that subrecipients match 20 percent of the project cost. The purpose of this requirement is to increase the amount of resources available to VOCA projects, prompting subrecipients to obtain independent funding sources to help ensure future sustainability. Match contributions must come from non-federal sources and can be either cash or an in-kind match.<sup>10</sup> VOCA Guidelines state that any deviation from this policy requires OVC approval. The state administering agency has primary responsibility for ensuring subrecipient compliance with the match requirements.

The Council communicated the 20 percent match requirement to its subrecipients in the RFP application packet provided to each subrecipient. The subrecipients report their matching contributions quarterly using the Council's

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<sup>10</sup> In-kind matches may include donations of expendable equipment, office supplies, workshop or classroom materials, workspace, or the value of time contributed by those providing integral services to the funded project.

Quarterly Financial Report. To determine if subrecipient matching costs were accurate, supportable, and reasonable, we selected a judgmental sample of 60 transactions from 6 subrecipients, in the amount of \$241,804. To review the provision of matching funds, we reviewed subrecipient transactions for personnel expenditures and fringe benefits, cash donations, in-kind donations, and in-kind volunteer time. We found the documentation provided by the subrecipients complied with the matching cost requirement.

### *Financial Reporting*

According to the 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 IDHW submitted accurate Federal Financial Reports, we compared the four most recent reports to the IDHW's accounting records for Grant Numbers 2016-VA-GX-0060, 2017-VA-GX-0056, and 2018-V2-GX-0002. We determined that quarterly and cumulative expenditures for the reports reviewed generally matched the accounting records for all grant awards reviewed.

### **Monitoring of Subrecipients**

According to the Financial Guide, the purpose of subrecipient monitoring is to ensure that subrecipients: (1) use grant funds for authorized purposes; (2) comply with the federal program and grant requirements, laws, and regulations; and (3) achieve subaward performance goals. As the primary grant recipient, the Council must develop policies and procedures to monitor subrecipients. To assess the adequacy of the Council's monitoring of its VOCA subrecipients, we interviewed the Council personnel, identified monitoring procedures, and obtained records of interactions between the Council and its subrecipients. We also conducted site visits of six subrecipients, which included interviewing personnel and reviewing accounting and performance records.

According to the Council's monitoring policy and procedures, the Council will visit every subrecipient at a minimum of once every 2 years. In addition, informal visits, evaluation visits, and intervention visits are also made to subrecipients. The Council's monitoring policy also details that on-site visits are made for three purposes:

1. To monitor a subrecipient's compliance with state and federal rules and regulations, fiscal management, and organizational structure;
2. To provide training and technical assistance; and
3. To assure that the Council has a clear understanding of the delivery of victim services in the state and a working relationship with the service providers.

During an on-site visit, the Council's monitoring policy states that the subrecipient's designated grant project director and any other project staff are interviewed by Council officials and the monitoring checklist questions are discussed. Programmatic statistic information are also reviewed to determine progress toward meeting objectives as outlined in the subrecipients grant project

proposal. Council officials prepare a written report and complete a risk assessment based on information obtained from the on-site visit. The completed report and the risk assessment is then reviewed and signed by the Executive Director. The report is then sent to the subrecipient and details all requirements and recommendations to be implemented. For any additional requirements imposed, documents needed, or recommendations made, the subrecipient is required to submit the required information and if needed, a corrective action plan, within 30 days. After all requirements and recommendations have been resolved, the Council sends a letter to the subrecipient verifying compliance.

Similar to the Council's policy, the VOCA Guidelines require that state administering agencies conduct on-site monitoring of all subrecipients at least once every 2 years. We reviewed all of the on-site monitoring visit reports conducted during the scope of our audit. We found 4 of the 38 subrecipients were not visited as required by VOCA Guidelines. We also determined in order for the Council to be in compliance for this year, 22 on-site monitoring visits should be conducted, but we found only 18 subrecipient on-site monitoring visits are planned for 2019. In addition, we concluded that the informal visits, evaluation visits, and intervention visits were not occurring as suggested in the Council's monitoring policy and we found no evidence that the monitoring risk assessments were completed as required. A Council official explained that it was behind on monitoring visits due to staffing issues. As a result, we recommend that OJP ensure the Council enhances and implements its written subrecipient monitoring procedures to ensure subrecipients are monitored in accordance with VOCA requirements.

In our overall assessment of the Council's subrecipient monitoring, we found that the existing Council monitoring procedures need to be strengthened to provide sufficient assurance that subrecipients are appropriately using and reporting VOCA funds. Our results are detailed in the sections below.

### *Financial Monitoring*

During subrecipient monitoring visits, Council officials complete a checklist and produce a report with information that includes aspects of program operations, program implementation, and general financial and performance information. In addition, a Council official stated that during subrecipient monitoring visits the processes for documenting expenses and submitting reimbursement forms are reviewed with the subrecipient.

The Council also requires its subrecipients to complete the approved reimbursement form on a bi-weekly basis in order to request payment. In addition to the reimbursement form, the subrecipients are required to provide all related documents (i.e., invoices, statements, and payroll sheets) to support expenditures for the requested amount. A Council official reviews the supporting documentation to ensure the requested amounts are allowable expenditures per the VOCA Guidelines and the approved Council budget. Then, the Council official forwards the payment request to the Executive Director for approval. The request is then provided to another Council official to input the request into the IDHW payment

system. The IDHW accounting staff reviews the request for proper coding, vendor information, and then processes the payment.

We determined the Council did have monitoring policies and procedures in place, but they were not always followed or accomplished as intended. For example, the subrecipient checklist included questions regarding the subrecipient payroll, if timesheets were used, and if the timesheets detailed the time spent on VOCA grants. However, as discussed in the Subaward Expenditures section, we identified \$82,420 in questioned costs for unallowable and unsupported subrecipient expenditures with a majority of the questioned costs due to payroll costs not agreeing with timecards or payroll costs that were not based on actual time spent on VOCA related activities. We also noted that the subrecipients provided the supporting documentation to the Council. However, the Council failed to identify the unallowable and unsupported expenditures we identified in the Subaward Expenditures section.

Considering this, we recommend that OJP ensure that the Council clarify timekeeping requirements to ensure that its subrecipients properly allocate salary and fringe costs based on actual time worked on VOCA grant projects. We further recommend that OJP ensure that the Council strengthens its monitoring policies and practices to ensure that financial reimbursements submitted by subrecipients are accurate, allowable, and supported as required by VOCA requirements.

Lastly, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards requires a pass-through entity to develop procedures to ensure that subrecipients expending \$750,000 or more in Federal awards during the subrecipient's fiscal year have a single audit or a program-specific audit conducted for that year.<sup>11</sup> These procedures need to:

- Evaluate the impact of subrecipient activities on the recipient organization's ability to comply with applicable Federal regulations;
- Issue a management decision on audit findings within 6 months after receipt of the subrecipient's audit report, and
- Ensure that the subrecipient takes timely and appropriate corrective action on all audit findings.

During our review, we found that two of the six subrecipients met the single audit threshold and the audits were completed as required. However, we also found that the Council had not developed the required procedures to ensure compliance with the single audit requirement as required by the Financial Guide. We asked Council officials about their process to ensure compliance with this requirement and were initially told that single audit information is reviewed as a part of the award application and selection process. However, a Council official told us that she is unaware of any actions the Council has taken to ensure compliance with this requirement and that there is no process to ensure subrecipient corrective action is taken if deficiencies are identified in an audit. Without a process in place to review deficiencies identified and ensure subrecipient corrective action, there is

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<sup>11</sup> 2 C.F.R. 200.

an increased risk that grant funds could be used inefficiently or inappropriately. We recommend that OJP ensure the Council develops policies and procedures to ensure subrecipient compliance with the single audit requirement.

Following our inquiries, we were informed by a Council official that the Council anticipates putting a process in place to maintain records of the required subrecipients' single audits and if a subrecipient has asked for funding to cover an audit, a copy of the audit will be requested. We believe implementation of these planned enhancements of the Council's monitoring of subrecipients will help ensure compliance with the single audit requirement.

### *Performance Monitoring*

According to the Financial Guide, an award recipient must ensure that valid and auditable source documentation is available to support all data collected for each performance measure required. In furtherance of this requirement, the Council's monitoring policy and procedures require a review of subrecipient statistical information to determine progress toward meeting objectives. As previously mentioned, the policy includes completing a monitoring risk assessment that requires scoring the subrecipient on the timeliness and accuracy of its quarterly reports. However, as stated in the Monitoring of Subrecipients section above, we found no evidence that the monitoring risk assessments were completed for any on-site monitoring.

Additionally, Council personnel are required to complete a monitoring checklist during subrecipient site visits. This checklist requires Council personnel to provide a response as to how the subrecipient collects and reports its quarterly performance measures, but does not explicitly require a review of the subrecipient's documentation supporting the accuracy of its quarterly reports.

We reviewed monitoring reports for a judgmental sample of subrecipients and found that they included short summaries of the subrecipients' processes to collect and compile performance report information. However, only one of the four checklists we reviewed included any indication that a verification of performance measures was completed.<sup>12</sup> A May 2017 site visit monitoring report included a brief statement that the subrecipient was "double counting in many categories." Two years later, in May 2019, we requested information from the Council on the double counting and any subsequent clarification or training provided to the subrecipient, but were told that it had no knowledge of the issue.<sup>13</sup> We believe this raises concerns regarding the accuracy of subrecipient performance data submitted to the Council and, ultimately, to OJP.

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<sup>12</sup> We tested six subrecipients total but the Council could not locate monitoring reports for two of these six subrecipients.

<sup>13</sup> In the Monitoring of Subrecipients section above, we recommended that OJP ensure the Council enhances and implements its written subrecipient monitoring procedures to ensure subrecipients are monitored in accordance with VOCA requirements.

As previously stated, the Council requires subrecipients to submit quarterly performance reports. A Council official explained that this subrecipient performance report was created to correspond with the data required for PMT reporting. A Council official further said that reviews of these quarterly reports focus on issues, such as large swings in numbers from one quarter to the next, and if discrepancies were identified, the subrecipient would be contacted to verify that the numbers reported in these reports were correct. The Council official then enters the data into PMT on a quarterly basis.

To determine the accuracy of subrecipients' quarterly performance reports submitted to the Council, we selected a judgmental sample of six subrecipients and a judgmental sample of those subrecipients' reported performance measures to test for accuracy and completeness. In general, our testing found inaccuracies in the performance data reported by all six subrecipients, but the extent of the inaccuracies differed greatly. While we found the data for two subrecipients to be off by small amounts in a few testing categories, we found one or more significant inaccuracies in the performance data submitted by four of the six subrecipients.<sup>14</sup> Further, 2 of these 4 subrecipients had inaccuracies in all 14 performance metrics tested across all 3 fiscal years. These two subrecipients could not provide adequate support for the numbers reported. Additionally, one of these two subrecipients was previously identified as double counting in many categories. We also note that these four subrecipients with one or more significant inaccuracies in the tested performance data did not have formal written policies regarding their performance data collection and reporting processes, while the two subrecipients with zero significant inaccuracies had robust policies and procedures for the collecting, documenting and reporting of their performance metrics.

We also found that one of the subrecipients submitted performance reports with obvious inconsistencies. Table 8 provides an example of the reporting inconsistencies we identified.

**Table 8**  
**Subrecipient A's**  
**Performance Report Inconsistencies**

Subrecipient	Total Individuals Served	Individuals Who Received Services – Information & Referral	Individuals Who Received Services – Personal Advocacy and Accompaniment
A	407	993	10,347

Source: Subrecipient A's Performance Reports

While our review of the PMT data submitted shows that the Council reported that Subrecipient A served 407 individuals rather than the numbers from the subrecipient performance report, we found no evidence that these inconsistencies were discussed with the subrecipient. We further note that this is also the same subrecipient who was identified for double counting many categories in the May

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<sup>14</sup> We deemed an inaccuracy in performance reporting to be significant when the number supported by the subrecipient differed from what was reported by 10 or more.

2017 Council site visit. We identified another instance of a different subrecipient with a similar report inconsistency.

Based on the inaccuracies in subrecipient performance data and the inconsistencies noted in the subrecipient performance reports, we determined that the Council has not complied with the requirements of the Financial Guide to ensure that valid and auditable source documentation is available to support all data collected for each performance measure required. We believe the Council should provide additional training and technical assistance to its subrecipients on the performance data collection, documentation and reporting processes. Additionally, we believe the Council should enhance its subrecipient monitoring to include a review of the accuracy of its subrecipient performance data. Failure to ensure complete and accurate performance reporting undermines OVC's ability to demonstrate the value of the program to government agencies, the general public, and other stakeholders. We recommend that OJP ensure the Council provides assistance to subrecipients to ensure the accuracy of subrecipients' collection, documentation and reporting of program performance data.

After discussing these issues with the Council, the Executive Director stated that the Council is developing a subrecipient grant manual. This manual will contain detailed information pertaining to the lifecycle of grant management, including program performance reporting, and any applicable forms.

Further, while reviewing subrecipient program performance information, we identified two subrecipients which reported VOCA performance measure data to the Council that included non-VOCA services. Additionally, these non-VOCA services were related to fee-based services offered through these programs. Through a review of the Council's monitoring reports and Council officials' statements, we determined that the Council was unaware of these programs charging fees for services. We therefore obtained more information about the services which the subrecipients were reporting in their VOCA performance reports to determine if these services should have been included and whether program income was generated as a result of these services. While, we determined that VOCA funding was not used for these fee-based services, we did identify that there were non-VOCA services reported in these subrecipients' reports.

One of these two subrecipients, Subrecipient A, included in its performance reports, the subrecipient's transitional housing services, through which the subrecipient provides victims with housing past 90 days, in the transitional housing field of the report. However, Subrecipient A charges a fee or requires the individual to perform community service for this housing. Subrecipient A's Executive Director acknowledged that even though the program refers to these services as transitional housing, the data should not be reported in its performance reports to the Council. The Executive Director further explained that it may be confusing given the field in the VOCA performance report is also "transitional housing" and there are no policies and procedures relating to the compilation of its performance reports. As such, the Executive Director also stated that performance reporting policies, procedures and training will help ensure that the erroneous reporting of these services in the

program's VOCA data will not continue. Furthermore, we found that the Council's monitoring of this subrecipient did not identify this performance reporting issue.

We also determined another subrecipient, Subrecipient B, erroneously included non-VOCA services in its VOCA performance reports. Subrecipient B reported its respite services, such as housing for short periods of time, in its VOCA performance reports despite the fact that these services are paid for by families. The CFO stated that none of these respite services were covered by VOCA funding and the Executive Director stated that the program would not be including these services in its performance reports to the Council going forward. As with Subrecipient A, the Council's monitoring of this subrecipient program's performance reporting did not identify this performance reporting issue.

In both the case of Subrecipient A and Subrecipient B, the Council's monitoring of these subrecipients did not identify that these subrecipient programs were including non-VOCA services in their performance reports. Therefore, we believe that the Council must improve its monitoring of its subrecipient programs to ensure it identifies and corrects these subrecipient performance reporting issues. We recommend that OJP ensure the Council enhances its performance reporting monitoring and clarifies the VOCA performance reporting requirements to its subrecipients to ensure the accuracy of subrecipient performance data.



## CONCLUSION AND RECOMMENDATIONS

Overall, we found that the Council's VOCA grant award funds were used to provide direct services to victims of crime. However, we identified deficiencies in key areas of the Council's management of its VOCA funding. Specifically, we found that the Council did not have a documented award allocation plan and that it did not comply with award distribution requirements to priority victim groups, both of which could adversely impact victims throughout the state that are most in need of assistance. We identified aspects of the Council's award management that increased the risk that grant funds would be used inefficiently or inappropriately such as an undocumented and unilateral decision making. We also found that the Council did not sufficiently communicate applicable VOCA requirements to its subrecipients. Further, we determined that the Council did not implement adequate procedures to ensure accurate annual performance reports and that it submitted late and inaccurate Subgrant Award Reports.

With respect to grant financial management, we identified \$36,843 in unallowable subrecipient and administrative costs as well as \$49,069 in unsupported subrecipient costs.<sup>15</sup> We further concluded that, while award funds were drawn down generally on a reimbursement basis, there were no drawdown policies and procedures and we identified excess cash on hand. A review of the Council's monitoring activity found that it did not always follow its policy or the policy failed to work as intended which resulted in unallowable and unsupported financial reimbursements to subrecipients. Lastly, we found that Council subrecipient monitoring activities did not include a data accuracy check and failed to identify subrecipients reporting performance data which included non-VOCA services.

Our report contains \$56,414 in total questioned costs and 17 recommendations to OJP to improve the administration of the victim assistance grants provided to Idaho.

We recommend that OJP:

1. Work with the Council to develop and implement a plan to identify additional victim needs throughout the state so that it can effectively implement its grant program and meet the needs of victims.
2. Ensure that the Council develop, implement, and adhere to written policies and procedures that include the subrecipient soliciting, awarding, and distributing of VOCA funds and ensure proper oversight of all aspects.
3. Ensure that the Council update, implement, and adhere to an RFP process with complete and accurate VOCA requirements.

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<sup>15</sup> Some costs were questioned for more than one reason. Net questioned costs exclude the duplicate amount, which include costs associated with subrecipient expenditures (\$29,498).

4. Ensure that the Council develop, implement, and adhere to written policies and procedures for ensuring VOCA funds are disbursed in accordance with the priority category funding requirement.
5. Ensure that the Council develop formal written performance reporting policies and procedures to ensure that it complies with the requirements of the DOJ Grants Financial Guide as well as to ensure the accuracy and reliability of data submitted to OVC.
6. Ensure that the Council submits accurate and timely SARs to comply with the grant award special condition.
7. Remedy \$33,351 in unallowable subrecipient costs.
8. Remedy \$49,069 in unsupported subrecipient costs.
9. Remedy \$3,492 in unallowable administrative expenditures.
10. Ensure the Council adheres to its internal purchasing policies and procedures for any future contracts.
11. Ensure the IDHW develops formal written drawdown policies and procedures to ensure compliance with the DOJ Grants Financial Guide.
12. Ensure the Council enhances and implements its written subrecipient monitoring procedures to ensure subrecipients are monitored in accordance with VOCA requirements.
13. Ensure that the Council clarify timekeeping requirements to ensure that its subrecipients properly allocate salary and fringe costs based on actual time worked on VOCA grant projects.
14. Ensure that the Council strengthens its monitoring policies and practices to ensure that financial reimbursements submitted by subrecipients are accurate, allowable, and supported as required by VOCA requirements.
15. Ensure the Council develops policies and procedures to ensure subrecipient compliance with the single audit requirement.
16. Ensure the Council provides assistance to subrecipients to ensure the accuracy of subrecipients' collection, documentation and reporting of program performance data.
17. Ensure the Council enhances its performance reporting monitoring and clarifies the VOCA performance reporting requirements to its subrecipients to ensure the accuracy of subrecipient performance data.

**OBJECTIVE, SCOPE, AND METHODOLOGY**

**Objective**

The objective of the audit was to evaluate how the Idaho Department of Health and Welfare (IDHW) designed and implemented its crime victim assistance program. To accomplish this objective, we assessed performance in the following areas of grant management: (1) grant program planning and execution, (2) program requirements and performance reporting, (3) grant financial management, and (4) monitoring of subrecipients.

**Scope and Methodology**

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

This was an audit of Victims of Crime Act (VOCA) victim assistance formula grants 2016-VA-GX-0060, 2017-VA-GX-0056, and 2018-V2-GX-0002 from the Crime Victims Fund (CVF) awarded to the IDHW. The Office of Justice Programs (OJP), Office for Victims of Crime (OVC) awarded these grants totaling \$39,223,106 to the IDHW, which serves as the state administering agency. However, as an office within the IDHW, the Idaho Council on Domestic Violence and Victim Assistance (Council) is responsible for administering and managing the state's victim assistance program. Our audit concentrated on, but was not limited to, the period of October 1, 2015, the project start date for VOCA assistance grant number 2016-VA-GX-0060, through June 2019. As of June 2019, the Council had drawn down a total of \$10,408,560 from the audited grants.

To accomplish our objective, we tested compliance with what we consider to be the most important conditions of the Council's activities related to the audited grants. We performed sample-based audit testing for grant expenditures including payroll and fringe benefit charges, financial reports, performance 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. The authorizing VOCA legislation, the VOCA victim assistance program guidelines, the DOJ 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 and Performance Measurement Tool, as well as the Council 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 was verified with documents from other sources.

While our audit did not assess the Council's overall system of internal controls, we did review the internal controls of the Council's financial management system specific to the management of funds for each VOCA grant within our review. To determine whether the Council adequately managed the VOCA funds we audited, we conducted interviews with state of Idaho financial staff, examined policies and procedures, and reviewed grant documentation and financial records. We also developed an understanding of the Council's financial management system and its policies and procedures to assess its risk of non-compliance with laws, regulations, guidelines, and terms and conditions of the grants.

**APPENDIX 2**

**SCHEDULE OF DOLLAR-RELATED FINDINGS**

<u>Description</u>	<u>Amount</u>	<u>Page</u>
<b>Questioned Costs<sup>16</sup></b>		
Unallowable Costs		
Unallowable Subrecipient Costs	\$33,351	18
Unallowable Administrative Costs	<u>3,492</u>	19
Total Unallowable Costs	\$36,843	
Unsupported Costs		
Unsupported Subrecipient Costs	<u>\$49,069</u>	18
Total Unsupported Costs	\$49,069	
Gross Questioned Costs	\$85,912	
Less Duplicate Questioned Costs <sup>17</sup>	<u>(29,498)</u>	
<b>Net Questioned Costs</b>	<b><u>\$56,414</u></b>	

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<sup>16</sup> **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.

<sup>17</sup> Some costs were questioned for more than one reason. Net questioned costs exclude the duplicate amount, which include costs associated with subrecipient expenditures (\$29,498).

IDAHO DEPARTMENT OF HEALTH AND WELFARE  
RESPONSE TO THE DRAFT AUDIT REPORT<sup>18</sup>

BRAD LITTLE  
GOVERNOR



P.O. Box 83720  
Boise, ID 83720-0036  
208-332-1540

State of Idaho

**COUNCIL ON DOMESTIC VIOLENCE  
AND VICTIM ASSISTANCE**

September 4, 2019

David M. Sheeren  
Regional Audit Manager  
Denver Regional Audit Office  
Office of the Inspector General  
U.S. Department of Justice  
1120 Lincoln Street, Suite 1500  
Denver, CO 80203  
VIA: U.S. mail and Electronic Mail at [David.M.Sheeren@usdoj.gov](mailto:David.M.Sheeren@usdoj.gov)

Dear Mr. Sheeren,

The Idaho Council on Domestic Violence and Victim Assistance (referred to as the Council for the remainder of the document) was issued a draft report, dated August 22, 2019 relating to an audit of the Victim of Crimes Act, Victim Assistance Formula Grant Numbers 2016-VA-GX-0060, 2017-VA-GX-0056, and 2018-V2-GX-0002. The draft report contains 17 recommendations and \$56,414 in net questioned costs. The purpose of this letter is to respond to the draft report recommendations.

The Council would like to thank the staff auditors, [REDACTED] and [REDACTED], for their professionalism and courtesy extended to the Council staff during the audit period.

**Recommendations and Council Response**

1. Work with the Council to develop and implement a plan to identify additional victim needs throughout the state so that it can effectively implement its grant program and meet the needs of victims.

We concur with the recommendation. In July 2019, the Council contracted with Boise State University to conduct a Victim Services and Victimization report. The Scope of Work, in part, directs the Contractor to provide information on:

- Data that identifies high need locations, crime types, specific services, and barriers to direct IDCVVA funding priorities;
- Data that identifies what types of assistance is needed for victims to access and receive services
- Develop recommendations for equitable access to and types of services in rural and frontier areas of the state

The contract and SOW can be reviewed in its entirety in Attachment 1.

The initial report is due to the Council by December 18, 2020. The Council will utilize the information provided in the report to develop a grant allocation formula, provide training to subrecipients, and ultimately meet the needs of victims throughout the states.

<sup>18</sup> Attachments referenced in this response were not included in this final report.

2. Ensure that the Council develop, implement, and adhere to written policies and procedures that include the subrecipient soliciting, awarding, and distributing of VOCA funds and ensure proper oversight of all aspects.

We concur with the recommendation. The Council will develop a Grantmaking Subcommittee at its October 11, 2019 meeting to develop and implement written policies and procedures for subrecipient solicitation, award, and distribution of the VOCA funds. The Subcommittee will also develop oversight procedures for the process. The Subcommittee will also develop an updated RFP, discussed in more detail in the next section. The Subcommittee will present draft policies and procedures at the December 6, 2019 Council meeting.

3. Ensure that the Council update, implement, and adhere to an RFP process with complete and accurate VOCA requirements.

We concur with the recommendation. The Council will develop a Grantmaking Subcommittee at its October 11, 2019 meeting to update the RFP process with complete and accurate VOCA requirements. The Subcommittee will also develop an implementation timeline for the RFP as well as develop oversight procedures for adherence to the update RFP. The Subcommittee will present a draft RFP and procedures at the December 6, 2019 Council meeting.

4. Ensure that the Council develop, implement, and adhere to written policies and procedures for ensuring VOCA funds are disbursed in accordance with priority category funding requirement.

We concur with the recommendation. The Council staff will develop written policies and procedures for ensuring VOCA funds are disbursed in accordance with priority category funding requirements. The draft policy and procedure will be available for review at the October 11, 2019 Council meeting.

5. Ensure that the Council develop formal written performance reporting policies and procedures to ensure that it complies with the requirements of the DOJ Grants Financial Guide as well as to ensure the accuracy and reliability of data submitted to OVC.

We concur with the recommendation. The Council staff will develop formal written performance reporting policies and procedures to ensure compliance with the requirements of the DOJ Grants Financial Guide and ensure accuracy and reliability of data submitted to OVC. The Council staff will prepare and present a draft performance reporting policies and procedures for the December 6, 2019 Council meeting.

To assist the Council staff in the future with performance reporting, the Council has implemented new online performance reporting where subrecipient programs select the program name from a drop-down menu and are required to submit the name of the individual preparing the report, date of submission, and quarter for the report being submitted. A blank copy of the report can be viewed at: <https://form.jotform.com/91767058842165>

6. Ensure that the Council submits accurate and timely SARs to comply with the grant award special condition.

We concur with the recommendation. The Council staff will develop a policy and procedure to ensure accurate and timely SARs. The draft policy and procedure will be reviewed at the October 11, 2019 Council meeting.

7. Remedy \$33,151 in unallowable subrecipient costs.

We concur with the recommendation. The Council staff will communicate with IDHW finance staff and OVC to develop a resolution of the unallowable subrecipient costs. In addition to resolving the unallowable subrecipient costs, Council staff will develop internal procedures for ensuring all Council staff reviewing and processing reimbursement requests clearly understand VOCA allowable and unallowable costs.

8. Remedy \$49,069 in unsupported subrecipient costs.

We concur with the recommendation. The Council staff will communicate with IDHW finance staff and OVC to develop a resolution of the unsupported subrecipient costs. In addition, the Council has begun requiring proof of payment to support reimbursement requests. The Council has scheduled a financial management webinar for all current subrecipients for September 18, 2019 to discuss changes the Council has made to reimbursement procedures in state fiscal year 2020.

9. Remedy \$3,492 in unallowable administrative expenditures.

We concur with the recommendation. The Council staff will communicate with IDHW finance staff and OVC to develop a resolution of the unallowable administrative expenditures. The Council staff paid by VOCA funds began tracking their time spent on each ICDVVA grant on July 1, 2019. In addition, all staff paid with DOJ grant funding and responsible for accounts payable will be required to take the OJP Financial Management and Grand Administration Training.

10. Ensure the Council adheres to its internal purchasing policies and procedures for any future contracts.

We concur with the recommendation. All current Council staff will be required to take the Contract and Procurement Services online training by January 1, 2020. All new Council employees will be required to complete the five, one-hour modules training within 120 days of hire. The Executive Director will maintain completion certificates in Council files.

11. Ensure the IDHW develops formal written drawdown policies and procedures to ensure compliance with the DOJ Grants Financial Guide.

We concur with the recommendation. The document labeled as Attachment B is the Department's formal written drawdown procedures for LOC 15041307 effective September 3, 2019. The Department Financial Policy Advisory Committee (DFPAC) is in the process of rewriting financial policies which will go through the formal process requiring Division Administrator approval soon. At present, the Cash Receipt Policies read as follows:

**General Cash Receipts Policies**

General cash receipts policies include restrictive endorsement, timely depositing, separation of duties, and depositing into the designated local bank account. Detailed policies and procedures for handling cash receipts are discussed in the BARS User Manual.

**Restrictive Check Endorsement**

All checks and money orders must be restrictively endorsed for "Deposit Only" at the time of receipt. Time of receipt is considered the time the check is physically given to a Department employee or the time a Department employee opens mail containing the check.

**Temporary Storage of Receipts Awaiting Bank Deposit**

Receipts that have been received but not yet taken to the bank for deposit must be stored in a safe and secure location such as a safe or locked file cabinet or drawer. The number of persons holding keys or having access to the combination should be kept to a minimum. Keys must not be loaned to other



persons. A list of combination or key holders must be maintained in the local office. This list must identify the name of each person having the combination or key, when that person received the combination or key and, if a key was returned, when the key was returned. If two keys are required to open the safe or drawer, the keys should be held by different persons. The combination should be changed or the lock re-keyed at least once every five years and a new list of combination or key holders developed at that time. If there is reason to believe that the security of the safe or drawer has been compromised, the combination should be changed or the lock re-keyed immediately.

#### **Timely Depositing of Cash Receipts**

Idaho Code 59-1014 states, "All state officers and agencies who receive any money or evidences of indebtedness for or on account of the state, or in payment of any fee, license, or tax due the state, shall deposit the same with the state treasurer:

- a) daily, when the amount of cash, checks or other evidences of indebtedness accrued during any twenty-four (24) hour period is two hundred dollars (\$200) or more; or
- b) weekly in all other situations, unless the particular state officer has been granted specific permission to deposit at some other interval by provisions of a resolution of the board of examiners, pursuant to Section 67-2025, Idaho Code."

To ensure that the Department complies with the above, each local receipting unit shall institute the necessary procedures to assure that all funds are deposited daily or whenever \$200 is accumulated, but not less than once each week. Units that regularly receive funds on a daily basis should make arrangements for daily deposits even if a particular day's deposit total is less than \$200.

#### **Segregation and Separation of Duties**

Each organization must designate separate and distinct individuals to bill, receipt, deposit and post receipts. Each function must operate independently of the others (i.e., the person who performs one of the functions should not also perform any of the remaining functions). Offices that do not have sufficient staff to separate these functions may allow staff members to perform two of the functions so long as those two functions are not sequential. In other words, the person who bills cannot also receipt payments against those bills, the person who receipts funds cannot also deposit those funds, and the person who deposits funds cannot also post those funds into BARS.

#### **Local Bank Accounts**

Each organization must deposit all monies in a local bank account, as determined by the State Treasurer. You must contact the Bureau of Financial Services, who will coordinate and obtain approval from the State Treasurer prior to opening any new bank accounts.

#### **FISCAL Cash Receipt Adjustment Support Documentation**

This policy pertains only to those cash receipt adjustment transactions necessary to complete the distribution from BARS receipt type FIS coding. Refer to How to Change a Receipt (Non-Bill Posting) of the BARS User Manual for instructions on how to change the distribution of a receipt in BARS.

When entering cash receipt adjustment transactions into FISCAL, you must develop, file, and retain on file a minimum level of support for your transactions. Use judgment when selecting the nature and extent of source documentation.

A suggested source document for recording cash receipts, if assistance is needed in screen entry, is the Cash Receipt Adjustment Form (HWJ-23). Refer to this form to assist you with cash receipts coding. See Cash Receipt Adjustment Form for instructions on completing this form.

Source documentation must be filed at the location entering the transaction by effective date order (in reverse date order) and then by BARS receipt number. See Retention of Documentation for information on how long you must retain the source documentation.

**Receipts From Employees or Former Employees for Group Insurance Coverage**

Do not deposit funds received from employees or former employees for coverage under state-sponsored group insurance plans. These receipts are to be immediately forwarded to the Bureau of Financial Services Employee Unit. Be sure to identify the employee's name, social security number and the coverage for which the check is intended. The Employee Unit will forward the funds directly to the Office of Insurance in the Idaho Department of Administration.

**Receipts from ACCESS Idaho' PayPort**

Access Idaho's PayPort™ customizable point-of-sale system conveniently enables agencies to accept credit/debit card payments (American Express, Discover, MasterCard, and Visa) for virtually any type of sales transaction. **Any Agency program (or department) wishing to accept credit cards for goods or services must first contact the [FISCAL Help Desk](#). The FISCAL Help Desk will coordinate with the program and Access Idaho to determine a process that best fits the program's needs in terms of credit card processing.**

Programs are responsible for knowing and complying State of Idaho policies to safeguard credit card and other personally identifiable or sensitive information. Programs must also follow established procedures to ensure that sensitive cardholder information is handled securely. This applies to all transactions regardless of the type of transaction (phone, in-person, internet transactions, etc.).

Document date: 8/1/08

12. Ensure the Council enhances and implements its written subrecipient monitoring procedures to ensure subrecipients are monitored in accordance with VOCA requirements.

The Council will strengthen its monitoring plans by enhancing the current monitoring policies and procedures and ensure they meet VOCA requirements. Additionally, when the Council staff submitted its 2019 monitoring plan for 2019, it only included those overdue or nearly due for monitoring. The Council staff has amended the monitoring plan, which can be found in Attachment C.

13. Ensure that the Council clarify timekeeping requirements to ensure that its subrecipients properly allocate salary and fringe costs based on actual time worked on VOCA grant projects.

We concur with the recommendation. The Council staff have scheduled a financial management webinar for September 18, 2019 that will address timekeeping for subrecipient staff. In addition, clarification will be made in an updated version of the state fiscal year 2020 Subrecipient Grant Manual.

The webinar draft agenda can be found as Attachment D.

14. Ensure that the Council strengthens its monitoring policies and practices to ensure that financial reimbursements submitted by subrecipients are accurate, allowable, and supported as required by VOCA requirements.

We concur with the recommendation. Council staff will strengthen its current monitoring policies and practices. The updated policy will be reviewed at the December 6, 2019 Council meeting. Additionally, the Council will ensure that all monitoring staff have been trained on how to accurately monitor subrecipient reimbursements and ensure timely correction for subrecipients found to be out of compliance.

15. Ensure the Council develops policies and procedures to ensure subrecipient compliance with the single audit requirement.

We concur with the recommendation. The Council staff will develop written policies and procedures to ensure subrecipient compliance with the single audit requirement. A draft policy and procedure will be available for review at the October 11, 2019 Council meeting.

16. Ensure the Council provides assistance to subrecipients to ensure the accuracy of subrecipients' collection, documentation, and reporting of program performance data.

We concur with the recommendation. The Council developed a subrecipient grant award manual to assist subrecipients in understanding VOCA reporting and definitions. The Council Grants/Contracts Officer will also conduct a Data Collection and Reporting webinar in the fall 2019.

The grant manual can be found at <https://icdv.idaho.gov/downloads/FY20-Grant-Manual-FINAL.pdf>

In addition, the Council has requested a research Analyst, Sr. position in its state fiscal year 2020 request. Part of the position responsibilities will include providing technical assistance to subrecipients for performance data collection, documentation and reporting.

17. Ensure the Council enhances its performance reporting monitoring and clarifies the VOCA performance reporting requirements to its subrecipients to ensure the accuracy of subrecipient performance data.

The Council will enhance its monitoring policies and procedures for performance reporting. The Scope of Work for the Victims Services and Victimization report includes the development of a standardized code book for all victim services data collected by the ICDVVA. This, in conjunction with webinars conducted by Council staff will assist in clarification of VOCA performance requirements for subrecipients.

The Council appreciates the opportunity to respond to the draft audit report. We look forward to implementing the OIG recommendations and better serving crime victims in Idaho.

Sincerely,



Nicole Fitzgerald  
Executive Director

Cc: Kimberly Stewart  
Grants/Contracts Officer  
Idaho Council on Domestic Violence and Victim Assistance

Dena Darpli  
Financial Manager  
Idaho Department of Health and Welfare

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

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Washington, D.C. 20531

SEP 18 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 Victim Assistance Grants Awarded to the Idaho Department of Health and Welfare, Boise, Idaho*

This memorandum is in reference to your correspondence, dated August 22, 2019, transmitting the above-referenced draft audit report for the Idaho Department of Health and Welfare (IDHW), Council on Domestic Violence and Victim Assistance (Council). We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains 17 recommendations and \$56,414<sup>1</sup> in net 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 work with the Council to develop and implement a plan to identify additional victim needs throughout the state so that it can effectively implement its grant program and meet the needs of victims.**

OJP agrees with the recommendation. We will work with the Council to develop and implement a plan that identifies additional victim needs throughout the state.

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<sup>1</sup> Some costs were questioned for more than one reason. Net questioned costs exclude the duplicate amounts.

2. **We recommend that OJP ensure that the Council develop, implement, and adhere to written policies and procedures that include the subrecipient soliciting, awarding, and distributing of VOCA funds and ensure proper oversight of all aspects.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of written policies and procedures, developed, and implemented, to include soliciting, awarding, and distributing Victims of Crime Act (VOCA) funds to subrecipients, and ensure proper oversight of all aspects.

3. **We recommend that OJP ensure that the Council update, implement, and adhere to an RFP process with complete and accurate VOCA requirements.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure that it adheres to a Request for Proposal process with complete and accurate VOCA requirements.

4. **We recommend that OJP ensure that the Council develop, implement, and adhere to written policies and procedures for ensuring VOCA funds are disbursed in accordance with the priority category funding requirement.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure that VOCA funds are disbursed in accordance with the priority category funding requirement.

5. **We recommend that OJP ensure that the Council develop formal written performance reporting policies and procedures to ensure that it complies with the requirements of the DOJ Grants Financial Guide as well as to ensure the accuracy and reliability of data submitted to OVC.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of formal written policies and procedures, developed and implemented, to ensure that it complies with the requirements of the U.S. Department of Justice (DOJ) Grants Financial Guide, and to ensure the accuracy of the data submitted to OJP's Office for Victims of Crime.

6. **We recommend that OJP ensure that the Council submits accurate and timely SARs to comply with the grant award special condition.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of formal written policies and procedures, developed and implemented, to ensure that it accurately and timely submits Subgrant Award Reports in compliance with the grant award special conditions.

**7. We recommend that OJP remedy \$33,351 in unallowable subrecipient costs.**

OJP agrees with the recommendation. We will review the \$33,351 in questioned costs, related to unallowable subrecipient costs, charged to Grant Number 2016-VA-GX-0060, and will work with the Council to remedy, as appropriate.

**8. We recommend that OJP remedy \$49,069 in unsupported subrecipient costs.**

OJP agrees with the recommendation. We will review the \$49,069 in questioned costs, related to unsupported subrecipient costs, charged to Grant Number 2016-VA-GX-0060, and will work with the Council to remedy, as appropriate.

**9. We recommend that OJP remedy \$3,492 in unallowable administrative expenditures.**

OJP agrees with the recommendation. We will review the \$3,492 in questioned costs, related to unallowable administrative expenditure costs, charged to Grant Number 2016-VA-GX-0060, and will work with the Council to remedy, as appropriate.

**10. We recommend that OJP ensure the Council adheres to its internal purchasing policies and procedures for any future contracts.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure that it adheres to its internal purchasing policies and procedures for future contracts.

**11. We recommend that OJP ensure the IDHW develops formal written drawdown policies and procedures to ensure compliance with the DOJ Grants Financial Guide.**

OJP agrees with the recommendation. Your office notified us that IDHW provided adequate documentation to close this recommendation.

**12. We recommend that OJP ensure the Council enhances and implements its written subrecipient monitoring procedures to ensure subrecipients are monitored in accordance with VOCA requirements.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure that subrecipients are monitored in accordance with VOCA requirements.

- 13. We recommend that OJP ensure that the Council clarify timekeeping requirements to ensure that its subrecipients properly allocate salary and fringe costs based on actual time worked on VOCA grant projects.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of revised written policies and procedures, developed and implemented, to ensure that its subrecipients properly allocate salary and fringe benefits costs based on actual time worked on VOCA grant projects.

- 14. We recommend that OJP ensure that the Council strengthens its monitoring policies and practices to ensure that financial reimbursements submitted by subrecipients are accurate, allowable, and supported as required by VOCA requirements.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of its revised monitoring policies and procedures, to ensure that financial reimbursements submitted by subrecipients are accurate, allowable, and supported, as required by VOCA requirements.

- 15. We recommend that OJP ensure the Council develops policies and procedures to ensure subrecipient compliance with the single audit requirement.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure subrecipient compliance with the single audit requirement.

- 16. We recommend that OJP ensure the Council provides assistance to subrecipients to ensure the accuracy of subrecipients' collection, documentation and reporting of program performance data.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure that subrecipients' collection, documentation, and reporting of program performance data is accurate.

- 17. We recommend that OJP ensure the Council enhances its performance reporting monitoring and clarifies the VOCA performance reporting requirements to its subrecipients to ensure the accuracy of subrecipient performance data.**

OJP agrees with the recommendation. We will coordinate with the Council to obtain a copy of revised performance reporting monitoring procedures, that clarify the VOCA performance reporting requirements to its subrecipients, to ensure the accuracy of subrecipient performance data.

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.

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**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 Idaho Department of Health and Welfare's (IDHW) Council on Domestic Violence and Victim Assistance (Council) and to the Office of Justice Programs (OJP). The Council's response is incorporated in Appendix 3 and OJP's response is incorporated in Appendix 4. In response to our draft audit report, OJP agreed with our recommendations, and as a result, the status of the audit is resolved. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

**Recommendation for OJP:**

- 1. Work with the Council to develop and implement a plan to identify additional victim needs throughout the state so that it can effectively implement its grant program and meet the needs of victims.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will work with the Council to develop and implement a plan that identified additional victim needs throughout the state.

The Council concurred with our recommendation and stated in its response that it contracted with Boise State University to conduct a Victim Services and Victimization report. The initial report is due to the Council on December 18, 2020, and the Council will utilize the information provided in the report to meet the needs of victims.

This recommendation can be closed when we receive the initial report and documentation detailing how the Council has utilized the report.

- 2. Ensure that the Council develop, implement, and adhere to written policies and procedures that include the subrecipient soliciting, awarding, and distributing of Victims of Crime Act (VOCA) funds and ensure proper oversight of all aspects.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of written policies and procedures, developed, and implemented, to include soliciting, awarding, and distributing of VOCA funds and ensure proper oversight of all aspects.

The Council concurred with our recommendation and stated in its response that it will develop a Grantmaking Subcommittee to develop and implement written policies and procedures for subrecipient solicitation, awarding, distribution of VOCA funds, and oversight procedures for the process. The Subcommittee will present the draft policies and procedures at the December 2019 Council meeting.

This recommendation can be closed when we receive documentation demonstrating the Council established and implemented policies and procedures addressing this recommendation.

**3. Ensure that the Council update, implement, and adhere to a Request for Proposal (RFP) process with complete and accurate VOCA requirements.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure that it adheres to a RFP process with complete and accurate VOCA requirements.

The Council concurred with our recommendation and stated in its response that it would develop a Grantmaking Subcommittee to: (1) update the RFP process with complete and accurate VOCA requirements; (2) develop an implementation timeline for the RFP; and (3) develop oversight procedures for adherence to the updated RFP. The Subcommittee will present the draft policies and procedures at the December 2019 Council meeting.

This recommendation can be closed when we receive documentation demonstrating the Council established and implemented policies and procedures addressing this recommendation.

**4. Ensure that the Council develop, implement, and adhere to written policies and procedures for ensuring VOCA funds are disbursed in accordance with the priority category funding requirement.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of written policies and procedures, developed and implement, to ensure that VOCA funds are disbursed in accordance with the priority category funding requirement.

The Council concurred with our recommendation and stated in its response that it would develop written policies and procedures to ensure VOCA funds are disbursed in accordance with priority category funding requirements, which will be available for review at the October 2019 Council meeting.

This recommendation can be closed when we receive documentation demonstrating the Council established and implemented policies and procedures addressing this recommendation.

**5. Ensure that the Council develop formal written performance reporting policies and procedures to ensure that it complies with the requirements of the DOJ Grants Financial Guide as well as to ensure the accuracy and reliability of data submitted to the Office for Victims of Crime (OVC).**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of formal written policies and procedures, developed and implemented, to ensure that the Council complies with the Financial Guide and to ensure the accuracy of the data submitted to OJP and OVC.

The Council concurred with our recommendation and stated in its response that it will prepare and present draft performance reporting policies and procedures for the December 2019 Council meeting. The Council's response also states that the Council has implemented a new online performance reporting process that will require subrecipient programs to select the program name, the name of the preparer, date of submission, and quarter for which the report is being submitted.

This recommendation can be closed when we receive documentation demonstrating the Council established and implemented policies and procedures addressing this recommendation.

**6. Ensure that the Council submits accurate and timely Subgrant Award Reports (SARs) to comply with the grant award special condition.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of formal written policies and procedures, developed and implemented, to ensure that the Council accurately and timely submits Subgrant Award Reports in compliance with the grant award special conditions.

The Council concurred with our recommendation and stated in its response that it will develop a policy and procedure to ensure accurate and timely SARs, a draft of which will be reviewed at the October 2019 Council meeting.

This recommendation can be closed when we receive documentation demonstrating the Council established and implemented policies and procedures addressing this recommendation.

**7. Remedy \$33,351 in unallowable subrecipient costs.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will review the \$33,351 in unallowable subrecipient questioned costs and will work with the Council to remedy, as appropriate.

The Council concurred with our recommendation and stated in its response that it would communicate with the Idaho Department of Health and Welfare (IDHW) finance staff and OJP to develop a resolution of the unallowable subrecipient costs. The Council also stated that it would develop internal procedures for ensuring all Council staff reviewing and processing reimbursement requests understand VOCA allowable and unallowable costs.

This recommendation can be closed when we receive documentation demonstrating that OJP remedied the \$33,351 in unallowable subrecipient costs.

**8. Remedy \$49,069 in unsupported subrecipient costs.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will review the \$49,069 in unsupported subrecipient questioned costs and will work with the Council to remedy, as appropriate.

The Council concurred with our recommendation and stated in its response that it would communicate with the IDHW finance staff and OJP to develop a resolution of the unsupported subrecipient costs. The Council also stated that it has scheduled a webinar for all current subrecipients to discuss changes the Council has made to the reimbursement procedures.

This recommendation can be closed when we receive documentation demonstrating that OJP remedied the \$49,069 in unsupported subrecipient costs.

**9. Remedy \$3,492 in unallowable administrative expenditures.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will review the \$3,492 in unallowable administrative expenditure questioned costs and will work with the Council to remedy, as appropriate.

The Council concurred with our recommendation and stated in its response that it would communicate with the IDHW finance staff and OJP to develop a resolution of the unallowable administrative expenditures. The Council also stated that staff paid with grant funding will be required to take the OJP Financial Management and Grant Administration Training. In addition, since July 2019, staff paid by VOCA funds are tracking their time spent on each grant.

This recommendation can be closed when we receive documentation demonstrating that OJP remedied the \$3,492 in unallowable administrative expenditures.

**10. Ensure the Council adheres to its internal purchasing policies and procedures for any future contracts.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure that it adheres to its internal purchasing policies and procedures for future contracts.

The Council concurred with our recommendation and stated that all current Council staff will be required to take the Contract and Procurement Services training by January 2020 and all new Council employees will be required to complete the training within 120 days of hire.

This recommendation can be closed when we receive documentation demonstrating that the aforementioned procedures have been put into place and the current Council staff have completed the training.

**11. Ensure the IDHW develops formal written drawdown policies and procedures to ensure compliance with the DOJ Grants Financial Guide.**

Closed. OJP agreed with our recommendation. OJP's response notes it had been notified that the Council had provided adequate documentation with its response to close this recommendation.

The Council concurred with our recommendation. The Council's response states that the IDHW's Financial Policy Advisory Committee is in the process of rewriting financial policies, which will soon go through the formal process requiring a Division Administrator approval. Additionally, the response included the IDHW's formal written drawdown procedures effective September 3, 2019.

We reviewed the formal written drawdown policies included in the Council's response. We found that these drawdown procedures included an effective date, dissemination information, and adequate information on the process to complete drawdowns. Based on the drawdown policies included with the Council's response and OJP's agreement, this recommendation is closed.

**12. Ensure the Council enhances and implements its written subrecipient monitoring procedures to ensure subrecipients are monitored in accordance with VOCA requirements.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure that subrecipients are monitored in accordance with VOCA requirements.

The Council stated in its response that it would strengthen its monitoring plans by enhancing the current monitoring policies and procedures and ensure they meet VOCA requirements. The Council also provided an amended monitoring plan for 2019 and added an additional two current subrecipients and four new subrecipients.

This recommendation can be closed when we receive documentation demonstrating the Council enhanced and implemented policies and procedures addressing this recommendation.

**13. Ensure that the Council clarify timekeeping requirements to ensure that its subrecipients properly allocate salary and fringe costs based on actual time worked on VOCA grant projects.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of revised written policies and procedures, developed and implemented, to ensure that its subrecipients properly allocate salary and fringe benefit costs based on actual time worked on VOCA grant projects.

The Council concurred with our recommendation and stated timekeeping requirements will be clarified in an updated version of the state fiscal year 2020 Subrecipient Grant Manual. The Council also stated that a webinar has been scheduled to address timekeeping for subrecipient staff. The Council provided the webinar draft agenda.

This recommendation can be closed when we receive documentation demonstrating the Council clarified subrecipient timekeeping requirements.

**14. Ensure that the Council strengthens its monitoring policies and practices to ensure that financial reimbursements submitted by subrecipients are accurate, allowable, and supported as required by VOCA requirements.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of its revised monitoring policies and procedures, to ensure that financial reimbursements submitted by subrecipients are accurate, allowable, and supported, as required by VOCA requirements.

The Council concurred with our recommendation and stated in its response that it would strengthen its current monitoring policies and practices and review the updated policy at the December 2019 Council meeting. In addition, the Council would ensure that all monitoring staff have been trained on how to accurately monitor subrecipient reimbursements and ensure timely correction for subrecipients found to be out of compliance.

This recommendation can be closed when we receive documentation demonstrating the Council strengthened and implemented policies and procedures addressing this recommendation.

**15. Ensure the Council develops policies and procedures to ensure subrecipient compliance with the single audit requirement.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of written policies and

procedures, developed and implemented, to ensure subrecipient compliance with the single audit requirement.

The Council concurred with our recommendation and stated in its response that it will develop a policy and procedure to ensure subrecipient compliance with the single audit requirement and that a draft of this policy will be available for review at the October 2019 Council meeting.

This recommendation can be closed when we receive documentation demonstrating the Council established and implemented policies and procedures addressing this recommendation.

**16. Ensure the Council provides assistance to subrecipients to ensure the accuracy of subrecipients' collection, documentation and reporting of program performance data.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of written policies and procedures, developed and implemented, to ensure subrecipients' collection, documentation, and reporting of program performance data is accurate.

The Council concurred with our recommendation and stated in its response that it has developed a subrecipient grant award manual to assist subrecipients in understanding VOCA reporting and definitions and that it will also be offering a webinar on Data Collection and Reporting in the fall of 2019. Additionally, the Council states that it has requested a Senior Research Analyst position for which the duties will include providing technical assistance to subrecipients for performance data collection, documentation and reporting.

We reviewed the Council's subrecipient grant award manual and determined it contains general information pertaining to the VOCA programmatic reporting requirements, including a brief statistical reporting section. We believe the provision of this general VOCA program information is a step toward providing subrecipients with adequate assistance in the collection, documentation, and reporting of program performance data. This recommendation can be closed when we receive evidence of the Council providing assistance to its subrecipients to ensure the accuracy of subrecipients' collection, documentation, and reporting of program performance data.

**17. Ensure the Council enhances its performance reporting monitoring and clarifies the VOCA performance reporting requirements to its subrecipients to ensure the accuracy of subrecipient performance data.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Council to obtain a copy of revised



performance reporting monitoring procedures that clarify the VOCA performance reporting requirements to its subrecipients, to ensure the accuracy of subrecipient performance data.

The Council stated in its response that it will enhance its monitoring policies and procedures for performance reporting. The Council's response further stated that the Scope of Work for the Victims Services and Victimization report includes the development of a standardized code book for all victim services data collected by the Council and that this, in conjunction with webinars conducted by Council staff will assist in clarification of VOCA performance requirements for subrecipients.

This recommendation can be closed when we receive evidence of the Council's enhancements to its subrecipient monitoring process to ensure the accuracy of subrecipient program performance data.



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