

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

OVERSIGHT ★ INTEGRITY ★ GUIDANCE



Audit of the Office of Justice Programs Victim Compensation Grants Awarded to the Connecticut Judicial Branch, Hartford, Connecticut

Audit Division 20-010

November 2019



Executive Summary

Audit of the Office of Justice Programs Victim Compensation Grants Awarded to the Connecticut Judicial Branch, Hartford, Connecticut

Objective

The objective of the audit was to evaluate how the Connecticut Judicial Branch (CJB) designed and implemented its crime victim compensation 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, and (3) grant financial management.

Results in Brief

As a result of our audit, we concluded that CJB used its funding to enhance its crime victim compensation program. This audit did not identify significant concerns regarding the use of administrative funding or the accuracy of CJB's state certification forms, federal financial reports, or performance reporting. However, our audit found that CJB's existing policy for Wage Loss Calculation was not adequate.

Recommendations

This report contains one recommendation to enhance CJB's victim compensation program. We provided our draft audit report to CJB and the Office of Justice Programs (OJP). Their responses can be found in Appendices 2 and 3, respectively. Our analysis of those responses is included in Appendix 4.

Audit Results

The U.S. Department of Justice Office of the Inspector General completed an audit of two Victims of Crime Act (VOCA) victim compensation formula grants awarded by the Office of Justice Programs, Office for Victims of Crime (OVC) to the Connecticut Judicial Branch in Hartford, Connecticut. The OVC awarded these formula grants, totaling \$2,347,000 from fiscal years 2015 - 2016, from the Crime Victims Fund to provide financial support through the payment of compensation benefits to crime victims throughout Connecticut. As of September 2019, CJB drew down a cumulative amount of \$1,475,460 for all of the grants we reviewed.

Program Accomplishments – We found evidence that CJB used its VOCA victim grant funding to enhance compensation for crime victims.

Lost Wage Calculations – We believe that parts of CJB's existing policy for Wage Loss Calculation, specifically its reliance on an Employer Information Request Form, was not adequate.

AUDIT OF THE OFFICE OF JUSTICE PROGRAMS VICTIM COMPENSATION GRANTS AWARDED TO THE CONNECTICUT JUDICIAL BRANCH, HARTFORD CONNECTICUT

TABLE OF CONTENTS

INTRODUCTION
The Grantee
OIG Audit Approach 3
AUDIT RESULTS
Grant Program Planning and Execution4
Program Implementation4
Annual State Certification Form
Program Requirements and Performance Reporting
Annual Performance Reports
Compliance with Special Conditions6
Grant Financial Management 7
Single Audit Report7
Grant Expenditures7
Drawdowns9
Financial Reporting10
Other Reportable Matters10
CONCLUSION AND RECOMMENDATIONS
APPENDIX 1: OBJECTIVE, SCOPE, AND METHODOLOGY
APPENDIX 2: CONNECTICUT JUDICIAL BRANCH RESPONSE TO THE DRAFT AUDIT REPORT
APPENDIX 3: U.S DEPARTMENT OF JUSTICE OFFICE OF JUSTICE PROGRAMS RESPONSE TO THE DRAFT AUDIT REPORT
APPENDIX 4: OFFICE OF THE INSPECTOR GENERAL ANALYSIS AND SUMMARY OF ACTIONS NECESSARY TO CLOSE THE REPORT

AUDIT OF THE OFFICE OF JUSTICE PROGRAMS VICTIM COMPENSATION GRANTS AWARDED TO THE CONNECTICUT JUDICIAL BRANCH, HARTFORD CONNECTICUT

INTRODUCTION

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of two victim compensation formula grants awarded by the Office of Justice Programs (OJP), Office for Victims of Crime (OVC) to the Connecticut Judicial Branch (CJB) in Hartford, Connecticut. The OVC awards victim compensation grants annually from the Crime Victims Fund (CVF) to state administering agencies. As shown in Table 1, from fiscal years (FY) 2015 to 2016, these OVC grants totaled \$2,347,000.

Table 1

Audited Grants Fiscal Years 2015 - 2016

Award Number	Award Date	Award Period Start Date	Award Period End Date	Award Amount
2015-VC-GX-0014	7/31/2015	10/1/2014	9/30/2018	\$1,192,000
2016-VC-GX-0054	9/19/2016	10/1/2015	9/30/2019	1,155,000
			Total:	\$ 2,347,000

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

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.¹ 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. VOCA victim compensation formula grant funds are available each year to states and territories for distribution to eligible recipients.

The primary purpose of the victim compensation grant program is to compensate victims and survivors of criminal violence for: (1) medical expenses attributable to a physical injury resulting from a compensable crime, including expenses for mental health counseling and care; (2) loss of wages attributable to a physical injury resulting from a compensable crime; and (3) funeral expenses attributable to a death resulting from a compensable crime.²

¹ The VOCA victim compensation formula program is funded under 34 U.S.C. § 20102.

² This program defines criminal violence to include drunk driving and domestic violence.

The Grantee

As the Connecticut state administering agency, the Connecticut Judicial Branch was responsible for administering the VOCA victim compensation program. According to its website, CJB's mission is to serve the interests of justice and the public by resolving matters brought before it in a fair, timely, efficient, and open manner. Within CJB, the Office of Victim Services (OVS) handles day-to-day administration and oversight of both the victim assistance and compensation VOCA grants. The Victim Compensation Program offers financial assistance to victims; family members of homicide, sexual assault, and domestic violence victims; child witnesses of domestic violence; and other eligible persons for certain expenses associated with violent crime.

In addition to federal funding from VOCA grants, the Connecticut General Assembly biennially allocates funds from the Criminal Injuries Compensation Fund (CICF) to CJB to compensate eligible persons for crime-related expenses. Payments to the CICF are required under Connecticut General Statutes and include defendants' contributions, court fines and fees, and inmate work-release wages.

OIG Audit Approach

The objective of the audit was to evaluate how CJB designed and implemented its crime victim compensation 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, and (3) grant financial management.

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, VOCA compensation program guidelines (VOCA Guidelines), DOJ Grants Financial Guides, General Statutes of the State of Connecticut (Chapter 968), and the OVS Policy and Procedure Manual as our primary criteria. We also reviewed relevant CJB policies and procedures and interviewed CJB personnel to determine how VOCA funds were administered. We also reviewed CJB records reflecting grant activity.³

³ 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.

AUDIT RESULTS

Grant Program Planning and Execution

The main purpose of VOCA victim compensation grants is to enhance state victim compensation payments to eligible crime victims. As part of our audit, we assessed CJB's overall process for making victim compensation payments. We assessed CJB's policies and procedures for providing compensation payments to victims, as well as the accuracy of the state certification form.

Overall, we determined that CJB's implementation of its victim compensation program was appropriate and in compliance with the VOCA Guidelines, and that CJB used its VOCA grants to supplement its state program. We found CJB complied with federal grant requirements and established an adequate program to compensate victims and survivors of criminal violence. We did not identify any issues with its policies, efforts to bring awareness to the program, and accuracy of the certification reports.

Program Implementation

State administering agencies receive VOCA victim compensation grants to compensate victims directly for expenses incurred from criminal victimization. As the state administering agency for Connecticut, CJB was responsible for the victim compensation program, including meeting all financial and programmatic requirements. When paying claims for victims, CJB operated under the OVS Policy and Procedure Manual, which conveyed the state-specific policies for administering the victim compensation program. In assessing CJB's implementation of its victim compensation program, we analyzed policies and procedures governing the decision-making process for individual compensation claims, as well as what efforts CJB had made to bring awareness to victims eligible for compensation program

Based on our review, we found that CJB had an established process for the intake, review, and payment or denial of individual compensation claims, and that CJB had adequate separation of duties between the employees who reviewed the claims and those who authorized payment. Also, we found that the OVS Policy and Procedure Manual was consistent with VOCA Guidelines.

Recent legislative updates changed how CJB processes particular claims. Effective October 1, 2015, Public Act 15-84 directed OVS to exclude life insurance benefits as a collateral source when determining the amount of compensation allowed on a claim. Effective October 1, 2017, Public Act 17-99 allows OVS staff to waive health insurance as a collateral source for victims of domestic violence, sexual assault, or child abuse, who believe that the release of treatment information associated with a health insurance claim would cause undue harm. From our review, these legislative changes did not impact VOCA grant requirements. We also found that CJB made efforts to enhance public awareness of available victim compensation benefits through outreach efforts that included brochures, posters, and distributing business cards to local and state police departments, advocate agencies, college campuses, hospitals, and funeral homes. CJB also provided trainings, participated in speaking engagements, and officials were active in local task forces. We further found that CJB's website contained both text and videos that explained eligibility, available benefits, and the claim process.

Annual State Certification Form

State administering agencies must submit an annual Crime Victim Compensation State Certification Form that provides the OVC the necessary information to determine the grant award amount. The certification form must include all sources of revenue to the crime victim compensation program during the federal fiscal year, as well as the total of all compensation claims paid out to, or on behalf of, victims from all funding sources. The OVC allocates VOCA victim compensation formula grant funds to each state by calculating 60 percent of the eligible compensation claims paid out to victims during the fiscal year 2 years prior.⁴ The accuracy of the information provided in the certification form is critical to OJP's correct calculation of the victim compensation award amounts granted to each state.

We assessed CJB's controls for preparing the annual certification forms submitted to the OVC for FYs 2013 through 2016 that were used to calculate the award amounts granted in FYs 2015 through 2018.⁵ We reviewed the annual certification forms, including the financial support for the payouts. CJB prepared its state certification forms using financial information reported on trial balances drawn from its accounting system, and also relied on supplemental accounting records to ensure certified expenditures matched the federal fiscal year.

Based on our testing of the financial information included in the accounting records, we found the amounts reported on CJB's Crime Victim Compensation State Certification Forms to be accurate and supported.

Program Requirements and Performance Reporting

To determine whether CJB distributed VOCA victim compensation program funds to compensate victims of crime, we reviewed CJB performance measures and performance documents that CJB used to track its goals and objectives. We further examined OVC solicitations and award documents, and verified CJB compliance with special conditions governing recipient award activity.

⁴ The eligible payout amount for award consideration is determined after deducting payments made with VOCA funds, subrogation and restitution recoveries, refunds, amounts awarded for property loss, and other reimbursements.

⁵ OJP's Office of the Chief Financial Officer, Budget Execution Division calculated the allocations for VOCA eligible crime victim compensation programs and OVC made the grant awards.

Based on our overall assessment in the areas of program requirements and performance reporting, we believe that the CJB: (1) implemented adequate procedures to compile quarterly performance reports, and (2) complied with tested special conditions.

Annual Performance Reports

Each state administering agency (SAA) must annually report to OVC activity funded by any VOCA awards active during the federal fiscal year. The reports are submitted through OJP's Grants Management System (GMS). As of FY 2016, the OVC also began requiring states to submit quarterly performance data through the web-based Performance Measurement Tool (PMT). After the end of the fiscal year, the SAA are required to produce the Annual State Performance Report and upload it to GMS. For the victim compensation grants, the states must report the number of victims for whom an application was made; the number of victims whose victimization is the basis for the application; victim demographics; the number of applications that were received, approved, denied, and closed; and total compensation paid by service type.

CJB used its existing electronic case management system to prepare its quarterly performance reports. For the annual report, CJB reconciled the financial data with Connecticut's accounting system to ensure the report matches actual payments. To assess CJB's performance, we compared the case management reports maintained quarterly by CJB to its FY 2016 quarterly performance reports submitted to OVC. We also sampled and tested metrics from every applicable category in the performance report, as listed above.

Based on our review, the state's information reconciled with the activity reported to OVC in CJB's Annual Performance Reports.

Compliance with Special Conditions

The special conditions of a federal grant award establish specific requirements for grant recipients. In its grant application documents, CJB certified it would comply with these special conditions. We reviewed the special conditions for each VOCA victim compensation program grant, and identified special conditions that we deemed significant to grant performance which are not otherwise addressed in another section of this report. We judgmentally selected the following four special conditions to review in greater detail:

- 1. Ensure that at least one key grantee official attends the annual VOCA National Training Conference.
- 2. Comply with applicable requirements regarding the System for Award Management (SAM), to include registering for a SAM account and maintaining the currency of information in the system.
- 3. Both the Point of Contact and all Financial Points of Contact for this award must have successfully completed the OJP Financial Management and Grant Administration Training.

4. Collect information regarding race, sex, and age of recipients of compensation benefits, where such information is voluntarily furnished.

We found that CJB complied with all of the special conditions we reviewed for compliance.

Grant Financial Management

Award recipients must establish an adequate accounting system and maintain accounting records and financial information that accurately account for awarded funds. To assess the adequacy of CJB's financial management of the VOCA victim compensation grants, we reviewed the process CJB used to administer these funds by examining expenditures charged to the grants, subsequent drawdown funding requests, and resulting financial reports. This included interviewing CJB personnel who were responsible for financial aspects of the grants, reviewing CJB written policies and procedures, inspecting award documents, and reviewing accounting records. To further evaluate CJB's financial management of the VOCA victim compensation grants, we also reviewed the Single Audit Reports for FYs 2016 and 2017.

As discussed below, in our overall assessment of grant financial management, we determined that CJB implemented adequate controls over claims processing, applied federal VOCA funds to eligible expenses, and reported quarterly Federal Financial Reports accurately. However, we identified an area for improvement related to the existing policy for lost wage claims.

Single Audit Report

The Single Audit Act requires that recipients of federal funding that expend \$750,000 or more in federal funds within the entity's fiscal year must have a single audit performed of its financial statements and federal funds expended for that year. We reviewed Single Audit Reports submitted by the State of Connecticut for FYs 2016 and 2017 and did not identify significant deficiencies or material weaknesses specifically related to CJB's Crime Victim Compensation Program or VOCA award requirements.

Grant Expenditures

Expenses for SAA VOCA compensation programs fall into two overarching categories: (1) compensation claim payments – 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 supporting documentation for select transactions.

Victim Compensation Claim Expenditures

Victims of crime in the state of Connecticut may submit claims for reimbursement of expenses incurred as a result of victimization, such as medical and funeral costs or loss of wages. CJB staff adjudicate these claims for eligibility and make payments from state funding supplemented by the VOCA victim compensation grants.

To evaluate CJB's financial controls over VOCA victim compensation grant expenditures, we reviewed victim compensation claims to determine whether the payments were accurate, allowable, timely, and in accordance with the requirements imposed by the VOCA Guidelines and the OVS Policy and Procedure Manual. We judgmentally sampled 53 separate payment transactions associated with 13 claims, totaling \$123,440. The transactions we reviewed included costs in the following categories: medical, mental health, funeral, lost wages, and loss of support.

Based on our testing, we determined that most expenditures were allowable, supported by adequate documentation, and approved in accordance with state policies and VOCA Guidelines. However, we believe that parts of CJB's existing policy for Wage Loss Calculation is not adequate to ensure complete and accurate compensation payments.

Lost Wage Claims

The OVS Policy and Procedure Manual required lost wages to be calculated from its Employer Information Request Form or from a 52-week salary history. For those claimants that did not work a full 52 weeks prior to the date of the crime, the number of weeks the claimant worked for the employer was to be used to determine the average weekly wage. CJB requests the claimant's employer to complete an Employment Information Request Form to provide information related to a victim's employment history such as: date employment began, days worked per pay period, gross and net earnings per pay period, payroll deductions, and benefits received. Based on the information received, a CJB claims examiner completes a Wage Loss Calculation Sheet to determine the amount of lost wages to be awarded. We found that CJB's current policy did not require the form to include any supporting documentation to allow for independent verification.

While the lost wage claims tested in our sample were allowable and supported, we still found a weakness in CJB's existing policy that needed to be addressed. As a result, we recommend that CJB strengthen its current policies and procedures to ensure that lost wage documentation fully supports the amount to be paid, the claim file explains the methodology used to make the calculation and the decision making process, and that documentation supporting the payments made is verified. Following audit fieldwork, we received a proposed draft of changes to the OVS Policy and Procedures Manual that requests additional documents (two complete paystubs) to consider salary loss when the victim/claimant's salary does not vary. CJB stated that these changes will be sent to their legal department for review and approval. However, we did not receive documentation establishing that this change has been implemented prior to our audit report, and our recommendation remains.

Denied Claims

We judgmentally selected and reviewed 5 denied claims. To assess whether the documentation maintained in CJB's case files adequately supported its decision to deny the claims, we reviewed available file documentation including; the application for benefits, the police report from the law enforcement agency, and any other supporting documentation. Based on our review, we determined that the documentation maintained by CJB adequately supported its decision to deny each of the claims.

Administrative Expenditures

The state administering agency may retain up to 5 percent of each grant to pay for administering its crime victim compensation program. However, such costs must derive from efforts to improve program effectiveness and service to crime victims, including claims processing, staff development and training, and public outreach. For the compensation grant program, we tested CJB's compliance with the 5 percent limit on the administrative category of expenses and found that CJB did not exceed its 5 percent limit and was generally well under the limit for all of the grants we reviewed. Additionally, we reviewed the administrative expenditures CJB made and found them to be appropriate.

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 victim compensation grant funds are available for the fiscal year of the award plus 3 additional fiscal years. To assess whether the CJB managed grant receipts in accordance with these federal requirements, we compared the total amount reimbursed to the total expenditures in CJB's accounting system and accompanying financial records.

For the VOCA victim compensation awards, CJB based its drawdowns on monthly trial balances prepared using its accounting system. Table 2 shows the total amount drawn down for each grant as of September 2019.

Table 2

Award Number	Award Period End Date	Total Award	Amount Drawn Down	Amount Remaining ^a
2015-VC-GX-0014	9/30/2018	\$1,192,000	\$853,203	\$338,797
2016-VC-GX-0054	9/30/2019	\$1,155,000	\$622,257	\$532,743
Total:		\$2,347,000	\$1,475,460	\$871,540

Amount Drawn Down for Each Grant as of September 2019

^a The amount remaining for grant 2015-VC-GX-0014 was deobligated and returned back to OJP. Unspent returned funds go back to the CVF for future CVF distribution.

Source: OJP records

We determined CJB's separate and cumulative drawdowns were supported by expenditures recorded in its accounting system and drawdowns were timed to minimize cash on hand to zero.

We found that CJB returned \$338,797 of its 2015 grant award to OJP as unspent program funds and is on track to return \$532,743 from its 2016 award. We did not find any indication that the return of funds affected program performance, as all the eligible compensation claims submitted during the scope of our testing were covered by the program.

Financial Reporting

According to the DOJ Grants Financial Guide, recipients shall report the actual expenditures and unliquidated obligations incurred for the reporting period on each financial report as well as cumulative expenditures. To determine whether the CJB submitted accurate Federal Financial Reports, we compared all reports due as of March 31, 2019, to its accounting records for each grant. We determined that quarterly and cumulative expenditures for the reports reviewed matched the accounting records.

Other Reportable Matters

As recommended in the U.S. Government Accountability Office's Standards for Internal Control in the Federal Government, effective documentation assists in management's design of internal controls by establishing and communicating the who, what, when, where, and why of internal control execution to personnel responsible for performing internal control operations. Such documentation also provides a means to retain organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel.⁶

As mentioned earlier in this report, within CJB, OVS handles the day-to-day administration and oversight of both the victim assistance and compensation VOCA

⁶ U.S. Government Accountability Office (GAO), Standards for Internal Control in the Federal Government (September 2014), 3.10, 35.

grants it receives. During our audit, we learned that the OVS Program Manager is responsible for completing the Crime Victim Compensation State Certification Form and progress reports, which are key aspects of the victim compensation grant program. However, the Program Manager confirmed that CJB does not have written policies and procedures that focused on these specific responsibilities for the OVS program. We believe the absence of written policies and procedures impacts management oversight of these functions and the continuity of operations.

We spoke with CJB officials about the importance of continuity planning, especially given the number of staff that will be eligible for retirement in less than 10 years. These officials agreed it was important to document, in writing, policies and procedures for the Program Manager's responsibilities. In order to strengthen CJB's internal control environment, we suggested CJB establish written policies and procedures that document the Program Manager's responsibilities.

CONCLUSION AND RECOMMENDATIONS

We concluded that CJB used its grant funding to enhance its crime victim compensation program. This audit identified one recommendation to improve CJB's existing program.

We recommend that OJP:

1. Work with CJB to strengthen its current policies and procedures to ensure that lost wage documentation fully supports the amount to be paid, the claim file explains the methodology used to make the calculation and the decision making process, and that documentation supporting the payments made is verified.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objective of the audit was to evaluate how the Connecticut Judicial Branch (CJB) designed and implemented its crime victim compensation 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, and (3) grant financial management.

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 compensation formula grants 2015-VC-GX-0014 and 2016-VC-GX-0054 from the Crime Victims Fund (CVF) awarded to CJB. The Office of Justice Programs (OJP), Office for Victims of Crime (OVC) awarded these grants totaling \$2,347,000 to CJB, which serves as the state administering agency. Our audit concentrated on, but was not limited to, the period of October 1, 2014, the project start date for VOCA compensation grant number 2015-VC-GX-0054, through the end of our fieldwork in September 2019. As of September 20, 2019, the CJB had drawn down a total of \$1,475,460 from the two audited grants.

To accomplish our objective, we tested compliance with what we consider to be the most important conditions of CJB's activities related to the audited grants. We performed sample-based audit testing for victim compensation expenditures, progress reports, and grant award special conditions. 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 compensation program guidelines, and the DOJ Grants Financial Guide, state compensation criteria, and the award documents contain the primary criteria we applied during the audit.

During our audit, we obtained information from OJP's Grants Management System as well as CJB accounting systems 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 CJB's overall system of internal controls, we did review the internal controls of CJB's financial management system specific to the management of funds for each VOCA grant within our review. To determine whether CJB adequately managed the VOCA funds we audited, we conducted interviews with CJB financial staff, examined policies and procedures, and reviewed grant documentation and financial records. We also developed an understanding of CJB'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.

CONNECTICUT JUDICIAL BRANCH RESPONSE TO THE DRAFT AUDIT REPORT



CHAMBERS OF PATRICK L. CARROLL III CHIEF COURT ADMINISTRATOR

231 CAPITOL AVENUE HARTFORD, CT 06106

October 29, 2019

Mr. Thomas O. Puerzer Regional Audit Manager Philadelphia Regional Audit Office Office of the Inspector General U.S. Department of Justice 701 Market Street, Suite 2300 Philadelphia, Pennsylvania 19106

Dear Mr. Puerzer:

I am writing in response to the U.S. Department of Justice, Office of the Inspector General's (OIG) draft audit report for the fiscal year 2015 and 2016 Connecticut Victim Compensation Formula Grants dated October 8, 2019.

The report contains one recommendation:

Work with CJB to strengthen its current policies and procedures to ensure that lost wage documentation fully supports the amounts to be paid, the claim file explains the methodology used to make the calculation and the decision making process, and that documentation supporting the payments made is verified.

Response: The Connecticut Judicial Branch concurs with the recommendation. Following discussion with the OIG field auditors, the Connecticut Office of Victim Services (OVS) revised policy and procedure 4.3 for Claim Development in June 2019 to require two complete paystubs to ensure that lost wage documentation fully supports the amount to be paid, the claim file explains the methodology used to make the calculation and the decision-making process, and that documentation supporting the payments made is verified. (See Attachment 1.) The policy was submitted to the Legal Services Unit on October 29, 2019 for review and, in accordance with CGS 54-207a, full and final approval from the Chief Court Administrator is expected in the next 4 weeks.

On September 19, 2019, the Branch implemented updated Personal Injury, Survivor Benefits and Court Attendance Employer Information Request forms and the corresponding letters. (See Attachment 2.) Each letter reflects the policy change where the Connecticut OVS requests, in addition to the completed Employer Information Request form, either two paystubs

Telephone: (860) 757-2100 Fax: (860) 757-2130 E-mail: Patrick.Carroll@jud.ct.gov

Page 2 Mr. Thomas O. Puerzer October 29, 2019

for the pay periods directly before the time taken or a 52-week salary history. This policy change was deemed sufficient by the OIG field auditors, and the revised forms have now been fully implemented.

Thank you for investing the time and expertise of the OIG staff in evaluating Connecticut's Victim Compensation Program. We appreciate your insights and welcome the opportunity to strengthen this important program.

Sincerely,

molt

Patrick L. Carroll III Chief Court Administrator

PLC:kms Attachments

cc: Linda J. Taylor, Lead Auditor Audit Coordination Branch, Audit and Review Division

APPENDIX 3

U.S DEPARTMENT OF JUSTICE OFFICE OF JUSTICE PROGRAMS RESPONSE TO THE DRAFT AUDIT REPORT



This memorandum is in reference to your correspondence, dated October 8, 2019, transmitting the above-referenced draft audit report for the Connecticut Judicial Branch (CJB). We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains **one** recommendation and no questioned costs. The following is Office of Justice Programs' (OJP) analysis of the draft audit report recommendation. For ease of review, the recommendation is restated in bold and is followed by our response.

1. We recommend that OJP work with CJB to strengthen its current policies and procedures to ensure that lost wage documentation fully supports the amount to be paid, the claim file explains the methodology used to make the calculation and the decision making process, and that documentation supporting the payments made is verified.

OJP agrees with this recommendation. We will coordinate with CJB to obtain a copy of its revised policies and procedures, developed and implemented, to ensure that lost wage documentation fully supports the amount to be paid, the claim file explains the methodology used to make the calculation and the decision making process, and the documentation supporting the payments is verified.

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

cc: Katharine T. Sullivan Principal Deputy Assistant Attorney General

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

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

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

Darlene L. Hutchinson Director Office for Victims of Crime

Allison Turkel Deputy Director Office for Victims of Crime

Katherine Darke-Schmitt Deputy Director Office for Victims of Crime

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

James Simonson Associate Director for Operations Office for Victims of Crime

Deserea Jackson Victim Justice Program Specialist Office for Victims of Crime

Charlotte Grzebien Deputy General Counsel



cc: Robert Davis Acting Director Office of Communications

> Leigh A. Benda Chief Financial Officer

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

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

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

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

OJP Executive Secretariat Control Number IT20191009134243

3

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 Department of Justice Office of Justice Programs (OJP) and the Connecticut Judicial Branch (CJB). OJP's response is incorporated in Appendix 3, and CJB's response is incorporated in Appendix 2 of this final report. In response to our draft audit report, both OJP and CJB agreed with our recommendation and, as a result, the status of the audit report 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 CJB to strengthen its current policies and procedures to ensure that lost wage documentation fully supports the amount to be paid, the claim file explains the methodology used to make the calculation and the decision making process, and that documentation supporting the payments made is verified.

<u>Resolved</u>. OJP agreed with our recommendation. In its response, OJP stated that it will coordinate with CJB to obtain a copy of its revised policies and procedures, developed and implemented, to ensure that lost wage documentation fully supports the amount to be paid, the claim file explains the methodology used to make the calculation and the decision-making process, and the documentation supporting the payments is verified.

CJB also agreed with our recommendation. In its response, CJB stated that they have already revised their policies and procedures and submitted the revisions to their Legal Services Unit on October 29, 2019, for review. Additionally, according to CJB, a full and final approval from the Chief Court Administrator is expected within four weeks of the policy and procedure submission.

This recommendation can be closed when we receive evidence that CJB's updated policies and procedures received full and final approval from the Chief Court Administrator and have been implemented.



The Department of Justice Office of the Inspector General (DOJ OIG) is a statutorily created independent entity whose mission is to detect and deter waste, fraud, abuse, and misconduct in the Department of Justice, and to promote economy and efficiency in the Department's operations.

To report allegations of waste, fraud, abuse, or misconduct regarding DOJ programs, employees, contractors, grants, or contracts please visit or call the **DOJ OIG Hotline** at <u>oig.justice.gov/hotline</u> or (800) 869-4499.

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

950 Pennsylvania Avenue, NW Washington, DC 20530-0001

Website

Twitter

YouTube

oig.justice.gov

@JusticeOIG

JusticeOIG

Also at Oversight.gov