



# Audit of the Office on Violence Against Women Grants Awarded to the Oklahoma Coalition Against Domestic Violence and Sexual Assault, Oklahoma City, Oklahoma

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**JUNE 2021 (Revised)**

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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, auditee's response, and are of individuals' names.

This report was revised in August 2022. This revision corrects figures that do not affect the report's findings and conclusions. The corrected figures, each noted by an asterisk, appear on pages 1, 10, and 17.



# EXECUTIVE SUMMARY

## **Audit of the Office on Violence Against Women Grants Awarded to the Oklahoma Coalition Against Domestic Violence and Sexual Assault, Oklahoma City, Oklahoma**

### **Objectives**

The Office on Violence Against Women (OVW) awarded the Oklahoma Coalition Against Domestic Violence and Sexual Assault (OCADVSA) three grants totaling \$1,416,594 for State Domestic Violence and Sexual Assault Coalitions program. The objectives of this audit were to determine whether costs claimed under the awards were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the awards; and to determine whether the grantee demonstrated adequate progress towards achieving program goals and objectives.

### **Results in Brief**

For the first 6 months of our audit, OCADVSA was largely unresponsive to our requests for audit documentation. When OCADVSA finally provided some but not all of the documentation we requested, we found that much of it was unreliable or did not support the costs charged to the awards. In addition, we concluded that OCADVSA did not adhere to award requirements we tested and did not demonstrate adequate progress towards achieving the awards' stated goals and objectives. As a result of our findings, we questioned all \$886,495 charged to the two awards that are now closed. Appendix 2 of this report provides a breakdown of these costs.

We advised OVW and the OCADVSA Board of Directors (the Board) about the issues identified during our audit. Subsequently, the Board initiated an investigation of OCADVSA, which resulted in the removal of the Executive Director and the resignation of the Bookkeeper. On February 19, 2021, the Board appointed an interim Executive Director and interim Chief Financial Officer.

### **Recommendations**

Our report contains 11 recommendations for OVW. We requested a response to our draft audit report from OCADVSA and OVW, which can be found in Appendices 3 and 4, respectively. Our analysis of those responses is included in Appendix 5.

### **Audit Results**

The purposes of the three OVW awards we reviewed were to support the enhancement of coalitions by funding specific projects and providing direct support to member rape crisis centers through funding, training and technical assistance, public awareness activities, and public policy advocacy. The project period for the awards was from September 1, 2015, through December 31, 2021. OCADVSA drew down a cumulative amount of \$907,495 for all of the awards we reviewed.

**Program Goals and Accomplishments** – Based on our review, we found that none of the documentation provided by OCADVSA provided sufficient evidence that the goals and objectives we tested had been achieved. Further, we found that progress reports we tested were inaccurate or not supported. As a result, we questioned the drawdowns for the closed awards totaling the \$886,495 as unsupported questioned costs.

**Award Financial Management** – We found weaknesses in OCADVSA's financial management of the awards, including its use of award funds, budget management, and financial reporting. We also found that OCADVSA's written policies and procedures did not have specific language regarding accountable property and asset management, contract award and management, payroll, or performance measurement and outcome assessment.

Finally, identified significant issues related to the reliability of the timesheets that OCADVSA provided as supporting documentation for personnel costs charged to the awards. As a result, we question all salary and fringe benefit expenditures charged to the awards totaling \$526,630. We also identified \$30,418 in unsupported and \$20,140 in unallowable contractor costs related to services that were not included in the approved award budgets. Additionally, we identified \$87,273 in unallowable and \$157,636 in unsupported other direct costs charged to the grant.

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## Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of three grants awarded by the Office on Violence Against Women (OVW), under the State Domestic Violence and Sexual Assault Coalitions program, to the Oklahoma Coalition Against Domestic Violence and Sexual Assault (OCADVSA) in Oklahoma City, Oklahoma. OCADVSA was awarded three grants totaling \$1,416,594, as shown in Table 1.\*

Table 1

### Grants Awarded to OCADVSA

Award Number	Program Office	Award Date	Project Period Start Date	Project Period End Date	Award Amount
2015-MU-AX-0014	OVW	09/25/2015	09/01/2015	09/30/2018	\$453,510
2017-MU-AX-0016	OVW	09/05/2017	09/01/2017	02/29/2020	477,248
2019-MU-AX-0016	OVW	09/24/2019	09/01/2019	12/31/2021	485,836
				<b>Total:</b>	<b>\$1,416,594</b>

Source: OJP Grants Management System (GMS)

Funding through the State Domestic Violence and Sexual Assault Coalitions program supports the enhancement of coalitions by funding specific projects. Statewide sexual assault coalitions provide direct support to rape crisis centers through funding, training, technical assistance, public awareness activities, and public policy advocacy. Additionally, statewide domestic violence coalitions provide similar support to domestic violence shelters and other domestic violence victim services programs. For approximately one-third of states and territories, these support services are provided through a dual sexual assault and domestic violence coalition, such as OCADVSA.

## The Grantee

Founded on March 5, 1979, the OCADVSA is a nonprofit organization that advocates to improve public policy and systems response to sexual assault, domestic violence, and stalking in Oklahoma and Indian Country. The mission of the OCADVSA is to organize and mobilize member programs to prevent and eliminate sexual and domestic violence and stalking in the State of Oklahoma and in Indian Country. OCADVSA is a resource for service providers and advocates throughout Oklahoma and Indian Country who work to prevent and eliminate domestic, sexual, and systemic violence. OCADVSA's website states that it provides training and technical assistance on the state, local, and national levels; sheds light on issues that affect all victims, and advocates for legislation that will better support victims. OCADVSA also states that it offers assistance on an array of subjects, including organizational capacity, policies, resource sharing, and agency connections.<sup>1</sup>

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<sup>1</sup> Background information on OCADVSA has been taken from the organization's website directly (unaudited).

## OIG Audit Approach

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

We tested compliance with what we consider to be the most important conditions of the awards. The 2015 and 2017 DOJ Grants Financial Guides and the award documents contain the primary criteria we applied during the audit.

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

# Audit Results

## OCADVSA Delays

Beginning on March 5, 2020, we sent OCADVSA repeated requests for the documentation necessary to conduct our audit. During much of the audit, OCADVSA was unresponsive to our requests for audit documentation. OCADVSA indicated that it was experiencing difficulties collecting the information we requested because of challenges involving the COVID-19 pandemic. We were understanding of the circumstances described and attempted to accommodate OCADVSA as it worked through its challenges. However, for the first 6 months of the audit, the only documentation we received were the OCADVSA accounting records and a list of OCADVSA employees paid from OVW award funds. As a result, on September 24, 2020, we sent OCADVSA a final request letter giving them 1 month to provide all requested documentation. After receiving the letter, OCADVSA provided some, but not all, of the requested documentation. Further, we found much of the documentation provided was unreliable or did not support the costs charged to the three OVW awards. In particular, OCADVSA did not provide us with documentation that adequately supported its achievement of the awards' goals and objectives. As a result, and as discussed in detail in the following section of this report, we question all costs charged to the awards.

In November 2020, we advised the OCADVSA Board of Directors (the Board) about the issues identified during our audit. The Board initiated an investigation of OCADVSA, which resulted in the removal of the Executive Director and the resignation of the Bookkeeper. On February 19, 2021, the Board appointed an interim Executive Director and interim Chief Financial Officer.

## Program Performance and Accomplishments

We reviewed required performance reports, award documentation, and interviewed OCADVSA officials to determine whether OCADVSA demonstrated adequate progress towards achieving the program goals and objectives. We also reviewed the Progress Reports, to determine if the required reports were accurate. Finally, we reviewed OCADVSA's compliance with the special conditions identified in the award documentation.

## Program Goals and Objectives

The goals and objectives for all awards included the following:

- Grants to State Coalitions Program: (1) Coordinate state victim service activities to identify gaps in services, avoid duplication of services, and coordinate services so that the greatest number of consumers will receive model services; (2) Collaborate and coordinate with federal, state, and local entities engaged in violence against women activities, including state-level awareness activities; (3) Provide technical assistance to member and non-member service providers; (4) Conduct workshops for victim advocates, survivors, legal service providers, and criminal justice representatives; and (5) Outreach to and encourage representation of underserved populations in coordination activities; (6) Coordinate or participate in the coordination of five state-level awareness activities.



In addition, Award Numbers 2015-MU-AX-0014 and 2017-MU-AX-0016 included the following:

- Sexual Assault Services to State Coalitions Program: (1) Provide support to staff for conducting trainings, meetings, facilitating educational displays and awareness month activities, providing other support required by staff, and facilitating inclusion and diversity in OCADVSA projects; (2) Offer four regional training sexual assault seminars for behavioral health professionals and other allied professionals in four regions of Oklahoma; and (3) Provide a trainer on Sexual Assault for the 2016 Annual Partners for Change Conference.<sup>2</sup>

We tested goals and objectives for closed Award Numbers 2015-MU-AX-0014 and 2017-MU-AX-0016 to determine whether goals and objectives were achieved and if the intended deliverables were realized.<sup>3</sup> We found that none of the documentation provided by OCADVSA supported that the goals and objectives we tested had been achieved. The documentation included a list of meetings and training sessions; however, OCADVSA did not provide documentation, such as meeting minutes, training agendas, sign-in sheets, or any other documentation, that demonstrated the meetings and training sessions took place or that they were related to the grant program.<sup>4</sup>

As discussed in more detail in the Required Performance Reports section of this report, OCADVSA could not provide support for any performance report measures we tested that are directly related to the goals and objectives of the awards. Additionally, as discussed in more detail in the Grant Expenditures and the Budget Management and Control sections of this report, we found that OCADVSA used a large percentage of the award funds for unallowable costs, including travel costs that were not related to the goals and objectives of the awards and that contributed to OCADVSA exceeding its travel budgets for Award Numbers 2015-MU-AX-0014 and 2017-MU-AX-0016 by \$167,000, collectively.

During our audit, OCADVSA provided no evidence that it achieved the stated goals and objectives of its closed awards or is on track to accomplish the goals and objectives of its open award. Based on this finding, combined with the other issues we discuss in detail later in this report concerning grant management and expenditures, we are questioning as unsupported all award funds that OCADVSA has drawn down for Award Numbers 2015-MU-AX-0014 and 2017-MU-AX-0016 totaling \$886,495. Therefore, we recommend that OVV remedy the \$886,495 in unsupported questioned costs given we found no evidence that OCADVSA achieved the stated goals and objectives of these two closed awards.

As stated previously, we advised the OCADVSA Board of the issues identified during our audit. In our judgment, the Board is taking action to address the award performance and financial management issues that we identified. As a result, we are not questioning the award funds that OCADVSA has received for Award Number 2019-MU-AX 0016 or recommending that the remaining award funds be put to better use. However, we recommend that OVV ensure that OCADVSA implements corrective actions and demonstrates documented progress for achieving the goals and objectives of its open award.

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<sup>2</sup> Award Number 2015-MU-AX-0014 did not include Sexual Assault Services to State Coalitions Program goal number 3.

<sup>3</sup> Award Number 2019-MU-AX-0016 was still ongoing at the time of our review.

<sup>4</sup> The exact same supporting documentation was provided for the goals and objectives for each of the closed awards we tested.

## Required Performance Reports

According to the 2015 and 2017 DOJ Grants Financial Guides, the funding recipient should ensure that valid and auditable source documentation is available to support all data collected for each performance measure specified in the program solicitation. In order to verify the information in progress reports, we selected a sample of 18 performance measures from the 2 most recent reports submitted for each of the closed grants and 9 performance measures for the open award for a total sample size of 45.<sup>5</sup> We then traced the items to supporting documentation maintained by OCADVSA.

Based on our review, we found that the progress reports we tested were inaccurate or not supported, as discussed below.

- Award Number 2015-MU-AX-0014: We found that there was not sufficient documentation to support 17 of the 18 performance measures tested. The majority of the documentation provided included notes written by OCADVSA in its programmatic database that described planned training topics and the number of people registered for the training. However, there were no training agendas, meeting minutes, or attendee sign-in sheets. In addition, OCADVSA did not provide us any supporting documentation for six performance measures in our sample. There also was one instance where OCADVSA reported a technical assistance consultation that was outside the scope of the reporting period.
- Award Number 2017-MU-AX-0016: We found that there was not sufficient documentation to support any of the 18 performance measures tested. The documentation provided was similar to the support provided for Award Number 2015-MU-AX-0014. However, there were no training agendas, meeting minutes, or attendee sign-in sheets. We also found that some of the technical assistance consultations included OCADVSA's performance reporting were for victim referrals to direct assistance programs and assisting a student with an internship opportunity, rather than technical assistance that OCADVSA provided to its member organizations. Additionally, we identified some technical assistance consultations claimed as performance accomplishments that were outside the scope for the reporting period.
- Award Number 2019-MU-AX-0016: We found that there was not sufficient documentation to support eight of the nine performance measures tested. The documentation provided was similar to the support provided for Award Numbers 2015-MU-AX-0014 and 2017-MU-AX-0016 and nothing that evidenced that the claimed accomplishments actually occurred, such as training agendas, meeting minutes, or attendee sign-in sheets. We also found that OCADVSA used some of the same training events reported for the 2017 award when reporting accomplishments for the 2019 award. Finally, there was one performance measure for which OCADVSA did not provide any supporting documentation.

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<sup>5</sup> There was only one progress report due for Award Number 2019-MU-AX-0016 at the time of our review; therefore, we only tested nine performance measurements for this award.



As a result of our testing, we found that the progress reports for the awards we tested were inaccurate or not supported. Therefore, we recommend that OVW coordinate with OCADVSA to ensure that progress reports are accurate and fully supported.

## **Compliance with Special Conditions**

Special conditions are the terms and conditions that are included with the awards. We evaluated the special conditions for each grant and selected a judgmental sample of two requirements from each award that are significant to performance under the grants and are not addressed in another section of this report. Based on our sample testing, we did not identify any instances of OCADVSA violating the six special conditions that we reviewed.

## **Award Financial Management**

According to the 2015 and 2017 DOJ Grants Financial Guides, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. To assess the OCADVSA's financial management of the grants covered by this audit, we conducted interviews with OCADVSA staff, examined policies and procedures, and inspected grant documents to determine whether OCADVSA adequately safeguards the grant funds we audited. We also performed testing in the areas that were relevant for the management of the awards, as discussed throughout this report.

Based on our analysis, we identified weaknesses in OCADVSA's financial management that resulted in unsupported and unallowable costs totaling \$928,367. Specifically, we found that OCADVSA: (1) charged unallowable and unsupported personnel, contractor, and other direct costs to the awards; (2) transferred funds among budget categories in excess of the allowable 10 percent, resulting in unallowable costs; and (3) submitted Federal Financial Reports (FFRs) that were inaccurate. These deficiencies are discussed in more detail in the Personnel Costs, Contractor Costs, Other Direct Costs, Budget Management and Control, and Federal Financial Reports sections of this report.

Additionally, we concluded that OCADVSA's written policies and procedures are inadequate. We noted that OCADVSA's policies and procedures did not have specific language regarding accountable property and asset management, contract award and management, payroll, and performance measurement and outcome assessment. Therefore, we recommend that OVW coordinate with OCADVSA to ensure it develops and implements financial policies and procedures that include specific language regarding accountable property and asset management, contract award and management, payroll, and performance measurement and outcome assessment.

## **Grant Expenditures**

For the three awards we audited, OCADVSA's approved budgets included personnel, fringe benefits, travel, supplies, contractual, and other direct costs. To determine whether costs charged to the awards were allowable, supported, and properly allocated in compliance with award requirements, we tested a

judgmental sample of 210 transactions totaling \$226,803.<sup>6</sup> We reviewed documentation, accounting records, and performed verification testing related to grant expenditures, in which we identified \$822,098 in questioned costs. The following sections describe the results of our testing.

## Personnel Costs

As part of our sample, we reviewed 46 employee salary and related fringe benefit transactions totaling \$62,503 for two non-consecutive pay periods for each of the three awards, to determine if labor charges were computed correctly, accurately recorded, and properly authorized and allocated to the awards.

OCADVSA timesheets are important support for its payroll costs charged to the awards because the Executive Director and other employees' salaries and fringe benefits are allocated between multiple awards. However, we identified significant issues related to the reliability of OCADVSA's timesheets. An OCADVSA employee told us that OCADVSA employees were responsible for tracking their own time, including paid time off instead of having their time tracked in the payroll system. OCADVSA staff also informed us that timesheets were never reviewed by a supervisor for accuracy. In addition, we were told that the former Executive Director did not complete or maintain timesheets.

One employee found unsigned timesheets on the copier, including one for the former Executive Director, and provided them to us because she was concerned that the former Executive Director created timesheets for our audit and was retroactively back dating and signing employee timesheets for the purposes of this audit. The timesheets the employee sent to us were dated as far back as October 2017 and did not contain evidence of supervisory review of employee timesheets and included a completely unsigned timesheet for the former Executive Director. Subsequently, the former Executive Director provided us timesheets in response to our request for payroll documentation to support compensation paid for the pay periods in our sample. We compared these two sets of timesheets, and we found discrepancies. Specifically, previously unsigned timesheets that the employee found on the copier were signed and dated retroactively by the former Executive Director. We also followed up with the Board Chair and confirmed that the former Executive Director had asked him to retroactively sign off as reviewer of the timesheets she created for the purposes of this audit.

Given that OCADVSA staff informed us that timesheets are not reviewed and verified by a supervisor and that the former Executive Director created timesheets only for the purpose of our audit, we do not have confidence in the accuracy or reliability of OCADVSA's timesheets to accurately support the payroll costs charged to the awards we audited. As a result, we do not consider any timesheets provided by OCADVSA as reliable supporting documentation, and we question all salary and fringe benefit expenditures charged to the awards totaling \$526,630 as unsupported. Therefore, we recommend that OVW coordinate with OCADVSA to remedy the \$526,630 in unsupported personnel questioned costs. Additionally, we recommend that OVW coordinate with OCADVSA to ensure it consistently and contemporaneously records employee time and documents supervisory review and validation of employee time charged to specific OVW awards.

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<sup>6</sup> Throughout this report, differences in the total amounts are due to rounding. The sum of individual numbers prior to rounding may differ from the sum of the individual numbers rounded.

## Contractor Costs

As part of our testing sample, we reviewed 26 contractor transactions totaling \$51,299 to determine if charges were computed correctly, properly authorized, accurately recorded, and properly allocated to the grants. In addition, we determined if rates, services, and total costs were in accordance with those allowed in the approved budgets. As a result of our testing, we identified \$50,558 in unsupported and unallowable contractor costs charged to the awards.

For Award Number 2015-MU-AX-0014, we identified 5 transactions totaling \$9,749 in contractor costs that were not supported by detailed invoices or did not have a contract agreement in place. In addition, we found that OCADVSA did not have a consistent or reasonably documented allocation methodology to charge each award. As a result, we were unable to verify the accuracy of the contractor costs allocated to the awards. We also identified three contractor transactions totaling \$8,213 for financial consulting services and a program evaluation for a member organization that were not included in the approved budget or subsequent Grant Adjustment Notice (GAN). Additionally, the purpose of the award was for OCADVSA to provide training and technical assistance; however, instead of providing training itself, OCADVSA reimbursed another organization for providing training. Given these findings, we reviewed the accounting records for this award and questioned all contractor costs charged to the award for services that were not included in the award budget, resulting in an additional \$3,719 in unallowable costs. For the sampled contractor transactions for this award, we identified \$9,749 as unsupported costs, and we identified a total of \$11,932 as unallowable costs.

For Award Number 2017-MU-AX-0016, we identified 11 transactions totaling \$20,129 in contractor costs that were not supported by detailed invoices, conference agenda, contract agreement, or final work product. Additionally, we were unable to verify the accuracy of contractor costs allocated to the award. We also identified four contractor transactions totaling \$5,835 for program evaluation for a member organization, membership dues, and training expenses that were not included in the approved budget or subsequent GAN. For three of the transactions we determined to be unallowable, the former Executive Director acknowledged that two of them were not supposed to be charged to this award and one was allocated to this award at the incorrect allocation rate. However, OCADVSA did not provide us with any documentation indicating these funds were reimbursed to the award. As with the 2015 award, we reviewed the accounting records for this award and questioned all contractor costs charged to the award for services that were not included in the award budget, resulting in an additional \$2,374 in unallowable questioned costs. For this 2017 award, we identified \$20,129 in our sample testing as unsupported costs, and we identified a total of \$8,209 as unallowable contractor costs charged to the award.

For Award Number 2019-MU-AX-0016, we identified two contractor transactions totaling \$540, for which one transaction was not supported because we were unable to verify the amount allocated to the award and for the other transaction OCADVSA did not provide us any supporting documentation. We, therefore, question both these transactions as unsupported.

During our testing, we found eight different contractors with which OCADVSA did not have a contract agreement covering the periods of transaction in our sample. In addition, we identified six instances where the contract was not signed or dated by either the contractor, an OCADVSA official, or both; and we identified one instance where the contract was dated approximately 9 months after the dates the services were provided to OCADVSA.

For all three awards, we identified a total of \$30,418 in unsupported and \$20,140 in unallowable contractor costs charged to the awards. Therefore, we recommend that OVW remedy the \$30,418 in unsupported and \$20,140 in unallowable contractor questioned costs. Additionally, we recommend that OVW coordinate with OCADVSA to ensure that: (1) current contract agreements are maintained for all contractors; (2) contractors provide detailed invoices prior to payment for services rendered; and (3) it implements specific policies and procedures to address procurement of contracts and consultants.

## Other Direct Costs

As part of our sample, we reviewed 138 other direct cost transactions totaling \$113,000 to determine if the costs were supported, approved, allowable, and reasonable. As a result of our testing, we identified \$244,910 in unsupported and unallowable other direct costs charged to the awards, as shown in Table 2 below.<sup>7</sup>

**Table 2**

### Other Direct Questioned Costs

Award Number	Number of Unsupported Transactions	Unsupported Other Direct Questioned Costs	Number of Unallowable Transactions	Unallowable Other Direct Questioned Costs	Additional Unsupported Questioned Costs	Additional Unallowable Questioned Costs
2015-MU-AX-0014	44	\$27,328	28	\$18,007	\$29,486	\$15,807
2017-MU-AX-0016	43	\$27,171	28	\$11,271	\$54,956	\$40,576
2019-MU-AX-0016	17	\$4,564	2	\$1,368	\$14,131	\$245
<b>Total:</b>	<b>104</b>	<b>\$59,063</b>	<b>58</b>	<b>\$30,646</b>	<b>\$98,573</b>	<b>\$56,628</b>

Source: OIG Analysis

For all three awards, we identified 104 transactions totaling \$59,063 in other direct costs that were not supported by detailed invoices, an invoice did not match details of the description in the accounting records, conference or meeting agendas and minutes, miscalculated mileage reimbursement, and we did not receive any supporting documentation for 23 sample items. In addition, we were unable to verify the accuracy of other direct costs allocated to the award. We also identified one transaction where the former Executive Director received an advance for travel based on the reservation amount; however, the hotel invoice after the stay was \$465 less than the reservation amount and we were unable to determine if the difference was reimbursed back to the award.

<sup>7</sup> The number of transactions identified as unsupported and unallowable is higher than the total number of transactions in our sample because some transactions were questioned for more than one reason.

We identified 58 other direct cost transactions totaling \$30,646 for conferences, a reference guide, service fees, registration and membership dues, tax preparation services, moving services, utilities, cleaning services, a television and wall mount, food for meetings, window decal installation, tax penalties, late fees, office furniture, tote bags, Christmas cards, newspaper subscription, shred box, safe deposit box, property taxes on a printer, and continuing education credits for the Oklahoma Bar Association that were not included in the approved budget or an approved GAN. According to the 2015 and 2017 DOJ Grants Financial Guides, travel expenses are allowable costs for employees who are in travel status on official business related to the award. These costs must be reasonable and in accordance with the organization's established travel policy. Additionally, OCADVSA's travel policy states it will reimburse employees for the cost of standard accommodations in a reasonably priced hotel for overnight stays during business trips. However, we identified one transaction that included in-town hotel costs for the former Executive Director and Bookkeeper. In our judgment, these employees did not adhere to the DOJ Financial Guides' or OCADVSA's established travel policy because they were not in travel status on official business. We also identified one transaction for phone and internet services that the former Executive Director acknowledged should have been partially allocated to another award instead of the entire amount being charged to this award. Additionally, we identified 27 transactions totaling \$15,883 for attending out-of-state conferences and training events that were beyond the scope of the purpose of the awards, which was to provide training and technical assistance to coalition member organizations.

Finally, we identified at least seven transactions in our sample where there is no indication of review of expenses prior to payment being made. Similar to what we found during payroll testing, an OCADVSA employee found and provided us with seven claim forms from April 2018 for our sample that did not have signatures indicating they had been reviewed. As a result of our testing, we reviewed the accounting records for these awards and questioned all other direct costs charged to the awards for unsupported expenses that were allocated to multiple awards and unallowable expenses that were not included in the award budgets, resulting in an additional \$98,573 in unsupported and \$56,628 in unallowable questioned costs. In total, we identified \$157,636 in unsupported and \$87,273 in unallowable other direct costs charged to the awards.\* Therefore, we recommend that OVW remedy the \$157,636 in unsupported and \$87,273 in unallowable other direct questioned costs.\* Additionally, we recommend that OVW coordinate with OCADVSA to ensure that: (1) it develops a consistent and reasonably documented allocation methodology and (2) claim forms and invoices are reviewed prior to payment.

## **Budget Management and Control**

According to the 2015 and 2017 DOJ Grants Financial Guides, the recipient is responsible for establishing and maintaining an adequate accounting system, which includes the ability to compare actual expenditures or outlays with budgeted amounts for each award. Additionally, the grant recipient must initiate a GAN for a budget modification that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.

We compared award expenditures to the approved budgets to determine whether OCADVSA transferred funds among budget categories in excess of 10 percent of the total award amounts. We found that OCADVSA transferred funds among budget categories in excess of 10 percent of the total award amount for Award Numbers 2015-MU-AX-0014 and 2017-MU-AX-0016. We noted that the budget category that was the highest over budget for both awards was for travel.

For Award Number 2015-MU-AX-0014 the budget for travel was \$38,037; however, OCADVSA spent \$130,145 in this category alone, which is \$92,108 more than what was budgeted. During grant expenditure testing, we found conferences and training events that were not in the approved budget or an approved GAN. We also noted that OVW approved 19 GANs for OCADVSA personnel and others to attend out-of-state conferences and training events, including one trip to a theme park resort, between July 2016 and September 2018. These conferences and training events were outside the scope of the purpose of the award, which was to provide training and technical assistance to coalition member organizations. We identified 10 approved GANs for these conferences and training events that follow 2 separate no-cost extension GANs where OCADVSA justified the extensions by stating it would be completing deliverables of the award. Although OVW approved the 19 GANs for the conferences and training events and 2 GANs for no-cost extensions of the project periods, there was no approval for a budget modification.

For Award Number 2017-MU-AX-0016 the travel budget was \$34,424; however, OCADVSA spent \$109,354 in this category alone, which is \$74,930 more than what was budgeted. During grant expenditure testing, we found conferences and training events that were not in the approved budget or GAN. We also noted an approved GAN for a no-cost extension of the project period with language that OCADVSA has submitted a budget revision asking for changes in multiple budget categories. However, that budget modification was denied by OVW. Therefore, OCADVSA was not authorized to transfer funds among budget categories that exceeded the 10 percent threshold.

Based on our analysis of actual expenditures to the approved budgets, we concluded that OCADVSA spent much of the award funds to attend conferences and training events that were beyond the scope and purpose of the awards, which was for OCADVSA to provide training and technical assistance to coalition member programs. As a result, we identified \$77,634 in unallowable costs charged to Award Number 2015-MU-AX-0014 and \$28,635 in unallowable costs charged to Award Number 2017-MU-AX-0016 related to the transfer of funds among budget categories in excess of 10 percent of the total award amounts. We recommend that OVW work with OCADVSA to ensure it initiates a GAN for budget modifications that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.

## **Drawdowns**

According to the 2015 and 2017 DOJ Grants Financial Guides, an adequate accounting system should be established to maintain documentation to support all receipts of federal funds. If, at the end of the grant award, recipients have drawn down funds in excess of federal expenditures, unused funds must be returned to the awarding agency. According to OCADVSA's former Executive Director, the Bookkeeper and a financial consultant are responsible for preparing and submitting drawdown requests. The Executive Director then is responsible for running reports from the accounting system to reconcile the numbers. Additionally, the former Executive Director stated that drawdowns are conducted on a reimbursement basis. As of September 22, 2020, OCADVSA had drawn down a total of \$907,495 from the awards in our scope. We did not identify significant deficiencies related to the recipient's process for developing drawdown requests. However, as discussed previously, we identified significant deficiencies and questioned costs related to compliance of individual expenditures with award rules.

## Federal Financial Reports

According to the 2015 and 2017 DOJ Grants Financial Guides, 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 OCADVSA submitted accurate Federal Financial Reports (FFRs), we compared the four most recent reports to OCADVSA's accounting records for each grant.

As shown in Table 3, we found that none of the FFRs matched OCADVSA's accounting records for Award Numbers 2015-MU-AX-0014 and 2017-MU-AX-0016. We also found that two of the four FFRs tested for Award Number 2019-MU-AX-0016 did not match the accounting records. We recommend that OVV coordinate with OCADVSA to develop policies and procedures that ensures information reported in FFRs is accurate and supported.

**Table 3**

### FFR Accuracy

Report #	Quarterly Expenditures Difference (Qtr. Exp. per GL – Qtr. Exp. per FFR)	Cumulative Expenditures Difference Per GL (Cumulative Exp. per GL – Cumulative Exp. per FFR)
<b>Award Number: 2015-MU-AX-0014</b>		
10	\$ (26,458)	\$ 125,817
11	49,291	175,109
12	(28,991)	146,117
13	(146,036)	(453,510)
<b>Award Number: 2017-MU-AX-0016</b>		
7	\$ (76,079)	\$ (88,085)
8	48,134	(39,951)
9	(90,599)	(130,550)
10	49,060	(81,490)
<b>Award Number: 2019-MU-AX-0016</b>		
1	\$ 0	\$ 0
2	0	0
3	100	100
4	21	121

Source: OJP Grants Management System and OCADVSA Accounting Records



## Conclusion and Recommendations

As a result of our audit testing, we conclude that OCADVSA did not adhere to all of the grant requirements we tested and did not demonstrate adequate progress towards achieving the awards' stated goals and objectives. We found that OCADVSA did not comply with essential award conditions related to progress reports, use of award funds, management of the award budgets, and financial reports. As a result, we provide 11 recommendations for OVW to address these deficiencies.

We recommend that OVW:

1. Remedy the \$886,495 in questioned costs related to the fact that there is no indication that OCADVSA achieved the stated goals and objectives of the closed awards.
2. Coordinate with OCADVSA to ensure that it implements corrective actions and demonstrates documented progress for achieving the goals and objectives of its open award.
3. Coordinate with OCADVSA to ensure that progress reports are accurate and fully supported.
4. Coordinate with OCADVSA to ensure it develops and implements financial policies and procedures that include specific language regarding accountable property and asset management, contract award and management, payroll, and performance measurement and outcome assessment.
5. Coordinate with OCADVSA to remedy the \$714,684 in unsupported questioned costs related to \$526,630 in unsupported personnel costs, \$30,418 in unsupported contractor costs, and \$157,636 in unsupported other direct costs.
6. Coordinate with OCADVSA to ensure it consistently and contemporaneously records employee time and documents supervisory review and validation of employee time charged to specific OVW awards.
7. Remedy the \$107,413 in unallowable questioned costs related to the \$20,140 in unallowable contractor costs and \$87,273 in unallowable other direct costs.
8. Coordinate with OCADVSA to ensure that current contract agreements are maintained for all contractors, contractors provide detailed invoices prior to payment for services rendered, and implements specific policies and procedures to address procurement of contracts and consultants.
9. Coordinate with OCADVSA to ensure it develops a consistent and reasonably documented allocation methodology and claim forms and invoices are reviewed prior to payment.
10. Coordinate with OCADVSA to ensure it initiates a GAN for budget modifications that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.

11. Coordinate with OCADVSA to develop policies and procedures that ensures information reported in FFRs is accurate and supported.

# **APPENDIX 1: Objectives, Scope, and Methodology**

## **Objectives**

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

## **Scope and Methodology**

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

This was an audit of Office on Violence Against Women (OVW) grants awarded to the Oklahoma Coalition Against Domestic Violence and Sexual Assault (OCADVSA) under the State Domestic Violence and Sexual Assault Coalitions program. Through Award Number 2015-MU-AX-0014, OCADVSA was awarded \$453,510; through Award Number 2017-MU-AX-0016, OCADVSA was awarded \$477,248; and through Award Number 2019-MU-AX-0016, OCADVSA was awarded \$485,836. As of September 22, 2020, OCADVSA had drawn down \$907,495 of the total grant funds awarded. Our audit concentrated on, but was not limited to September 25, 2015, the award date for Award Number 2015-MU-AX-0014, through March 8, 2021, the last day of our audit work. We noted that Award Numbers 2015-MU-AX-0014 and 2017-MU-AX-0016 had reached the end of their project periods prior to the start of our review, and Award Number 2019-MU-AX-0016 was still ongoing, with a project end date of December 31, 2021. As a result of the COVID-19 pandemic response, we performed our audit fieldwork exclusively in a remote manner.

To accomplish our objectives, we tested compliance with what we consider to be the most important conditions of OCADVSA's activities related to the audited awards. We performed sample-based audit testing for award expenditures including payroll and fringe benefit charges, financial reports, and progress reports. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the awards reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected. The 2015 and 2017 DOJ Grants Financial Guides 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 OCADVSA's accounting system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

## Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of OCADVSA to provide assurance on its internal control structure as a whole. OCADVSA management is responsible for the establishment and maintenance of internal controls in accordance with 2 C.F.R. §200. Because we do not express an opinion on the OCADVSA's internal control structure as a whole, we offer this statement solely for the information and use of the OCADVSA and OVW.<sup>8</sup>

In planning and performing our audit, we identified the following internal control components and underlying internal control principles as significant to the audit objective(s):

Internal Control Components & Principles Significant to the Audit Objectives	
Control Activity Principles	
	Management should design control activities to achieve objectives and respond to risks.
	Management should implement control activities through policies.
Information & Communication Principles	
	Management should internally communicate the necessary quality information to achieve the entity's objectives.
	Management should externally communicate the necessary quality information to achieve the entity's objectives.

We identified deficiencies that we believe could affect OCADVSA's ability to effectively and efficiently operate, and to ensure compliance with laws and regulations. However, because our review was limited to internal control components and underlying principles determined to be significant to the audit objectives, it may not have disclosed all deficiencies that may have existed at the time of this audit. The internal control deficiencies we found are discussed in the Audit Results section of this report.

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<sup>8</sup> This restriction is not intended to limit the distribution of this report, which is a matter of public record.

## APPENDIX 2: Schedule of Dollar-Related Findings<sup>9</sup>

Description	Grant No.	Amount	Page
<b>Questioned Costs:</b>			
Unallowable Contractor Costs	2015-MU-AX-0014	\$11,932	8
Unallowable Contract Costs	2017-MU-AX-0016	8,209	8
Unallowable Other Direct Costs	2015-MU-AX-0014	33,814	9
Unallowable Other Direct Costs	2017-MU-AX-0016	51,847	9
Unallowable Other Direct Costs	2019-MU-AX-0016	<u>1,613</u>	9
Unallowable Costs		\$107,415	
Unsupported Lack of Performance Costs	2015-MU-AX-0014	\$453,510	4
Unsupported Lack of Performance Costs	2017-MU-AX-0016	432,985	4
Unsupported Personnel Costs	2015-MU-AX-0014	224,033	7
Unsupported Personnel Costs	2017-MU-AX-0016	220,499	7
Unsupported Personnel Costs	2019-MU-AX-0016	82,098	7
Unsupported Contractor Costs	2015-MU-AX-0014	9,749	8
Unsupported Contractor Costs	2017-MU-AX-0016	20,129	8
Unsupported Contractor Costs	2019-MU-AX-0016	540	8
Unsupported Other Direct Costs	2015-MU-AX-0014	56,814	9
Unsupported Other Direct Costs	2017-MU-AX-0016	82,127	9
Unsupported Other Direct Costs	2019-MU-AX-0016	<u>18,695</u>	9
Unsupported Costs		\$1,601,179	
<i>Gross Questioned Costs<sup>10</sup></i>		<i>\$1,708,594</i>	
Less Duplicate Questioned Costs <sup>11</sup>		<u>(720,521)*</u>	
<b>Net Questioned Costs</b>		<b>\$988,073*</b>	
<b>TOTAL DOLLAR-RELATED FINDINGS</b>		<b><u>\$988,073*</u></b>	

<sup>9</sup> Differences between the amounts shown here and in the report are due to rounding and grouping of questioned costs.\*

<sup>10</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>11</sup> Some costs were questioned for more than one reason. Net questioned costs exclude the duplicate amount, which includes \$444,532 in personnel costs, \$50,019 in contractor costs and \$225,970 in other direct costs.\*

# APPENDIX 3: The Oklahoma Coalition Against Domestic Violence and Sexual Assault Response to the Draft Report



Oklahoma Coalition Against Domestic Violence and Sexual Assault  
8524 S. Western, Ste. 111, Oklahoma City, OK 73139  
405.524.0700 www.ocadvsa.org

Ada  
Family Crisis Center  
Altus  
ACMI House  
Ardmore/Marietta  
Family Shelter of Southern OK  
Bartlesville  
Ray of Hope  
Chickasha/El Reno  
Intervention & Crisis Advocacy  
Network  
Claremore/Pryor  
Safenet Services  
Clinton/Elk City  
Action Associates  
Duncan  
Safe Center  
Durant/Madill  
Crisis Control Center  
Enid  
YWCA of Enid  
Lawton  
New Directions  
Miami/Jay/Vinita  
Community Crisis Center  
Muskogee/Eufaula  
Women in Safe Home  
Norman  
Women's Resource Center  
Oklahoma City  
La Luz  
Oklahoma City  
YWCA OKC  
Okmulgee  
Okmulgee Co. Family Resource  
Center  
Ponca City  
Survivor Resources Network  
Sand Springs  
Day Spring Villa Women &  
Children's Shelter  
Seminole  
Seminole Family Resource Center  
Shawnee  
Project Safe  
Stillwater  
Wings of Hope Family  
Crisis Services  
Tahlequah/Sallisaw/Wagoner  
Help In Crisis  
Tulsa  
Domestic Violence Intervention  
Services  
Woodward/Alva/Guymon  
NW Domestic Crisis Services

May 27, 2021

Assistant 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

Dear [REDACTED]:

I received the Draft Audit Report from the Department of Justice (DOJ) Office of the Inspector General on May 3, 2021. I, as well as the team now in place at OCADVSA appreciate the granting of a two week extension for the response letter and appreciate the understanding and patience of this department over the course of this audit.

As you are aware in December 2020 the OCADVSA Board put the Executive Director on administrative leave pending investigation of complaints. In January 2021 the OCADVSA Board appointed Tracey Lyall, CEO of DVIS, to oversee the contracting of myself, Meline Epley, as interim Executive Director, [REDACTED] as interim CFO, and [REDACTED] as interim accountant, referred to here as "team". The team was engaged the last week of January 2021.

The initial tasks for the team were to gain access to all the required granting websites, gain an understanding of the status of the audit, manage the day to day operations of payroll and paying invoices, and gain an understanding of the programs and objectives of OCADVSA. Upon requesting a status of the audit and requesting a listing of items still needed for the audit we were told by the bookkeeper, who was still employed until mid-February that everything that could be located had been submitted to the auditor.

Upon arriving at OCADVSA it was quickly identified that the proper recordkeeping within OCADVSA's accounting system and with physical copies of documentation had not been fully implemented and maintained. There were piles of documents that needed to be reviewed and filed in an orderly fashion before we could begin to try and locate missing documents for the audit. This process is ongoing but we believe the documentation is in a workable state to allow review for missing documents. The review of the accounting system is ongoing as well but several areas of improper accounting practices have been corrected.

With this background given I will respond to the eleven recommendations presented in the audit.

1. Remedy the \$886,495 in questioned costs related to the fact that there is no indication that OCADVSA achieved the stated goals and objectives of the closed awards.

**Response:** During the process of reviewing, organizing, and filing of documentation along with a review of accounting records the team believes there is evidence that OCADVSA was conducting training, providing technical assistance, attending OVW and other organizational events and meeting their objectives as stated in the grants but that there had not been an adequate system of recordkeeping established and implemented. Therefore, the recordkeeping was not adequate at the time of the audit to provide the proper substantiation of those goals and objectives.

2. Coordinate with OCADVSA to ensure that it implements corrective actions and demonstrates documented progress for achieving the goals and objectives of its open awards.

**Response:** The team has been working with OCADVSA's training coordinator to ensure we all have an understanding of the goals and objectives of each award. The training coordinator has implemented a spreadsheet with each goal/objective and is tracking each training event and/or completion of each objective. The Coalition Manager software is utilized for managing the scheduling and tracking attendance for each training webinar or event. Reports of attendance along with agendas and any related materials are all saved electronically by event.

3. Coordinate with OCADVSA to ensure that progress reports are accurate and fully supported.

**Response:** The tracking spreadsheet explained in Response #2 will be maintained on an ongoing basis for tracking all training webinars and other OCADVSA sponsored events. Each attendee is tracked within Coalition Manager. Copies of Agendas and any provided materials will be maintained electronically.

4. Coordinate with OCADVSA to ensure it develops and implements financial policies and procedures that include specific language regarding accountable property and asset management, contract award and management, payroll and performance measurement and outcome assessment.

**Response:** The financial policies and procedures were approved by OCADVSA's Board at a Special Meeting on May 17, 2021 after several drafts and reviews by the Finance Committee, Board members and legal counsel. Accountable property and asset management is addressed in the Financial Policy in Section 7, contract award and management is addressed in Section 4, payroll is addressed in Section 3, and performance measurement and outcome assessment is addressed in Exhibit A, Grant Requirements, to the Financial Policies. Exhibit A, Grant Requirements, is still being finalized but should be completed by the end of June 2021.

5. Coordinate with OCADVSA to remedy the \$714,684 in unsupported questioned costs related to \$526,630 in unsupported personnel costs, \$30,418 in unsupported contractor costs, and \$157,636 in unsupported other direct costs.

**Response:** The unsupported payroll costs that total \$526,630 identified in the audit included an amount of \$82,098.16 for personnel costs from the 2019-MU-AX-0016 award. This award had not been drawn against at the time of the audit and as stated on Page 4, last paragraph of the Draft Audit Report the OIG is not questioning the award funds that have been received for 2019-MU-AX-0016. We request this amount be removed from the unsupported personnel costs.

After review of payroll records and the payroll system it is apparent the payroll system was being relied upon to do the allocations of time based on what had been submitted in each budget. From review of the budgets for OVW and FVPSA for fiscal year 2015, two of the personnel were included at 100% on the OVW budget and the other two personnel at 100% on the FVPSA budget. Given the budgets were approved based on 100% of specific personnel wages and benefits it would appear to be unnecessary to track time worked by each award.



In the subsequent award periods, 2016-2018, personnel costs were allocated between OVW and FVPSA grants on a more equal basis for each employee given these grants were the main sources of funding for OCADVSA. It is my understanding the goals and objectives for both grants, OVW and FVPSA, are basically the same and it would be appropriate to allocate personnel costs on an equal basis. Again, the payroll system was used to perform the allocations of time based on what had been submitted in each budget.

Although timecards were determined not reliable we request consideration be given to the process that was established in an effort to allocate personnel costs according to approved budgets.

We request additional time to locate support for the contractor costs of \$30,418 and direct costs of \$157,636. Now that documents have been organized and filed we would appreciate the opportunity to locate the missing documents.

6. Coordinate with OCADVSA to ensure it consistently and contemporaneously records employee time and documents supervisory review and validation of employee time charged to specific OVW awards.

**Response:** A process has been put in place for employees to track their time worked in the payroll system with timesheets being approved by the Executive Director (currently the interim Executive Director) each pay period. Paid time off (PTO) is being tracked in the payroll system and hard copies of PTO requests are required to be submitted by the employee and approved by the Executive Director.

7. Remedy the \$107,413 in unallowable questioned costs related to the \$20,140 in unallowable contractor costs and \$87,273 in unallowable other direct costs.

**Response:** We request additional time to locate support for the unallowable contractor costs of \$20,140 and unallowable direct costs of \$87,273. There were several grant adjustment forms and support, totaling over 200 pages, we recently obtained covering the audit period and now that documents have been organized and filed we would appreciate the opportunity to locate the missing documents and to review the grant adjustments to see if they support some of the questioned costs.

8. Coordinate with OCADVSA to ensure that current contract agreements are maintained for all contractors, contractors provide detailed invoices prior to payment for services rendered, and implement specific policies and procedures to address procurement of contracts and consultants.

**Response:** The approved Financial Policies address procurement of contracts and consultants in Section 2. OCADVSA has implemented these policies and procedures covering contracts and consultants.

9. Coordinate with OCADVSA to ensure it develops a consistent and reasonably documented allocation methodology and claim forms and invoices are reviewed prior to payment.

**Response:** The team at OCADVSA has implemented the procedures for proper invoice approval prior to payment and are preparing claim forms with each payment. The team has committed to analyzing employee time allocations and to have a written allocation process in place by the end of June 2021.

10. Coordinate with OCADVSA to ensure it initiates a GAN for budget modifications that reallocates funds among budget categories if the proposed cumulative change is greater than 10% of the total award amount.

**Response:** The policies and procedures for this requirement are being included in the Financial Policies as Exhibit A covering applicable Grant Requirements.

11. Coordinate with OCADVSA to develop policies and procedures that ensures information reported in FFRs is accurate and supported.

**Response:** The Board approved Financial Policies have detailed procedures in all areas covering management of funds to help ensure information is accurate and in compliance with grant requirements. The team has been working to correct the accounting records and to obtain a proper system for filing and retention of documents. We believe going forward we will be in a position to provide accurate, timely and supported FFRs.

## APPENDIX 4: The Office on Violence Against Women Response to the Draft Report



U.S. Department of Justice  
Office on Violence Against  
Women Washington, DC, 20530

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June 10, 2021

### MEMORANDUM

TO: David M. Sheeren  
Regional Audit Manager

THROUGH: Nadine M. Neufville *dy*  
Acting Director, Office on Violence Against Women (OVW)

Erin Lorah *EML*  
Acting Associate Director, Grants Financial Management Unit

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

SUBJECT: Draft Audit Report – Audit of the Office on Violence  
Against Women Grants Awarded to the Oklahoma Coalition  
Against Domestic Violence and Sexual Assault, Oklahoma City,  
Oklahoma.

This memorandum is in response to your correspondence dated May 3, 2021 transmitting the above draft audit report for the Oklahoma Coalition Against Domestic Violence and Sexual Assault (OCADVSA), Oklahoma City, Oklahoma. We consider the subject report resolved and request written acceptance of this action from your office.

The report contains 11 recommendations with \$886,495 in total questioned costs. OVW is committed to addressing and bringing the open recommendations identified by your office to a close as quickly as possible. The following is our analysis of each OVW recommendation.

**1. Remedy the \$886,495 in questioned costs related to the fact that there is no indication that OCADVSA achieved the stated goals and objectives of the closed awards.**

MEMORANDUM

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grant Awarded to the Oklahoma Coalition Against Domestic Violence and Sexual Assault

Concur: OVW will work with OCADVSA to remedy the \$886,495 in questioned costs related to the fact that there is no indication that OCADVSA achieved the stated goals and objectives of the closed awards.

**2. Coordinate with OCADVSA to ensure that it implements corrective actions and demonstrates documented progress for achieving the goals and objectives of its open award.**

Concur: OVW will coordinate with OCADVSA to ensure that it implements corrective actions and demonstrates documented progress for achieving the goals and objectives of its open award.

**3. Coordinate with OCADVSA to ensure that progress reports are accurate and fully supported.**

Concur: OVW will coordinate with OCADVSA to ensure that progress reports are accurate and fully supported.

**4. Coordinate with OCADVSA to ensure it develops and implements financial policies and procedures that include specific language regarding accountable property and asset management, contract award and management, payroll, and performance measurement and outcome assessment.**

Concur: OVW will coordinate with OCADVSA to ensure it develops and implements financial policies and procedures that include specific language regarding accountable property and asset management, contract award and management, payroll, and performance measurement and outcome assessment.

**5. Coordinate with OCADVSA to remedy the \$714,684 in unsupported questioned costs related to \$526,630 in unsupported personnel costs, \$30,418 in unsupported contractor costs, and \$157,636 in unsupported other direct costs.**

Concur: OVW will coordinate with OCADVSA to remedy the \$714,684 in unsupported questioned costs related to \$526,630 in unsupported personnel costs, \$30,418 in unsupported contractor costs, and \$157,636 in unsupported other direct costs.

**6. Coordinate with OCADVSA to ensure it consistently and contemporaneously records employee time and documents supervisory review and validation of employee time charged to specific OVW awards.**

Concur: OVW will coordinate with OCADVSA to ensure it consistently and contemporaneously records employee time and documents supervisory review and validation of employee time charged to specific OVW awards.

MEMORANDUM

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grant Awarded to the Oklahoma Coalition Against Domestic Violence and Sexual Assault

**7. Remedy the \$107,413 in unallowable questioned costs related to the \$20,140 in unallowable contractor costs and \$87,273 in unallowable other direct costs.**

Concur: OVW will work with OCADVSA to remedy the \$107,413 in unallowable questioned costs related to the \$20,140 in unallowable contractor costs and \$87,273 in unallowable other direct costs.

**8. Coordinate with OCADVSA to ensure that current contract agreements are maintained for all contractors, contractors provide detailed invoices prior to payment for services rendered, and implements specific policies and procedures to address procurement of contracts and consultants.**

Concur: OVW will coordinate with OCADVSA to ensure that current contract agreements are maintained for all contractors, contractors provide detailed invoices prior to payment for services rendered, and implements specific policies and procedures to address procurement of contracts and consultants.

**9. Coordinate with OCADVSA to ensure it develops a consistent and reasonably documented allocation methodology and claim forms and invoices are reviewed prior to payment.**

Concur: OVW will coordinate with OCADVSA to ensure it develops a consistent and reasonably documented allocation methodology and claim forms and invoices are reviewed prior to payment.

**10. Coordinate with OCADVSA to ensure it initiates a GAM for budget modifications that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.**

Concur: OVW will coordinate with OCADVSA to ensure it initiates a GAM for budget modifications that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.

**11. Coordinate with OCADVSA to develop policies and procedures that ensures information reported in FFRs is accurate and supported.**

Concur: OVW will coordinate with OCADVSA to develop policies and procedures that ensures information reported in FFRs is accurate and supported.

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

MEMORANDUM

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grant Awarded to the Oklahoma Coalition Against Domestic Violence and Sexual Assault

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

Emma West Ramus  
Program Specialist  
Office on Violence Against Women

Thelma Bailey  
Program Assistant  
Office on Violence Against Women



## **APPENDIX 5: 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 Oklahoma Coalition Against Domestic Violence and Sexual Assault (OCADVSA) and the Office on Violence Against Women (OVW) for review and official comment. OCADVSA's response is incorporated in Appendix 3 and OVW's response is incorporated in Appendix 4 of this final report. In response to our draft audit report, OVW concurred with our recommendations, and as a result, the status of the audit report is resolved. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

### **Recommendations for OVW:**

- 1. Remedy the \$886,495 in questioned costs related to the fact that there is no indication that OCADVSA achieved the stated goals and objectives of the closed awards.**

Resolved. OVW concurred with our recommendation and stated in its response that it will work with OCADVSA to remedy the \$886,495 in questioned costs related to the fact that there is no indication that OCADVSA achieved the stated goals and objectives of the closed awards.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that during the process of reviewing, organizing, and filing of documentation along with a review of accounting records, the team believes there is evidence that OCADVSA was conducting training, providing technical assistance, attending OVW and other organization events, and meeting their objectives as stated in the grants, but that there had not been an adequate system of recordkeeping established and implemented. Therefore, the recordkeeping was not adequate at the time of the audit to provide the proper substantiation of those goals and objectives.

This recommendation can be closed when we receive documentation that OVW has remedied the \$886,495 in unsupported questioned costs related to the fact that there is no indication that OCADVSA achieved the stated goals and objectives of the closed awards.

- 2. Coordinate with OCADVSA to ensure that it implements corrective actions and demonstrates documented progress for achieving the goals and objectives of its open award.**

Resolved. OVW concurred with our recommendation and stated in its response that it will coordinate with OCADVSA to ensure that it implements corrective actions and demonstrates documented progress for achieving the goals and objectives of its open award.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that the team has been working with OCADVSA's training coordinator to ensure they have an understanding of the goals and objectives of each award. The training coordinator has implemented a spreadsheet with each goal and objective and is tracking each training event and/or completion of each objective. The programmatic database is utilized for managing the scheduling and tracking attendance for each training webinar or event. Reports of attendance along with agendas and any related materials are all saved electronically by event.



This recommendation can be closed when we receive documentation showing that OCADVSA has implemented corrective actions and demonstrates documented progress towards achieving the goals and objectives of its open award.

**3. Coordinate with OCADVSA to ensure that progress reports are accurate and fully supported.**

Resolved. OVW concurred with our recommendation and stated in its response that it will coordinate with OCADVSA to ensure that progress reports are accurate and fully supported.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that the tracking spreadsheet explained in its response to recommendation number 2 will be maintained on an ongoing basis for tracking all training webinars and other OCADVSA sponsored events. OCADVSA plans to track each attendee using its programmatic database. It stated that copies of agendas and any provided materials will be maintained electronically.

This recommendation can be closed when we receive documentation showing that OCADVSA has written policies and procedures to ensure that progress reports are accurate and fully supported by source documentation that is maintained for future auditing purposes.

**4. Coordinate with OCADVSA to ensure it develops and implements financial policies and procedures that include specific language regarding accountable property and asset management, contract award and management, payroll, and performance measurement and outcome assessment.**

Resolved. OVW concurred with our recommendation and stated in its response that it will coordinate with OCADVSA to ensure it develops and implements financial policies and procedures that include specific language regarding accountable property and asset management, contract award and management, payroll, and performance measurement and outcome assessment.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that the financial policies and procedures were approved by OCADVSA's Board at a special meeting on May 17, 2021, after several drafts and reviews by the Finance Committee, Board members, and legal counsel. Accountable property and asset management is addressed in the Financial Policy in Section 7, contract award and management is addressed in Section 4, payroll is addressed in Section 3, and performance measurement and outcome assessment is addressed in Exhibit A, Grant Requirements, to the Financial Policies. Exhibit A, Grant Requirements, is still being finalized but should be completed by the end of June 2021.

This recommendation can be closed when we receive documentation showing that OCADVSA has developed and implemented financial policies and procedures that include specific language regarding accountable property and asset management, contract and award management, payroll, and performance measurement and outcome assessment.

**5. Coordinate with OCADVSA to remedy the \$714,684 in unsupported questioned costs related to \$526,630 in unsupported personnel costs, \$30,418 in unsupported contractor costs, and \$157,636 in unsupported other direct costs.**

Resolved. OVW concurred with our recommendation and stated in its response that it will coordinate with OCADVSA to remedy the \$714,684 in unsupported questioned costs related to

\$526,630 in unsupported personnel costs, \$30,418 in unsupported contractor costs, and \$157,636 in unsupported other direct costs.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that the unsupported payroll costs from the 2019-MU-AX-0016 award identified in the audit included an amount of \$82,098 for personnel costs. OCADVSA requested this amount to be removed from the unsupported personnel costs. However, as stated on page 4 of the this report, the OIG is not questioning the award funds that have been received for 2019-MU-AX-0016 for its goals and objectives deficiency because the Board is taking action to address the award performance and financial management issues . The statement is specifically related to this finding – not all findings in the report related to Award Number 2019-MU-AX-0016.

OCADVSA also stated that after its review of payroll records and the payroll system it is apparent the payroll system was being relied upon to do the allocations of time based on what had been submitted in each budget. Based on their review of the budgets for the OVW and the non-DOJ grants for fiscal year 2015, OCADVSA asserted that two of the personnel were included at 100 percent on the OVW budget and the other two personnel at 100 percent on the non-DOJ grant budget. Given the budgets were approved based on 100 percent of specific personnel wages and benefits OCADVSA stated that it would appear to be unnecessary to track time worked by each award. OCADVSA also stated that in the subsequent award periods, 2016-2018, personnel costs were allocated between OVW and non-DOJ grants on a more equal basis for each employee given these grants were the main sources of funding for OCADVSA. OCADVSA further asserted that the goals and objectives for both grants, OVW and its non-DOJ grant, are basically the same and therefore believes it is appropriate to allocate personnel costs on an equal basis.

Although timecards were determined not reliable, OCADVSA requested consideration be given to the process that was established in an effort to allocate personnel costs according to approved budgets. However, according to the 2015 and 2017 DOJ Grants Financial Guides, charges made to federal awards for salaries, wages, and fringe benefits, must be based on records that accurately reflect the work performed. Even though the budget states these employees were budgeted at 100 percent, without valid timesheets, there is no way to know for sure if they actually worked 100 percent of the time on the grant or on multiple projects during each pay period.

OCADVSA also requested additional time to locate support for the contractor costs of \$30,418 and direct costs of \$157,636 and stated that now that the documents have been organized and filed, it would appreciate the opportunity to locate the missing documents. We will work with OVW to remedy these costs with any additional documentation OCADVSA has located.

This recommendation can be closed when we receive documentation that OVW has remedied the \$714,684 in unsupported questioned costs related to the \$526,630 in unsupported personnel costs, \$30,418 in unsupported contractor costs, and \$157,636 in unsupported other direct costs.

**6. Coordinate with OCADVSA to ensure it consistently and contemporaneously records employee time and documents supervisory review and validation of employee time charged to specific OVW awards.**

Resolved. OVW concurred with our recommendation and stated in its response that it will coordinate with OCADVSA to ensure it consistently and contemporaneously records employee time

and documents supervisory review and validation of employee time charged to specific OVW awards.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that a process has been put in place for employees to track their time worked in the payroll system with timesheets being approved by the Executive Director (currently the interim Executive Director) each pay period. Paid time off is being tracked in the payroll system and hard copies of time off requests are required to be submitted by the employee and approved by the Executive Director.

This recommendation can be closed when we receive documentation showing that OCADVSA has written policies and procedures to ensure that it consistently and contemporaneously records employee time and documents supervisory review and validation of employee time charged to specific OVW awards.

**7. Remedy the \$107,413 in unallowable questioned costs related to the \$20,140 in unallowable contractor costs and \$87,273 in unallowable other direct costs.**

Resolved. OVW concurred with our recommendation and stated in its response that it will work with OCADVSA to remedy the \$107,413 in unallowable questioned costs related to the \$20,140 in unallowable contractor costs and \$87,273 in unallowable other direct costs.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA requested additional time to locate support for the unallowable contractor costs of \$20,140 and unallowable direct costs of \$87,273. In addition, it stated that there were several grant adjustment forms and support, totaling over 200 pages, it recently obtained covering the audit period and now that documents have been organized and filed it would appreciate the opportunity to locate the missing documents and to review the grant adjustments to see if they support some of the questioned costs. We will work with OVW to remedy these costs with any additional documentation OCADVSA has located.

This recommendation can be closed when we receive documentation showing that OCADVSA has remedied the \$107,413 in unallowable questioned costs related to the \$20,140 in unallowable contractor costs and \$87,273 in unallowable other direct costs.

**8. Coordinate with OCADVSA to ensure that current contract agreements are maintained for all contractors, contractors provide detailed invoices prior to payment for services rendered, and implements specific policies and procedures to address procurement of contracts and consultants.**

Resolved. OVW concurred with our recommendation and stated in its response that it will coordinate with OCADVSA to ensure that current contract agreements are maintained for all contractors, contractors provide detailed invoices prior to payment for services rendered, and implements specific policies and procedures to address procurement of contracts and consultants.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that the approved Financial Policies address procurement of contracts and consultants in its response to recommendation number 2. Additionally, it stated that OCADVSA has implemented these policies and procedures covering contracts and consultants.

This recommendation can be closed when we receive documentation showing that OCADVSA has written policies and procedures to ensure that current contract agreements are maintained for all contractors, contractors provide detailed invoices prior to payment for services rendered, and implements specific policies and procedures to address procurement of contracts and consultants.

**9. Coordinate with OCADVSA to ensure it develops a consistent and reasonably documented allocation methodology and claim forms and invoices are reviewed prior to payment.**

Resolved. OVW concurred with our recommendation and stated in its response that it will coordinate with OCADVSA to ensure it develops a consistent and reasonably documented allocation methodology and claim forms and invoices are reviewed prior to payment.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that the team at OCADVSA has implemented the procedures for proper invoice approval prior to payment and are preparing claim forms with each payment. The team has committed to analyzing employee time allocations and to have a written allocation process in place by the end of June 2021.

This recommendation can be closed when we receive documentation showing that OCADVSA has written policies and procedures to ensure it has a consistent and reasonably documented allocation methodology and claim forms and invoices are reviewed prior to payment.

**10. Coordinate with OCADVSA to ensure it initiates a GAN for budget modifications that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.**

Resolved. OVW concurred with our recommendation and stated in its response that it will coordinate with OCADVSA to ensure it initiates a Grant Award Modification (GAM) for budget modifications that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.<sup>11</sup>

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that the policies and procedures for this requirement are being included in the Financial Policies as Exhibit A covering applicable Grant Requirements.

This recommendation can be closed when we receive documentation showing that OCADVSA has written policies and procedures to ensure it initiates a GAM for budget modifications that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.

**11. Coordinate with OCADVSA to develop policies and procedures that ensures information reported in FFRs is accurate and supported.**

Resolved. OVW concurred with our recommendation and stated in its response that it will coordinate with OCADVSA to develop policies and procedures that ensures information reported in FFRs is accurate and supported.

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<sup>11</sup> The purpose of a Grant Award Modification is to update award details, modifying key facts or details about the award.

OCADVSA did not agree or disagree with our recommendation. In its response, OCADVSA stated that the Board approved Financial Policies have detailed procedures in all areas covering management of funds to help ensure information is accurate and in compliance with grant requirements. The team has been working to correct the accounting records and to obtain a proper system for filing and retention of documents. OCADVSA believes going forward it will be in a position to provide accurate, timely and supported FFRs.

This recommendation can be closed when we receive documentation showing that OCADVSA has developed policies and procedures that ensures the information reported in FFRs is accurate and supported.