



Audit of the Office of Justice Programs State of  
Washington Victim Assistance Funds Subawarded  
to the Young Women's Christian Association of  
Seattle, King County, and Snohomish County,  
Seattle, Washington



AUDIT DIVISION

25-018

---

**JANUARY 2025**

---

REDACTED FOR PUBLIC RELEASE

*Redactions were made to the full version of the report for privacy reasons. The redactions are contained in Appendix 4, the grantees' responses, and are the contact information of individuals.*



# EXECUTIVE SUMMARY

## **Audit of the Office of Justice Programs State of Washington Victim Assistance Funds Subawarded to the Young Women's Christian Association of Seattle, King County, and Snohomish County, Seattle, Washington**

### **Background**

The U.S. Department of Justice (DOJ), Office of Justice Programs (OJP), Office for Victims of Crime provided funds to the Washington State Department of Commerce (Washington COM) to make subawards to support victim assistance programs in the state of Washington. The Washington COM awarded grant funding to the Washington Department of Social and Health Services (DSHS). The DSHS, as a pass-through entity, made four subawards, totaling \$603,666, to the Young Women's Christian Association of Seattle, King County, and Snohomish County (YWCA of Seattle). The purpose of the YWCA of Seattle's subawards was to provide culturally specific legal advocacy and outreach and prevention services to youth affected by gender-based violence. The project period for the subawards was from November 2021 through September 2025. As of February 2024, the DSHS reimbursed the YWCA of Seattle a cumulative amount of \$226,691 for the subawards we reviewed.

### **Audit Objective**

The objective of this DOJ Office of the Inspector General audit was to review how the YWCA of Seattle used Victims of Crime Act (VOCA) funds to assist crime victims and assess whether it accounted for these funds in compliance with select award requirements, terms, and conditions.

### **Summary of Audit Results**

We concluded that the YWCA of Seattle provided outreach and prevention services to youth and direct services to victims of crime in the state of Washington. However, we found that the YWCA of Seattle should improve certain areas of its programmatic and financial subaward management.

#### **Program Performance Accomplishments**

We determined that the YWCA of Seattle provided legal advocacy services to victims of crime and outreach services to African American youth affected by gender-based violence. However, the Washington COM did not clearly communicate its performance reporting requirements to the DSHS and YWCA of Seattle. As a result, the YWCA of Seattle's performance measurement data was over-reported and included not only VOCA grant-funded activities but also activities funded by other sources.

#### **Financial Management**

We found that the YWCA of Seattle did not reconcile a subsidiary ledger to the program's general ledger and did not have adequate controls in place to prevent unapproved salaries and unallowable gift cards from being charged to the subawards. The YWCA of Seattle also did not maintain adequate documentation to support its gift card purchases. In total, we questioned \$43,614 in unallowable and unsupported costs.

### **Recommendations**

Our report contains seven recommendations. We provide one recommendation for OJP and Washington COM and six recommendations for OJP, Washington COM, and DSHS to assist the YWCA of Seattle in improving its subaward management. We requested a response to our draft audit report from the YWCA of Seattle, Washington COM, DSHS, and OJP. The responses can be found in Appendices 3, 4, 5, and 6. Our analysis of these responses can be found in Appendix 7.

# Table of Contents

<b>Introduction</b>	<b>1</b>
YWCA of Seattle	2
OIG Audit Approach	2
<b>Audit Results</b>	<b>4</b>
Program Performance and Accomplishments	4
Program Implementation	4
Program Services	4
Tracking of VOCA Grant-funded Victims Served	4
Washington COM Reporting Requirements to Subrecipients	5
Financial Management	6
Fiscal Policies and Procedures	6
Reconciliation of Accounting Records	6
Subaward Expenditures	7
Personnel Costs	7
Other Costs	7
<b>Conclusion and Recommendations</b>	<b>11</b>
<b>APPENDIX 1: Objective, Scope, and Methodology</b>	<b>12</b>
Objective	12
Scope and Methodology	12
Internal Controls	13
<b>APPENDIX 2: Schedule of Dollar-Related Findings</b>	<b>14</b>
<b>APPENDIX 3: Young Women’s Christian Association of Seattle, King County, and Snohomish County Response to the Draft Audit Report</b>	<b>15</b>
<b>APPENDIX 4: The Washington Department of Social and Health Services Response to the Draft Audit Report</b>	<b>18</b>
<b>APPENDIX 5: The Washington Department of Commerce’s Response to the Draft Audit Report</b>	<b>22</b>
<b>APPENDIX 6: The Office of Justice Program’s Response to the Draft Audit Report</b>	<b>27</b>
<b>APPENDIX 7: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report</b>	<b>32</b>



## Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of victim assistance funds received by the Young Women's Christian Association of Seattle, King County, and Snohomish County (YWCA of Seattle), which is located in Seattle, Washington. The Office of Justice Programs (OJP) Office for Victims of Crime (OVC) provided this funding to the Washington State Department of Commerce (Washington COM), which serves as the state administering agency (SAA) for the state of Washington. In turn, the Washington COM provides funding to pass-through entities that make subawards to direct service providers. One of those direct service providers is the YWCA of Seattle. Specifically, the Washington COM subawarded some of its VOCA grant funds to the Washington Department of Social and Health Services (DSHS), which in turn subawarded those funds to the YWCA of Seattle. As a direct service provider, the YWCA of Seattle received four subawards totaling \$603,666 for project periods starting between November 2021 and October 2023. These funds originated from fiscal years (FY) 2018 through 2021 for the Victims of Crime Act (VOCA) victim assistance grants that OJP awarded to the Washington COM, as shown in Table 1.

**Table 1**

**Audited Subawards to the YWCA of Seattle from Washington COM through DSHS**

DSHS Subaward Number	OJP Award Number	Project Start Date	Project End Date	Subaward Amount
2113-36531	2018-V2-GX-0046	11/01/2021	09/30/2023	\$212,500
2213-45264	2020-V2-GX-0022	10/01/2022	09/30/2023	\$75,000
2313-50923	15POVC-21-GG-00605-ASSI	10/01/2023	06/30/2024	\$121,344
2313-51694	15POVC-21-GG-00605-ASSI	10/01/2023	09/30/2025	\$194,822
<b>Total:</b>				<b>\$603,666</b>

Note: The YWCA of Seattle did not receive a VOCA subaward from the DSHS in federal fiscal year 2019.

Source: JustGrants, Washington COM

Established by the VOCA of 1984, the Crime Victims Fund is used to support crime victims through DOJ programs and state and local victim assistance and compensation initiatives.<sup>1</sup> According to OJP's program guidelines, victim assistance services eligible to receive VOCA support must: (1) respond to the emotional and physical needs of crime victims, (2) assist victims of crime to stabilize their lives after a victimization, (3) assist victims to understand and participate in the criminal justice system, and (4) provide victims of crime with a measure of safety and security. Direct service providers receiving VOCA victim assistance subawards thus may provide a variety of support to victims of crime, to include offering help filing

---

<sup>1</sup> The VOCA Victim Assistance Formula Grant Program is funded under 34 U.S.C. § 20101. Federal criminal fees, penalties, forfeited bail bonds, gifts, donations, and special assessments support the CVF. The total amount of funds that the OVC may distribute each year depends upon the amount of CVF deposits made during the preceding years and limits set by Congress.



restraining orders, counseling in crises arising from the occurrence of crime, crisis intervention, and emergency shelter.

## **YWCA of Seattle**

Founded in 1894, the YWCA of Seattle is a not-for-profit organization whose mission is to eliminate racism and empower women. The YWCA of Seattle provides emergency shelter and housing, counseling services, domestic violence advocacy, job readiness classes, and support groups for women, children, and families in Washington state. The YWCA of Seattle operates 900 units of housing and almost 40 programs from its 25 locations in King and Snohomish counties.

The YWCA of Seattle has been a subrecipient of VOCA grant funding since at least 2004. YWCA of Seattle's VOCA-funded programs include a teen advocate program and a legal advocate program. The teen advocate program provides African American high school girls a peer-to-peer outreach and youth leadership program, which focuses on culturally specific curriculum aimed at increasing knowledge and skills around gender-based violence prevention. The legal advocate program provides African American women legal advocacy services and trauma-informed counseling to victims of domestic violence, sexual assault, and other crimes.

## **OIG Audit Approach**

The objective of this audit was to review how the YWCA of Seattle used VOCA funds received through a subaward to assist crime victims and assess whether the YWCA of Seattle accounted for VOCA funds in compliance with select award requirements, terms, and conditions. To accomplish this objective, we assessed program performance and accomplishments and financial management.

To gain a further understanding of victim assistance subaward oversight, as well as to evaluate subrecipient performance and administration of VOCA-funded programs, we solicited feedback from Washington COM and DSHS officials regarding the YWCA of Seattle's record of delivering crime victim services, accomplishments, and compliance with Washington COM and DSHS's award requirements.<sup>2</sup>

We tested compliance with what we considered to be the most important conditions of the subawards. The DOJ Grants Financial Guide; VOCA Guidelines and Final Rule; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Washington COM and DSHS guidance; and the OVC, SAA, and DSHS award documents contain the primary criteria we applied during this audit.

---

<sup>2</sup> As an SAA, the Washington COM is responsible for ensuring that YWCA of Seattle's subawards are used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. As such, we considered the results of our audit of victim assistance grants awarded to Washington COM in performing this separate review. See U.S. Department of Justice Office of the Inspector General, [Audit of the Office of Justice Programs Victim Assistance Grants Awarded to the State of Washington Department of Commerce](#), Audit Report 20-106 (September 2020), [oig.justice.gov/reports/audit-office-justice-programs-victim-assistance-grants-awarded-state-washington-department](https://oig.justice.gov/reports/audit-office-justice-programs-victim-assistance-grants-awarded-state-washington-department).

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



## Audit Results

### Program Performance and Accomplishments

As established by the VOCA legislation, VOCA subawards are available to subrecipients for the purpose of providing direct services to victims. The YWCA of Seattle received its VOCA funding from the Washington COM, passed through a subaward from the DSHS, to provide culturally specific prevention and outreach services to African American high school girls affected by gender-based violence, as well as legal advocacy and other supportive services to victims of domestic violence, sexual assault, and other crimes. We obtained an understanding of the YWCA of Seattle's standard operating procedures in relation to the subaward-funded services. We also compared the subaward solicitation, project application, and subaward agreement against available evidence of accomplishments to determine whether the YWCA of Seattle demonstrated adequate progress towards providing the services for which it was funded. Overall, we concluded that the YWCA of Seattle addressed the subaward goals and objectives to provide outreach and prevention services to high school girls and legal advocacy services to victims of crime.

### Program Implementation

According to the DOJ Grants Financial Guide, recipients of federal awards should maintain a well-designed and tested system of internal controls. The DOJ Grants Financial Guide further defines internal controls as a process designed to provide reasonable assurance regarding the achievement of objectives in: (1) the effectiveness and efficiency of operations, (2) reliability of reporting for internal and external use, and (3) compliance with applicable laws and regulations.

To obtain an understanding of its standard operating procedures in relation to audited victim services, we conducted interviews with relevant YWCA of Seattle personnel, including the Regional Director. We also requested and reviewed the YWCA of Seattle's written policies and procedures that govern the VOCA-funded program. We determined that the YWCA of Seattle instituted measures to safeguard victim confidentiality and comply with applicable laws and regulations.

### Program Services

According to the goals of the subawards, the YWCA of Seattle was to provide culturally specific legal advocacy services to 20 individuals and peer-to-peer outreach services to 20 African American youth affected by gender-based violence. To verify the YWCA of Seattle's progress towards meeting the goals of the subawards, we interviewed YWCA of Seattle officials, visited two YWCA of Seattle locations, and reviewed case files. Based on our observations and analysis, we concluded that the YWCA of Seattle has met the goals and objectives of its subawards by providing culturally specific legal advocacy services to more than 20 individuals and peer-to-peer outreach services to more than 20 youth affected by gender-based violence.

### *Tracking of VOCA Grant-funded Victims Served*

According to OVC's Performance Measurement Tool (PMT) guidance, grant recipients are required to collect and report performance measurement data for activities supported by the VOCA program. It is imperative that grantees make every effort to report performance data accurately, thoroughly, and consistently. According to the subaward agreements, the YWCA of Seattle is required to collect and maintain data that measures the performance and effectiveness of work performed under the contract. To track the activities



performed, the YWCA of Seattle reports each victim who receives services into a Washington COM victim tracking database. At the end of each quarter, the Washington COM extracts from the database the YWCA of Seattle's performance data, along with all other subrecipients' performance data and uploads it into the PMT. Although the DSHS ensures that the YWCA of Seattle's data is entered into the Washington COM's database, the Washington COM is responsible for ensuring the performance data is correct and reported accurately in the PMT. We determined that the YWCA of Seattle's performance data for its legal advocacy program reported in the PMT was inaccurate and included both VOCA grant-funded activities and activities funded by other, non-VOCA sources. As shown in Table 2, the YWCA of Seattle's performance measurement data was over-reported in the PMT for each of the two quarters we tested.

**Table 2**

**YWCA of Seattle's Performance Measurement Data Fiscal Year 2023**

DSHS Subaward Number	Quarter	PMT Reported Number of Victims Served	Number of Victims Served by VOCA Subaward Funds	Difference
2213-45264	January – March	96	21	75
2313-50923	October – December	15	7	8

Source: OIG Analysis

An OVC official explained that PMT data should only reflect activities that are VOCA-funded, match-funded, and program income-funded. Activities, including the number of victims served, funded with other, non-VOCA grant funding sources should not be reported in PMT. Additionally, if a victim is served by multiple funding streams, including federal and non-federal sources, the YWCA of Seattle should have a methodology to prorate the total number of victims served to ensure PMT data is accurate. When we asked a YWCA of Seattle official if they have procedures for populating performance data into the Washington COM's database, a YWCA of Seattle official acknowledged that it does not have written policies and procedures for how it enters performance data in the database. Additionally, a YWCA of Seattle official stated that it was their understanding that they should report all victims served in the Washington COM's database and the database has no way for the YWCA of Seattle to differentiate the number of victims served based on funding sources. Without policies and procedures to ensure adequate tracking of victims served based on funding sources, the YWCA of Seattle is at risk of not knowing how many of its victims were served with VOCA grant funds and reporting inaccurate performance data to the Washington COM. Therefore, we recommend that OJP work with the Washington COM and DSHS to ensure that the YWCA of Seattle establishes written policies and procedures to accurately track victims served with VOCA grant funding.

***Washington COM Reporting Requirements to Subrecipients***

The OVC PMT User Guide states that grant recipients are responsible for collecting all data required in the PMT and ensuring its accuracy, as well as communicating with subrecipients about reporting, monitoring subrecipient reporting, and reviewing subrecipient data before approving it in the PMT. We asked a Washington COM official how they ensure subrecipient performance data being reported to OVC is accurate. A Washington COM official stated that subrecipient data is reviewed before being uploaded into



the PMT and that victims who receive VOCA services regardless of whether they are funded by VOCA grants or other funding sources can be reported in the PMT. We believe this understanding differs from the requirements and expectations set by OVC, specifically that PMT data should only reflect activities that are VOCA-funded, match-funded, and program income-funded. We explained to a Washington COM official that by not requiring grant recipients to identify and report on activities that are solely VOCA grant-funded, the Washington COM is at risk that its subrecipients may be reporting inaccurate performance measurement data in the PMT. Therefore, we recommend that OJP work with the Washington COM to ensure its policies and procedures for collecting and reporting subrecipient performance data align with the OVC's guidance, to include communicating clear instructions to subrecipients on how to report VOCA grant-funded performance data into the Washington COM's victim tracking database.

## **Financial Management**

To assess the adequacy of the YWCA of Seattle's financial management of the VOCA subawards, we interviewed the YWCA of Seattle's Regional Director and personnel responsible for financial aspects of the grant, examined policies and procedures, reviewed subaward documents, and performed expenditure testing. Overall, and as discussed in detail below, we identified concerns with the YWCA of Seattle's lack of adequate internal controls over its purchase and billing processes. We also found that the YWCA of Seattle did not reconcile a subsidiary ledger used to bill VOCA expenditures to its general ledger.

### **Fiscal Policies and Procedures**

To test fiscal policies and procedures, we reviewed the YWCA of Seattle's written policies and procedures related to subaward fiscal oversight and interviewed the Regional Director of Finance and Data regarding financial procedures. We found that the YWCA of Seattle maintained written policies and procedures related to its accounting processes, including purchasing, payroll, accountable property, and indirect costs.

### ***Reconciliation of Accounting Records***

According to the DOJ Grants Financial Guide, grant recipients' accounting systems must be able to account for award funds separately and must accurately track funds received, obligated, and expended under each award. Based on our review of the YWCA of Seattle's accounting records, we determined that the YWCA of Seattle utilized a general ledger and a subsidiary ledger, consisting of a spreadsheet, to track overall program-related costs and to separate out VOCA-billed expenditures. Based on our review of the accounting records, we determined that the YWCA of Seattle's spreadsheet generally reconciled to the program's general ledger. However, we found multiple instances in which the YWCA of Seattle identified transactions in its general ledger as being charged to the VOCA subaward, but the expenditures were not listed on the spreadsheet and, therefore, were never billed to the subaward. When we asked a YWCA of Seattle official about the differences, the official explained that the spreadsheet—which was used to track and calculate the amount to request in reimbursement of VOCA expenditures—was not reconciled to the general ledger and the transactions were not included on the spreadsheet because the YWCA of Seattle was closing its accounting records for the fiscal year end and the transactions were not included. By not reconciling a subsidiary ledger to the general ledger, the YWCA of Seattle is at risk that errors in its accounting records will go undetected and it could seek reimbursement for incorrect amounts. Therefore, we recommend that OJP work with the Washington COM and DSHS to ensure that the YWCA of Seattle implements controls to ensure its subaward transactions are accurately tracked, to include routinely reconciling any subsidiary ledgers utilized to the program's general ledger.



## Subaward Expenditures

The YWCA of Seattle requested reimbursement from the DSHS by submitting a monthly invoice of grant-related costs. As of February 2024, the DSHS paid the YWCA of Seattle a total of \$226,691 in VOCA funds for costs incurred.<sup>3</sup> We selected a judgmental sample of 14 expenditures, totaling \$16,670 charged to the subawards to determine whether the costs charged to the projects were accurate, allowable, supported, and in accordance with the VOCA program requirements. The transactions we reviewed included costs for: (1) salaries and associated fringe benefits; (2) stipends; (3) gift cards; and (4) food. As described below, we found issues in our review of personnel costs, gift cards, and other direct costs. The remaining expenditures tested, consisting of indirect costs were allowable and supported.

### *Personnel Costs*

The largest cost area for which the YWCA of Seattle received reimbursement was personnel costs. As of February 2024, \$162,018, or 71 percent of the total \$226,691 that the YWCA of Seattle had received, was for salary and fringe benefit expenses for the subawards in our audit scope. We judgmentally selected a sample of eight transactions totaling \$11,242 representing salary and fringe benefit expenditures across the YWCA of Seattle's four subawards.

We determined that the majority of the personnel transactions we tested (75 percent) were allowable and supported. However, we found that two of the eight tested transactions were not allowable. Specifically, we determined that the YWCA of Seattle charged \$3,146 in salary and associated fringe benefits for its Program Director and Program Manager even though these positions were not included in the approved budget. The DSHS's solicitation required subrecipients to list each position to be paid with grant funds, including the position title and salary rate. Further, the Washington COM's VOCA Manual required invoices submitted for reimbursement to be appropriate, allowable, and accounted for as determined by an approved budget. A YWCA of Seattle official explained that the Advocate position, which was an approved position in the budget, was vacant and both the Program Director and Program Manager had performed the duties of an Advocate during the time when the position was vacant. We asked the YWCA of Seattle if it had received approval from the DSHS to charge the Program Director and Program Manager's salary costs while the Advocate position was vacant. The YWCA of Seattle was unable to provide us a budget modification or documentation of the DSHS's approval for the personnel costs charged. Additionally, we could not identify on the Program Director or Program Manager's timesheets that time was spent performing the Advocate's duties. We expanded our testing and found that the YWCA of Seattle charged \$18,804 to its subaward in salaries and associated fringe benefits for its Program Director and Program Manager between June 2023 and September 2023. Therefore, we recommend that OJP work with the Washington COM and DSHS to remedy \$18,804 (VOCA Grant Number 2020-V2-GX-0022) in unapproved salary and fringe benefit costs charged to the subaward.

### *Other Costs*

To test other costs charged to the subawards, we judgmentally selected a sample of six non-personnel transactions, totaling \$5,429, from the YWCA of Seattle's four subawards. To perform verification testing of these expenditures, we reviewed accounting records and available supporting documentation. We

---

<sup>3</sup> Following guidance from the VOCA Fix to Sustain Crime Victim Fund Act of 2021, the Washington COM allowed its subrecipients to receive a waiver from the requirement to provide matching funds. We confirmed that the YWCA of Seattle received a waiver which was in place as of March 2022.



determined that four of the six transactions we tested were allowable and supported. However, we found that the remaining two non-personnel costs charged were not allowable. Specifically, we found that the YWCA of Seattle utilized VOCA grant funds to purchase gift cards: (1) as a form of stipends to student peer leaders; (2) to buy food for a parenting class; and (3) that were billed in error and unrelated to the YWCA of Seattle's legal and teen advocate programs. The YWCA of Seattle also purchased furniture that was not related to the VOCA subawards. We discuss these unallowable costs in further detail below.

### *Gift Cards as Stipends and Incentives for Program Participation*

According to the YWCA of Seattle's Gift Card Policy, gift cards can be purchased for victim assistance purposes and as small incentives for participation at meetings and functions. Further, when purchasing a gift card or seeking reimbursement for such an expense, the YWCA of Seattle must ensure that it is in the approved grant budget and allowable based on the terms and conditions of the grant. Each time a gift card is disbursed, a log sheet must be updated to include the: (1) date the gift card was disbursed; (2) number of gift cards given to an individual; (3) the gift card number or identifier; (4) the total amount for each gift card; and (5) the name of the individual receiving the gift card. However, we found that the YWCA of Seattle used VOCA funds to purchase \$27,810 in gift cards that were not used for allowable purposes and for which the YWCA of Seattle did not maintain adequate supporting documentation.<sup>4</sup>

We found that the YWCA of Seattle purchased gift cards for multiple purposes in batched amounts and did not maintain complete log sheets for each of the gift cards disbursed. As a result, we were unable to determine exactly how many gift cards were purchased and for which purpose. First, the YWCA of Seattle was using gift cards in lieu of paying its peer leaders a wage. Specifically, we found that the YWCA of Seattle paid high school students \$500 a month in gift cards to attend and lead weekly peer-to-peer outreach meetings. According to the YWCA of Seattle's Gift Card Policy, gift cards cannot be purchased for staff. We asked if the YWCA of Seattle considered these peer leaders employees or contractors. A YWCA of Seattle official stated they were neither employees nor contractors. Instead, the YWCA of Seattle considers the peer leaders to be stipend recipients. According to the Washington Administrative Code 192-100-500, a stipend is nominal when it does not exceed \$600 per year. Additionally, according to the Washington State Department of Labor and Industries, if volunteers are paid for their services beyond \$600 per year, they are considered employees. We take issue with the YWCA of Seattle's use of gift cards as a form of stipends, which does not appear to be in compliance with Washington state law and regulations.

Second, we identified that the YWCA of Seattle purchased gift cards for students as incentives to participate in the teen advocate program. According to OVC's Gift Card Best Practice, purchasing gift cards as an incentive for participation in services is unallowable.<sup>5</sup> We also found that the YWCA of Seattle bought gift cards to buy food for a parenting class. According to the VOCA Guidance, emergency food is allowed if it is related to the immediate health and safety of crime victims. When we asked a YWCA of Seattle official if the purchase of food was related to the immediate health and safety of crime victims, the official did not say that it was. Rather, the YWCA of Seattle official stated that the YWCA of Seattle purchases food to encourage participation in its programs. The YWCA of Seattle's Gift Card Policy states that although not recommended,

---

<sup>4</sup> Because the YWCA of Seattle returned \$3,000 of the unallowable costs (which is discussed later in this section), our total questioned costs were \$24,810.

<sup>5</sup> OVC, "[Gift Card Best Practices For Office for Victims of Crime \(OVC\)-Funded Victim Service Providers](https://ovc.ojp.gov/program/human-trafficking/gift-card-best-practices.pdf)," June 28, 2021, <https://ovc.ojp.gov/program/human-trafficking/gift-card-best-practices.pdf> (accessed August 14, 2024).



gift cards can be purchased to pay for program supplies such as to buy food for weekly group meetings. We found that the YWCA of Seattle's policy conflicts with the aforementioned VOCA Guidance and DSHS's solicitation, which states that food and beverage for meetings is not allowable with VOCA funding. As previously mentioned, because the YWCA of Seattle combined its gift card purchases into one transaction, we were unable to identify how much the YWCA of Seattle expended for each gift card or how much the YWCA of Seattle spent on gift cards for each of the various purposes for which the cards were used.

Lastly, we identified \$3,000 in gift card purchases that were billed in error and unrelated to the YWCA of Seattle's legal and teen advocate programs. Once we brought this issue to the YWCA of Seattle's attention, the YWCA of Seattle acknowledged that this \$3,000 was billed to the VOCA subawards in error and returned these funds to the DSHS.

The remaining \$24,810 in gift card purchases was not allowable and not adequately supported. When purchasing a gift card or seeking reimbursement for such an expense, the YWCA of Seattle must ensure that it is in the approved grant budget, allowable based on the terms and conditions of the grant, and adequately supported. Therefore, we recommend that OJP work with the Washington COM and DSHS to remedy \$24,810 (VOCA grant number 2018-V2-GX-0046) in unallowable gift card purchases charged to the VOCA subaward. We also recommend that OJP work with the Washington COM and DSHS to remedy \$24,810 (VOCA grant number 2018-V2-GX-0046) in unsupported gift card purchases for which the YWCA of Seattle could not produce adequate documentation.

#### *Cost Unrelated to VOCA*

According to the DSHS solicitation, subaward grant funds are to be used to support victim service providers in expanding and enhancing current programs and addressing unmet victim service needs. We identified one expenditure that was billed to the subaward in error. Specifically, we found the purchase of a bookshelf for \$1,288 (VOCA Grant Number 15POVC-21-GG-00605-ASSI) billed to the subaward even though it was unrelated to the subaward program. We asked a YWCA of Seattle official how the expenditure was mistakenly billed to the subaward. A YWCA of Seattle official explained that the Program Manager verbally approved the expense, which led the billing team to believe it was for VOCA-funded activities. We discuss the YWCA of Seattle's lack of adequate controls over its billing process throughout the [Financial Management](#) section of this report. Because the purchase was not related to the VOCA subaward, we consider this expenditure to be unallowable. Once we brought this issue to the YWCA of Seattle's attention, the YWCA of Seattle returned the \$1,288 to the DSHS. Therefore, no further action is necessary.

#### *Lack of Controls over Grant Purchases*

Recognizing that a lack of internal controls increases the risk of theft, the DOJ Grants Financial Guide states that accounting and internal controls systems should, at a minimum, include documented written procedures. We found that while the YWCA of Seattle had maintained written policies and procedures, including procedures for purchasing, employee reimbursement, and gift cards, we identified instances in which the YWCA of Seattle sought reimbursement for costs that it could not support or were charged in error to the subawards. As we discussed in the [Subaward Expenditures](#) section of this report, we found that the YWCA of Seattle inappropriately charged salaries, gift cards, and a bookshelf to the subawards. We determined that the YWCA of Seattle did not have adequate controls in place to prevent unallowable costs from being approved and charged to the subawards. Without adequate internal controls, the YWCA of Seattle is at a continued risk of charging unallowable expenses to the VOCA subawards. Therefore, we



recommend that OJP work with the Washington COM and DSHS to ensure that the YWCA of Seattle establishes controls to ensure expenditures charged to the subawards are allowable and adequately supported.

## Conclusion and Recommendations

As a result of our audit testing, we concluded that the YWCA of Seattle provided outreach to youth and direct services to victims of crime in the state of Washington. However, we found that the YWCA of Seattle's performance data reported to OVC was inaccurate. Additionally, the YWCA of Seattle lacked adequate controls over its purchase and billing processes and did not reconcile a subsidiary ledger utilized to bill VOCA expenditures to the program's general ledger. Lastly, we found that the YWCA of Seattle charged \$18,804 in unapproved personnel costs and \$27,810 in unallowable and unsupported gift card purchases. The YWCA of Seattle returned \$3,000 of the unallowable gift card purchases made to the DSHS. We make seven recommendations to OJP to work with the Washington COM and DSHS to address these deficiencies and remedy \$43,614 in net questioned costs.

We recommend that OJP work with the Washington COM and DSHS to:

1. Ensure that the YWCA of Seattle establishes written policies and procedures to accurately track victims served with VOCA grant funding.
2. Ensure that the YWCA of Seattle implements controls to ensure its subaward transactions are accurately tracked, to include routinely reconciling any subsidiary ledgers utilized to the program's general ledger.
3. Remedy \$18,804 in unapproved salary and fringe benefit costs charged to the subaward.
4. Remedy \$24,810 in unallowable gift card purchases charged to the VOCA subaward.
5. Remedy \$24,810 in unsupported gift card purchases for which the YWCA of Seattle could not produce adequate documentation.
6. Ensure that the YWCA of Seattle establishes controls to ensure expenditures charged to the subawards are allowable and adequately supported.

We recommend that OJP:

7. Work with the Washington COM to ensure its policies and procedures for collecting and reporting subrecipient performance data align with the OVC's guidance, to include communicating clear instructions to subrecipients on how to report VOCA grant-funded performance data into the Washington COM's victim tracking database.



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

## **Objective**

The objective of this audit was to review how the Young Women's Christian Association of Seattle, King County, and Snohomish County (YWCA of Seattle) used the Victims of Crime Act (VOCA) funds received through a subaward to assist crime victims and assess whether it accounted for VOCA funds in compliance with select award requirements, terms, and conditions. To accomplish this objective, we assessed program performance and accomplishments and 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 four subawards to the YWCA of Seattle. These subawards, totaling \$603,666, were funded by the Washington Department of Commerce (Washington COM) from VOCA grants awarded by the Office of Justice Programs (OJP) Office for Victims of Crime (OVC). The Washington COM subawarded its VOCA grant funds to the Washington Department of Social and Health Services (DSHS), who then subawarded grant funding to the YWCA of Seattle. As of February 2024, the DSHS had reimbursed the YWCA of Seattle \$226,691 in subaward funds.

Our audit concentrated on, but was not limited to, the period of November 2021 through February 2024. The Department of Justice (DOJ) Grants Financial Guide; the VOCA Guidelines and Final Rule; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Washington COM and DSHS guidance; and OVC and subaward documents contain the primary criteria we applied during the audit.

To accomplish our objective, we tested compliance with what we considered to be the most important conditions of the YWCA of Seattle's activities related to the audited subawards. Our work included conducting interviews with YWCA of Seattle financial staff, examining policies and procedures, and reviewing subaward documentation and financial records. We performed sample-based audit testing for subaward expenditures including payroll and fringe benefit charges. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the subawards reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected.

During our audit, we obtained information from DOJ's JustGrants System and the Washington COM's client tracking system, as well as the YWCA of Seattle'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 objective. We did not evaluate the internal controls of the YWCA of Seattle to provide assurance on its internal control structure as a whole. The YWCA of Seattle's 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 YWCA of Seattle's internal control structure as a whole, we offer this statement solely for the information and use of the YWCA of Seattle, DSHS, Washington COM, and OJP.<sup>6</sup>

In planning and performing this audit, we identified internal control components and underlying internal control principles as significant to the audit objective. Specifically, we reviewed the design and implementation of the YWCA of Seattle's written policies and procedures. We also tested the existence, implementation, and operating effectiveness of the YWCA of Seattle's controls over management of VOCA funds and expenditures, as well as compliance with laws and regulations in our audit scope.

The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to those internal control components and underlying principles that we found significant to the objective of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

---

<sup>6</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

Description	OJP Prime Grant Number	SAA Subaward Identifier	Amount	Page
<b>Questioned Costs:<sup>7</sup></b>				
Unallowable salary and fringe due to unapproved Personnel Costs	2020-V2-GX-0022	2213-45264	\$18,804	7
Unallowable Gift Cards	2018-V2-GX-0046	2113-36531	<u>\$24,810</u>	8
Total Unallowable Costs			\$43,614	
Unsupported Gift Cards	2018-V2-GX-0046	2113-36531	<u>\$24,810</u>	8
Total Unsupported Costs			\$24,810	
Gross Questioned Costs			\$68,424	
Less Duplicate Questioned Costs <sup>8</sup>			(\$24,810)	
Net Questioned Costs			<b>\$43,614</b>	
<b>TOTAL DOLLAR-RELATED FINDINGS</b>			<u><b>\$43,614</b></u>	

<sup>7</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>8</sup> Some costs were questioned for more than one reason. Net questioned costs exclude the duplicated amounts, which include costs associated with gift card purchases for unallowable purposes and inadequately supported gift card purchases.

# APPENDIX 3: Young Women's Christian Association of Seattle, King County, and Snohomish County Response to the Draft Audit Report



October 21, 2024  
David J. Gaschke  
Regional Audit Manager  
San Francisco Regional Audit Office  
Office of the Inspector General  
U.S. Department of Justice  
90 7th Street  
San Francisco, CA 94103

Dear Mr. Gaschke:

Thank you for the opportunity to respond to the Department of Justice (DOJ) Office of the Inspector General (OIG) Audit Division's report, "Audit of the Office of Justice Programs State of Washington Victim Assistance Funds subawarded to the Young Women's Christian Association of Seattle, King County, and Snohomish County (YWCA of Seattle), located in Seattle, Washington." Upon review, we have provided responses to each of the recommendations.

**1) Ensure that the YWCA of Seattle establish written policies and procedures to accurately track victims served with VOCA grant funding.**

The YWCA of Seattle will work with DSHS to assess our written policies and procedures to improve tracking victims served with Victims of Crime Act (VOCA) funding. The YWCA of Seattle will submit revised policies and procedures to DSHS for input and approval.

**2) Ensure that the YWCA of Seattle implements controls to ensure its subaward transaction are accurately tracked, to include routinely reconciling and subsidiary ledgers utilized to the program's general ledger.**

The YWCA of Seattle will update procedures regarding the reconciliation of ledgers and submit the new policies and procedures to DSHS.

**3) Remedy \$18,804 in unapproved salary and fringe benefit costs charged to the subaward.**

The YWCA of Seattle does not concur with this recommendation. Based on DSHS contract # 2213-45264 (By & For #3 Year 1) terms, these were approved expenses. The budget provided to DSHS and Commerce was an estimate of expenses and did not include detailed budgets or personnel details.

The YWCA of Seattle determined which personnel are necessary to complete the Statement of Work and fulfill the purpose of the contract. Adjusting personnel within the approved budget category does not require advance approval from DSHS. The DSHS contract on page 16 states that the transfer of over \$2,000 in funds between line-item budget categories requires a budget amendment.

**YWCAWORKS.ORG**

**YWCA Seattle | King | Snohomish**  
1010 S 2<sup>nd</sup> Street Renton, WA



The YWCA of Seattle Advocate terminated employment with the organization, and the Director and Program Manager took over the clients that were still being served under the grant parameters. The YWCA of Seattle submitted invoices for personnel reimbursement that were within the approved budget categories of the contract. The additional Program Manager and Director personnel expenses are in support of the contract's approved statement of work and within the approved budget total for salary and benefits. These roles were listed as allowable on page 20 of the Department of Commerce's competitive application. The approval of personnel additions was documented through DSHS's approval and submission to their fiscal department.

**4) Remedy \$24,810 in unallowable gift card purchases charged to the VOCA subaward.**

The YWCA of Seattle does not concur with this recommendation. The YWCA of Seattle designed a program with a racial equity lens to remove decades of institutional racism that have resulted in high rates of violence and low rates of seeking services, and be "trauma-informed and responsive, comprehensive, accessible, developmentally appropriate, culturally responsive, and meet the self-determined needs of the individuals/community you are working with." This unique approach was developed to be a culturally appropriate, service model for Black/ African American girls who have been impacted by gender-based violence.

The YWCA of Seattle identified that compensating peer leaders with gift cards as sub-contractors was reasonable and necessary. It also reduced unnecessary barriers that would come with hiring youth leaders as part-time staff or paying them through a method that would require parental management of their compensation. These sub-contractors were compensated at \$500 per month for school-based peer advocacy. They work more than six hours a month keeping them below the federal limit of \$81.25/hour. We believe the compensation provided to the peer leaders is an allowable expense. VOCA federal regulations do not expressly disallow gift cards as incentives. The YWCA of Seattle gave reasonable incentives to youth participating in groups associated with these contracts. Due to barriers the program participants experience, the YWCA of Seattle believes these types of gift card determinations should be up to VOCA Administrator at the Department of Commerce.

The YWCA of Seattle's youth peer advocacy groups are offered during school lunchtime. The YWCA of Seattle determined providing food during these peer advocacy groups was reasonable and necessary. While the Department of Commerce's competitive application included on page 18 that "Food/beverages for trainings, meetings, and conferences" are non-eligible services and expenses, we received clarification from the Department of Commerce that referred to food/beverages for staff. The food expenses in question were for the clients and not for staff and were a reasonable and necessary component of their culturally specific outreach and victim services. The VOCA rule does not expressly disallow food to be provided during outreach events, therefore, The YWCA of Seattle defers to the determination of the state VOCA administrator, Department of Commerce.

**5) Remedy \$24,810 in unsupported gift card purchases for which the YWCA of Seattle could not produce adequate documentation.**

The YWCA of Seattle partially agrees with this recommendation. OIG determined there was an unspecified and unsupported amount of gift card purchases and recommended the entire amount of gift card purchases for the

entire contract to be repaid. The YWCA of Seattle had provided documentation for approximately 53% of the gift card purchases reimbursed. The YWCA of Seattle and DSHS request that OIG provide documentation to specify which purchases exactly were and were not deemed as supported and agrees to repay the actual verified adjusted amount of gift cards that are unsupported to remedy this finding.

Moving forward, the YWCA of Seattle, with DSHS assistance, will conduct a review and assessment of written policies and procedures to improve guidance on purchasing, distributing, and tracking gift cards. YWCA of Seattle will revise existing policies, procedures and/or guidance regarding purchasing, distributing, and tracking gift cards.

**6) Ensure that the YWCA of Seattle establish controls to ensure expenditures charged to the subawards are allowable and adequately supported.**

The YWCA of Seattle will assess our current policies and procedures around determination of allowable expenses and ensuring they are adequately supported.

**7) Recommend that OJP work with the Washington Department of Commerce to ensure its policies and procedures for collecting and reporting subrecipient performance data align with the OVC's guidance, to include communicating clear instructions to recipients on how to report VOCA grant-funded performance**

The YWCA of Seattle will work with the Department of Commerce and DSHS to comply with any new data requirements.

Sincerely,  
Jeanice Hardy  
Chief Program Officer  
YWCA of Seattle, King County and Snohomish County

cc:  
Linda Taylor, Lead Auditor, Audit Coordination Branch, Department of Justice, Office of the Inspector General  
Nicky Gleason, VOCA Administrator, WA State Department of Commerce, Office of Crime Victims Advocacy  
Maria Chavez-Wilcox, Chief Executive Officer, YWCA of Seattle-King and Snohomish County  
Jeanice Hardy, Chief Officer of Programs, YWCA of Seattle-King and Snohomish County  
Jilma Meneses, Secretary, Office of the Secretary, WA State DSHS  
Lori Manning, Special Assistant to the Secretary, Office of the Secretary, WA State DSHS  
Brice Montgomery, Interim CSD Director, WA State DSHS  
Mette Earlywine, CSD Administrator, WA State DSHS  
Andrea Bachofer, CSD External Audit & Strategic Initiatives Manager, WA State DSHS  
Kathryn Monusky, Program Manager, WA State DSHS  
Annie Vandenberg, Staff Services & Operations Consultant, WA State DSHS  
Summer Garcia, Staff Services & Operations Consultant, WA State DSHS



## APPENDIX 4: The Washington Department of Social and Health Services Response to the Draft Audit Report



STATE OF WASHINGTON  
DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
Economic Services Administration  
Community Services Division  
Post Office Box 45440  
Olympia WA 98504-5440

October 18, 2024

David J. Gaschke  
Regional Audit Manager  
San Francisco Regional Audit Office  
Office of the Inspector General  
U.S. Department of Justice  
90 7th Street  
San Francisco, CA 94103

Dear Mr. Gaschke:

Thank you for the opportunity to review and respond to the Department of Justice (DOJ) Office of the Inspector General (OIG) Audit Division's report, "Audit of the Office of Justice Programs State of Washington Victim Assistance Funds Subawarded to the Young Women's Christian Association (YWCA) of Seattle, King County, and Snohomish County, Seattle, Washington." After careful consideration and review, we have provided responses to each of the recommendations related to the Washington State Department of Social and Health Services (DSHS).

- 1) Ensure that the YWCA of Seattle establish written policies and procedures to accurately track victims served with VOCA grant funding.

DSHS concurs with this recommendation and will assist the YWCA of Seattle in assessing written policies and procedures to improve tracking victims served with Victims of Crime Act (VOCA) funding.

- 2) Ensure that the YWCA of Seattle implements controls to ensure its subaward transaction are accurately tracked, to include routinely reconciling and subsidiary ledgers utilized to the program's general ledger.

DSHS concurs with this recommendation and will assist the YWCA of Seattle in assessing the current system(s) that are used for ledgers and transactions. The YWCA of Seattle will develop and/or update procedures regarding the reconciliation of ledgers.

- 3) Remedy \$18,804 in unapproved salary and fringe benefit costs charged to the subaward.

DSHS does not concur with this recommendation. Based on DSHS contract # 2213-45264 (By & For #3 Year 1) terms these were approved expenses. The approved budget in DSHS contracts is Exhibit D and provides the budget category totals but does not include detailed budgets such as personnel detail. YWCA of Seattle submitted a detailed budget to the Department of Commerce with the application, which was an estimate of the expenses for the contract period. DSHS applied his detailed budget during negotiations to create the contract budget. As per the DSHS contract, page 16:

***8. Budget – Exhibit D***

*a. "Contractor's budget for providing services under this Contract during the term of the Contract for the period of performance stated on page 1 of this Contract is attached as **Exhibit D**. This budget is based on the Contractor's budget submittal in the associated VOCA funding initiative application, as approved by DSHS for this Contract. If the approved budget includes equipment which was approved for purchase by the DSHS Program Manager for this Contract, ownership of the equipment shall be retained by the Contractor."*

Throughout the period of performance, contractors determine which personnel are necessary to complete the Statement of Work and fulfill the purpose of the contract. Adjusting personnel within the approved budget category does not require advance approval from the DSHS program manager. DSHS contract page 16 states that only the transfer of over \$2,000 in funds between line-item budget categories require a budget amendment.

The YWCA of Seattle submitted invoices for personnel reimbursement that were within the approved budget categories of their contract and assessed to be reasonable and necessary. The additional Program Manager/Director expenses are in support of the contract's approved statement of work, within the approved budget total for salary and benefits, and these roles were listed as allowable on page 20 of the Department of Commerce's competitive application. Approval of personnel additions were documented through DSHS's approval of the invoices and submission to the fiscal department. As stated on page four of the Draft Audit Report, the YWCA of Seattle met the performance measures of each contract, and DSHS contracts do not prohibit contractors from expanding the personnel required to meet the performance measure.

4) Remedy \$24,810 in unallowable gift card purchases charged to the VOCA subaward.

DSHS does not concur with this recommendation. The VOCA Unmet Needs competitive application (referenced as solicitation in the Audit Report) that the Department of Commerce released, was designed to support service providers in addressing unmet victim service needs. The YWCA of Seattle was selected under the focus area of "Girls of Color" and according to pages 10-11 of that application, programs for this population should be designed with a racial equity lens to mitigate layers of institutional racism that have resulted in high rates of experiencing violence and low rates of seeking services, and be "trauma-informed and responsive, comprehensive, accessible, developmentally appropriate, culturally responsive, and meet the self-determined needs of the individuals/community you are working with." This required the YWCA of Seattle to develop a culturally appropriate, perhaps atypical, service model for Black/ African American girls who have been impacted by gender-based violence.

The YWCA of Seattle identified that compensating peer leaders with gift cards as sub-contractors was reasonable and necessary to center racial equity and reduce unnecessary barriers that would come with hiring youth leaders as part-time staff or paying them through a method that would require parental management of their compensation. These sub-contractors are compensated at \$500 per month for a few active months of school-based peer advocacy and they work more than six hours a month keeping them below the federal limit of \$81.25/hour. The compensation provided to the peer leaders is an allowable expense.

The Gift Card Best Practices for Office of Victims of Crime (OVC)-funded victim service providers document under the Issuance of Gift Card section refers to "incentive for participation in services" and states they are "costs that are typically unallowable". The OVC document guidance does not explicitly state unallowable. The word "typically" means in most cases, however, these programs and services provided to vulnerable communities require special considerations as stated in contracts. VOCA guidance does not expressly disallow gift cards as incentives. The YWCA of Seattle offered reasonable and necessary nominal incentives to youth participating in groups associated with these contracts. Due to barriers program participants experience, DSHS believes these types of gift card determinations should be up to VOCA Administrator at the Department of Commerce.

The YWCA of Seattle's youth peer advocacy groups are often during school lunchtime. As part of their compliance with the funding opportunity they determined providing food during these peer advocacy groups was reasonable and necessary. The Department of Commerce's competitive application included on page 18 that "Food/beverages



for trainings, meetings, and conferences” are non-eligible services and expenses. The food expenses in question were not for YWCA of Seattle staff meetings, but rather a reasonable and necessary component of their culturally specific outreach and victim services. The VOCA rule does not expressly disallow food to be provided during outreach events, therefore, we believe this is up to the determination of the state VOCA administrator, Department of Commerce.

- 5) Remedy \$24,810 in unsupported gift card purchases for which the YWCA of Seattle could not produce adequate documentation.

DSHS partially concurs with this recommendation. OIG determined during their review there was unspecified amount of unsupported gift card purchases and recommended the entire amount of gift card purchases for the entire contract as unsupported be remedied.

The YWCA of Seattle and DSHS request that OIG provide documentation to specify what amounts exactly were and were not deemed as supported and has agreed to repay the actual verified adjusted amount of gift cards that truly are unsupported to remedy this finding. Moving forward, the YWCA of Seattle with DSHS assistance will conduct a review and assessment of written policies and procedures to improve guidance on purchasing, distributing, and tracking gift cards. YWCA of Seattle will develop new and/or revise existing policies, procedures and/or guidance regarding purchasing, distributing, and tracking gift cards.

- 6) Ensure that the YWCA of Seattle establish controls to ensure expenditures charged to the subawards are allowable and adequately supported.

DSHS concurs with this recommendation and will assist the YWCA of Seattle in assessing the current system(s) that are being used to determine if expenses are allowable and adequately supported.

DSHS appreciates the feedback and recommendations provided. We are committed to continuing our collaborative partnership with the YWCA of Seattle and the Washington Department of Commerce while considering the impacts of implementing recommendations as we move forward.

Sincerely,



Brice Montgomery  
Interim Community Services Division (CSD) Director  
Economic Services Administration (ESA)  
Washington (WA) State Department of Social and Health Services (DSHS)

cc:

Linda Taylor, Lead Auditor, Audit Coordination Branch, Department of Justice, Office of the Inspector General  
Nicky Gleason, VOCA Administrator, WA State Department of Commerce, Office of Crime Victims Advocacy  
Maria Chavez-Wilcox, Chief Executive Officer, YWCA of Seattle-King and Snohomish County  
Jeanice Hardy, Chief Officer of Programs, YWCA of Seattle-King and Snohomish County  
Jilma Meneses, Secretary, Office of the Secretary, WA State DSHS  
Lori Manning, Special Assistant to the Secretary, Office of the Secretary, WA State DSHS

October 18, 2024

Page 2 of 2

Terry Redmon, Assistant Secretary, Office of the Assistant Secretary, WA State DSHS  
Brice Montgomery, Interim CSD Director, WA State DSHS  
Mette Earlywine, CSD Administrator, WA State DSHS  
Andrea Bachofer, CSD External Audit & Strategic Initiatives Manager, WA State DSHS  
Kathryn Monusky, Program Manager, WA State DSHS  
Annie Vandenberg, Staff Services & Operations Consultant, WA State DSHS  
Summer Garcia, Staff Services & Operations Consultant, WA State DSHS  
[REDACTED]  
[REDACTED]



## APPENDIX 5: The Washington Department of Commerce's Response to the Draft Audit Report



STATE OF WASHINGTON  
DEPARTMENT OF COMMERCE  
1011 Plum Street SE • PO Box 42525 • Olympia, Washington 98504-2525 • 360-725-4000  
[www.commerce.wa.gov](http://www.commerce.wa.gov)

November 1, 2024

David J. Gaschke  
Regional Audit Manager  
San Francisco Regional Audit Office  
Office of the Inspector General  
U.S. Department of Justice  
90 70<sup>th</sup> Street, Suite 3-100  
San Francisco, CA 94013

Dear Mr. Gaschke,

The Washington State Department of Commerce (Commerce) is thankful for the opportunity to provide a written response to the draft report issued by the Office of Justice Programs Victim Assistance Funds subawarded to the Young Women's Christian Association of Seattle, King County, and Snohomish County in Seattle, Washington. This letter serves as our official response to the report recommendations made by the Office of the Inspector General to the Office of Justice Programs, dated October 3, 2024, that are listed on page 11.

If there is a need to clarify any information of documentation provided, please contact Cindy Guertin-Anderson, Assistant Director in the Community services Division, or Gena Allen, Internal Control Officer in our Financial Services Division.

We have responded to each recommendation and concern in order and all Commerce responses are in blue colored font.

### **Recommendation #1 – Tracking of VOCA Grant-funded Victims Served**

We determined that the YWCA of Seattle's performance data for its legal advocacy program reported in the PMT was inaccurate and included both VOCA grant-funded activities and activities funded by other, non-VOCA sources. As shown in Table 2, the YWCA of Seattle's performance measurement data was over-reported in the PMT for each of the two quarters we tested.

Without policies and procedures to ensure adequate tracking of victims served based on funding sources, the YWCA of Seattle is at risk of not knowing how many of its victims were served with VOCA grant funds and reporting inaccurate performance data to the Washington COM.

### **Corrective Action:**

We recommend that OJP work with the Washington COM and DSHS to ensure that the

YWCA of Seattle establish written policies and procedures to accurately track victims served with VOCA grant funding.

**Commerce's Response:**

Commerce concurs with this recommendation and will work with the YWCA of Seattle to strengthen their policies and procedures for tracking victims served with VOCA grant funding.

**Recommendation #2: Reconciliation of Accounting Records**

Based on our review of the accounting records, we determined that the YWCA of Seattle's spreadsheet generally reconciled to the program's general ledger. However, we found multiple instances in which the YWCA of Seattle identified transactions in its general ledger as being charged to the VOCA subaward, but the expenditures were not listed on the spreadsheet and, therefore, were never billed to the subaward. When we asked a YWCA of Seattle official about the differences, the official explained that the spreadsheet—which was used to track and calculate the amount to request in reimbursement of VOCA expenditures—was not reconciled to the general ledger and the transactions were not included on the spreadsheet because the YWCA of Seattle was closing its accounting records for the fiscal year end and the transactions were not included. By not reconciling a subsidiary ledger to the general ledger, the YWCA of Seattle is at risk that errors in its accounting records will go undetected and it could seek reimbursement for incorrect amounts.

**Corrective Action:**

We recommend that OJP work with the Washington COM and DSHS to ensure that the YWCA of Seattle implements controls to ensure its subaward transactions are accurately tracked, to include routinely reconciling any subsidiary ledgers utilized to the program's general ledger.

**Commerce's Response:**

Commerce concurs with this recommendation and will work with the YWCA of Seattle to strengthen their policies and procedures for tracking subaward transactions, including reconciliation of any subsidiary ledgers.

**Recommendation #3: Personnel Costs**

We found that two of the eight tested transactions were not allowable. Specifically, we determined that the YWCA of Seattle charged \$3,146 in salary and associated fringe benefits for its Program Director and Program Manager even though these positions were not included in the approved budget. The DSHS's solicitation required subrecipients to list each position to be paid with grant funds, including the position title and salary rate. Further, the Washington COM's VOCA Manual required invoices submitted for reimbursement to be appropriate, allowable, and accounted for as determined by an approved budget. A YWCA of Seattle official explained that the Advocate position, which



was an approved position in the budget, was vacant and both the Program Director and Program Manager had performed the duties of an Advocate during the time when the position was vacant. We asked the YWCA of Seattle if it had received approval from the DSHS to charge the Program Director and Program Manager's salary costs while the Advocate position was vacant. The YWCA of Seattle was unable to provide us a budget modification or documentation of the DSHS's approval for the personnel costs charged. Additionally, we could not identify on the Program Director or Program Manager's timesheets that time was spent performing the Advocate's duties. We expanded our testing and found that the YWCA of Seattle charged \$18,804 to its subaward in salaries and associated fringe benefits for its Program Director and Program Manager between June 2023 and September 2023.

**Corrective Action:**

We recommend that OJP work with the Washington COM and DSHS to remedy \$18,804 in unapproved salary and fringe benefit costs charged to the subaward.

**Commerce's Response:**

Commerce does not concur with this recommendation, as the salary and fringe benefit costs charged to the subaward between June 2023 and September 2023 were determined allowable, documented by the approval of the invoice which included information about the staff on that invoice. The allowability of charging costs for alternate staff during a vacancy does not require submission of a formal budget modification.

**Recommendation #4: Gift Cards as Stipends and Incentives for Program Participation**

We found that the YWCA of Seattle used VOCA funds to purchase \$27,810 in gift cards that were not used for allowable purposes and for which the YWCA of Seattle did not maintain adequate supporting documentation.

**Corrective Action:**

We recommend that OJP work with the Washington COM and DSHS to remedy \$24,810 in unallowable gift card purchases charged to the VOCA subaward.

**Commerce's Response:**

Commerce does not concur with this recommendation, and believes the gift card purchases were allowable.

Peer Youth Leaders, who Commerce has identified as subcontractors, neither staff nor volunteers. The YWCA has explained to Commerce's satisfaction why it is necessary to pay these individuals via gift card rather than via another method, and we were unable to determine any regulation that would prohibit payment via gift card if it is legal and for both parties.

Food for outreach: The VOCA rule (§ 94.119 Allowable direct service costs) states "direct services for which VOCA funds may be used include, *but are not limited to*, the following." In the

report, the OIG states that emergency food is listed as an example, the list from which it is cited is not all inclusive, and Commerce believes the food for the outreach is an allowable expense.

Incentives: While the OVC Best Practices Document cited in the report does state that "incentives for participation in services" are "typically unallowable," that reference is guidance to subrecipient agencies in crafting their own gift card policies. The YWCA has explained to Commerce's satisfaction why the incentives were necessary and reasonable to the provision of services under their VOCA funded grant.

**Recommendation #5: Gift Cards as Stipend and Incentives for Program Participation**

We take issue with the YWCA of Seattle's use of gift cards as a form of stipends, which does not appear to be in compliance with Washington state law and regulations.

As previously mentioned, because the YWCA of Seattle combined its gift card purchases into one transaction, we were unable to identify how much the YWCA of Seattle expended for each gift card or how much the YWCA of Seattle spent on gift cards for each of the various purposes for which the cards were used.

The remaining \$24,810 in gift card purchases was not allowable and not adequately supported. When purchasing a gift card or seeking reimbursement for such an expense, the YWCA of Seattle must ensure that it is in the approved grant budget, allowable based on the terms and conditions of the grant, and adequately supported.

**Corrective Action:**

We recommend that OJP work with the Washington COM and DSHS to remedy \$24,810 in unsupported gift card purchases for which the YWCA of Seattle could not produce adequate supporting documentation

**Commerce's Response:**

Commerce partially concurs with this recommendation. Since the request from the OIG auditors, the YWCA has located documentation for all but \$11,559 of the gift cards. The remaining documentation, totaling \$11,559, includes forms that are missing signatures or receipts, and Commerce agrees they are unsupported. Commerce will work with the YWCA to remedy the \$11,559 of unsupported costs through repayment of those funds.

**Recommendation #6: Lack of Controls over Grant Purchases**

As we discussed in the Subaward Expenditures section of this report, we found that the YWCA of Seattle inappropriately charged salaries, gift cards, and a bookshelf to the subawards. We determined that the YWCA of Seattle did not have adequate controls in place to prevent unallowable costs from being approved and charged to the subawards. Without adequate internal controls, the YWCA of Seattle is at a continued risk of charging unallowable expenses to the VOCA subawards.



**Corrective Action:**

We recommend that OJP work with the Washington COM and DSHS to ensure that the YWCA of Seattle establish controls to ensure expenditures charged to the subawards are allowable and adequately supported.

**Commerce's Response:**

Commerce concurs with this recommendation and will work with the YWCA of Seattle to enhance their internal controls for ensuring expenditures charged to the subawards are allowable and adequately supported.

**Recommendation #7:**

Conclusion and Recommendations

**Corrective Action:**

We recommend that OJP work with the Washington COM to ensure its policies and procedures for collecting and reporting subrecipient performance data align with the OVC's guidance, to include communicating clear instructions to subrecipients on how to report VOCA grant-funded performance data into the Washington COM's victim tracking database.

**Commerce's Response:**

Commerce concurs with this recommendation and will review policies and procedures to ensure the subrecipient performance data aligns with OVC's guidance, and will create and implement a communications plan to communicate clear instructions to recipients on how to report VOCA grant funded performance data.



Regena J. Allen, CFE  
Internal Control Officer

# APPENDIX 6: The Office of Justice Program's Response to the Draft Audit Report



U.S. Department of Justice

Office of Justice Programs

Office of Audit, Assessment, and Management

Washington, D.C. 20531

November 12, 2024

MEMORANDUM TO: David J. Gaschke  
Regional Audit Manager  
San Francisco Regional Audit Office  
Office of the Inspector General

FROM: Iyauta I. Green  
Director

lyauta lyeesha Green  
Digitally signed by lyauta lyeesha Green  
Date: 2024.11.12 18:29:52 -05'00'

SUBJECT: Response to the Draft Report, *Audit of the Office of Justice Programs State of Washington Victim Assistance Funds Subawarded to the Young Women's Christian Association of Seattle, King County, and Snohomish County, Seattle, Washington*

This memorandum is in reference to your correspondence, dated October 3, 2024, transmitting the above-referenced draft audit report for the Young Women's Christian Association of Seattle, King County, and Snohomish County (YWCA of Seattle). YWCA of Seattle received subaward funds from the Washington Department of Social and Health Services (DSHS), via subaward funds from the Washington Department of Commerce (Washington COM), under the Office of Justice Programs' (OJP) Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 2018-V2-GX-0046, 2020-V2-GX-0022, and 15POVC-21-GG-00605-ASSI. We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains **seven** recommendations and **\$43,614<sup>1</sup>** in net questioned costs. The following is the Office of Justice Programs' (OJP) analysis of the draft audit report recommendations. For ease of review, the recommendations are restated in bold and are followed by our response.

- 1. We recommend that OJP work with the Washington COM and DSHS to ensure that the YWCA of Seattle establish written policies and procedures to accurately track victims served with VOCA grant funding.**

OJP agrees with this recommendation. In its response, dated November 1, 2024, the Washington COM stated that it will work with the YWCA of Seattle to establish policies and procedures to accurately track victims served with VOCA grant funding.

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



Accordingly, we will coordinate with the Washington COM, who in turn, will coordinate with DSHS, to obtain a copy of YWCA of Seattle's written policies and procedures, developed and implemented, to ensure that victims served with VOCA grant funding are accurately tracked.

2. **We recommend that OJP work with the Washington COM and DSHS to ensure that the YWCA of Seattle implements controls to ensure its subaward transactions are accurately tracked, to include routinely reconciling any subsidiary ledgers utilized to the program's general ledger.**

OJP agrees with this recommendation. In its response, dated November 1, 2024, Washington COM stated that it will work with the YWCA of Seattle to strengthen its policies and procedures for tracking subaward transactions, including reconciliation of any subsidiary ledgers.

Accordingly, we will coordinate with the Washington COM, who in turn, will coordinate with DSHS, to obtain a copy of YWCA of Seattle's written policies and procedures, developed and implemented, to strengthen controls related to subaward transactions to ensure these transactions are accurately tracked, and subsidiary ledgers are routinely reconciled to the general ledger.

3. **We recommend that OJP work with the Washington COM and DSHS to remedy \$18,804 in unapproved salary and fringe benefit costs charged to the subaward.**

OJP agrees with this recommendation. In its response, dated November 1, 2024, the Washington COM stated that the salary and fringe benefit costs charged to the subaward, between June 2023 and September 2023, were determined to be allowable, and were documented by the approval of the invoice, which included information about the staff on that invoice. Further, the Washington COM stated that the allowability of charging costs for alternate staff during a vacancy does not require submission of a formal budget modification.

We will review the \$18,804 in questioned costs, related to unapproved salary and fringe benefit costs charged to Grant Number 2020-V2-GX-0022, and will work with the Washington COM, who in turn, will work with DSHS, to remedy, as appropriate.

4. **We recommend that OJP work with the Washington COM and DSHS to remedy \$24,810 in unallowable gift card purchases charged to the VOCA subaward.**

OJP agrees with this recommendation. In its response, dated November 1, 2024, Washington COM stated that it believes the gift cards, used as stipends and incentives for program participation, were allowable under VOCA Rule § 94.119. The Washington COM also stated that, while the OVC Best Practices Document lists "incentives for participation in services" as "typically unallowable," that the reference is used as guidance to subrecipient agencies in crafting their own gift card policies. Further, the Washington COM stated that the YWCA of Seattle had explained why the incentives were necessary and reasonable to the provision of services under their VOCA-funded subaward.

We will review the \$24,810 in questioned costs, related to unallowable gift card purchases charged to Grant Number 2020-V2-GX-0022, and will work with the Washington COM who in turn, will work with DSHS to remedy, as appropriate.

5. **We recommend that OJP work with the Washington COM and DSHS to remedy \$24,810 in unsupported gift card purchases for which the YWCA of Seattle could not produce adequate documentation.**

OJP agrees with this recommendation. In its response, dated November 1, 2024, the Washington COM stated that the YWCA of Seattle had located documentation to support most of the gift card purchases, and that they will work with YWCA of Seattle to remedy the remaining unsupported costs, through repayment of funds.

Accordingly, we will review the \$24,810 in questioned costs, related to unsupported gift card purchases charged to Grant Number 2020-V2-GX-0022, and will work with the Washington COM, who in turn will work with DSHS, to remedy, as appropriate.

6. **We recommend that OJP work with the Washington COM and DSHS to ensure that the YWCA of Seattle establish controls to ensure expenditures charged to the subawards are allowable and adequately supported.**

OJP agrees with this recommendation. In its response, dated November 1, 2024, the Washington COM stated that it will work with the YWCA of Seattle to enhance internal controls for ensuring expenditures charged to the subawards are allowable and adequately supported.

Accordingly, we will coordinate with Washington COM, who in turn will coordinate with DSHS, to obtain a copy of YWCA of Seattle's written policies and procedures, developed and implemented, to ensure expenditures charged to the subawards are allowable and adequately supported; and the supporting documentation is maintained for future auditing purposes.

7. **We recommend that OJP work with the Washington COM to ensure its policies and procedures for collecting and reporting subrecipient performance data align with the OVC's guidance, to include communicating clear instructions to subrecipients on how to report VOCA grant-funded performance data into the Washington COM's victim tracking database.**

OJP agrees with this recommendation. In its response, dated November 1, 2024, Washington COM stated that it will review its policies and procedures to ensure that the collection and reporting of subrecipient performance data aligns with OVC's guidance, and will create and implement a communications plan to provide clear instructions to subrecipients on how to report VOCA grant-funded performance data.



Accordingly, we will coordinate with the Washington COM to obtain a copy of its written policies and procedures, developed and implemented, to ensure that its procedures for collecting and reporting subrecipient performance data align with OVC's guidance, to include communicating clear instructions to subrecipients on how to report VOCA grant-funded performance data into the Washington COM's victim tracking database.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact Jeffrey Haley, Deputy Director, Audit and Review Division, of my staff, at (202) 598-0529.

cc: 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

Kristina Rose  
Director  
Office for Victims of Crime

Katherine Darke Schmitt  
Principal Deputy Director  
Office for Victims of Crime

James Simonson  
Director of Operations, Budget, and  
Performance Management  
Office for Victims of Crime

Jeffrey Nelson  
Deputy Director of Operations, Budget, and  
Performance Management Division  
Office for Victims of Crime

Willie Bronson  
Director, State Victim Resource Division  
Office for Victims of Crime

Joel Hall  
Associate Director, State Victim Resource Division  
Office for Victims of Crime

cc: Malgorzata Bereziewicz  
Grant Management Specialist  
Office for Victims of Crime

Charlotte Grzebien  
Deputy General Counsel

Katherine Brown  
Principal Deputy Director  
Office of Communications

Rachel Johnson  
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  
Assistant Director, Audit Liaison Group  
Internal Review and Evaluation Office  
Justice Management Division

Jorge L. Sosa  
Director, Office of Operations – Audit Division  
Office of the Inspector General

OJP Executive Secretariat  
Control Number OCOM001232



## APPENDIX 7: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report

The U.S. Department of Justice Office of the Inspector General (OIG) provided a draft of this audit report to the Office of Justice Programs (OJP), the Washington Department of Commerce (Washington COM), the Washington Department of Social and Health Services (DSHS), and the Young Women's Christian Association of Seattle, King County, and Snohomish County (YWCA of Seattle). The YWCA of Seattle's response is incorporated in Appendix 3, the DSHS's response is incorporated in Appendix 4, the Washington COM's response is incorporated in Appendix 5, and OJP's response is incorporated in Appendix 6 of this final report. In its response to our draft report, OJP agreed with our recommendations, and as a result, the status of the report is resolved. The Washington COM concurred with four recommendations, partially concurred with one recommendation, and did not concur with two recommendations. The DSHS concurred with three recommendations, partially concurred with one recommendation, and did not concur with two recommendations. The YWCA of Seattle did not concur with two recommendations, partially agreed with one recommendation, and did not state whether it agreed or disagreed with three recommendations but included planned actions to address each recommendation.<sup>9</sup> The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

### **Recommendations for OJP to work with the Washington COM and DSHS to:**

- 1. Ensure that the YWCA of Seattle establishes written policies and procedures to accurately track victims served with VOCA grant funding.**

Resolved. OJP agreed with our recommendation and stated in its response that it will work with the Washington COM, which in turn will coordinate with the DSHS, to obtain a copy of YWCA of Seattle's written policies and procedures, developed and implemented, to ensure that victims served with Victims of Crime Act (VOCA) grant funding are accurately tracked. As a result, this recommendation is resolved.

The Washington COM and DSHS concurred with our recommendation and stated in their responses that they will work with the YWCA of Seattle to strengthen its policies and procedures for tracking victims served with VOCA grant funding.

The YWCA of Seattle neither agreed nor disagreed with our recommendation. In its response, the YWCA of Seattle stated that it will work with the DSHS to assess its policies and procedures to improve tracking victims served with VOCA grant funding. The YWCA of Seattle stated that it would submit revised policies and procedures to the DSHS for input and approval.

This recommendation can be closed when we receive documentation that the YWCA of Seattle has developed and implemented written policies and procedures to accurately track victims served with VOCA grant funding and these policies have been distributed to relevant personnel.

---

<sup>9</sup> The DSHS and YWCA of Seattle did not comment on our last recommendation because it was directed solely to OJP.

- 2. Ensure that the YWCA of Seattle implements controls to ensure its subaward transactions are accurately tracked, to include routinely reconciling any subsidiary ledgers utilized to the program's general ledger.**

Resolved. OJP agreed with our recommendation and stated in its response that it will work with the Washington COM, which in turn will coordinate with the DSHS, to obtain a copy of YWCA of Seattle's written policies and procedures, developed and implemented; to strengthen controls related to subaward transactions to ensure such transactions are accurately tracked and subsidiary ledgers are routinely reconciled to the general ledger.

The Washington COM and DSHS concurred with our recommendation and stated in their responses that they will work with the YWCA of Seattle to strengthen its policies and procedures for tracking subaward transactions, including reconciliation of any subsidiary ledgers.

The YWCA of Seattle neither agreed nor disagreed with our recommendation. In its response, the YWCA of Seattle stated that it will update its procedures regarding the reconciliation of ledgers and submit the new policies and procedures to the DSHS.

This recommendation can be closed when we receive evidence that the YWCA of Seattle has implemented controls to ensure its subaward transactions are accurately tracked, to include routinely reconciling any subsidiary ledgers utilized to the program's general ledger.

- 3. Remedy \$18,804 in unapproved salary and fringe benefit costs charged to the subaward.**

Resolved. OJP agreed with our recommendation and stated in its response that it will review the \$18,804 in questioned costs, related to unapproved salary and fringe benefit costs charged to Grant Number 2020-V2-GX-0022, and will work with the Washington COM, which in turn will work with the DSHS to remedy them, as appropriate.

The Washington COM and DSHS did not concur with our recommendation. In its response, the Washington COM stated that the salary and fringe benefit costs charged to the subaward between June and September 2023 were determined to be allowable and documented by the approval of the invoice, which included information about the staff on that invoice. Further, the DSHS stated in its response that the approved budget for the subaward included categorical totals but did not include a detailed listing of personnel to be paid by the contract. The DSHS stated that they used an estimate of expenses that the YWCA of Seattle submitted as part of its application to the Washington COM when creating the subaward budget. Additionally, the DSHS put forward that the YWCA of Seattle can, throughout the period of performance, determine which personnel are necessary to complete the Statement of Work and fulfill the purpose of the agreement. DSHS's response also stated that adjusting personnel within the approved budget category does not require advance approval from the DSHS Program Manager and the approval of personnel additions were documented through the DSHS's approval of the invoices submitted by the YWCA of Seattle.

The YWCA of Seattle did not concur with our recommendation and stated in its response that the \$18,804 in costs charged to the subaward were approved expenses. The YWCA of Seattle stated that



it determined which personnel were necessary to complete the Statement of Work and adjusting personnel within the approved category did not require advance approval from the DSHS. The YWCA of Seattle stated that its Advocate terminated employment with the organization, and therefore, the Director and Program Manager took over the clients who were still being served by the subaward. YWCA asserted that the Program Manager and Director's personnel expenses were in support of the approved Statement of Work and within the approved budget total for salary and benefits.

We disagree with these positions put forth by the YWCA of Seattle, DSHS, and Washington COM that personnel costs for the non-approved positions were allowable. The YWCA of Seattle's Statement of Work stated that "services shall be provided in accordance with the contractor's approved application and budget" which listed one full-time Legal Advocate to be paid by the subaward. The Director and Program Manager roles were not listed on the approved budget or Statement of Work. Furthermore, as stated in the report, the YWCA of Seattle could not provide evidence that the Director and Program Manager's time charged was approved by the DSHS and Washington COM and related to fulfilling the duties of an Advocate and in support of the subaward.

This recommendation can be closed when we receive evidence that OJP has remedied \$18,804 in unapproved salary and fringe benefit costs charged to the subaward.

#### **4. Remedy \$24,810 in unallowable gift card purchases charged to the VOCA subaward.**

Resolved. OJP agreed with our recommendation and stated in its response that it will review the \$24,810 in questioned costs, related to unallowable gift card purchases charge to Grant Number 2020-V2-GX-0022, and will work with the Washington COM, which in turn will work with the DSHS, to remedy them, as appropriate.

The Washington COM did not concur with this recommendation. In its response, the Washington COM stated that it believes the YWCA of Seattle's gift card purchases were allowable. The Washington COM stated that the YWCA of Seattle explained to Washington COM's satisfaction why it was necessary to pay Peer Youth Leaders, which the Washington COM identified as subcontractors, by gift card. The Washington COM stated it did not identify any regulation that would prohibit payment by gift card. The Washington COM also stated that it believes gift cards used to purchase food for outreach meetings was an allowable cost. The Washington COM noted that Office for Victims of Crime's (OVC) Best Practices Document states that "incentives for participation in services" are "typically unallowable," and therefore, the Washington COM interprets this to mean certain instances may allow for gift cards to be purchased as incentive to participate in program activities.

The DSHS did not concur with this recommendation. The DSHS stated in its response that the solicitation that the Washington COM released was designed to support service providers in addressing unmet victim service needs and that the focus area under which the YWCA of Seattle was selected as a subrecipient required it to develop culturally appropriate, perhaps atypical, service model for Black/African American girls who have been impacted by gender-based violence. Further, the DSHS asserted that compensation provided to peer leaders under this subaward (through the



use of gift cards) was an allowable expense and also asserted that gift card purchases for food expenses were reasonable and necessary to provide culturally specific outreach and meetings.

The YWCA of Seattle did not concur with this recommendation and stated in its response that compensating Peer Youth Leaders with gift cards as subcontractors was reasonable and necessary “to center racial equity and reduce unnecessary barriers” that would come with hiring youth leaders as part-time staff or paying them through a method that would require parental management of their compensation. The YWCA of Seattle noted that although OVC’s Best Practices Document states that “incentives for participation in services” are “typically unallowable,” special considerations must be made given the type of services being provided to vulnerable members of the community. The YWCA of Seattle also stated that although it received clarification from the Washington COM that “food/beverages for trainings, meetings, and conferences” are non-eligible services and expenses for staff, the YWCA of Seattle’s youth advocacy groups were offered food during school lunchtimes and the food expenses were for clients and not for staff; therefore, the expenses were allowable. Further, the YWCA of Seattle stated that VOCA guidance does not expressly disallow gift cards to be used to purchase food for outreach events and the determination of eligibility should reside with the Washington COM VOCA Administrator.

As stated in our report, YWCA of Seattle officials stated that the students were not considered contract employees (as asserted in its response), but rather were stipend recipients. In addition, the YWCA of Seattle listed the gift card purchases to be used for stipend payments under “goods and services” within its approved budget and did not list these expenditures under “subcontracted services.” Moreover, according to VOCA Rule § 94.119 Allowable Direct Service Costs, VOCA funds may be used for immediate emotional, psychological, and physical health and safety services that respond to immediate needs of crime victims and includes emergency food. Purchasing gift cards for food for pre-planned outreach meetings does not appear to be in response to an immediate need. OVC’s Gift Card Best Practices explains that gift cards should not be used for as an incentive for participation in services as it is typically unallowable. It further explains that gift cards sometimes are used for as incentives for participation in research that may be allowed for purposes of research and evaluation, and OVC typically does not fund these activities. There are separate restrictions on these, and they must have prior approval from OJP. We found that the YWCA of Seattle did not receive approval to purchase gift cards as an incentive for program participation. Therefore, this recommendation can be closed when we receive evidence that OJP has remedied \$24,810 in unallowable gift card purchases charged to the subaward.

**5. Remedy \$24,810 in unsupported gift card purchases for which the YWCA of Seattle could not produce adequate documentation.**

Resolved. OJP agreed with our recommendation and stated in its response that it will review the \$24,810 in questioned costs related to unsupported gift card purchases charged and will work with the Washington COM, which in turn will work with the DSHS, to remedy them, as appropriate.

The Washington COM and DSHS partially concurred with this recommendation. In its response, the Washington COM stated that the YWCA of Seattle has located documentation for a portion of the questioned costs. For the remaining amount, totaling \$11,559, the available documents are missing



signatures or receipts, and the Washington COM agreed they are unsupported. In its response, the DSHS stated that moving forward, the YWCA of Seattle, with the DSHS's assistance, will conduct a review and assessment of written policies and procedures to improve guidance on purchasing, distributing, and tracking gift cards.

The YWCA of Seattle partially agreed with this recommendation and stated in its response that it has provided documentation to support approximately 53 percent of the gift cards purchased. The YWCA of Seattle also requested the OIG to provide documentation to specify which gift card amounts were and were not supported and agreed to repay the amount of gift cards that were unsupported. We provided the YWCA of Seattle the requested list of unsupported gift cards purchases after our exit conference. The YWCA of Seattle said it will, with DSHS's assistance, review, assess, and revise written policies and procedures to improve guidance on purchasing, distributing, and tracking gift cards. The OIG will work with OJP after the issuance of this final report to review this new documentation that YWCA provided and determine whether it will remedy the unsupported costs.

This recommendation can be closed when we receive evidence that OJP has remedied \$24,810 in unsupported gift card purchases charged to the subaward.

**6. Ensure that the YWCA of Seattle establishes controls to ensure expenditures charged to the subawards are allowable and adequately supported.**

Resolved. OJP agreed with our recommendation and stated in its response that it will coordinate with the Washington COM, which in turn will coordinate with the DSHS, to obtain a copy of the YWCA of Seattle's written policies and procedures, developed and implemented, to ensure expenditures charged to the subawards are allowable and adequately supported; and the supporting documentation is maintained.

The Washington COM and DSHS concurred with this recommendation and stated in their responses that they will work with the YWCA of Seattle to enhance its internal controls for ensuring expenditures charged to the subawards are allowable and adequately supported.

The YWCA of Seattle neither agreed nor disagreed with our recommendation. In its response, the YWCA of Seattle stated that it will assess its current policies and procedures around determination of allowable expenses and ensuring they are adequately supported.

This recommendation can be closed when we receive evidence that YWCA of Seattle has established controls to ensure expenditures charged to the subawards are allowable and adequately supported.

**Recommendation for OJP to:**

- 7. Work with the Washington COM to ensure its policies and procedures for collecting and reporting subrecipient performance data align with the OVC's guidance, to include communicating clear instructions to subrecipients on how to report VOCA grant-funded performance data into the Washington COM's victim tracking database.**

Resolved. OJP agreed with our recommendation and stated in its response that it will coordinate with the Washington COM to obtain a copy of its written policies and procedures, developed and implemented, to ensure that its procedures for collecting and reporting subrecipient performance data align with OVC's guidance, to include communicating clear instructions to subrecipients on how to report VOCA grant-funded performance data into the Washington COM's victim tracking database.

The Washington COM concurred with this recommendation and stated that it will review its policies and procedures to ensure the subrecipient performance data aligns with OVC's guidance and will create and implement a communications plan to communicate clear instructions to recipients on how to report VOCA grant-funded performance data.

This recommendation can be closed when we receive evidence that OJP has ensured the Washington COM's policies and procedures for collecting and reporting subrecipient performance data align with OVC's guidance, to include communicating clear instructions to subrecipients on how to report VOCA grant-funded performance data into the Washington COM's victim tracking database.