



Audit of the Office of Justice Programs
Victim Assistance Funds Subawarded by
the Puerto Rico Department of Justice to
Hogar Sustituto y Educativo Rosanna,
Corp. Bayamón, Puerto Rico



AUDIT DIVISION

25-069

JULY 2025



EXECUTIVE SUMMARY

Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Puerto Rico Department of Justice to Hogar Sustituto y Educativo Rosanna, Corp. Bayamón, Puerto Rico

Background

The U.S. Department of Justice (DOJ), Office of Justice Programs (OJP) provided funds to the Puerto Rico Department of Justice (PRDOJ) to make subawards to support victim assistance programs in Puerto Rico. The PRDOJ awarded \$815,184 in crime victim assistance funds to the Hogar Sustituto y Educativo Rosanna, Corp. (Hogar Rosanna) under three subawards from September 2021 through September 2023. The purpose of Hogar Rosanna's subawards, provided by the PRDOJ, was to provide services to victims of crime. As of August 2024, the PRDOJ had reimbursed Hogar Rosanna a cumulative amount of \$801,884 for the subawards we reviewed.

Audit Objective

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

Summary of Audit Results

We concluded that Hogar Rosanna provided services to victims of crime in Bayamón, Puerto Rico. However, we found that Hogar Rosanna should improve policies and procedures related to grant financial management.

Program Performance Accomplishments

The audit concluded Hogar Rosanna provided support to victims of crime, including shelter, food, medical care, and counseling. However, Hogar Rosanna did not have comprehensive written policies and procedures for performance reporting.

Financial Management

The audit concluded that Hogar Rosanna needs to establish written policies and procedures to improve its internal controls for the financial management of subaward funds.

Recommendations

Our report contains nine recommendations for OJP and the PRDOJ to assist Hogar Rosanna in improving its award management and administration. We requested a response to our audit report from Hogar Rosanna, the PRDOJ, and OJP officials. Their responses can be found in Appendices 2, 3, and 4, respectively. Our analysis of those responses can be found in Appendix 5.

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Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of victim assistance funds received by Hogar Sustituto y Educativo Rosanna, Corp. (Hogar Rosanna), which is located in Bayamón, Puerto Rico. The Office of Justice Programs (OJP) Office for Victims of Crime (OVC) provided this funding to the Puerto Rico Department of Justice (PRDOJ), which serves as the State Administering Agency for Puerto Rico and makes subawards to direct service providers. As a direct service provider, Hogar Rosanna received three subawards from the PRDOJ totaling \$815,184 between September 2021 and September 2023. These funds originated from PRDOJ fiscal years (FY) 2020, 2021, and 2022 federal grants, as shown in Table 1.

Table 1

Audited Subawards to Hogar Rosanna from the PRDOJ

Subaward Identifier	OJP Prime Award Numbers	Project State Date	Project End Date	Subaward Amount
2020-V2-EPMC-V-01	2020-V2-GX-0035	9/25/2021	9/24/2022	\$307,187
2021-VA-EPMC-V-01	15POVC-21-GG-00595-ASSI	9/25/2022	9/24/2023	\$259,625
2022-VA-EPMC-V-01	15POVC-22-GG-00798-ASSI	9/25/2023	9/24/2024	\$248,372
Total:				\$815,184

Source: JustGrants and PRDOJ

Established by the Victims of Crime Act of 1984 (VOCA), the Crime Victims Fund (CVF) is used to support crime victims through DOJ programs, and state and local victim assistance and compensation initiatives.¹ According to OJP's program guidelines, eligible victim assistance programs provide services and efforts that: (1) respond to the emotional, psychological, or 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, or (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 restraining orders, counseling in crises arising from the occurrence of crime, crisis intervention, and emergency shelter.

Hogar Sustituto y Educativo Rosanna, Corp.

Hogar Rosanna is a 501(c)(3) non-profit organization located in Bayamón, Puerto Rico, whose mission includes providing temporary and permanent housing and integrated services to women who are victims of neglect and sexual abuse facing health conditions and developmental challenges. Hogar Rosanna was

¹ 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.

founded in 2007 and has been a subrecipient of VOCA grants since 2016. Hogar Rosanna's services include housing, counseling, medical services, transportation, clothing, and educational services.

OIG Audit Approach

The objective of this audit was to review how Hogar Rosanna used the VOCA funds received through subawards from the PRDOJ to assist crime victims and assess whether Hogar Rosanna accounted for VOCA funds in compliance with 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 the PRDOJ officials regarding Hogar Rosanna's records of delivering crime victim services, accomplishments, and compliance with the PRDOJ award requirements.²

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; and the OVC and PRDOJ award documents contain the primary criteria we applied during this audit.

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.

² As an SAA, the PRDOJ is responsible for ensuring that Hogar Rosanna's subaward is 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 the PRDOJ in performing this separate review. See U.S. Department of Justice Office of the Inspector General, [Audit of Office of Justice Programs Grants Awarded to the Puerto Rico Department of Justice](#), Audit Report GR-40-15-006 (September 2015), oig.justice.gov/reports/audit-office-justice-programs-grants-awarded-puerto-rico-department-justice.

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. Hogar Rosanna received its VOCA funding from the PRDOJ to provide services to women who are victims of sexual abuse and neglect. We obtained an understanding of Hogar Rosanna's standard operating procedures in relation to the subaward funded services. We also compared the project proposal and subaward agreement against available evidence of accomplishments to determine whether Hogar Rosanna demonstrated adequate progress towards providing the services for which it was funded. Overall, we concluded that Hogar Rosanna provided the services for which it was funded.

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 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 Hogar Rosanna officials, staff, and the president of the Board of Directors. We also requested and reviewed copies of its written policies and procedures that govern the VOCA-funded program. Hogar Rosanna provided us an overview and documentation regarding the procedures for its program services, including processes for intake, daily program activities, and shelter operations. The program is administered by the Executive Director, who is responsible for operations and overseeing the staff providing the services. The staff includes seven caregivers, a cook, a driver, a program coordinator, and a contracted social worker.

The victims (clients) are usually referred by state agencies such as the Puerto Rico Department of Family and the Department of Health. Hogar Rosanna operates 24 hours a day. Upon arrival, clients go through an assessment and intake process to identify their needs. Once accepted into the program, a Hogar Rosanna staff member explains to the client their rights and responsibilities and assigns a room for the client.

Performance Reporting

Performance reporting for the subawards is performed by the contracted social worker providing professional services. This person collects the performance data from hard copy records maintained by the Executive Director and reports it through OJP's Performance Measurement Tool (PMT). A Hogar Rosanna official told us that the contractor was the only person with access to PMT but acknowledged that there should be a backup person with access to the system and trained to use the system in cases where the contractor is not available to ensure continuity. In addition, there were no written policies and procedures for reporting their quarterly VOCA-funded activities.

We selected a quarterly Performance Measures Report and confirmed that the number of victims reported was accurate. However, we believe that to ensure continuity and reliability of reporting and compliance with

federal award requirements, there should be written policies and procedures for performance reporting. We also believe that at least one Hogar Rosanna staff member should have access and be trained in the use of PMT. Therefore, we recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna develops and implements written policies and procedures for quarterly performance reporting and that at least one employee is provided access to PMT, and training is provided to the employee.

Program Services

According to the objectives of the subawards, Hogar Rosanna was to provide shelter, nutrition, safety, medical services, and social and emotional development services. To verify that these services were provided, we interviewed staff, toured the facilities, and reviewed documented program activities.

We found that Hogar Rosanna was providing the services in accordance with the subaward application. We observed 7 staff members dedicated to the daily care of 14 victims, and a contracted social worker providing direct services. We confirmed that the services being provided included shelter, daily care, food, counseling, medical, and dental services. Based on the performance documentation we reviewed, our interviews with staff, and observations made by the audit team, we determined that Hogar Rosanna provided the services for which it was funded.

Financial Management

According to the DOJ Grants Financial Guide, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records to accurately account for awarded funds. To determine whether Hogar Rosanna adequately accounted for the audited subaward funds, we conducted interviews with officials, examined policies and procedures, reviewed award documents, and performed expenditure testing.

We found that most of Hogar Rosanna's accounting functions were performed by a single contracted external accountant using commercially available accounting software. The accountant is responsible for recording daily accounting activities, preparing checks, running the payroll, performing monthly bank reconciliations, and preparing financial reports for the PRDOJ, while Hogar Rosanna's Executive Director retains responsibility for authorizing disbursements and signing the checks.

Although the accounting software used by Hogar Rosanna's accountant appears to be adequate to account for grant funds, we found deficiencies in Hogar Rosanna's system of internal controls that we believe are the result of inadequate policies, procedures, and resources. In particular, the small size of the organization's staff precludes the establishment of certain internal control activities, including proper segregation of duties.

We also found that no one within the Hogar Rosanna organization had access to the organization's own accounting records—not even read-only access. The accountant was the only person with access to the system. We believe that this condition may result in loss of access to important historical data and a potential challenge to continuity of financial operations. The accountant agreed with our concern and told us that she paid for and owns the license for the use of the accounting software and believed that Hogar Rosanna should acquire its own license, which would provide in-house access to and retention of the current and historical accounting data. Having in-house visibility of the accounting records would also offer

Hogar Rosanna officials and the Board of Directors additional options for implementing controls to mitigate the limited segregation of duties that exists due to the small staff size. The Executive Director also agreed with our concerns and told us she was working on making changes. We recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna improves its grant financial management by ensuring that it obtains independent access to the organization's electronic accounting records and that at least one Hogar Rosanna official receives training in, at a minimum, basic navigation within the system.

We also found two additional conditions which, combined with the insufficient segregation of duties, may potentially put funds at risk. We discuss these concerns in the Fiscal Policies and Procedures section below and provide recommendations to assist Hogar Rosanna with improving its internal controls.

Fiscal Policies and Procedures

We found that Hogar Rosanna had policies and procedures in place for the financial management of funds. However, additional policies and procedures are needed, and some existing policies need improvement.

- **Disbursement Controls** – We spoke with the Executive Director of Hogar Rosanna about the organization's procedures for reviewing and approving disbursements of subaward funds. The Executive Director told us that, for expenditures from every funding source except VOCA subaward funds, the organization had additional control activities in place. Specifically, additional authorizations were required for check payments of \$10,000 or more from funding sources other than VOCA. Given the challenges associated with proper segregation of duties in a small organization such as Hogar Rosanna, having a requirement for two signatures formalized within the organization's policies provides an additional control to ensure expenditures are appropriate, allowable, and accurate. An official told us that this practice had not been extended to VOCA funds but that for some VOCA purchases they seek approval in advance from the PRDOJ. Although obtaining approval from the PRDOJ could help ensure that those purchases are allowable, we believe that Hogar Rosanna should take additional action to mitigate risk of fraud and improper payments more broadly for its VOCA subgrants. We recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna enhances its internal controls over grant disbursements by implementing and documenting a control to ensure payments are appropriate, allowable, and accurate.
- **Tracking Expenditures** – We found that the accounting system in place for Hogar Rosanna had the capability to track subaward activities by dedicated accounting codes for each subaward, but Hogar Rosanna had not established accounting codes to provide for such automated tracking of individual program activities. Instead, it relied on time-consuming manual analyses prepared periodically by the accountant. When expenditures are not properly coded and tracked, the accuracy of the resulting financial reports could be affected. To mitigate the risk of potentially inaccurate financial reports, we recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna establishes accounting codes and written policies and procedures to ensure its accounting system accurately reflects costs supported by and charged to VOCA awards.
- **Physical Control of Checks** – To prepare disbursement checks, it is the accountant's practice to take home a stack of blank checks to prepare and then bring them back to the Executive Director for signature and issuance. We inquired about any log for tracking checks that are handled in this way

and were told there were no such tracking mechanisms. As is common in small organizations, Hogar Rosanna faces challenges related to proper segregation of duties. As a result, many of the organization's financial activities are performed by the same contracted external accountant, including functions related to transaction recording (such as daily accounting entries and payroll entries), custody of physical assets (checks), and reconciliations (including monthly bank reconciliations). In particular, we are concerned that inadequate physical control over checks increases the risks of errors, improper payments, and fraud. Based on our tests of expenditures, we did not find adverse consequences, but we believe that this control weakness increases the risks of mismanagement or misuse of VOCA funds. Accordingly, we recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna identifies solutions or mitigating controls to address the organization's challenges with segregation of duties, including controls over the custody of checks.

- **Quarterly Financial Reports** – Hogar Rosanna did not have policies and procedures for the preparation of required quarterly subaward financial reports to submit to the PRDOJ. An official told us that the procedures for the preparation of these reports were learned through trial and error and in consultation with the PRDOJ. To ensure the continuity of Hogar Rosanna's operations, we recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna develops and implements written policies and procedures for the preparation of quarterly financial reports.

Based on the results of our expenditure testing (described below), we did not find any adverse effects on subaward funds related to the control weaknesses discussed above. We discussed the deficiencies with Hogar Rosanna's Executive Director, who concurred with our concerns. We believe that the above internal control deficiencies, along with the need for additional or enhanced policies and procedures, increase the potential that errors or irregularities may occur and not be detected. Consequently, we also recommend that OJP work with the PRDOJ to ensure that the appropriate Hogar Rosanna officials receive training in the financial management and administration of DOJ grants and fraud risk awareness.

Subaward Expenditures

Hogar Rosanna requested quarterly reimbursements from the PRDOJ for subaward expenditures. For the subawards audited, Hogar Rosanna's approved budgets included personnel, professional services, equipment, and utilities. As of August 2024, we found that the PRDOJ paid a total of \$801,884 of the \$815,184 total in VOCA subawards to Hogar Rosanna for costs incurred in these areas.

We reviewed a sample of Hogar Rosanna transactions to determine whether the costs charged to the projects and paid with VOCA funds were accurate, allowable, supported, and in accordance with the VOCA program requirements. We judgmentally sampled transactions that included payments for personnel, professional services, equipment, and utilities. The methodology for selecting and testing transactions from these cost categories and results of our review are discussed below.

Personnel Costs

The largest cost area for which Hogar Rosanna received reimbursement was personnel costs. We determined that, of the \$801,884 in total disbursements made by the PRDOJ to Hogar Rosanna for the subawards in our audit scope, \$651,294, or approximately 81 percent, was for personnel costs. We judgmentally sampled four pay periods, which included 41 payments to employees totaling \$33,376.

We determined that the charges for the personnel costs we tested were allowable and supported. Hogar Rosanna policies require its employees to fill out timesheets to account for their time worked. However, we identified multiple concerns related to review and approval of timesheets used by Hogar Rosanna to prepare the payroll, specifically: (1) timesheets prepopulated with the date and time of entrance and departure, and (2) timesheets missing approval by the Executive Director. The Uniform Guidance, 2 C.F.R. § 200.430, indicates that salaries and wages must be based on records that accurately reflect the work performed and these records must be supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated. We discussed these conditions with a Hogar Rosanna official who explained that they were able to rely on other documentation, such as daily activity logs to corroborate the timesheets for billing purposes. The official told us that they are in the process of implementing improvements. Because we received additional documentation that adequately supported the charged payroll expense we reviewed, we do not question those costs, but we recommend that OJP works with the PRDOJ to require Hogar Rosanna to enhance its timesheet-related policies to include adequate controls to ensure the timesheets correctly reflect the hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented.

Other Costs

To test other costs charged to the subawards, we judgmentally selected a sample of 25 expenditure transactions related to professional services, equipment, and utilities. The value of these transactions totaled \$39,446. To perform verification testing of these expenditures, we reviewed accounting records and available supporting documentation. We determined that the transactions tested were allowable and supported; however, we found inconsistencies in Hogar Rosanna's procedures that we believe are the result of inadequately developed and implemented policies.

Hogar Rosanna had invoice forms available to be used by its contracted service providers to request payment for the services they performed, but we found inconsistencies in how those forms were being reviewed by Hogar Rosanna. Hogar Rosanna required that these forms be reviewed and certified by the Executive Director, whose name was prepopulated in the form. In 9 of the 19 invoice forms we reviewed, we found that the forms had not been reviewed and certified by the Executive Director prior to their payment by Hogar Rosanna's accountant. We also found that the procedure for reviewing Hogar Rosanna's contracted service provider invoices was not within the written financial policies and procedures.

We believe that the proper use of Hogar Rosanna's invoice forms is an important control to ensure that disbursements are properly authorized and to safeguard funds from potential errors or misuse. We discussed this with a Hogar Rosanna official who concurred with the need to strengthen the procedures for paying its contractors. We do not question the nine payments associated with invoice forms that were not reviewed and certified by the Executive Director because we found those costs to be supported, so there was no adverse effect in this case. However, we recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna incorporates procedures for proper use of its invoice forms within its financial policies to help ensure that federal funds are properly safeguarded.

Conclusion and Recommendations

As a result of our audit testing, we concluded that Hogar Rosanna assisted victims by providing the services described in its subaward applications, including shelter, food, medical care, and counseling. However, we also found a control environment where Hogar Rosanna relied heavily on its contractors for financial management and performance reporting, where subrecipient officials lacked access to the organization's own systems, and where additional policies and procedures are needed to ensure responsible organizational governance and the continuation of both activities even in the absence of contractor assistance. We provide nine recommendations to OJP to work with the PRDOJ to address these deficiencies.

We recommend that OJP work with the PRDOJ to:

1. Ensure that Hogar Rosanna develops and implements written policies and procedures for quarterly performance reporting, and that at least one employee is provided access to PMT, and training is provided to the employee.
2. Ensure that Hogar Rosanna obtains independent access to the organization's accounting records and that at least one Hogar Rosanna official receives training in, at a minimum, basic navigation within the system.
3. Ensure that Hogar Rosanna enhances its internal controls over grant disbursements by implementing and documenting a control to help ensure payments are appropriate, allowable, and accurate.
4. Ensure that Hogar Rosanna establishes accounting codes and written policies and procedures to ensure its accounting system accurately reflects costs supported by and charged to VOCA awards.
5. Ensure that Hogar Rosanna identifies solutions or mitigating controls to address the organization's challenges with segregation of duties, including controls over the custody of checks.
6. Ensure that Hogar Rosanna develops and implements written policies and procedures for the preparation of quarterly financial reports.
7. Ensure that the appropriate Hogar Rosanna officials receive training in the financial management and administration of DOJ grants and fraud awareness.
8. Require Hogar Rosanna to enhance its timesheet-related policies to include adequate controls to ensure the timesheets correctly reflect the hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented.
9. Ensure that Hogar Rosanna incorporates procedures for proper use of its invoice forms within its financial policies to help ensure that federal funds are properly safeguarded.

APPENDIX 1: Objective, Scope, and Methodology

Objective

The objective of this audit was to review how Hogar Sustituto y Educativo Rosanna, Corp. (Hogar Rosanna) used the Victims of Crime Act (VOCA) funds received through a subaward from the Puerto Rico Department of Justice (PRDOJ) to assist crime victims and assess whether it accounted for VOCA funds in compliance with 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 three subawards to Hogar Rosanna. These subawards, totaling \$815,184, were funded by the PRDOJ from primary VOCA grants 2020-V2-GX-0035, 15POVC-21-GG-00595-ASSI, and 15POVC-22-GG-00798-ASSI awarded by the Office of Justice Programs (OJP) Office for Victims of Crime (OVC). As of August 2024, the PRDOJ had reimbursed Hogar Rosanna \$801,884 in subaward funds.

Our audit concentrated on, but was not limited to, the period of September 2021 through August 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; and the OVC and the PRDOJ award documents contained 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 Hogar Rosanna's activities related to the audited grants. Our work included conducting interviews with officials and staff, examining policies and procedures, and reviewing grant documentation and financial records. We performed sample-based audit testing for costs related to personnel, professional services, equipment, and utilities. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grants reviewed. This non-statistical sample design did not allow for 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, as well as from the PRDOJ 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 Hogar Rosanna to provide assurance on its internal control

structure as a whole. Hogar Rosanna 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 Hogar Rosanna's internal control structure as a whole, we offer this statement solely for the information and use of Hogar Rosanna, the PRDOJ and OJP.³

In planning and performing our 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 Hogar Rosanna's written policies and procedures. We also tested the implementation and operating effectiveness of specific controls over subaward execution and compliance with laws and regulations applicable to 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.

³ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

APPENDIX 2: Hogar Sustituto y Educativo Rosanna, Corp. Response to the Draft Audit Report



Hogar Sustituto y Educativo Rosanna Corp.

April 21, 2025

B. Allen Wood
Regional Audit Manager
U.S. Department of Justice
Office of the Inspector General
Atlanta Regional Audit Office
75 Ted Turner Dr. SW
Atlanta, GA 30303

Dear Mr. Wood:

This letter is in response to the audits completed by the Department of the Inspector General (OIG) on Hogar Sustituto y Educativo Rosanna, Corp. VOCA grant awards 2020-V2-EPMC-V-01 (2020-V2-GX-0035), 2021-VA-EPMC-V-01 (15POVC-21-GG-00595-ASSI) and 2022-VA-EPMC-V-01 (15POVC-22-GG-00798-ASSI). The responses to the recommendations of the audit report that OJP work with the PRDOJ and thus with Hogar Rosanna were accomplished. Hogar Rosanna analyzed all the recommendations and developed written procedures for the 9 points, also met with Lorena Soler, Esq., Directora de Recursos Externos, and Sr. Carlos Casiano, Management Affairs Specialist, from PRDOJ to ensure that the written procedures were correct and to know the dates to be implemented. Each recommendation is outlined below:

1. Implement written policies and procedures for PMT and give access and training to an employee. HSRC agrees with the recommendation and has already written the policies and procedures and has given access to an employee.
2. Obtain independent access to the organization's accounting records and train at least one employee. HSRC agrees with the recommendation and starts working with the online platform on April 25, 2025, and with the purchase of a new accounting license. Training will be completed and ready to start with the next grant in October 2025.
3. Enhance internal controls over grant disbursement. HSRC agrees with the recommendation and has already written procedures and will integrate and train an employee. Training will be completed and ready to start with the next grant in October 2025.
4. Ensure that Hogar Rosanna establishes accounting codes and written policies and procedures to reflect VOCA costs accurately in the accounting system. HSRC agrees with



Hogar Sustituto y Educativo Rosanna Corp.

the recommendation. The process will start with the online platform on April 25, 2025, and the purchase of a new accounting license. Training and the coding system will be completed and ready to start with the next grant in October 2025.

5. Identify solutions to address organization's challenges with segregation of duties, including custody of checks. HSRC agrees with the recommendation and has already written procedures, designed forms and will integrate and train an employee. Training will be completed and ready to start with the next grant in October 2025.
6. Ensure that Hogar Rosanna develops and implements written policies and procedures for the preparation of quarterly financial reports. HSRC agrees with the recommendation and has already written policies and procedures and will train also an employee. Training will be completed and ready to start with the next grant in October 2025.
7. Ensure that the appropriate Hogar Rosanna officials receive training in financial management and administration of DOJ grants. All appropriate officials have the training.
8. Enhance its timesheet related policies to include adequate controls. HSRC agrees with the recommendation and has already written policies and procedures. Will be implemented with the start of new grant in October 2025.
9. Ensure that Hogar Rosanna incorporates procedures for proper use of its invoice forms within its financial policies to help ensure that federal funds are properly safeguarded. HSRC agrees with the recommendation and has already written policies and procedures.

Hogar Sustituto y Educativo Rosanna Corp., appreciates the opportunity and the help from PRDOJ to implement the recommendations from OIG. Also, we are grateful that the OIG has brought these recommendations to our attention as it will guarantee the continuance of our organization and a better understanding of the required financial policies and procedures when dealing with federal grants.

Sincerely,


Rosanna Mesa Pérez
Executive Director

APPENDIX 3: Puerto Rico Department of Justice Response to the Draft Audit Report



GOBIERNO DE PUERTO RICO
Departamento de Justicia

Hon. Jennifer González Colón
Gobernadora

Hon. Janet Parra Mercado
Secretaria de Justicia Designada

April 21, 2025

Scott Kelly
Assistant Regional Audit Manager
Atlanta Regional Audit Office
Office of the Inspector General
U.S. Department of Justice

Dear Mr. Kelly,

On March 26, 2025, we received a copy of the draft report on the Audit of the Office of Justice Programs Victim Assistance Funds Sub awarded by the Puerto Rico Department of Justice to *Hogar Sustituto y Educativo Rosanna, Corp.* based in Bayamón, Puerto Rico. For the issuance of the final report, a formal response to the Office of the Inspector General's report was requested from the Department of Justice of Puerto Rico. In compliance with the said request, personnel from the External Resources Division of the Department of Justice of Puerto Rico met with Hogar Rosanna's management on April 10, 2025, to discuss the findings of the report.

As discussed with management of *Hogar Sustituto y Educativo Rosanna, Corp.*, the Department of Justice of Puerto Rico agrees with the recommendations posed on the draft report and has identified an action plan for corrective action. The Draft Audit Report identified the following recommendations:

1. Ensure that Hogar Rosanna develops and implements written policies and procedures for quarterly performance reporting, and that at least one employee is provided with access to PMT, and training is provided to the employee.

Hogar Rosanna acknowledged that since they are a small organization they have outsourced accounting matters to an independent contractor. Raising the need for continuous institutional access to accounting systems and



financial information, management decided to designate the Program Facilitator as institutional personnel to be granted access to the PMT. The independent contractor currently in charge of the accounting systems and keeper of the financial information will train and delegate these tasks to the Program Facilitator. This process is expected to be completed during October 2025.

2. Ensure that Hogar Rosanna obtains independent access to the organization's accounting records and that at least one Hogar Rosanna official receives training in, at a minimum, basic navigation within the system.

As indicated in the previous finding, Hogar Rosanna acknowledges that accounting matters are currently delegated to an independent contractor. This contractor maintains accounting records electronically through a platform called SAGE; the license to this platform belongs to the independent contractor. To ensure independent access to the organization's accounting records, Hogar Rosanna has agreed to obtain an institutional license for an electronic accounting records platform. Nonetheless, this acquisition requires approval from the institution's board of directors as an assessment of the adequacy of the platform to be obtained is required. The approval of the software acquisition process is expected to be completed by the end of April 2025 and the software procurement should be completed by May 2025.

3. Ensure that Hogar Rosanna enhances its internal controls over grant disbursements by implementing and documenting and control to help ensure payments are appropriate, allowable and accurate.

Hogar Rosanna is drafting new and improved internal procedures regarding grant disbursement to assist in the process of ensuring that all payments are appropriate, allowable and accurate. The Department of Justice staff had the opportunity to review and comment on the drafts of these procedures and provided feedback to the institution to ensure compliance with the applicable regulations. These policies and procedures drafts are to be finalized and implemented by Hogar Rosanna by October 2025.

4. Ensure that Hogar Rosanna establishes accounting codes and written policies and procedures to ensure its accounting system accurately reflects costs supported by and charged to VOCA awards.

Hogar Rosanna is drafting new and improved internal policies and procedures regarding grant to ensure its accounting system accurately reflects costs supported by and charged to VOCA awards. The Department of Justice staff had the opportunity to review and comment on the drafts of these procedures and provided feedback to the institution. Hogar Rosanna has also acknowledged the need to establish accounting codes; nonetheless, this process will be performed on the new accounting records platform acquired by the institution and further procedures will be pending the acquisition of this software in May 2025. These policies and procedures drafts are to be finalized and implemented by Hogar Rosanna by October 2025.

5. Ensure that Hogar Rosanna identifies solutions or mitigating controls to address the organization's challenges with segregation of duties, including controls over the custody of checks.

Hogar Rosanna is drafting new and improved internal procedures regarding segregation of duties, including controls over the custody of checks. The Department of Justice staff had the opportunity to review and comment on the drafts of these procedures and provided feedback to the institution to ensure compliance with the applicable regulations. These policies and procedures drafts are to be finalized and implemented by Hogar Rosanna by October 2025.

6. Ensure that Hogar Rosanna develops and implements written policies and procedures for the preparation of quarterly financial reports.

Hogar Rosanna is drafting new and improved internal procedures regarding the preparation of quarterly financial reports. These policies and procedures incorporate the Program Facilitator in the process, to ensure the entity's access and know-how in this process. The Department of Justice staff had the opportunity to review and comment on the drafts of these procedures and provided feedback to the institution to ensure compliance with the applicable regulations. These policies and procedures drafts are to be finalized and implemented by Hogar Rosanna by October 2025.

7. Ensure that the appropriate Hogar Rosanna officials receive training in the financial management and administration of DOJ grants and fraud awareness.

*The Department of Justice staff had the opportunity to discuss the issue of training in financial management and administration with Hogar Rosanna's management. At the time of our meeting both the Director, Rosanna Mesa and their accountant Carmen Pilar Portela, have completed the **OJP Grants Financial Management and Grant Administration Training**. The entity was advised that the Program Facilitator, in their new responsibilities regarding accounting services, would need to complete the **OJP Grants Financial Management and Grant Administration Training**. The Department's staff also advised Hogar Rosanna's management to register all pertaining personnel in training opportunities provided or promoted by the Department of Justice of Puerto Rico regarding grant management matters and fraud awareness.*

8. Require Hogar Rosanna to enhance its timesheet-related policies to include adequate controls to ensure the timesheets correctly reflect the hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented.

Hogar Rosanna is drafting new and improved internal procedures to include adequate controls to ensure the timesheets correctly reflect the hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented. The Department of Justice staff had the opportunity to review and comment on the drafts of these procedures and provided feedback to the institution to ensure compliance with the applicable regulations. These policies and procedures drafts are to be finalized and implemented by Hogar Rosanna by October 2025.

9. Ensure that Hogar Rosanna incorporates procedures for proper use of its invoice forms within its financial policies to help ensure that federal funds are properly safeguarded.

Hogar Rosanna is drafting new and improved procedures for proper use of its invoice forms within its financial policies to help ensure that federal funds are properly safeguarded. The Department of Justice staff had the opportunity to review and comment on the drafts of these procedures and provided feedback to the institution to ensure compliance with the applicable

regulations. These policies and procedures drafts are to be finalized and implemented by Hogar Rosanna by October 2025.

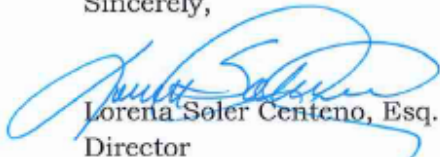
It is the understanding of the Department of Justice of Puerto Rico, that Hogar Rosanna has maintained a proven track record of compliance with the laws and regulations governing the use of federal funds, as well as a strong commitment to supporting crime victims.

The Department acknowledges that the findings issued by the Office of the Inspector General are valid and highlight areas in need of procedural improvement. However, following the meeting held with the institution's management, the Department recognizes their genuine commitment to implementing the necessary changes to address the identified areas of improvement and to ensure the continued proper, transparent, and responsible management of grant funds.

The Department remains available to provide guidance and support throughout this process and looks forward to continued collaboration to strengthen compliance and service delivery.

Should you have any questions or require further clarification, please do not hesitate to contact us.

Sincerely,



Lorena Soler Centeno, Esq.
Director

External Funding Division
Department of Justice of Puerto Rico

c.c. Rosanna Mesa
Executive Director
Hogar Sustituto y Educativo
Rosanna, Corp.

Thomas Murphy
Senior Audit Liason Specialist
Audit Coordination Branch,
Audit & Review Division
Office of Audit, Assessment & Management
Office of Justice Programs

Draft Audit Report for Hogar Rosanna- Department of Justice of Puerto Rico Response

Melonic Threatt
Acting Team Leader
Audit Coordination Branch,
Audit & Review Division
Office of Audit, Assessment & Management
Office of Justice Programs

APPENDIX 4: Office of Justice Programs Response to the Draft Audit Report



U.S. Department of Justice

Office of Justice Programs

Office of Audit, Assessment, and Management

Washington, D.C. 20531

May 2, 2025

MEMORANDUM TO: B. Allen Wood
Regional Audit Manager
Atlanta Regional Audit Office
Office of the Inspector General

FROM: Iyauta I. Green
Director

Iyauta Iyeesha Green

Digitally signed by Iyauta Iyeesha Green
Date: 2025.05.02 11:17:44 -04'00'

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs Victim Assistance Funds, Subawarded by the Puerto Rico Department of Justice to Hogar Sustituto y Educativo Rosanna, Corp., Bayamon, Puerto Rico*

This memorandum is in reference to your correspondence, dated March 26, 2025, transmitting the above-referenced draft audit report for Hogar Sustituto y Educativo Rosanna, Corp. (Hogar Rosanna). Hogar Rosanna received subaward funds from the Puerto Rico Department of Justice (PRDOJ), under the Office of Justice Programs' (OJP), Office for Victims of Crime (OVC), Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 2020-V2-GX-0035, 15POVC-21-GG-00595-ASSI, and 15POVC-22-GG-00798-ASSI. We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains **nine recommendations and no questioned costs**. The following is OJP's analysis of the draft audit report recommendations. For ease of review, the recommendations are restated in bold and are followed by OJP's response.

- We recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna develops and implements written policies and procedures for quarterly performance reporting, and that at least one employee is provided access to PMT, and training is provided to the employee.**

OJP agrees with the recommendation. In its response, dated April 21, 2025, the PRDOJ stated that Hogar Rosanna has outsourced accounting matters to an independent contractor. PRDOJ also stated that the contractor will train and delegate accounting and financial management tasks to the Program Facilitator, to be completed during October 2025.

Accordingly, we will coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that quarterly performance data is reported in the Performance Measurement Tool (PMT) accurately, and that supporting records are maintained. In addition, we will coordinate with the PRDOJ to obtain evidence that Hogar Rosanna provided at least one employee access to PMT, and trained the employee.

We will also work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

2. **We recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna obtains independent access to the organization's accounting records and that at least one Hogar Rosanna official receives training in, at a minimum, basic navigation within the system.**

OJP agrees with the recommendation. In its response, dated April 21, 2025, the PRDOJ stated that Hogar Rosanna has agreed to obtain a license for an electronic accounting records platform. In addition, the PRDOJ stated that this requires approval from Hogar Rosanna's Board of Directors, and that the approval should occur by the end of April 2025, while software procurement should be completed by May 2025.

Accordingly, we will coordinate with the PRDOJ to obtain evidence that Hogar Rosanna has acquired and implemented an electronic accounting records platform, and that at least one Hogar Rosanna official has completed training in the operation of the platform.

3. **We recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna enhances its internal controls over grant disbursements by implementing and documenting a control to help ensure payments are appropriate, allowable, and accurate.**

OJP agrees with the recommendation. In its response, dated April 21, 2025, the PRDOJ stated that Hogar Rosanna is currently drafting updated procedures to ensure that all payments are appropriate, allowable, and accurate, and that the PRDOJ has reviewed and provided feedback on these procedures. The PRDOJ also stated that the policies and procedures should be completed by October 2025.

Accordingly, we will coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that proper controls are in place to ensure that grant disbursements are appropriate, allowable, and accurate.

We will also work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

4. **We recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna establishes accounting codes and written policies and procedures to ensure its accounting system accurately reflects costs supported by and charged to VOCA awards.**

OJP agrees with the recommendation. In its response, dated April 21, 2025, the PRDOJ stated that Hogar Rosanna is currently drafting updated procedures to ensure that the accounting system accurately reflects costs supported by and charged to VOCA awards, which the PRDOJ has reviewed and provided feedback on. The PRDOJ also stated that Hogar Rosanna has acknowledged the need to establish new accounting codes and that this process will occur on the new accounting records platform to be acquired in compliance with Recommendation 2. The PRDOJ expects this process to be completed by October 2025.

Accordingly, we will coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that accounting codes are established, and that they are properly used to record costs supported by and charged to VOCA awards.

We will also work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

5. **We recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna identifies solutions or mitigating controls to address the organization's challenges with segregation of duties, including controls over the custody of checks.**

OJP agrees with the recommendation. In its response, dated April 21, 2025, the PRDOJ stated that Hogar Rosanna is currently drafting updated procedures regarding segregation of duties – including controls over custody of checks – which the PRDOJ has reviewed and provided feedback on. The PRDOJ also stated that the policies and procedures should be completed by October 2025.

Accordingly, we will coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure segregation of duties, including controls over custody of checks, in accordance with the Uniform Guidance.

We will also work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

6. **We recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna develops and implements written policies and procedures for the preparation of quarterly financial reports.**

OJP agrees with the recommendation. In its response, dated April 21, 2025, the PRDOJ stated that Hogar Rosanna is currently drafting updated procedures regarding the preparation of quarterly financial reports, which the PRDOJ has reviewed and provided feedback on. The PRDOJ also stated that the policies and procedures should be completed by October 2025.

Accordingly, we will coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that quarterly financial reports are accurately completed and submitted on time.

We will also work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

7. **We recommend that OJP work with the PRDOJ to ensure that the appropriate Hogar Rosanna officials receive training in the financial management and administration of DOJ grants and fraud awareness.**

OJP agrees with the recommendation. In its response, dated April 21, 2025, the PRDOJ stated that Hogar Rosanna's Director and Accountant have both completed the U.S. Department of Justice (DOJ) Grants Financial Management Administration Training, and that Hogar Rosanna has been informed that the Program Facilitator will also need to complete this training. The PRDOJ also stated that Hogar Rosanna was informed that all grant management and fraud awareness staff will also be required to complete this training.

Accordingly, we will coordinate with the PRDOJ to obtain documentation supporting that all appropriate Hogar Rosanna officials have received training in the financial management and administration of DOJ grants and fraud awareness.

8. **We recommend that OJP work with the PRDOJ to require Hogar Rosanna to enhance its timesheet-related policies to include adequate controls to ensure the timesheets correctly reflect the hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented.**

OJP agrees with the recommendation. In its response, dated April 21, 2025, the PRDOJ stated that Hogar Rosanna is currently drafting updated procedures to ensure that timesheets are accurate to time worked and support charges that are accurate, allowable, and properly documented. The PRDOJ also stated that it has reviewed these policies and provided feedback to Hogar Rosanna. In addition, the PRDOJ also stated that the policies and procedures should be completed by October 2025.

Accordingly, we will coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that adequate controls are in place to ensure that timesheets accurately reflect hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented.

We will also work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

9. We recommend that OJP work with the PRDOJ to ensure that Hogar Rosanna incorporates procedures for proper use of its invoice forms within its financial policies to help ensure that federal funds are properly safeguarded.

OJP agrees with the recommendation. In its response, dated April 21, 2025, the PRDOJ stated that Hogar Rosanna is currently drafting updated procedures for proper use of invoice forms to help ensure that federal funds are properly safeguarded, which the PRDOJ has reviewed and provided feedback on. The PRDOJ also stated that the policies and procedures should be completed by October 2025.

Accordingly, we will coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that invoice forms are incorporated within the financial policies to ensure that federal funds are properly safeguarded, in accordance with DOJ guidance.

We will also work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact Michael Freed, Acting Deputy Director, Audit and Review Division, of my staff, on (202) 598-7964.

cc: Maureen A. Henneberg
Deputy Assistant Attorney General

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

Michael Freed
Acting Deputy Director, Audit and Review Division
Office of Audit, Assessment, and Management

Katherine Darke Schmitt
Acting Director
Office for Victims of Crime

cc: 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

Alina Gomez
Grants Management Specialist, State Victim Resource Division
Office for Victims of Crime

Nathanial Kenser
Deputy General Counsel

Phillip Merkle
Acting 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

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

OJP Executive Secretariat
Control Number OCOM001440

APPENDIX 5: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report

The Office of the Inspector General (OIG) provided this audit report to the Office of Justice Programs (OJP), the Puerto Rico Department of Justice (PRDOJ), and Hogar Sustituto y Educativo Rosanna, Corp. (Hogar Rosanna). OJP's response is incorporated in Appendix 4, the PRDOJ response is incorporated in Appendix 3, and Hogar Rosanna's response is incorporated in Appendix 2 of this final report. In response to our audit report, OJP agreed with the recommendations, and as a result, the status of the audit report is resolved. The PRDOJ agreed with our nine recommendations, and Hogar Rosanna agreed with eight recommendations and did not state whether it agreed with one recommendation. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendations for OJP and PRDOJ:

- 1. Ensure that Hogar Rosanna develops and implements written policies and procedures for quarterly performance reporting, and that at least one employee is provided with access to PMT, and training is provided to the employee.**

Resolved. OJP agreed with the recommendation. OJP stated that it would coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that quarterly performance data is reported in the Performance Measurement Tool (PMT) accurately, supporting records are maintained, at least one employee has access to PMT, and the employee is trained in the use of the system. OJP also stated that it would work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

The PRDOJ also agreed with the recommendation and stated that Hogar Rosanna acknowledged that because it was a small organization, it had outsourced accounting matters to an independent contractor. The PRDOJ noted that Hogar Rosanna decided to designate the Program Facilitator as the individual to be granted access to the PMT. The PRDOJ also noted that Hogar Rosanna's independent contractor currently in charge of the accounting system and keeper of the financial information would train and delegate these tasks to the Program Facilitator and that this process was expected to be completed during October 2025.

Hogar Rosanna agreed with the recommendation. Hogar Rosanna stated in its response that it had already written policies and procedures and has given access to an employee, but it did not provide documentation with its response.

This recommendation can be closed when we receive evidence that Hogar Rosanna has developed and implemented written policies and procedures for quarterly performance reporting, and that at least one employee has been provided with access to and training related to PMT.

2. Ensure that Hogar Rosanna obtains independent access to the organization's accounting records and that at least one Hogar Rosanna official receives training in, at a minimum, basic navigation within the system.

Resolved. OJP agreed with the recommendation. OJP stated that it would coordinate with the PRDOJ to obtain evidence that Hogar Rosanna has acquired and implemented an electronic accounting records platform and that at least one Hogar Rosanna official has completed training in the operation of the platform.

The PRDOJ also agreed with the recommendation and stated that Hogar Rosanna acknowledged that accounting matters were delegated to an independent contractor, who maintained the accounting records electronically and the license to the platform. The PRDOJ stated that, to ensure independent access to the organization's accounting records, Hogar Rosanna had agreed to obtain an institutional license for an electronic accounting records platform. However, the PRDOJ explained that the acquisition required approval from Hogar Rosanna's Board of Directors, as an assessment of the adequacy of the platform to be obtained was required. The approval of the software acquisition process was expected to be completed by the end of April 2025 and the software procurement was expected to be completed by May 2025.

Hogar Rosanna agreed with the recommendation and stated that it would start working with the online platform on April 25, 2025, with the purchase of a new accounting license; Hogar Rosanna projected that training would be completed and it would be ready to start with the next grant in October 2025.

This recommendation can be closed when we receive evidence that Hogar Rosanna has obtained independent access to the organization's accounting records and that at least one Hogar Rosanna official received training in, at a minimum, basic navigation within the system.

3. Ensure that Hogar Rosanna enhances its internal controls over grant disbursements by implementing and documenting a control to help ensure payments are appropriate, allowable, and accurate.

Resolved. OJP agreed with the recommendation. OJP stated that it would coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that proper controls are in place to ensure that grant disbursements are appropriate, allowable, and accurate. OJP also stated that it would work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

The PRDOJ also agreed with the recommendation and stated that Hogar Rosanna was drafting new and improved internal procedures regarding grant disbursement to assist in the process of ensuring that all payments are appropriate, allowable and accurate. The PRDOJ also stated that its staff had the opportunity to review and comment on drafts of these procedures and provided feedback to ensure compliance with the applicable regulations. The PRDOJ further stated that the drafts were expected to be finalized and implemented by Hogar Rosanna by October 2025.

Hogar Rosanna agreed with the recommendation and stated that it had already written procedures. As noted previously, PRDOJ provided feedback on draft policies and procedures and projected implementation in October 2025. Hogar Rosanna also stated that it would train an employee and projected that training would be completed and ready to start with the next grant in October 2025.

This recommendation can be closed when we receive evidence that Hogar Rosanna has enhanced its internal controls over grant disbursements by implementing and documenting a control to help ensure payments are appropriate, allowable, and accurate.

4. Ensure that Hogar Rosanna establishes accounting codes and written policies and procedures to ensure its accounting system accurately reflects costs supported by and charged to VOCA awards.

Resolved. OJP agreed with the recommendation. OJP stated that it would coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that accounting codes are established, and that they are properly used to record costs supported by and charged to VOCA awards. OJP also stated that it would work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

The PRDOJ also agreed with the recommendation and stated that Hogar Rosanna was drafting new and improved internal policies and procedures to ensure its accounting system accurately reflects costs supported by and charged to VOCA awards. The PRDOJ stated that its staff had the opportunity to review and comment on drafts of these procedures and provided feedback. The PRDOJ also stated that Hogar Rosanna had acknowledged the need to establish accounting codes; however, that process would be performed on the new accounting records platform acquired by the institution and further procedures were pending the acquisition of this software in May 2025. The PRDOJ further stated that the policy and procedure drafts were expected to be finalized and implemented by Hogar Rosanna by October 2025.

Hogar Rosanna agreed with the recommendation and indicated that the process would start with the online platform on April 25, 2025, and the purchase of a new accounting license; Hogar Rosanna projected that training, and the coding system would be completed and ready to start with the next grant in October 2025. As noted previously, PRDOJ provided feedback on draft policies and procedures and projected implementation in October 2025.

This recommendation can be closed when we receive evidence that Hogar Rosanna has established accounting codes and written policies and procedures to ensure its accounting system accurately reflects costs supported by and charged to VOCA awards.

5. Ensure that Hogar Rosanna identifies solutions or mitigating controls to address the organization's challenges with segregation of duties, including controls over the custody of checks.

Resolved. OJP agreed with the recommendation. OJP stated that it would coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure segregation of duties, including controls over custody of checks, in accordance with the Uniform Guidance. OJP also stated that it would work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

The PRDOJ also agreed with the recommendation and stated that Hogar Rosanna was drafting new and improved internal procedures regarding segregation of duties, including controls over the custody of checks. The PRDOJ also stated that its staff had the opportunity to review and comment on drafts of these procedures and provided feedback to ensure compliance with the applicable regulations. The PRDOJ further stated that the policy and procedure drafts were expected to be finalized and implemented by Hogar Rosanna by October 2025.

Hogar Rosanna agreed with the recommendation and stated that it had already written procedures and designed forms, and it would integrate and train an employee; Hogar Rosanna projected this to be completed by the start of the next grant in October 2025. As noted previously, PRDOJ provided feedback on draft policies and procedures and projected implementation in October 2025.

This recommendation can be closed when we receive evidence that Hogar Rosanna has identified solutions or mitigating controls to address the organization's challenges with segregation of duties, including controls over the custody of checks.

6. Ensure that Hogar Rosanna develops and implements written policies and procedures for the preparation of quarterly financial reports.

Resolved. OJP agreed with the recommendation. OJP stated that it would coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that quarterly financial reports are accurately completed and submitted on time. OJP also stated that it would work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

The PRDOJ also agreed with the recommendation and stated that Hogar Rosanna was drafting new and improved internal procedures regarding the preparation of quarterly financial reports and that these policies and procedures incorporate the Program Facilitator in the process to ensure the entity's access and know-how in the process. The PRDOJ also stated that its staff had the opportunity to review and comment on drafts of these procedures and provided feedback to ensure compliance with the applicable regulations. The PRDOJ further stated that the policy and procedure drafts were expected to be finalized and implemented by Hogar Rosanna by October 2025.

Hogar Rosanna agreed with the recommendation and stated that it had already written policies and procedures and would train an employee; Hogar Rosanna projected this to be completed by the start of the next grant in October 2025. As noted previously, PRDOJ provided feedback on draft policies and procedures and projected implementation in October 2025.

This recommendation can be closed when we receive evidence that Hogar Rosanna has developed and implemented written policies and procedures for the preparation of quarterly financial reports.

7. Ensure that the appropriate Hogar Rosanna officials receive training in the financial management and administration of DOJ grants and fraud awareness.

Resolved. OJP agreed with the recommendation. OJP stated that it would coordinate with the PRDOJ to obtain documentation supporting that all appropriate Hogar Rosanna officials have received training in the financial management and administration of DOJ grants and fraud awareness.

The PRDOJ also agreed with the recommendation and stated that PRDOJ staff had the opportunity to discuss the issue of training in financial management and administration with Hogar Rosanna's management. PRDOJ stated that, at the time its staff met with Hogar Rosanna's Director and accountant, both officials had completed the OJP Grants Financial Management and Grant Administration Training. PRDOJ stated that Hogar Rosanna was advised that its Program Facilitator, in the individual's new responsibilities regarding accounting services, would need to complete the OJP Grants Financial Management and Grant Administration Training as well. The PRDOJ stated that its staff further advised Hogar Rosanna's management to register all pertinent personnel in training opportunities provided or promoted by the PRDOJ regarding grant management matters and fraud awareness.

Hogar Rosanna did not state whether it agreed with the recommendation and stated that all appropriate officials had training.

This recommendation can be closed when we receive evidence that the appropriate Hogar Rosanna officials have received training in the financial management and administration of DOJ grants and in fraud awareness.

8. Require Hogar Rosanna to enhance its timesheet-related policies to include adequate controls to ensure the timesheets correctly reflect the hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented.

Resolved. OJP agreed with the recommendation. OJP stated that it would coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that adequate controls are in place to ensure that timesheets accurately reflect hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented.

The PRDOJ also agreed with the recommendation and stated that Hogar Rosanna was drafting new and improved internal procedures to include adequate controls to ensure the timesheets correctly reflect the hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented. The PRDOJ also stated that its staff had the opportunity to review and comment on drafts of the procedures and provided feedback to ensure compliance with the applicable regulations. The PRDOJ further stated that the policy and procedure drafts were expected to be finalized and implemented by Hogar Rosanna by October 2025.

Hogar Rosanna agreed with the recommendation and stated that it had already written policies and procedures that would be implemented with the start of the new grant in October 2025. As noted previously, PRDOJ provided feedback on draft policies and procedures and projected implementation in October 2025.

This recommendation can be closed when we receive evidence that Hogar Rosanna has enhanced its timesheet-related policies to include adequate controls to ensure the timesheets correctly reflect the hours worked by employees and provide the necessary support that charges are accurate, allowable, and properly documented.

9. Ensure that Hogar Rosanna incorporates procedures for proper use of its invoice forms within its financial policies to help ensure that federal funds are properly safeguarded.

Resolved. OJP agreed with the recommendation. OJP stated that it would coordinate with the PRDOJ to obtain a copy of Hogar Rosanna's written policies and procedures, developed and implemented, to ensure that invoice forms are incorporated within the financial policies to ensure that federal funds are properly safeguarded, in accordance with DOJ guidance. OJP also stated that it would work with the PRDOJ to obtain evidence that Hogar Rosanna distributed the policies and procedures to its relevant staff responsible for managing federal grant funds.

The PRDOJ also agreed with the recommendation and stated that Hogar Rosanna was drafting new and improved procedures for proper use of its invoice forms within its financial policies to help ensure that federal funds are properly safeguarded. The PRDOJ also stated that its staff had the opportunity to review and comment on drafts of the procedures and provided feedback to ensure compliance with the applicable regulations. The PRDOJ further stated that the policy and procedure drafts were expected to be finalized and implemented by Hogar Rosanna by October 2025.

Hogar Rosanna agreed with the recommendation and stated that it had already written policies and procedures. As noted previously, PRDOJ provided feedback on draft policies and procedures and projected implementation in October 2025.

This recommendation can be closed when we receive evidence that Hogar Rosanna has incorporated procedures for proper use of invoice forms within its financial policies to help ensure that federal funds are properly safeguarded.