



Audit of the Office on Violence Against Women's Pandemic-Era Grant Administration and Lessons Learned for Grant Monitoring and Oversight



AUDIT DIVISION

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Audit of the Office on Violence Against Women's Pandemic-Era Grant Administration and Lessons Learned for Grant Monitoring and Oversight

Overview

We determined that the Office on Violence Against Women (OVW) can apply lessons learned during its pandemic-era grant administration that will improve its oversight of grant recipients. We provide two recommendations for OVW to assist in these efforts

Introduction

OVW was created to implement the Violence Against Women Act (VAWA) and in recognition of the severity of crimes associated with domestic violence, sexual assault, and stalking. VAWA was first passed by Congress in 1994 and reauthorized four times, including the most recent reauthorization signed in March 2022.¹ Funding is awarded to local, state, and tribal governments, and coalitions, courts, non-profit and community-based organizations; and secondary schools and institutions of higher education. At the time of our audit, OVW administered 19 grant programs that provide direct services, crisis intervention, transitional housing, legal assistance, and court improvements for domestic violence victims, as well as training for law enforcement agencies and the courts.²

Grant Monitoring

Federal agencies are required to ensure that federal funding is expended and associated programs are implemented in accordance with the U.S. Constitution, federal law and regulations, and public policy requirements.³ Monitoring of

the use of federal funds is a key function that awarding agencies employ to ensure they fulfill this responsibility. However, we found that OVW was not always ensuring that monitoring goals were being completed, which it attributed to the COVID-19 pandemic and staffing challenges.

According to the OVW Monitoring Manual, the function of OVW Program Specialists is to conduct a review and perform a risk assessment for each active grant to determine the monitoring priority level. Figure 1 shows the stages of the OVW monitoring plan development.

Figure 1

Stages of the OVW Monitoring Plan Development



Source: OVW Monitoring Manual

The OVW Monitoring Manual outlines policies and procedures for conducting oversight of OVW grant awards. This manual includes monitoring standards for OVW to perform on-site monitoring for 10 percent, and office-based reviews for 5 percent of its active grant recipients each fiscal year.⁴ According to the manual, OVW Program Specialists are directed to use grant recipient risk levels to develop monitoring plans for the grant recipients they are assigned. The individual monitoring plans are then consolidated into a program monitoring plan for each of the 19 OVW grant

¹ The Violence Against Women Act of 2022, Pub. L. No. 117-103.

² Four programs are "formula," meaning the enacting legislation specifies how the funds are to be distributed. The remaining programs are "discretionary," meaning OVW is responsible for creating program parameters, qualifications, eligibility, and deliverables in accordance with authorizing legislation.

³ 2 C.F.R. § 200.300 (2024).

⁴ OVW refers to this review as an office-based review, which is a comprehensive review of a grant recipient performed off-site, or remotely. According to OVW, the structure of the office-based review allows a program specialist to closely monitor and evaluate a grant recipient's performance at a given point in time without traveling to the grant recipient's location. As discussed later in this report, OVW issued a FY 2017 Monitoring Plan and Requirements memorandum that eliminated the 5 percent office-based review requirement.

programs and submitted to the respective OVW Associate Director for approval. Associate Directors then review the plans to ensure that at least 50 percent of each program's highest risk grant recipients are designated for on-site monitoring. The approved plans are submitted to a central OVW monitoring designee, who maintains the overall OVW monitoring plan and evaluates compliance with OVW grant monitoring standards.

Adjustments to OVW's Grant Monitoring Approach

OVW management stated to us that the standards established in the OVW Monitoring Manual were expectations, but not a requirement. In fact, we found that OVW adjusted monitoring goals before and during the pandemic. OVW implemented the practice of issuing an annual Monitoring Requirement Memorandum (Monitoring Memo) for establishing a monitoring goal for a specific fiscal year. In its FY 2017 Monitoring Memo, OVW eliminated the 5 percent office-based review standard for FY 2017 due to limited staffing, hiring freezes, and sequestration efforts to reduce travel expenses. OVW management stated that beginning in FY 2017, OVW adopted a more pragmatic approach by aligning initial monitoring plans with available resources to enhance the likelihood of meeting established targets. Each FY subsequent to FY 2017, the Monitoring Memo established monitoring plans to address challenges in meeting monitoring goals, including staffing shortages, pandemic-related travel restrictions, and the transition to a new grants management system.⁵ For FYs 2020 through 2022, OVW almost exclusively performed off-site monitoring as a result of the COVID-19 pandemic, which impacted OVW's ability to travel and perform on-site monitoring. Table 1 identifies the number of reviews targeted and completed during FYs 2019 through 2022.

Table 1
Completed Grant Monitoring Activities
In Accordance with OVW Adjusted Monitoring Goals

Description	FY 2019	FY 2020	FY 2021	FY 2022
Number of Active Grant Recipients	1,259	1,286	1,328	1,400
Reviews Targeted Per OVW Monitoring Memo	126	64	133	70
Targeted % of Active Grant Recipients to be Monitored Per OVW Monitoring Memo	10%	5%	10%	5%
Completed Reviews	106	81	94	82
% of Active Grant Recipients Monitored	8.4%	6.3%	7.1%	5.9%

Source: OVW and Office of the Inspector General

On average, during FYs 2019 through 2022, OVW performed monitoring for about 7 percent of its active grant recipients. In FYs 2019 and 2021, OVW did not meet its monitoring goal of 10 percent of active grant recipients, only performing monitoring for 8.4 percent and 7.1 percent of its grant recipients, respectively.⁶ In FY 2019, OVW stated in its Monitoring Memo that it was unable to meet the 10 percent goal because of staffing challenges. For FY 2021, OVW cited the pandemic as the reason that affected its monitoring activities.

In FYs 2020 and 2022, OVW decreased its monitoring goal to 5 percent of active grant recipients and was able to monitor 6.3 percent in FY 2020 and 5.9 percent in 2022. In FY 2020, OVW officials stated the pandemic, reduced staffing, and challenges with the grant risk assessment tool affected its monitoring activities and led to the reduced monitoring goal. For FY 2022, OVW also stated there was a need to reduce its monitoring goal because of continued understaffing and delays with the new grant management system.

We also reviewed the completed monitoring reviews for OVW during FYs 2021 and 2022 to assess the coverage across OVW programs. We found that some level of monitoring was

⁵ During the COVID-19 pandemic, all of the DOJ grant-making components, including OVW, transitioned to a new grants management system known as JustGrants. DOJ award recipients experienced challenges with JustGrants after its launch, as previously described in prior OIG reports: U.S. Department of Justice (DOJ) Office of the Inspector General (OIG), [Issue Alert, JustGrants Transition Impacting DOJ Awardees' Ability to Access Funds and Manage Award Activities](#), Issue Alert 21069 (May 2021); [Audit of the Office of Justice Programs' Procurement for the JustGrants System](#), Audit Report 23-087 (July 2023).

⁶ As discussed previously, the OVW Monitoring Manual discussed a monitoring goal of 15 percent (10 percent on site and 5 percent off site).

conducted on grant recipients in all OVW programs for FY 2021, but no monitoring reviews were completed for 4 of the 19 programs (21 percent) in FY 2022.

OVW is responsible for the proper administration and oversight of hundreds of millions of grant dollars and it establishes its monitoring standards, requirements, and goals to manage risk related to grant recipients’ use of federal funds. It is incumbent on OVW to periodically assess the risk its adjusted monitoring practices have on its grant management structure to help ensure its fiduciary responsibility over Department of Justice funds is fulfilled. We believe conducting monitoring reviews below its established standards and goals undermines its ability to ensure it is effectively managing its programs, including its responsibility for stewardship over federal funds. Moreover, the continued adjustments to its monitoring goals, both before and during the pandemic, lessens confidence in OVW’s monitoring process.

We believe OVW can apply lessons learned as described in this report and improve its administration of grant programs going forward. We recommend that OVW evaluate its monitoring practices in consideration of its needs and resources, establish appropriate monitoring plans to achieve the necessary oversight of its programs, and institute a risk mitigation strategy to address any shortfalls in meeting its monitoring plans. This strategy should consider active grant recipients deemed to be high-risk, as well as those receiving multiple grant extensions on the same award, from all program offices each fiscal year.

Guidance and Assistance

OVW faced new challenges at the onset of the pandemic in the areas of its grant administration practices and efforts to ensure that grant recipients continued to provide direct services, crisis intervention, transitional housing, legal assistance, and court improvements for domestic violence victims, as well as training for law enforcement agencies and the courts. Beginning in March 2020, the Office of Management and Budget (OMB) issued guidance and flexibilities to the heads of departments and agencies for managing grant programs during the COVID-19 pandemic. The guidance also promoted relief to federal recipients of federal financial assistance that were affected by the loss of operational capacity and increased costs due to the pandemic.⁷

Between March and June 2020, the then-Acting OVW Director issued guidance and information to grant recipients regarding flexibilities related to grant activities, such as

progress reporting, conferences, grant extensions, and human resources policies. In addition, OVW provided a resource guide on operating safely and continuing to provide services to victims during the pandemic. Further, OVW officials told us that OVW collaborated with its established Technical Assistance Program providers to assist grant recipients with pandemic-related challenges by providing webinars, virtual training, direct support, and sharing best practices used by other agencies. We judgmentally selected five OVW grants programs for our audit testing. Table 2 identifies some examples of technical assistance that was provided during the pandemic for the five OVW grant programs we selected.

Table 2
**Examples of Pandemic-Era Technical Assistance
Provided to Grant Recipients**

Grant Program	Technical Assistance Provided
Campus	webinars, virtual trainings, and developed products to assist grant recipients with the transition to virtual settings: such as conducting victim services virtually and facilitating strategies of virtual program meetings
Disability	webinars, listening sessions, virtual trainings, and weekly strategy sessions for problem solving on a case-by-case basis
Legal Assistance for Victims	virtual training, advocacy self-paced training, and remote litigation tips
Rural	virtual partner meetings, in-person seminars and training, webinars, social media campaigns
Transitional Housing	remote training and listening sessions, webinars, and educational material on safe housing

Source: OIG Analysis

An example of the short-term relief options for grant recipients impacted by the pandemic that OVW provided was continuing its practice for approving “no cost extensions” to assist grant recipients with achieving the goals and objectives of a grant program. A no-cost extension is an extension of the period of performance to receive additional time to achieve the goals and objectives of a grant program. These

⁷ OMB Memoranda M-20-17, March 19, 2020, and M-20-26, June 18, 2020. Flexibilities provided in M-20-17 expired on June 16, 2020.

extensions do not provide additional funding.⁸ As Table 3 shows, for the same five OVW programs, we determined that OVW approved a total of 574 no-cost extensions to the grant program period of performance for 468 grant recipients from October 2019 through September 2021.

Table 3
Grants with Extensions for Five OVW Grant Programs
FY 2020 - 2021

Selected Grant Program	Number of Grant Extensions	Number of Grant Recipients with Extensions	Grant Recipients with More than One Extension
Campus	159	119	35
Disability	31	25	6
Legal Assistance for Victims	129	107	16
Rural	111	96	14
Transitional Housing	144	121	20
Total	574	468	91 ^a

Source: OIG compilation and analysis of OVW data

^a The number of unique grant recipients is 89, as 2 recipients received grants from 2 programs.

We found that 91 of those 468 grant recipients (19.4 percent) represented in Table 3 received 2 or more no-cost extensions during the same timeframe and some of those extensions were granted within 2 months of each other.⁹ OVW also awarded new grants to extended recipients prior to the end of the extended periods. According to the extension explanations provided by OVW, approximately 308 of the 574 approved grant extensions were provided to address COVID-related challenges and the remaining no-cost extensions were for varied reasons not specific to the pandemic.

Risks of Multiple Extensions

Although OVW approved no-cost extensions for administrative relief to assist grant recipients with

responding to pandemic-related challenges, extensions nevertheless create risks for OVW to meet its monitoring responsibilities. Specifically, numerous no-cost extensions for existing projects, along with providing new awards each fiscal year, increases the number of active grant recipients that OVW needs to monitor and can exacerbate OVW's monitoring shortfalls.

When asked about the grant recipients that have received multiple extensions for active grants, OVW officials told us that the extension approvals should not be viewed globally, but on a case-by-case basis. OVW officials stated that they do not consider the need for no cost extensions as problematic; their concern is with helping grant recipients achieve the programs' goals and assisting victims. While we agree that it is important for OVW to help individual grant recipients achieve program goals and assist victims, approving multiple extensions while also awarding new grants to recipients with performance challenges undermines those goals and risks wasting scarce program funds that could be used by other applicants that may be better positioned to implement programs.

Federal regulations allow grant recipients to submit a request for a no-cost extension and allow federal granting agencies to approve no-cost extensions if such action is not prohibited by another federal statute or regulation.¹⁰ Some DOJ grant-making offices have more written controls over the approval of no-cost extensions than OVW does. According to the most recent DOJ Grants Financial Guide (dated October 2024), these controls provide that covered DOJ grants shall—generally—receive no more than one no-cost extension, which should be supported by extension requests with a robust narrative justification that includes a plan and timeline for completion. Further, the guidance requires the awarding agency to limit extensions to 12 months and only approve extensions for grant recipients without significant performance or compliance concerns. However, since at least March 2022, OVW was among the grant-making offices excluded from these provisions. OVW has used extensions frequently, as evidenced by the nearly 20 percent of FY 2019-2020 grants having received extensions. OVW officials told us its established internal procedures are used to guide staff in managing their assigned awards but agreed that its practices for extension approvals could be improved.

⁸ In March 2020, OMB advised federal agencies that they could provide no-cost extensions for a period of 12 months for awards that were active as of March 31, 2020, and scheduled to expire prior or up to December 31, 2020. OMB issued guidance under Memoranda M-20-17, March 19, 2020, and M-20-26, June 18, 2020.

⁹ For all 91 recipients, at least 1 of the extensions was for circumstances related to the pandemic.

¹⁰ 2 C.F.R. § 200.308(f)(10) (2024).

Controls over extensions provide grant-making agencies with the ability to mitigate the risk that extensions create for grant funds and program implementation. However, OVW does not have a written policy related to grant extensions outside of guidance provided to its grant managers in its monitoring manual. Although federal guidelines allow for multiple grant extensions, we believe it would be prudent for OVW to adopt written controls over no-cost extensions.

A grant recipient's performance history and need for multiple extensions should be diligently and consistently assessed prior to approving such extensions or awarding additional funds. Further, the additional risk presented by multiple extensions to an award should be a significant factor for consideration in monitoring plans. As a result, we recommend that OVW review DOJ and OVW guidance and practices regarding extensions to award performance periods and develop written policies to enhance extension-related controls for the appropriate administration of grant programs and fulfillment of OVW's fiduciary responsibilities.

Conclusion and Recommendations

OVW provided guidance and assistance to grant recipients during the pandemic. However, we found that OVW experienced challenges in its pandemic-era grant program monitoring. In addition, we determined that OVW's use of multiple no-cost extensions risked undermining the execution of its monitoring goals. We provide two recommendations for OVW to apply the lessons learned from our audit that address these grant oversight risks.

We recommend that OVW:

1. Evaluate its monitoring practices in consideration of its needs and resources, establish appropriate plans to achieve the necessary oversight of its programs, and institute a risk mitigation strategy to address any shortfalls in meeting its monitoring plans. This strategy should consider active grant recipients deemed to be high-risk, as well as those receiving multiple grant extensions on the same award, from all program offices each fiscal year.
2. Review relevant DOJ and internal OVW guidance and practices regarding extensions to award performance periods and develop written policies to enhance extension-related controls for the appropriate administration of grant programs and fulfillment of OVW's fiduciary responsibilities.

APPENDIX 1: Objectives, Scope, and Methodology

Objectives

The objectives of this audit were to assess OVW's: (1) pandemic-era grant administration and monitoring; and (2) guidance and assistance provided to grant recipients for addressing any increased risks to effective program implementation and violence against women during the pandemic.

Scope and Methodology

The audit focused on, but was not limited to, OVW activities during fiscal years (FY) 2019 through 2022. As shown below, OVW awarded 3,026 grants totaling over \$1.9 billion during that period.

OVW Grant Awards

Fiscal Year	Total Number of Grant Awards	Total Funds Awarded
2019	754	\$462,064,610
2020	773	\$489,915,368
2021	749	\$479,563,710
2022	750	\$488,548,689
Total	3,026	\$1,920,092,377

Source: OVW

To accomplish our objectives, we evaluated OVW's administrative practices for the pre-award process and reviewed OVW pandemic-related guidance. We interviewed OVW personnel, including Deputy Directors, Associate Directors, Program Specialists, and other staff.

In addition, we judgmentally selected five grant programs administered by OVW to examine grant administration practices during the pandemic. We reviewed data for completed monitoring and approved no-cost extensions during FYs 2019 through 2022 and determined whether OVW approved these awards for funding in FYs 2020-2022.

Statement on Compliance with Generally Accepted Government Auditing Standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on

our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of OVW to provide assurance on its internal control structure as a whole. OVW management is responsible for the establishment and maintenance of internal controls in accordance with OMB Circular A-123, 2 C.F.R. § 200. Because we do not express an opinion on OVW's internal control structure as a whole, we offer this statement solely for the information and use of the OVW.¹¹

Our review of internal controls covered OVW established policies and procedures for administering and overseeing program funding. We identified OVW management and staff responsible for the establishment and implementation of the established policies and procedures for programmatic and financial management of program awards.

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 objectives of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Compliance with Laws and Regulations

In this audit we tested, as appropriate given our audit objectives and scope, records, procedures, and practices, to obtain reasonable assurance that the Office on Violence Against Women's management complied with federal laws and regulations for which non-compliance, in our judgment, could have a material effect on the results of our audit. Our audit included examining, on a test basis, the Office on Violence Against Women's compliance with certain elements of the following laws and regulations that could have a material effect on the Office of Violence Against Women's operations:

- The Violence Against Women Act of 2022

¹¹ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

- 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards

While we identified certain internal control deficiencies, nothing came to our attention that caused us to believe that OVW was not in compliance with the aforementioned laws and regulations.

Sample-Based Testing

To accomplish our objectives, we performed sample-based testing for the selection of OVW programs to obtain an understanding of the OVW-approved extensions during the pandemic. This non-statistical sample design did not allow projection of results to the universe from which the samples were selected. The 5 grant programs reviewed represented 26 percent of the 19 programs administered by OVW.

Computer-Processed Data

During our audit, we obtained information from the Office of Justice Programs Grants Management System and JustGrants. 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.

We reviewed monitoring and extension data for obvious inconsistency errors, completeness, and duplicate entries. When we found discrepancies, we brought them to the attention of OVW and worked with them to correct the discrepancies before conducting our analyses. As a result of these efforts, we determined that the monitoring and approved grant extension data were sufficiently reliable for the purposes of this report.

APPENDIX 2: The Office on Violence Against Women's Response to the Draft Audit Report



U.S. Department of Justice


Office on Violence Against Women

Washington, DC 20530

July 10, 2025

MEMORANDUM

TO: Jason R. Malmstrom
Assistant Inspector General for Audit
Office of the Inspector General

FROM: Ginger Baran Lyons
Deputy Director for Grants Development
and Management (Supervisory Official) 

SUBJECT: Response to the Office of the Inspector General's Draft Audit Report, *Audit of the Office on Violence Against Women's Pandemic-Era Grant Administration and Lessons Learned for Grant Monitoring and Oversight*

This memorandum provides a response to the Office of the Inspector General's (OIG), draft audit report, *Audit of the Office on Violence Against Women's Pandemic-Era Grant Administration and Lessons Learned for Grant Monitoring and Oversight*. The Office on Violence Against Women (OVW) appreciates the opportunity to review and comment on the draft audit report.

The draft audit report directed two recommendations to OVW. For ease of review, the recommendations are summarized below and followed by OVW's response.

1. **Evaluate monitoring practices in consideration of its needs and resources, establish appropriate plans to achieve the necessary oversight of its programs, and institute a risk mitigation strategy to address any shortfalls in meeting its monitoring plans. This strategy should consider active grant recipients deemed to be high-risk, as well as those receiving multiple grant extensions on the same award, from all program offices each fiscal year.**

OVW concurs with this recommendation. OVW does consider high risk status when making monitoring decisions, but we can enhance our monitoring approach to include consideration of entities who have received multiple grant extensions on the same award. This includes updating the OVW Monitoring Manual and formalizing a mitigation process to address shortfalls in meeting annual monitoring goals.

2. **Review relevant DOJ and internal OVW guidance and practices regarding extensions to award performance periods and develop written policies to enhance extension-related controls for the appropriate administration of grant programs and fulfillment of OVW's fiduciary responsibilities.**

OVW concurs with this recommendation. OVW will enhance its Grant Award Modification standard operating procedure to more clearly document existing controls over no-cost extensions, including criteria for approval, documentation requirements, and considerations related to recipient performance and award history.

We note, however, that in summarizing the audit the draft report does not account for critical contextual factors at play when OVW issued no-cost extensions between October 2019 and September 2021:

- First, the COVID-19 pandemic and public health measures in place beginning in March 2020 upended many recipients' plans for providing victim services and administering justice. Recipients may have paused work, devised changes to their approaches that affected timelines, and weathered staff departures for reasons including mothers needing to be home with children while daycares and schools were closed, all while struggling to fill grant-funded vacancies partway through a project period.
- Second, the Department's JustGrants system launched in October 2020 with extensive glitches and deficiencies that rendered the system nearly inoperable, greatly hampering OVW's grant processes. (Some of these issues are mentioned in the OIG's July 2023 report, 23-087). Furthermore, because JustGrants did not have the functionality to supplement existing projects when continuation funding was awarded, OVW had to issue entirely new awards in these cases. The increase in *awards* creates the distorted impression that OVW was funding more *projects* during the span of time the audit examined, when in fact system limitations prevented OVW from issuing supplemental awards like we would in our normal course of business.

We also note that the report overstates the number of grant recipients with two or more extensions. The reported figure of 91 is based on a program-level aggregation in which extensions were first counted within each grant program and then summed across programs. This approach results in double-counting two recipients who received multiple extensions under more than one program. When the data are properly consolidated at the recipient level, the correct number of unique recipients with two more extensions is 89. This adjustment reduces the percentage of grant recipients with more than one extension, relative to the total number of grant recipients with extensions to 19 percent.

Additionally, more than half of the extensions (308 of the 574) were issued pursuant to OMB Memorandum M-20-17, *Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations*. The extensions were to ensure recipients could continue to provide services to victims, and to alleviate the administrative burden on recipients while they contended with the pandemic. Absent the pandemic and the administrative relief afforded to federal grant recipients during that time, OVW would have only approved 266 extensions, for 247 different recipients. Of these, 17 recipients representing 6.9 percent of the total received two or more no-cost extensions, as shown in the table below.

Excluding COVID Extensions			
Selected Grant Program	Number of Grant Extensions	Grant Recipients with Extensions	Recipients with More than One Extension
Campus	76	68	7
Disability	13	13	-
Legal Assistance for Victims	53	47	5
Rural	79	78	1
Transitional Housing	45	41	4
Total	266	247	17

Finally, OVW understands and agrees that our business practices need to be updated and clearly documented. The extensions issued during the pandemic ensured that OVW recipients could safely pause, continue, and/or adjust their operations while grant-funded staff and the crime victims they serve faced unprecedented circumstances. COVID-19 leveled a disproportionately heavy toll on the vulnerable populations that OVW recipients serve, as well as on service providers themselves. As such, recipients struggled to maintain continuity of services while keeping everyone safe as the pandemic raged on. Domestic violence increased by an estimated 8% after the imposition of stay-at-home orders and service providers reported an increase in the different types and amounts of services survivors needed. The pandemic required a tremendous amount of flexibility and ingenuity on the part of OVW recipients, which OVW supported in multiple ways including by issuing no-cost extensions.

OVW appreciates the opportunity to review and comment on the draft report. If you have any questions or require additional information, please contact Kevin Mihalyi, Senior Audit Liaison at (202) 717-5696.

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APPENDIX 3: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report

The Office of the Inspector General (OIG) provided a draft of this audit report to the Office on Violence Against Women (OVW). OVW's response is incorporated in Appendix 2 of this final report. In response to our audit report, OVW concurred with our recommendations and discussed the actions it will implement in response to our findings. As a result, the status of the audit report is resolved.

In addition to concurring with our recommendations, the OVW response also stated the OIG did not account for certain contextual factors when OVW granted no-cost extensions and that the OIG overstated the reported number of grant recipients that received two or more extensions. Throughout the report, the OIG appropriately and repeatedly acknowledged the technical and pandemic-related challenges OVW faced when administering no-cost extensions, in particular the DOJ JustGrants system on which the OIG previously reported.¹² As it relates to the reported number of grant recipients that received two or more extensions, as OVW correctly notes, our analysis was based on recipient extensions by OVW program and not across the OVW programs reviewed. We conducted our analysis in this manner because recipient performance can vary significantly under different OVW programs. Notably, had the OIG only considered unique recipients with two or more extensions across these OVW programs, the total percentage of grant recipients with two or more extensions would have been reduced by only 0.4 percent. For clarity, we added additional information to Table 3.

OVW also provided some new analysis in its response identifying grant extensions excluding those for COVID-19. However, OVW did not provide support for its analysis and therefore we could not validate it. Further, it would be impossible for the OIG to identify how many extensions would have been sought in the absence of the pandemic. Nevertheless, even if such an analysis was possible, it would not impact the basis for our recommendation because it is important for OVW to have clear, documented guidance on providing extensions to best exercise its fiduciary responsibility.

The following provides the OIG analysis of OVW's response and summary of actions necessary to close the report.

Recommendations for OVW:

- 1. Evaluate its monitoring practices in consideration of its needs and resources, establish appropriate plans to achieve the necessary oversight of its programs, and institute a risk mitigation strategy to address any shortfalls in meeting its monitoring plans. This strategy should consider active grant recipients deemed to be high-risk, as well as those receiving multiple grant extensions on the same award, from all program offices each fiscal year.**

Resolved. OVW concurred with our recommendation. OVW stated in its response that it does consider high-risk status when making monitoring decisions but will enhance its monitoring approach to include consideration of entities that have received multiple grant extensions on the same award. OVW also

¹² OIG Audit Report 23-087 (July 2023).

stated it will update the OVW Monitoring Manual and formalize a mitigation process to address shortfalls in meeting annual monitoring goals. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation that the OVW Monitoring Manual has been updated to include consideration of needs and resources, appropriate plans to achieve the necessary oversight of its programs, and a risk mitigation strategy to address any shortfalls in meeting its monitoring plans. In addition to considering grant recipients receiving multiple grant extensions on the same award, the update should include consideration of grant recipients deemed to be high-risk, across all program offices each fiscal year.

2. Review relevant DOJ and internal OVW guidance and practices regarding extensions to award performance periods and develop written policies to enhance extension-related controls for the appropriate administration of grant programs and fulfillment of OVW's fiduciary responsibilities.

Resolved. The OVW concurred with our recommendation. OVW stated in its response that it understands and agrees that its business practices need to be updated and clearly documented. OVW stated that it will enhance the Grant Award Modification standard operating procedure to more clearly document existing controls over no-cost extensions, including criteria for approval, documentation requirements, and consideration related to recipient performance and award history. As a result, this recommendation is resolved.

This recommendation can be closed when we receive documentation of written policies that enhance extension-related controls for the appropriate administration of grant programs and fulfillment of OVW's fiduciary responsibilities.