



Audit of the Office of Justice Programs
Bureau of Justice Assistance Second Chance Act
Community-Based Reentry Program Grant Awarded to
the Ladies Empowerment and Action Program, Inc.,
South Miami, Florida



AUDIT DIVISION

25-075

AUGUST 2025



EXECUTIVE SUMMARY

Audit of the Office of Justice Programs Bureau of Justice Assistance Second Chance Act Community-Based Reentry Program Grant Awarded to the Ladies Empowerment and Action Program Inc., South Miami, Florida

Objectives

The Office of Justice Programs (OJP) awarded the Ladies Empowerment and Action Program, Inc. (LEAP) in South Miami, Florida, one grant totaling \$750,000 under the Second Chance Act Community-Based Reentry Program. The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the award; and to determine whether the grantee demonstrated adequate progress towards achieving program goals and objectives.

Results in Brief

As a result of our audit, we concluded that LEAP demonstrated adequate progress towards achieving the grant's stated goals and objectives. This audit did not identify significant concerns regarding LEAP's federal financial reports and drawdowns. However, we identified discrepancies in program performance reports and grant financial management. We identified \$2,682 in questioned costs.

Recommendations

Our report contains seven recommendations for OJP. We requested a response to our draft audit report from OJP and LEAP officials. Their responses can be found in Appendices 3 and 4, respectively. Our analysis of those responses is included in Appendix 5.

Audit Results

The purposes of the one OJP Bureau of Justice Assistance grant we reviewed were to reduce recidivism and create opportunities for women returning from incarceration. The project period for the grant was from October 3, 2022, through September 30, 2025. As of November 6, 2024, LEAP drew down a cumulative amount of \$453,995 for the grant.

Program Goals and Accomplishments

We found that overall, LEAP developed a hub by securing partnerships to form a reentry community and collecting and analyzing data to measure impact. We also determined that LEAP was providing reentry services. We were unable to determine whether LEAP met its specific goal to reduce recidivism by 25 percent. Data needed for comparison will not be available until July 2027. We also found that LEAP's reported performance statistics did not reconcile to its supporting documentation for the metrics we reviewed.

Grant Financial Management

We identified a total of \$2,682 unallowable costs related to software costs. We found that LEAP was charging more than budgeted for personnel and other direct costs and should work with OJP to seek adjustments to its approved grant budget. Lastly, we found that LEAP does not follow its policy to document the approval of timesheets.

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Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of one grant awarded by the Office of Justice Programs (OJP) Bureau of Justice Assistance (BJA) under the Second Chance Act's Community-Based Reentry Program to the Ladies Empowerment and Action Program, Inc. (LEAP) in South Miami, Florida. LEAP was awarded one grant totaling \$750,000, as shown in Table 1.¹

Table 1

Grant Awarded to Ladies Empowerment and Action Program

Award Number	Program Office	Award Date	Project Period Start Date	Project Period End Date	Award Amount
15PBJA-22-GG-01771-SCAX	BJA	9/29/2022	10/3/2022	9/30/2025	\$750,000
Total:					\$750,000

Source: JustGrants

Funding through the Second Chance Act Community-Based Reentry Program supports the Department of Justice's mission by aiming to reduce recidivism and facilitate the successful reintegration of individuals returning from incarceration.

The Grantee

LEAP is a non-profit organization established in 2009. According to LEAP, it was designed to teach essential life skills beyond employability: entrepreneurship, and comprehensive life skills classes that address cognitive, behavioral, and substance abuse issues. LEAP's goal is to create an educational program based in love, forgiveness, and practical skills so that women who successfully graduate can productively rejoin their communities and families and avoid future prison sentences.

OIG Audit Approach

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

We tested compliance with what we considered to be the most important conditions of the grant. The DOJ Grants Financial Guide; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit

¹ Second Chance Act of 2007: Community Safety Through Recidivism Prevention. 42 U.S.C. § 17501.

Requirements for Federal Awards (Uniform Guidance); and the award documents contain the primary criteria we applied during the audit.

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

Audit Results

Program Performance and Accomplishments

We reviewed the grant program solicitation and grant award documentation and interviewed grantee officials to determine whether LEAP demonstrated adequate progress towards achieving the program goals and objectives. We also reviewed the progress reports for the 6-month periods ending December 31, 2023, and June 30, 2024, to determine if the required reports were accurate.

Program Goals and Objectives

LEAP's stated program goal was to empower incarcerated and recently released women as they prepare for reentry in the community through transformational opportunities and advocacy. To accomplish this, LEAP planned to implement the following objectives: (1) provide comprehensive reentry services, (2) reduce recidivism and strengthen community safety, (3) collect and analyze data to measure impact, and (4) develop a hub by securing partnerships and forming a cohesive reentry community within Miami-Dade County.

By reviewing performance reports and interviewing case managers, we were able to determine that LEAP was making progress for each stated objective to meet its goal. Based on our review, we were able to determine that LEAP provided reentry services, such as housing and job training. LEAP was also collecting and analyzing data to measure impact by tracking the number of females served and participant employment. We also determined that LEAP developed partnerships with Miami-Dade County Corrections and Rehabilitation Department and the Florida Department of Corrections (FDC) to form a reentry community. LEAP relied upon recidivism rates calculated by the FDC every 3 years to assess its success in reducing recidivism. Prior to the grant, the FDC reported a recidivism rate of 12.8 percent in July 2021, based on data of female prisoners released during calendar year 2017. The FDC reported a recidivism rate of 11.9 percent in July 2024, based on data of female prisoners released during calendar year 2019. The FDC's next report of the recidivism rate will be reported in July 2027. At that time, LEAP will be able to determine if its efforts reflect its goal of a 25 percent decrease in recidivism. Our detailed testing of performance is in the following section.

Required Performance Reports

According to the Department of Justice (DOJ) Grants Financial Guide, the funding recipient should ensure that valid and auditable source documentation is available to support all data collected for each performance measure specified in the program solicitation. To verify the information in the progress reports, we selected a sample of four performance measures from the two most recent reports submitted for the audited grant. We then attempted to trace the reported performance to supporting documentation maintained by LEAP. Table 2 shows the performance measures tested.

Table 2

Testing of Reported Performance Measures

Performance Measure	Performance Report Date	Number Reported	Number Supported	Difference
Number of participants served since the beginning of the grant.	July 1 — December 31, 2023	22	28	(6)
	January 1 — June 30, 2024	84	94	(10)
Number of participants who received cognitive behavioral therapies since the beginning of the grant.	July 1 — December 31, 2023	22	0	22
	January 1 — June 30, 2024	46	32	14
Number of participants who received education services.	July 1 — December 31, 2023	22	0	22
	January 1 — June 30, 2024	12	31	(19)
Number of people trained.	July 1 — December 31, 2023	4	4	0
	January 1 — June 30, 2024	1	0	1

Source: OJP’s JustGrants and LEAP

Based on our review, we found that LEAP was unable to fully support the accuracy of its reported performance figures. LEAP overreported on four performance measures and underreported on four performance measures. We requested additional supporting documentation on multiple occasions, however, as of March 2025, LEAP was unable to provide accurate data.

LEAP’s Office and Grants Manager told us that the information was not accurate because LEAP was using a new case management software that was not capturing the information properly. The Office and Grants Manager also told us that although LEAP was aware of problems with the case management software data reporting and has made progress in addressing them, resolving these challenges remained an ongoing process.

Although LEAP provided services to meet its goal and objectives, without accurate performance reporting, it is unable to demonstrate the extent of its progress. We recommend that OJP work with LEAP to ensure it implements procedures to report accurate performance data and maintain proper support documentation for the reported performance.

Grant 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 and to accurately account for funds awarded to them. To assess LEAP’s financial management of the grant covered by this audit, we conducted

interviews with financial staff, examined policy and procedures, and inspected grant documents to determine whether LEAP adequately safeguarded the grant funds we audited. We performed testing in the areas that were relevant for the management of this grant, as discussed throughout this report.

LEAP's approved grant budget included personnel, fringe benefits, travel, equipment, supplies and other costs such as rent, training, and marketing. To determine whether costs charged to the award were allowable, supported, and properly allocated in compliance with award requirements, we tested a judgmental sample of transactions that included at least one transaction from each approved budget category. We reviewed documentation, accounting records, and performed verification testing related to grant expenditures. Based on this testing, we identified \$2,682 in questioned costs. The following sections describe the results of that testing.

Personnel Costs

We determined that from October 3, 2022, through June 30, 2024, LEAP spent \$399,129. LEAP spent \$253,949 of the \$399,129 (64 percent) in personnel and fringe benefit costs. For testing, we judgmentally selected a sample of one pay period in 2022, and two pay periods in 2024, for all three employees that charged salary and fringe benefits to the grant. The total salary and fringe benefits for the three pay periods we tested was \$29,916.

Our testing of these three pay periods included a review of the approved budget, payroll and general ledger records, and available supporting documentation. We found that one employee, the Executive Director, received three payments totaling \$12,603. Included in the \$12,603, was a bonus of \$10,000 awarded to the Executive Director, of which \$8,558 was charged to the grant. LEAP's Office and Grants Manager told us that the bonus was a retroactive raise for 2022. We consider this cost unallowable because no bonus, nor raise, was approved in the budget. During the audit, LEAP provided an adjusting entry to the general ledger reversing the \$8,558; therefore, we make no recommendation. For the remaining 2 transactions LEAP's Office and Grants Manager told us that one of those payments totaling \$1,317 was charged to the grant in error. LEAP subsequently provided documentation that it had corrected the error and reversed the \$1,317 charged to the grant. The remaining \$2,728 charged to the grant was allowable. As a result, we do not make any recommendation related to this matter.

During our analysis, we also found that LEAP paid two of the three employees more than the amount listed on the approved budget. The approved budget allocated salaries for four employees, however the grant only paid three employees' salaries. The three employees were the Executive Director, a Case Manager, and the Reentry Program Director. The Executive Director was approved to receive 10 percent of her salary or \$9,000 per year for 3 years. However, we found that the Executive Director charged \$38,972 (43 percent) in salary to the grant for the first year, an excess of \$29,972 over the approved amount. The Reentry Program Director was approved to receive \$37,500 in the second year of the grant, but charged \$61,150 to the grant, an excess of \$23,650 over the approved amount.

LEAP's Office and Grants Manager told us that LEAP charged the additional salary over the approved amounts for the Executive Director and Reentry Program Director because LEAP was still under the approved amount for this budgeted category. Although LEAP's approved budget included funding for four employees and LEAP attempted to hire a fourth employee for the approved case manager position, LEAP

was unable to fill the position. Instead of hiring an approved case manager dedicated 100 percent to the program, LEAP continued to use funding for that vacant position to pay the Executive Director and Reentry Program Director over the approved budgeted amounts. LEAP provided documentation that the Executive Director and the Reentry Director were performing the duties of the vacant case manager position. As a result, LEAP submitted a Grant Award Modification (GAM) in September 2023 requesting a total decrease of \$13,900 in salaries and \$9,510 in fringe benefits. The GAM included a request to increase the percentage for the Executive Director's salary from 10 percent to 30 percent and remove the vacant case manager position. As discussed earlier, LEAP charged 43 percent of the Executive Director's salary in the first year, well above the 30 percent in this request. On November 29, 2023, OJP denied the GAM because the modification was less than 10 percent of the total award and therefore did not require a GAM. The denial also stated that to correct its budget for salaries, LEAP could instead submit a Program Office Approval GAM. However, LEAP did not submit the suggested Program Office Approval GAM.²

Although the Executive Director was spending more of her time performing the duties of the vacant case manager position, hiring a dedicated case manager—as planned in LEAP's grant application—would allow LEAP to provide more services to individuals participating in LEAP's Reentry Program. Therefore, we recommend that OJP work with LEAP to ensure it complies with its approved funding structure or seeks approval and any necessary assistance to pursue a different structure to administer the program.

We also found that LEAP was not following its policy to document the approval of timesheets. LEAP's Office and Grants Manager explained that the timesheet does not have a location for an approval signature, but that LEAP would implement a process so that LEAP properly documents the approval of timesheets. We recommend that OJP work with LEAP to ensure it properly documents the approval of timesheets so that LEAP is compliant with its own existing policy.

Other Direct Costs

From October 3, 2022, through June 30, 2024, LEAP had other direct costs, outside of personnel, totaling \$145,180. We selected 25 transactions totaling \$35,167 (24 percent) for testing. As mentioned above, we selected at least one transaction from each approved budget category.

Five of the 25 transactions in our sample were for rental costs. The transactions were for transitional housing rent and for LEAP's post-release reentry program administrative offices at a space adjoining LEAP's retail thrift store.³ The transactions were supported; however, we found that LEAP charged \$1,211 more than the budgeted amount for rent in the first year of the grant that included both transitional housing and rent for the administrative offices. As part of the denied GAM discussed above, LEAP requested a net increase of \$10,880 for "Other" costs, which included rent. The GAM requested a \$12,895 increase in rent from \$62,400 to \$75,295. LEAP's request was to allocate more funds to transitional housing rent costs, and a

² The Grant Award Modification is processed through the Bureau of Justice Assistance (BJA) and OJP's Office of Chief Financial Officer while the Program Office Approval Grant Award Modification is reviewed, processed, and approved wholly within BJA.

³ LEAP operates a thrift-based retail store that supports the program. Previously incarcerated women are provided a paid retail training internship. It offers programs to help women heal from trauma and addiction and prepare for the workforce.

reduction in office space rent. We recommend that OJP work with LEAP to identify the amount needed for office space and modify its budget to ensure it reflects bona fide grant-related needs for rental costs.

In addition to the unallowable bonus discussed earlier in this report, we also found that one transaction for software in the amount of \$2,682 was not included in the approved budget. LEAP's official told us that the software was allocated as "supplies" necessary to meet deliverables. We do not consider the software costs as supplies; therefore we consider the \$2,682 unallowable. Additionally, LEAP does not have a written policy to ensure grant charges are limited to costs approved in the budget. We recommend that OJP remedy the \$2,682 in unallowable software costs that were not approved in the grant budget. We also recommend that OJP ensures that LEAP develop and implement policies and procedures to ensure it charges to the grant only approved items in the budget.

In addition, we found that 10 of the 25 tested other direct cost transactions did not include evidence of confirmation that the goods or services were received. LEAP did not have a policy in place confirming the receipt of goods or services. Without such a control, LEAP is at risk of paying for goods or services that are not received, and scarce federal funds can be wasted. We recommend that OJP work with LEAP to establish a policy for confirming the receipt of goods or services.

Lastly, we found that for 8 of the 25 transactions we reviewed, LEAP could not provide documentary evidence that the transactions were authorized by a grantee official. LEAP's Office and Grants Manager told us that the transactions were approved orally. During the audit, LEAP updated its policy and provided a revised purchase request form that included a place for proper authorization. Based on LEAP's corrective action, we do not provide a recommendation.

Budget Management and Control

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

We compared grant expenditures to the approved budgets for the total amount of the grant and annually to determine whether LEAP transferred funds among budget categories in excess of 10 percent. We determined that the cumulative difference between category expenditures and approved budget category totals was not greater than 10 percent.

Drawdowns

According to the DOJ Grants Financial Guide and 2 C.F.R. § 200, an adequate accounting system should be established to maintain documentation to support all receipts of federal funds. If, at the end of the grant award, recipients have drawn down funds in excess of federal expenditures, unused funds must be returned to the awarding agency. The Grantee requests drawdowns based on actual expenses incurred. According to LEAP's procedures, the accounting department reviews and reconciles an expense report with invoices, receipts, and relevant documentation before sending it to the accounting manager for review.

Then the Grants Administrator verifies compliance and confirmation of the amount and forwards the expense report with a drawdown request to the Chief Financial Officer for final review and drawdown authorization. Once authorized, LEAP submits the drawdown request to DOJ based on the amount of grant expenditures listed on the report. As of November 6, 2024, the total drawdowns were \$453,995. To assess whether LEAP managed grant receipts in accordance with federal requirements, we compared the total amount reimbursed to the total expenditures in the accounting records. We found that total expenditures did not exceed drawdowns.

During this audit, we did not identify significant deficiencies related to the recipient's process for developing drawdown requests.

Federal Financial Reports

According to the DOJ Grants Financial Guide, recipients shall report the actual expenditures and unliquidated obligations incurred for the reporting period on each Federal Financial Report (FFR), as well as cumulative expenditures. To determine whether LEAP submitted accurate FFRs, we compared the FFR for the reporting period ending June 30, 2024, to LEAP's accounting records for the grant. We determined that quarterly and cumulative expenditures for the FFR reviewed matched the accounting records.

Conclusion and Recommendations

As a result of our audit testing, we concluded that LEAP did not adhere to all of the grant requirements we tested but demonstrated progress towards achieving the grant's stated goals and objectives. We did not identify significant issues regarding LEAP's federal financial reports or drawdowns. However, we found that LEAP did not comply with essential award conditions related to performance reports and grant financial management. We provide seven recommendations to OJP to address these deficiencies.

We recommend that OJP work with LEAP to:

1. Ensure it implements procedures to report accurate performance data and maintain proper support documentation for the reported performance.
2. Ensure it complies with its approved funding structure or seeks approval and any necessary assistance to pursue a different structure to administer the program.
3. Ensure it properly documents the approval of timesheets so that LEAP is compliant with its existing policy.
4. Identify the amount needed for office space and modify its budget to ensure it reflects bona fide grant-related needs for rental costs.
5. Remedy the \$2,682 in unallowable software costs that were not approved in the grant budget.
6. Develop and implement policies and procedures to ensure it charges to the grant only approved items in the budget.
7. Establish a policy for confirming the receipt of goods or services.

APPENDIX 1: Objectives, Scope, and Methodology

Objectives

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

Scope and Methodology

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

This was an audit of an Office of Justice Programs grant awarded to the Ladies Empowerment and Action Program under the Second Chance Act Community-Based Reentry Program. The grant number under this auditee and program was 15PBJA-22-GG-01771-SCAX, with an award amount of \$750,000 and as of November 6, 2024, had drawn down \$453,995 of the total grant funds awarded. Our audit concentrated on, but was not limited to, the period of October 2022 through September 2024.

To accomplish our objectives, we tested compliance with what we consider to be the most important conditions of LEAP's activities related to the audited grants. We performed sample-based audit testing for grant expenditures including payroll and fringe benefit charges, financial reports, and progress reports. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grant reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected. The DOJ Grants Financial Guide; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; and the award documents contain the primary criteria we applied during the audit.

During our audit, we obtained information from DOJ JustGrants system as well as LEAP's accounting system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of LEAP to provide assurance on its internal control structure as a whole. LEAP 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 LEAP's internal control structure as a whole, we offer this statement solely for the information and use of LEAP and OJP.⁴

In planning and performing our audit, we identified internal control components and underlying internal control principles that are significant to the audit objectives. Specifically, we reviewed the design and implementation of LEAP's written policies and procedures and process controls pertaining to aspects of grant planning, program performance, and financial management. We also tested the implementation and operating effectiveness of specific controls over grant execution and compliance with laws and regulations in our audit scope.

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

⁴ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

APPENDIX 2: Schedule of Dollar-Related Findings

<u>Description</u>	<u>Grant No.</u>	<u>Amount</u>	<u>Page</u>
Questioned Costs:			
Unallowable Software Costs	15PBJA-22-GG-01771-SCAX	\$2,682	7
Total Unallowable Costs		\$2,682	
Net Questioned Costs		\$2,682	
TOTAL DOLLAR-RELATED FINDINGS		<u>\$2,682</u>	

APPENDIX 3: The 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

July 9, 2025

MEMORANDUM TO: Sean Relay
Acting 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: 2025.07.09 15:25:28 -04'00'

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs, Bureau of Justice Assistance, Second Chance Act Community-Based Reentry Program Grant, Awarded to the Ladies Empowerment and Action Program, Inc., South Miami, Florida*

This memorandum is in reference to your correspondence, dated June 9, 2025, transmitting the above-referenced draft audit report for the Ladies Empowerment and Action Program, Inc. (LEAP). We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains 7 recommendations and \$2,682 in questioned costs. The following is the Office of Justice Programs' (OJP) analysis of the draft audit report recommendations. For ease of review, the recommendations are restated in bold and are followed by OJP's response.

- 1. We recommend that OJP work with LEAP to ensure it implements procedures to report accurate performance data and maintain proper support documentation for the reported performance.**

OJP agrees with the recommendation. In its response, dated July 9, 2025, LEAP stated that it understands the importance of maintaining accurate and verifiable performance data, and has worked directly with their software company to implement system adjustments that allow for the accurate and consistent extraction of data needed for grant reporting.

Accordingly, we will coordinate with LEAP to obtain a copy of its written policies and procedures, developed and implemented, to ensure that performance data is accurately reported; and the supporting documentation is maintained for future auditing purposes.

- 2. We recommend that OJP work with LEAP to ensure it complies with its approved funding structure or seeks approval and any necessary assistance to pursue a different structure to administer the program.**

OJP agrees with the recommendation. In its response, dated July 9, 2025, LEAP stated that they have reviewed their current structure and found that, for the most part, it aligns with the approved parameters of the program. It also stated that if any adjustments are necessary to further align with the requirements, that they are committed to seeking the approval of OJP.

Accordingly, we will coordinate with LEAP to obtain a copy of its written policies and procedures, developed and implemented, to ensure compliance with its approved funding structure, or that it seeks proper approval and any necessary assistance to pursue a different structure to administer the program.

- 3. We recommend that OJP work with LEAP to ensure it properly documents the approval of timesheets so that LEAP is compliant with its existing policy.**

OJP agrees with the recommendation. In its response, dated July 9, 2025, LEAP stated that they have reviewed their timesheet approval process to ensure that all timesheets are properly reviewed and approved by the designated supervisors, as stated in LEAP's existing policy.

Accordingly, we will coordinate with LEAP to obtain a copy of its written policies and procedures, developed and implemented, to ensure that the review and approval of timesheets is adequately documented in compliance with its existing policy.

- 4. We recommend that OJP work with LEAP to identify the amount needed for office space and modify its budget to ensure it reflects bona fide grant-related needs for rental costs.**

OJP agrees with the recommendation. In its response, dated July 9, 2025, LEAP stated that they are in the process of conducting a thorough review of their office space needs and considering the actual usage of space for grant-related activities, and anticipate that the review will be completed, and a budget modification submitted to reflect this by July 30, 2025.

Accordingly, we will coordinate with LEAP to identify the amount needed for office space and modify its budget to ensure it reflects bona fide grant-related needs for rental costs.

5. We recommend that OJP work with LEAP to remedy the \$2,682 in unallowable software costs that were not approved in the grant budget.

OJP agrees with the recommendation. In its response, dated July 9, 2025, LEAP stated that they acknowledge the error and will be submitting a Grant Award Modification (GAM) request by July 30, 2025. LEAP also stated that in the event the request is not approved, they will take the necessary steps to ensure that the costs are reimbursed to the grant fund.

Accordingly, we will coordinate with LEAP to obtain documentation to support that a GAM request for the software costs has been appropriately submitted and approved, as required by the terms and conditions of the grant. If adequate documentation cannot be provided, we will request that LEAP return the funds, for any unsupported costs, to the U.S. Department of Justice, remove the costs from their grant accounting records, and submit a revised Federal Financial Report for the grant.

6. We recommend that OJP work with LEAP to develop and implement policies and procedures to ensure it charges to the grant only approved items in the budget.

OJP agrees with the recommendation. In its response, dated July 9, 2025, LEAP stated that they are in the process of reviewing internal financial procedures to ensure that all charges to the grant are strictly limited to items that are included in the approved budget. LEAP also stated that they anticipate the review process will be completed, with updated internal financial procedures, by July 30, 2025.

Accordingly, we will coordinate with LEAP to obtain a copy of its written policies and procedures, developed and implemented, to ensure that costs charged to the grant are for items included in the approved budget, allowable under the terms and conditions of the grant, and properly reviewed and approved by management, and the supporting documentation is maintained for future auditing purposes.

7. We recommend that OJP work with LEAP to establish a policy for confirming the receipt of goods and services.

OJP agrees with the recommendation. In its response, dated July 9, 2025, LEAP stated that they are in the process of drafting a policy that outlines the process of confirming and documenting receipt of goods and services.

Accordingly, we will coordinate with LEAP to obtain a copy of its written policies and procedures, developed and implemented, to ensure that the receipt of goods and services are properly confirmed, and the supporting documentation is maintained for future auditing purposes.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact me on (202) 820-6807.

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Control Title OCOM001560

APPENDIX 4: The Ladies Empowerment and Action Program, Inc. Response to the Draft Audit Report



1. Ensure it implements procedures to report accurate performance data and maintain proper supporting documentation for the reported performance.

LEAP concurs with the recommendation to ensure accurate performance data reporting and proper support documentation. We understand the importance of maintaining accurate and verifiable performance data, and we have already taken steps to address this. We recently experienced challenges with the case management software being utilized, which temporarily impacted our ability to generate complete reports. We worked directly with the software company to resolve these issues and have since implemented system adjustments that allow us to accurately and consistently extract the data needed for grant reporting. LEAP will work with OJP on implementing acceptable supporting documentation for the reported performance.

2. Ensure it complies with its approved funding structure or seeks approval and any necessary assistance to pursue a different structure to administer the program.

LEAP concurs with the recommendation regarding compliance with our approved funding structure. After reviewing our current structure, we found that it aligns with the approved parameters for the most part. However, if any adjustments are necessary to further align with the requirements, we are committed to seeking approval from the Office of Justice Programs (OJP).

At this point, we are confident that the current structure supports our objectives, and we are prepared to make any required modifications to ensure full compliance with the grant.

3. Ensure it properly documents the approval of timesheets so that LEAP is compliant with its existing policy.

In response to the recommendation to properly document the approval of timesheets, LEAP concurs and acknowledges the need for adherence to our existing policy. We have already reviewed our timesheet approval process to ensure that all timesheets are properly reviewed and approved by the designated supervisors as stated in LEAP's existing policy.

4. Identify the amount needed for office space and modify its budget to ensure it reflects bona fide grant-related needs for rental costs.

LEAP concurs with the recommendation to ensure that the office space costs are properly identified and reflected in the grant budget. To address this, LEAP is in the process of

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conducting a thorough review of our office space needs, considering the actual usage of space for grant-related activities. We anticipate this will be completed by July 30, 2025 and a budget modification will be submitted to reflect this by July 30, 2025.

5. Remedy the \$2,682 in unallowable software costs that were not approved in the grant budget.

LEAP concurs with the recommendation to address the \$2,682 in unallowable software costs that were not approved in the grant budget. Upon reviewing our records, we acknowledge the error and will be submitting a GAM for approval by July 30, 2025. In the event the request is not approved, LEAP will take the necessary steps to ensure that these costs are reimbursed to the grant fund.

6. Develop and implement policies and procedures to ensure it charges to the grant only approved items in the budget.

LEAP concurs with the recommendation to develop and implement policies and procedures to ensure that only approved items are charged to the grant. In response, LEAP is in the process of reviewing internal financial procedures to ensure that all charges to the grant are strictly limited to items that are included in the approved budget. LEAP anticipates this will be completed with updated internal financial procedures by July 30, 2025.

7. Establish a policy for confirming receipt of goods or services.

LEAP concurs with the recommendation to establish a policy for confirming the receipt of goods or services. To address this, we are in the process of drafting a policy that outlines the process for confirming receipt and documenting receipt of goods and services. This policy will ensure that we maintain thorough records of all goods and services received, which will further support the integrity of our financial reporting. LEAP anticipates this will be completed July 30, 2025.

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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 a draft of this audit report to the Office of Justice Programs (OJP) and the Ladies Empowerment and Action Program, Inc. (LEAP). OJP's response is incorporated in Appendix 3 and LEAP's response is incorporated in Appendix 4 of this final report. In response to our draft audit report, OJP agreed with our recommendations, and as a result, the status of the audit report is resolved. LEAP also concurred with all 7 recommendations. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendations for OJP:

- 1. Ensure LEAP implements procedures to report accurate performance data and maintain proper support documentation for the reported performance.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with LEAP to obtain a copy of its written policies and procedures to ensure performance data is accurately reported and that supporting documentation is maintained.

LEAP concurred with our recommendation and stated in its response its understanding of the importance of maintaining accurate and verifiable performance data. LEAP also stated that it has taken steps to address the issue by working directly with the software company and has since implemented system adjustments to accurately and consistently extract the data needed for grant reporting.

This recommendation can be closed when we receive documentation that the system accurately and consistently extracts the data needed for grant reporting and that support is maintained.

- 2. Ensure LEAP complies with its approved funding structure or seeks approval and any necessary assistance to pursue a different structure to administer the program.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with LEAP to obtain a copy of its written policies and procedures to ensure it complies with its approved funding structure or seeks approval and necessary assistance to pursue a different structure to administer the program.

LEAP concurred with our recommendation and stated in its response that its funding structure aligns with the approved parameters. LEAP also stated that if any adjustments are necessary to further align with requirements, LEAP is committed to seeking approval from OJP.

This recommendation can be closed when we receive documentation of compliance with the approved funding structure.

- 3. Ensure LEAP properly documents the approval of timesheets so that LEAP is compliant with its existing policy.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with LEAP to obtain a copy of its written policies and procedures to ensure that the review and approval of timesheets is adequately documented in compliance with its existing policy.

LEAP concurred with our recommendation and acknowledged the need for adherence to its existing policy. LEAP's response also stated that it has reviewed the timesheet approval process to ensure timesheets are reviewed and approved by the designated supervisors.

This recommendation can be closed when we receive evidence that LEAP is implementing and following its timesheet approval policy.

4. Identify the amount needed for office space and modify its budget to ensure it reflects bona fide grant-related needs for rental costs.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with LEAP to identify the amount needed for office space and modify its budget to ensure it reflects grant-related needs for rental costs.

LEAP concurred with our recommendation and stated in its response that it is in the process of conducting a thorough review of its office space needs and will submit a Grant Award Modification (GAM) to reflect those needs. LEAP anticipates completion by July 30, 2025.

This recommendation can be closed when we receive LEAP's budget modification request and supporting documentation related to office space.

5. Remedy the \$2,682 in unallowable software costs that were not approved in the grant budget.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with LEAP to obtain documentation to support the previously submitted and approved GAM request for the software costs. If documentation cannot be provided, OJP will request LEAP: return of funds to the U.S. Department of Justice, remove the costs from its grant accounting records, and submit a revised Federal Financial Report for the grant.

LEAP concurred with our recommendation and stated in its response that it will submit a GAM for approval by July 30, 2025. LEAP also stated that if the GAM is not approved, it will ensure that the costs are reimbursed to OJP.

This recommendation can be closed when we receive documentation that the \$2,682 in unallowable costs has been remedied.

6. Develop and implement policies and procedures to ensure it charges to the grant only approved items in the budget.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with LEAP to obtain a copy of its written policies and procedures, to ensure that costs charged to the grant are for items included in the approved budget, allowable under the terms and conditions of the grant, and properly reviewed and approved by management and supporting documentation is maintained.

LEAP concurred with our recommendation and stated in its response that it is in the process of reviewing internal financial procedures to ensure all charges to the grant are included in the approved budget. LEAP stated that it anticipates completion of updated procedures by July 30, 2025.

This recommendation can be closed when we receive documentation of the updated financial procedures.

7. Establish a policy for confirming the receipt of goods or services.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with LEAP to obtain a copy of its written policies and procedures that ensure that the receipt of goods and services are properly confirmed and that the supporting documentation is maintained.

LEAP concurred with our recommendation and stated in its response that it is in the process of drafting a policy for the confirmation and documentation of the receipt of goods and services. LEAP stated that it anticipates the completion of the policy by July 30, 2025.

This recommendation can be closed when we receive documentation of the policy for the confirmation and documentation of the receipt of goods and services.