



Audit of the Office on Violence Against Women
Grant to Reduce Domestic Violence, Dating Violence,
Sexual Assault and Stalking on Campus Program
Awarded to Arcadia University,
Glenside, Pennsylvania



AUDIT DIVISION

26-050

APRIL 2026



EXECUTIVE SUMMARY

Audit of the Office on Violence Against Women Grant to Reduce Domestic Violence, Dating Violence, Sexual Assault and Stalking on Campus Program Awarded to Arcadia University, Glenside, Pennsylvania

Objectives

The U.S. Department of Justice (DOJ) Office on Violence Against Women (OVW) awarded Arcadia University (Arcadia), in Glenside, Pennsylvania, a grant totaling \$299,999 to reduce domestic violence, dating violence, sexual assault, and stalking on campus. The objectives of this audit were to determine whether costs claimed under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the award; and to determine whether Arcadia demonstrated adequate progress towards achieving program goals and objectives.

Results in Brief

We found that Arcadia worked to prevent and improve its response to incidents of sexual violence. In addition, we found that Arcadia and its subrecipients provided victim services and enhanced awareness and prevention programming. We did not identify significant deficiencies with Arcadia's processes for basing drawdowns on its recorded expenditures, charging expenditures to the approved grant budget categories, or preparing federal financial reports. However, we identified areas for improvement related to performance reports, grant expenditures, and subrecipient monitoring.

Recommendations

Our report contains four recommendations to OVW. We requested a response to our draft report from Arcadia and OVW officials, which can be found in Appendices 2 and 3, respectively. Our analysis of those responses is included in Appendix 4.

Audit Results

The purpose of the OVW grant was to provide comprehensive, confidential victim services, enhance awareness and prevention programming, and serve underserved populations. The grant's project period was from October 2022 through September 2026. As of March 2026, Arcadia had drawn down a cumulative amount of \$228,931 for the grant.

Program Goals and Accomplishments

Arcadia was able to produce documentation to support what was reported in its performance reports; however, because the records were not readily available or retained as required, Arcadia had to re-compile much of the supporting documentation in response to our audit.

Grant Expenditures

We found Arcadia did not demonstrate that salaries and wages charged to the grant were based on records that accurately reflect actual time spent on grant-related activities.

Subrecipient Monitoring

We found Arcadia did not adequately review the financial invoices submitted by its subrecipients and did not require periodic performance reports from its subrecipients, as required.

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Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of a grant awarded by the Office on Violence Against Women (OVW) under the Grants to Reduce Domestic Violence, Dating Violence, Sexual Assault and Stalking on Campus Program (Campus Program), to Arcadia University (Arcadia) in Glenside, Pennsylvania. Arcadia was awarded a grant totaling \$299,999, as shown in Table 1.

Table 1

Grant Awarded to Arcadia University

Award Number	Program Office	Award Date	Project Period Start Date	Project Period End Date	Award Amount
15JOVW-22-GG-03171-CAMP	OVW	9/23/2022	10/1/2022	9/30/2026 ^a	\$299,999

Source: JustGrants

^a The project received a 1-year, no cost extension.

According to OVW, funding through the Campus Program provides institutions of higher education an opportunity to enhance victim services, implement prevention and education programs, and develop and strengthen security and investigation strategies in order to prevent, prosecute, and respond to domestic violence, dating violence, sexual assault, and stalking. The Campus Program supports activities that develop campus-based coordinated responses that include campus victim services, law enforcement, health care providers, housing officials, administrators, student leaders, faith-based organizations, student organizations, and disciplinary boards, and that enhance victim safety and assistance and hold offenders accountable.

Arcadia University

Arcadia is a non-profit, 501(c)(3), entity. According to Arcadia, it dates back to 1853 and has been through many changes throughout the years including locations and names. As of March 2026, Arcadia reported having 2,163 undergraduate students and 1,447 graduate students in 75 fields of study.

Arcadia's Campus Program is administrated by the Office of Sexual Violence Prevention and Education which works to prevent and improve Arcadia's response to incidents of sexual violence. This office leads Arcadia's Coordinated Community Response Team; reviews policies, protocols, and procedures; and helps community members understand and access resources and services if they or someone they know has experienced sexual violence.

OIG Audit Approach

The objectives of this audit were to determine whether costs claimed under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant; and to determine whether Arcadia 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 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.

Audit Results

Program Performance and Accomplishments

To determine whether Arcadia demonstrated adequate progress towards achieving program goals and objectives, we reviewed grant documentation, including the application, solicitation, and budget narrative, reviewed required performance reports, and interviewed Arcadia officials. Based on our review, we did not take issue with Arcadia's accomplishment of its program goals and objectives, but we identified an area of improvement related to performance reports.

Program Goals and Objectives

The goals of the grant were to provide comprehensive, confidential victim services, enhance awareness and prevention programming, and serve underserved populations. Arcadia subawarded funds to three subrecipients, the local law enforcement entity and two victim service providers, to assist in providing program services. As part of their grant-related activities, we saw evidence that Arcadia and its subrecipients provided: (1) services to victims, (2) bystander intervention training to student athletes, (3) sexual violence prevention training for incoming students, and (4) an awareness event to draw attention to the prevalence of sexual violence on college campuses.

In October 2025, the grant's Project Director stepped down, and in November 2025, the grant's Victim Advocate also left the program, leaving no officials available to perform programmatic work on the grant. The Project Director and Victim Advocate were the only positions funded under the OVW grant. According to Arcadia officials, grant-related activities were placed on hold following their departures. In February 2026, Arcadia hired a new Project Director to fill the vacancy. Despite the turnover in these key grant-funded positions and the temporary pause in activities, our audit did not identify any indications that Arcadia was not adequately achieving its stated goals and objectives of the grant. According to Arcadia, the final goal to serve underserved populations will be addressed during the grant's no cost extension.

Required Performance Reports

According to the DOJ Grants Financial Guide, funding recipients 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 performance reports, we selected a judgmental sample of five performance measures from the performance reports and then traced the items to participant spreadsheets, advertising documentation, and victim logs.

Based on our performance report testing, we did not identify any instances where the accomplishments described in the required reports did not match the supporting documentation. While Arcadia was able to produce documentation to support what was reported, the records were not readily available or retained, and Arcadia had to compile much of the documentation in response to our audit. As a result, we recommend that OVW ensure Arcadia maintain and retain documentation to support the accomplishments in the performance reports.

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 the financial management of the grant covered by this audit, we conducted interviews with financial staff, examined policies and procedures, and inspected grant documents to determine whether Arcadia adequately safeguarded the grant funds we audited. We also reviewed Arcadia's most recent Single Audit Report, which did not have any relevant findings.¹ Finally, we performed testing in the areas that were relevant for the management of this grant, as discussed throughout this report.

Based on our review, we did not identify significant deficiencies with Arcadia's processes for basing drawdowns on its recorded expenditures, charging expenditures to the approved grant budget categories, or preparing federal financial reports. However, we found that Arcadia's management of grant expenditures and subrecipient monitoring could be improved.

Grant Expenditures

Arcadia's approved budget included personnel, fringe benefits, travel, supplies, subrecipients, and indirect costs. No matching funds were required for the grant. To determine whether costs charged to the grant were allowable, supported, and properly allocated in compliance with award requirements, we reviewed documentation, accounting records, and performed verification testing related to grant expenditures. Of the \$211,105 charged to the grant as of September 2025, we judgmentally sampled and tested a total of \$54,043. Based on this testing, we identified areas of improvement related to personnel and subrecipient expenditures. We did not identify significant concerns related to fringe benefits, travel, supplies, or indirect costs. We discuss the tested subrecipient expenditures within the [Subrecipient Monitoring](#) section of this report.

Personnel

According to the DOJ Grants Financial Guide, charges made to federal awards for salaries and wages must be based on records that accurately reflect the work performed. We judgmentally selected a sample of \$39,001 of the total \$140,233 charged to the grant in personnel. We reviewed accounting and payroll records, as well as Arcadia's methodology for allocating personnel costs. We were able to reconcile the personnel costs charged to the grant to Arcadia's payroll records. To support the salary of an employee with allocated costs, Arcadia used employee certifications to identify level of effort by funding source. However, we found instances when the certifications were not based on the employee's actual time spent on grant-related activities. During our testing, we found a certification that indicated the Project Director spent zero time on grant-related activities during a particular period, yet personnel costs were retroactively charged to the grant for that same period. According to an Arcadia official, this occurred because OVW had not yet

¹ Non-federal entities that receive federal financial assistance are required to comply with the Single Audit Act of 1984, as amended. The Single Audit Act requires recipients of federal funding above a certain threshold to receive an annual audit of their financial statements and federal expenditures. The audit is referred to as "single" because it includes all federal financial assistance that the entity has received and expended. Under the Uniform Guidance, such entities that expend \$1,000,000 or more in federal funds within the entity's fiscal year must have a single audit performed annually covering all federal funds expended that year. Prior to October 1, 2024, the threshold for single audit requirements was \$750,000.

approved the grant budget, and therefore Arcadia could not charge personnel costs to the grant. However, the supporting documentation we received for the retroactive charges was the certification that reflected zero time spent on grant-related activities. The Arcadia official explained that the Project Director's salary, 75 percent of which is budgeted to the grant, is what was ultimately charged to the grant. This explanation further indicates that Arcadia relied on the budgeted allocation rather than documenting and certifying the employee's actual time spent on grant-related activities at the time it occurred. Therefore, we recommend that OVV ensure Arcadia maintains documentation to demonstrate that salaries and wages charged to the grant are based on records that accurately reflect time spent on grant-related activities.

Subrecipient Monitoring

As mentioned earlier, Arcadia subawarded funds to three local subrecipients to aid in providing victim services. According to the DOJ Grants Financial Guide, the purpose of subrecipient monitoring is to ensure that subrecipients: (1) use grant funds for authorized purposes; (2) comply with the federal program and grant requirements, laws, and regulations; and (3) achieve subaward performance goals. As the primary grant recipient, Arcadia must develop policies and procedures to monitor subrecipients. To assess the adequacy of Arcadia's monitoring, we tested all subrecipient expenditures and reviewed Arcadia's written subrecipient policies and procedures.

Expenditures

We tested all 6 subrecipient expenditures totaling \$6,672. We found Arcadia did not adequately review the financial invoices submitted by its subrecipients that were charged to the grant. Specifically, the financial invoices we reviewed were not accompanied by supporting documentation. Arcadia did not adhere to its written policy that requires random reviews of invoiced expenditures by financial personnel to confirm accuracy of the subrecipient submissions. Not reviewing supporting documentation presents greater risk of unallowable or unsupported subrecipient expenses being charged to the grant. To demonstrate the importance of a financial review, we found one instance when a subrecipient requested reimbursement for more than the amount actually expended. Arcadia identified the \$5,172 overpayment at the end of the fiscal year and the money was returned to the grant by the subrecipient. We recommend that OVV require Arcadia to establish adequate controls to ensure that subrecipient expenditures are allowable, accurate, and supported.

Performance

Arcadia's subrecipient monitoring policies and procedures did not include subrecipient performance. Arcadia did not periodically review the performance of its subrecipients as required by the DOJ Grants Financial Guide. Arcadia officials told us the Project Director, who was no longer in the position at the time of our audit, believed it was adequate to only collect technical progress reports on an as-needed basis. In addition, Arcadia could not provide any such reports to the audit team and the Project Director did not retain documentation of subrecipient performance. Instead, we were told the Project Director had routine undocumented discussions with subrecipients. Lack of performance reporting presents the risk that the grantee will not adequately monitor the overall performance of a subrecipient to ensure that the goals and objectives of subawards are achieved. We recommend that OVV work with Arcadia to develop and implement subrecipient performance reporting policies and procedures as part of subrecipient monitoring.

Conclusion and Recommendations

As a result of our audit, we did not identify significant concerns regarding Arcadia's program goals, budget management, drawdowns, or federal financial reports. However, we identified several areas for improvement related to performance reports, grant expenditures, and subrecipient monitoring. Specifically, we found that Arcadia did not retain or have readily available support for its performance reports, lacked adequate documentation to support actual time spent on grant-related activities, and did not adequately monitor its subrecipient financial invoices or performance. We provide four recommendations to OVW to address these deficiencies.

We recommend that OVW:

1. Ensures Arcadia maintain and retain documentation to support the accomplishments in progress reports.
2. Ensures Arcadia maintains documentation to demonstrate that salaries and wages charged to the grant are based on records that accurately reflect time spent on grant-related activities.
3. Ensures that Arcadia establish adequate controls to ensure that subrecipient expenditures are allowable, accurate, and supported.
4. Ensures that Arcadia develops and implements subrecipient performance reporting policies and procedures as part of subrecipient monitoring.

APPENDIX 1: Objectives, Scope, and Methodology

Objectives

The objectives of this audit were to determine whether costs claimed under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant; and to determine whether Arcadia University (Arcadia) 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 the Office on Violence Against Women (OVW) grant awarded to Arcadia under the Grants to Reduce Domestic Violence, Dating Violence, Sexual Assault and Stalking on Campus Program. 15JOVW-22-GG-03171-CAMP for \$299,999, and as of March 2026, had drawn down \$228,931 of the total grant funds awarded. Our audit concentrated on, but was not limited to, the period of October 2022 through February 2026.

To accomplish our objectives, we tested compliance with what we considered to be the most important conditions of Arcadia'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 Arcadia'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.

We discussed our audit results with Arcadia officials throughout the audit and at a formal exit conference. We also provided Arcadia and OVW a draft of our report. Arcadia and OVW provided written responses, which can be found in Appendix 2 and 3, respectively.

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 Arcadia to provide assurance on its internal control structure as a whole. Arcadia management is responsible for the establishment and maintenance of internal controls in accordance with the OMB Circular A-123 and 2 C.F.R. § 200. Because we do not express an opinion on Arcadia's internal control structure as a whole, we offer this statement solely for the information and use of Arcadia and OVV.²

We interviewed Arcadia officials, reviewed policies and procedures, and evaluated supporting documentation. We assessed management's design, implementation, and operating effectiveness of relevant internal controls and identified deficiencies that we believe could affect Arcadia's ability to effectively operate, and to ensure compliance with laws and regulations. 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.

² This restriction is not intended to limit the distribution of this report, which is a matter of public record.

APPENDIX 2: Arcadia University Response to the Draft Audit Report



April 14, 2026

Thomas O. Puerzer
Regional Audit Manager
Office of the Inspector General
U.S. Department of Justice
701 Market Street, Suite 2300
Philadelphia, PA 19016

Official Response to DOJ Office of the Inspector General Draft Audit Report: Audit of the Office on Violence Against Women Grant Award No. 15JOVW-22-GG-03171-CAMP

Arcadia University (Arcadia) appreciates the opportunity to respond to the Draft Audit Report issued by the Department of Justice Office of the Inspector General. Arcadia is committed to responsible stewardship of federal grant funds and to the goals of the OVW Campus Program. Arcadia is pleased that the OIG did not identify significant deficiencies with Arcadia's processes for basing drawdowns on its recorded expenditures, charging expenditures to the approved grant budget categories, or preparing federal financial reports, and did not take issue with Arcadia's accomplishment of its program goals and objectives.

Arcadia provides the following responses to the four recommendations:

Audit Recommendation 1: Maintain and retain documentation to support the accomplishments in progress report

Arcadia concurs. The University acknowledges that, in connection with this award, supporting documentation for programmatic accomplishments reported to OVW was not readily available at the project level, necessitating retrieval of records from multiple institutional departments. Arcadia takes this finding seriously and has implemented systemic procedural corrections to ensure that this does not recur.

In direct response to this recommendation, Arcadia has developed two complementary standard operating procedures that together establish a comprehensive internal framework for Principal Investigator (PI) level documentation accountability. They are as follows:

SOP-OSRP-001 establishes written procedures governing PI technical progress report monitoring for all sponsored awards, including reporting frequency, required content elements, submission deadlines, and Office of Sponsored Research and Programs (OSRP) review responsibilities. Central to this framework is Form OSRP-PAC-01 (PI Progress and Attestation Certification), which is now required to accompany

every technical progress report submitted to OSRP. By signing Form OSRP-PAC-01, the PI certifies, for each reporting period and each specific award, that reported information is accurate and complete, that all activities and expenditures are authorized, that the project is in compliance with applicable federal requirements, and, critically, that supporting documentation for all reported accomplishments exists, is maintained on file, and is available upon request. The PI further acknowledges that failure to maintain adequate records constitutes noncompliance with award obligations.

SOP-OSRP-004 operationalizes this certification by establishing a mandatory post-submission documentation spot check following every technical progress report received by OSRP. Upon receipt of each TPR, OSRP will request at least one item of supporting documentation from the PI. The specific item is selected by the OSRP Grants Administrator or OSRP Director at the time of the request and is not disclosed to the PI in advance. The PI is required to produce the requested documentation within two (2) business days. Failure to respond within this window triggers immediate escalation to the OSRP Director, with consequences including formal written notice, and mandatory corrective action. This mechanism ensures that the PI's attestation on Form OSRP-PAC-01 is subject to routine, unannounced verification, and that documentation deficiencies are identified and remediated in real time.

In addition, all PIs are required to submit copies of supporting documentation for reported accomplishments to a centralized OSRP electronic repository concurrent with each Technical Progress Report submission. This ensures that complete project-level records are maintained by OSRP and accessible to administrative and compliance personnel, including in the event of PI turnover.

Together, SOP-OSRP-001, SOP-OSRP-004, and Form OSRP-PAC-01 establish an institution-wide framework that ensures programmatic accomplishments reported to federal sponsors are accurately documented, that supporting records are maintained and retrievable at the project level, and that PI compliance with these obligations is certified at each reporting interval, subject to ongoing institutional verification. This framework is consistent with Arcadia's obligations as a federal award recipient under 2 CFR § 200.329, 200.334, and 200.337.

Furthermore, Arcadia will enhance its PI orientation and ongoing training program to include explicit instruction on federal progress reporting requirements under 2 CFR § 200.329, recordkeeping and retention obligations under 2 CFR § 200.334, Arcadia's internal reporting and documentation procedures under SOP-OSRP-001 and SOP-OSRP-004, and the PI's certification obligations under Form OSRP-PAC-01.

Audit Recommendation 2: Maintain documentation to demonstrate that salaries and wages charged to the grant are based on records that accurately reflect time spent on grant-related activities.

Arcadia concurs. In response to this recommendation, Arcadia has revised its effort certification template to ensure that the salaries and wages charged to the grant are supported by records that accurately reflect time spent on the grant-related activities, consistent with 2 CFR § 200.430.

The revised Effort Certification template (Attachment 1) explicitly accommodates exceptions, including delayed posting of personnel expenses charged to the grant, that may otherwise create a disconnect

between effort performed and the actual charges recorded. By capturing these circumstances within the certification itself, the template ensures that effort certifications accurately represent the work performed during the covered period and that personnel charges to the grant are supported by accurate records. Additionally, Arcadia will enhance its PI orientation and investigator training program to include enhanced education on effort certification requirements.

The University's effort certification process is supported by a system of internal controls designed to provide reasonable assurance that salary charges to federal awards reflect actual work performed. These controls include pre- and post-award meetings and orientation on effort allocation and certification requirements; effort certifications reflecting total institutional commitments and following established institutional expectations for different classifications of employees; mandatory review and approval by individuals with direct knowledge of the work performed and suitable means of verification consistent with 2 CFR § 200.430, and a requirement that any variance between planned and actual performed effort be identified and salary adjustment made when needed; ongoing monitoring by OSRP to identify and address discrepancies. Arcadia is deploying mandatory training modules for all PIs and grant-funded personnel required to certify their effort by August 31, 2026, reinforcing that effort certifications must reflect actual effort performed and introducing the revised effort certification template.

Audit Recommendation 3: Establish adequate controls to ensure that subrecipient expenditures are allowable, accurate, and supported.

Arcadia concurs. In direct response to this recommendation, Arcadia has strengthened its financial monitoring of subrecipient expenditures through revised procedures now formalized in SOP-OSRP-003, an updated invoice guidance, and enhanced PI orientation training.

Structured Invoice Review and Required Supporting Documentation. As detailed in SOP-OSRP-003, Section 6.2, all subrecipient invoices will now be processed through a structured, sequential review and approval process. Only invoices bearing both the Financial Services (FS) and PI approval are forwarded to Accounts Payable for payment processing. This sequential review ensures that subrecipient expenditures are verified as allowable, accurate, and supported before reimbursement is made, consistent with 2 CFR § 200.403–200.405 and pass-through entity monitoring obligations under 2 CFR § 200.332(e).

Invoice Documentation Guidance for Subrecipients. Arcadia has developed its subrecipient invoice documentation guidance to establish clear and consistent expectations regarding the format and level of supporting documentation required to substantiate invoiced expenditures. The guidance document is provided (Attachment 2).

Enhanced PI Training. Arcadia will enhance its PI orientation to include explicit training on subrecipient monitoring responsibilities, with specific coverage of invoice review procedures, allowable expenditure standards under 2 CFR § 200.403–200.405 and supporting documentation requirements. This training will also ensure that PIs understand that invoice certification is a substantive programmatic responsibility.

Audit Recommendation 4: Develop and implement subrecipient performance reporting policies and procedures as part of subrecipient monitoring.

Arcadia concurs. Arcadia's role as a pass-through entity is to monitor subrecipient performance and compliance. Consistent with this framework, subrecipients are required to retain supporting documentation for reported accomplishments under 2 CFR § 200.334, and such records are subject to access by Arcadia and federal agencies upon request under 2 CFR § 200.337.

In direct response to this recommendation, Arcadia has developed SOP-OSRP-002, which establishes standardized, written procedures governing subrecipient performance reporting, including reporting frequency, required content elements, submission deadlines, OSRP review responsibilities, and follow-up actions for incomplete or inadequate submissions. Central to this framework is Form OSRP-TPR-01, which is now required of all subrecipients at intervals defined in SOP-OSRP-002, independent of assigned risk level. Together, SOP-OSRP-002 and Form OSRP-TPR-01 ensure that programmatic performance data is systematically collected and reviewed across the entire subaward portfolio, consistent with pass-through entity monitoring obligations under 2 CFR § 200.332(e) and access to records provisions under 2 CFR § 200.337.

As further detailed in SOP-OSRP-002, OSRP will conduct supporting documentation reviews for a random sample of subrecipient Technical Progress Reports (TPRs) each fiscal year. Selection shall be documented, and no subrecipient shall go unreviewed for more than two (2) consecutive fiscal years. Selected subrecipients will be notified in writing and required to provide sufficient supporting documentation, as described in Form OSRP-TPR-01, to substantiate reported accomplishments within fifteen (15) business days of notification. OSRP will document the review and any follow-up actions taken, ensuring that reported accomplishments are accurate, complete, and supported by underlying records.

Institutional Training and Sustainability. Arcadia will develop pre-recorded training modules covering all new and revised SOPs and forms referenced in this response, including SOP-OSRP-001, SOP-OSRP-002, SOP-OSRP-003, SOP-OSRP-004, and revised effort certification template. These modules will be made available through the Arcadia University intranet for PIs and other grant-funded personnel. The platform will track module completion at the individual user level. Completion records will be maintained and accessible for compliance review. Training will be fully deployed by August 31, 2026.

Arcadia remains committed to the goals of the OVW Campus Program and to addressing each of the OIG's recommendations. We welcome the opportunity to work with OVW to strengthen our grant management practices as we continue serving Arcadia's campus community through the remaining grant period.

Arcadia does not identify any sensitive information in this response requiring redaction from the publicly released version of the final audit report.

Respectfully submitted,

Nataliia Shablia, OSRP Director

Cc: Erin Lorah, Associate Director, Grants Financial Management Division, Office on Violence Against Women

Ginger Baran Lyons, Deputy Director for Grants Development and Management, Office on Violence Against Women

Kevin Mihalyi, Senior Audit Liaison, Office on Violence Against Women

Enclosures:

1. Attachment 1 (Revised Effort Certification Report Template)
2. Attachment 2 (Invoice Documentation Guidance for Subrecipients)
3. Signed Management Representation Letter
4. SOP_OSRP_001
5. SOP_OSRP_002
6. SOP_OSRP_003
7. SOP_OSRP_004
8. Form_OSRP_PAC_01
9. Form_OSRP_TPR_01

APPENDIX 3: Office on Violence Against Women Response to the Draft Audit Report



U.S. Department of Justice

Office on Violence Against Women

Washington, DC, 20530

April 16, 2026

MEMORANDUM

TO: Thomas Puerzer
Regional Audit Manager
Philadelphia Regional Audit Office

FROM: Kevin Mihalyi *KM*
Senior Audit Liaison
Office on Violence Against Women

SUBJECT: Draft Audit Report – Audit of the Office on Violence
Against Women Grant Awarded to Arcadia University,
Glenside, Pennsylvania

This memorandum is in response to your correspondence dated March 26, 2026, transmitting the above draft audit report for Arcadia University (Arcadia), Glenside, Pennsylvania.

OVW concurs with all four recommendations contained in the draft report. Following issuance of the draft report, Arcadia undertook corrective action to address each recommendation. OVW has reviewed Arcadia's corrective actions and supporting documentation and has determined they are sufficient to fully implement each recommendation. Accordingly, OVW requests that the OIG consider all 4 recommendations closed upon issuance of the final report.

Your office recommends that OVW:

1. Ensures Arcadia maintains and retains documentation to support the accomplishments in progress reports.

Concur: Following issuance of the draft report, Arcadia took corrective action to address this recommendation by implementing procedures designed to ensure that documentation supporting accomplishments reported in progress reports are maintained and retained in an organized and accessible manner. OVW reviewed Arcadia's corrective actions and the documentation provided and determined that the actions taken are sufficient to address the recommendation. Accordingly, OVW requests that the OIG consider this recommendation closed upon issuance of the final report.

MEMORANDUM

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women Grant Awarded to Arcadia University, Glenside Pennsylvania

2. Ensures Arcadia maintains documentation to demonstrate that salaries and wages charged to the grant are based on records that accurately reflect time spent on grant-related activities.

Concur: Following issuance of the draft report, Arcadia took corrective action to address this recommendation by revising its effort certification template to ensure that salaries and wages charged to the grant are based on records that accurately reflect time spent on grant-related activities. OVW reviewed Arcadia's corrective actions and the documentation provided and determined that the actions taken are sufficient to address the recommendation. Accordingly, OVW requests that the OIG consider this recommendation closed upon issuance of the final report.

3. Ensures that Arcadia establishes adequate controls to ensure that subrecipient expenditures are allowable, accurate, and supported.

Concur: Following issuance of the draft report, Arcadia took corrective action to address this recommendation by strengthening its financial monitoring of subrecipient expenditures through revised procedures designed to ensure that subrecipient expenditures are allowable, accurate, and supported. OVW reviewed Arcadia's corrective actions and the documentation provided and determined that the actions taken are sufficient to address the recommendation. Accordingly, OVW requests that the OIG consider this recommendation closed upon issuance of the final report.

4. Ensures that Arcadia develops and implements subrecipient performance reporting policies and procedures as part of subrecipient monitoring.

Concur: Following issuance of the draft report, Arcadia took corrective action to address this recommendation by developing written procedures governing subrecipient performance reporting. OVW reviewed Arcadia's corrective actions and the documentation provided and determined that the actions taken are sufficient to address the recommendation. Accordingly, OVW requests that the OIG consider this recommendation closed upon issuance of the final report.

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

Cc: Joseph M. Krzystofik
Director, Office of Compliance and Review
Justice Management Division

Louise M. Duhamel, Ph.D.

MEMORANDUM

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women Grant
Awarded to Arcadia University, Glenside Pennsylvania

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

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APPENDIX 4: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report

The U.S. Department of Justice Office of the Inspector General (OIG) provided a draft of this audit report to the Office on Violence Against Women (OVW) and Arcadia University (Arcadia). OVW's response is incorporated in Appendix 3 and Arcadia's response is incorporated in Appendix 2. In response to our draft audit report, OVW and Arcadia agreed with our recommendations, and Arcadia provided documentation demonstrating that it has taken corrective actions to address all four of the recommendations. As a result, the status of the audit report is closed.

Recommendations for OVW:

- 1. Ensure Arcadia maintains and retains documentation to support the accomplishments in progress reports.**

Closed. OVW concurred with our recommendation. OVW stated Arcadia took corrective action to address this recommendation by implementing procedures designed to ensure that documentation supporting accomplishments reported in progress reports are maintained and retained in an organized and accessible manner. OVW reviewed Arcadia's corrective actions and the documentation provided and determined that the actions taken were sufficient to address the recommendation. OVW requested that the OIG consider this recommendation closed.

Arcadia concurred with our recommendation. In its response, Arcadia stated it developed two complementary standard operating procedures that together established a comprehensive internal framework for Principal Investigator-level documentation accountability.

We reviewed the documentation and determined that Arcadia's new standard operating procedures are sufficient to address our recommendation. Therefore, this recommendation is closed.

- 2. Ensure Arcadia maintains documentation to demonstrate that salaries and wages charged to the grant are based on records that accurately reflect time spent on grant-related activities.**

Closed. OVW concurred with our recommendation. OVW stated Arcadia took corrective action to address this recommendation by revising its effort certification template. OVW reviewed Arcadia's corrective actions and the documentation provided and determined that the actions taken were sufficient to address the recommendation. OVW requested that the OIG consider this recommendation closed.

Arcadia concurred with our recommendation. In its response, Arcadia stated it revised its effort certification template to ensure that the salaries and wages charged to the grant are supported by records that accurately reflect time spent on the grant-related activities.

We reviewed the documentation and determined that Arcadia's revision to its effort certification template is sufficient to address this recommendation. As a result, this recommendation is closed.

3. Ensure that Arcadia establishes adequate controls to ensure that subrecipient expenditures are allowable, accurate, and supported.

Closed. OVW concurred with our recommendation. OVW stated Arcadia took corrective action to address this recommendation by strengthening its financial monitoring of subrecipient expenditures through revised procedures designed to ensure that subrecipient expenditures are allowable, accurate, and supported. OVW reviewed Arcadia's corrective actions and the documentation provided and determined that the actions taken were sufficient to address the recommendation. OVW requested that the OIG consider this recommendation closed.

Arcadia concurred with our recommendation. In its response, Arcadia stated it strengthened its financial monitoring of subrecipient expenditures through revised procedures, updated invoice guidance, and enhanced Principal Investigator orientation training.

We reviewed the documentation and determined that Arcadia's enhanced procedures, guidance, and training sufficiently address this recommendation. Therefore, this recommendation is closed.

4. Ensure that Arcadia develops and implements subrecipient performance reporting policies and procedures as part of subrecipient monitoring.

Closed. OVW concurred with our recommendation. OVW stated that Arcadia developed written procedures governing subrecipient performance reporting. OVW reviewed Arcadia's corrective actions and the documentation provided and determined that the actions taken were sufficient to address the recommendation. OVW requested that the OIG consider this recommendation closed.

Arcadia concurred with our recommendation. In its response, Arcadia stated it developed standardized written procedures governing subrecipient performance reporting, including reporting frequency, required content elements, submission deadlines, review responsibilities, and follow-up actions for incomplete or inadequate submissions.

We reviewed the documentation and determined that Arcadia's new standardized written procedures sufficiently address our recommendation. Therefore, this recommendation is closed.