



Audit of the Utilization of the
Office on Violence Against Women's
STOP (Services, Training, Officers, and Prosecutors)
Violence Against Women and Sexual Assault Services
Formula Grant Programs



AUDIT DIVISION

26-061

JUNE 2026



Audit of the Utilization of the Office on Violence Against Women's STOP (Services, Training, Officers, and Prosecutors) Violence Against Women and Sexual Assault Services Formula Grant Programs

Introduction

The Department of Justice (DOJ) Office of the Inspector General (OIG) audited select aspects of two Office on Violence Against Women (OVW) formula grant programs: the STOP (Services, Training, Officers, and Prosecutors) Violence Against Women program and the Sexual Assault Services Program (SASP). Together, these programs distribute over \$200 million annually to 56 U.S. states, territories, and the District of Columbia that, in turn, subaward funds to organizations dedicated to combating violence against women. This audit focused on STOP and SASP grant fund utilization over the OVW-established 2-year project period and issues in closing STOP and SASP grants.

In fiscal year (FY) 2025, OVW awarded 541 grants totaling over \$463 million across two program types: (1) discretionary grants, where OVW defines broad program goals, deliverables, and recipient eligibility in accordance with authorizing legislation, and (2) formula grants, including STOP and SASP, which follow distribution guidelines and other requirements set by enacted legislation.

STOP provides funding to local communities to develop and strengthen law enforcement and prosecution strategies to combat violent crimes against women, and to develop and strengthen victim services in cases involving violent crimes against women. SASP provides funding to rape crisis centers and other nonprofit, nongovernmental organizations or tribal programs that provide services, direct intervention, and related assistance to sexual assault victims and their families. Both programs are administered by the State Administering Agencies (SAA) in the state or territory. Additional information about both programs can be found in [Appendix 3](#).

Audit Objectives

The objectives of this audit were to assess: (1) the utilization of STOP and SASP formula grant program funds and (2) OVW efforts to close STOP and SASP formula grants

in a timely manner once the program period has ended. [Appendix 1](#) contains details on our audit scope and methodology.

Results in Brief

We identified \$22,068,208 in STOP and SASP funding in expired grant accounts and an additional \$1,159,509 in unallowable excess drawdowns. Prior to the issuance of this final report, OVW remedied \$15,223,420 of expired grant funds, leaving \$6,844,788 in remaining funds that should be put to better use. Additionally, OVW remedied \$533,786 in excess drawdowns, leaving \$625,723 in remaining questioned costs. Additionally, because OVW's current universe of expired, but not closed, grants is the highest of DOJ's primary grant making agencies by a significant margin, we believe OVW should develop a plan to ensure sustained compliance with federal closeout requirements.

We also found that, while some SAAs spend STOP and SASP funds slower than others, the spending strategies of the nine SAAs we sampled appeared reasonable. We make no funding utilization recommendations as over 95 percent of STOP and SASP funding is ultimately used. However, we identified challenges that can complicate the SAA's ability to administer these grants. Due to significant increases of funding to the STOP and SASP programs in 2023, OVW should monitor fund utilization moving forward.

Recommendations

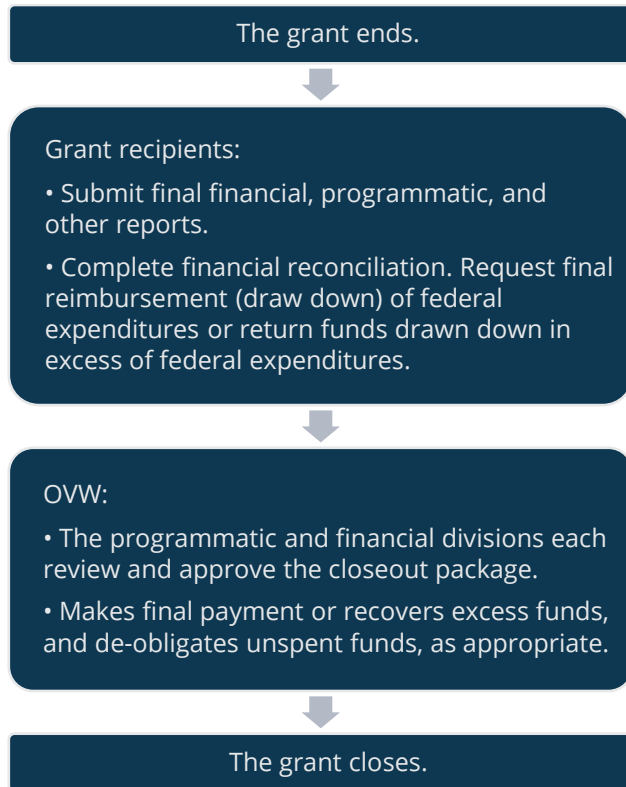
We make three [recommendations](#) to address grant closeout issues. The Schedule of Dollar-Related Findings is in [Appendix 2](#). OVW concurred with our recommendations in response to a draft of this report; the response can be found in [Appendix 4](#). Our analysis of OVW's response and actions needed to close the report can be found in [Appendix 5](#).

Audit Results

OVW Should Work to Remedy over \$23 Million in STOP and SASP Funds on Expired Grants

The grant closeout process, shown in Figure 1, begins when a grant is completed and all federal and matching funds are spent, or when the project period ends. Closing the grants allows for unspent funds to be de-obligated from expired grants and re-obligated to new grants with the original purpose—serving victims of crime against women and sexual assault. Federal regulation, 2 C.F.R. § 200.344, requires SAAs to complete all final administrative actions within 120 calendar days after the grant ends and requires OVW to make every effort to complete all closeout actions within 1 year.

Figure 1
Grant Closeout Process



Source: DOJ Grants Financial Guide and OVW guidance

We evaluated STOP and SASP grants that expired at least 1 year prior to December 31, 2025 (i.e., on or before December 31, 2024), but were not closed. We found significant amounts of funding still obligated to expired grants, as shown in Table 1.

Table 1
Expired STOP and SASP Grants
Not Closed as of December 31, 2025

| | Number of expired grants ^a | Undisbursed balances in expired grant accounts | Excess drawdowns by SAAs ^b |
|--------------|---------------------------------------|--|---------------------------------------|
| STOP | 164 | \$19,447,553 | \$1,093,201 |
| SASP | 59 | \$2,620,655 | \$66,308 |
| TOTAL | 223 | \$22,068,208 | \$1,159,509 |

^a These grants ended between 1 and 9 years before December 31, 2025. Less than a quarter, 51, had zero-dollar balances in the expired grant accounts and no excess drawdowns.

^b These totals are based on the final federal financial reports submitted by the SAAs.

Source: DOJ's Data Management, Reporting, and Analytics (DMRA) system

First, we identified \$22,068,208 in undisbursed balances in expired grant accounts. This included approximately \$8.9 million in funds the recipients reported as spent on their final federal financial reports (FFR) but had not yet drawn down (\$8,533,611 for STOP and \$407,484 for SASP). Because the SAAs did not make their final drawdowns within 120 days after the grants ended, as required, the SAAs can no longer access these funds. OVW will need to conduct its financial reconciliation and, if it determines the FFR is accurate, make payment to the SAA. Any funds it determines are not owed should be de-obligated and returned to the program for the original purpose or used for a rescission. The remaining \$13.1 million was not reported as spent by the recipients but remained obligated on the expired grants. Additionally, we identified \$1,159,509 in drawn down funds that exceeded the final expenditure amounts reported by the SAAs. Between December 31, 2025, and May 15, 2026, OVW closed 139 of the expired grants and remedied \$15,223,420 in expired grant funds and \$533,786 in excess drawdowns. As such, we recommend that OVW review and put to better use, as appropriate, the remaining \$6,844,788 of the \$22,068,208

in undisbursed balances in expired STOP and SASP grant accounts. We also recommend that OVW remedy the remaining \$625,723 of the \$1,159,509 in unallowable costs, which are excess drawdowns due to OVW from the SAAs.

These issues reflect broader closeout-related challenges within OVW, which the OIG has reported before.¹ DOJ reporting shows 771 expired, but not closed, OVW grants and undisbursed balances for expired OVW grants exceeding \$66 million—far higher than DOJ’s two other primary granting agencies, the Office of Justice Programs (OJP) and the Office of Community Oriented Policing Services (COPS Office).² We asked OVW’s staff about the closeout process generally and the STOP and SASP programs specifically. OVW staff acknowledged challenges and highlighted actions taken.³

Continued Closeout Issues at OVW

In March 2018, the OIG issued an audit of the DOJ’s grant award closeout process, including the closeout actions of OVW. We identified similar issues, including closeout delays and over \$14.6 million in funds remaining on expired OVW grants. OVW addressed our major findings by updating policies and procedures and de-obligating unused funds.

This 2026 audit work shows that: (1) closeout issues are more, not less, prevalent almost a decade later; and (2) OVW’s previous corrective actions were not a lasting solution.

OVW-IDENTIFIED CHALLENGES

- OVW must collect delinquent documentation and revised financial reports, if there are discrepancies in the financial reconciliation, and facilitate final payments or the return of excess funds. Obtaining this information can take time (often more than 120 days after the end of the grant), which may be compounded by SAA staff turnover.
- OVW staff face heavy workloads, with closeout being one of many responsibilities for programmatic and financial staff. We found that over 80 percent of expired, but not closed, STOP and SASP grants were pending financial review, likely due in part to the fact that OVW currently has only 2 of its 13 Grants Financial Management Division (GFMD) staff working on closeout issues.
- Open monitoring cases delay the closeout process when unresolved issues persist. However, only 2 percent of expired, but not closed, STOP and SASP grants fell into this category as of December 31, 2025.

OVW ACTIONS TAKEN

- OVW provides SAAs training and technical assistance for closeout, including pre-recorded training, a detailed how-to guide, reminder emails, and several points of contact.
- As of February 2026, OVW was revising the STOP Match Calculation Worksheet, used to verify SAAs’ compliance with the program’s cost-sharing requirements, to eliminate common errors that cause financial reconciliation discrepancies.

¹ DOJ OIG, [Audit of the Department of Justice Grant Award Closeout Process](#), Audit Report 18-18 (March 2018), oig.justice.gov/reports/audit-department-justice-grant-award-closeout-process.

² Agencies with federal grants programs must submit a summary of grants that are expired but not closed. DOJ defines these as grants with a period of performance that have been expired at least 2 years but remain unclosed. For OVW’s FY 2025 reporting of 771 grants and \$66 million as of September 30, 2025, this included OVW grants that ended on or before September 30, 2023. For the same period, OJP reported 88 expired, but not closed, grants and \$7.4 million in undisbursed balances on expired grants while the COPS Office reported 322 grants and \$4 million. U.S. Department of Justice (DOJ) Office of the Inspector General (OIG), [Audit of the U.S. Department of Justice Annual Financial Statements Fiscal Year 2025](#), Audit Report 26-014 (February 2026), oig.justice.gov/reports/audit-us-department-justice-annual-financial-statements-fiscal-year-2025, 141-144.

³ OVW officials cited technical issues in the DOJ’s grants management system as a challenge; however, these issues stem from a system migration in 2020, and OVW acknowledged that they have largely been addressed.

The OIG acknowledges OVW's efforts outlined above but closeout remains a persistent challenge for OVW. Given OVW's significantly larger number of expired, but not closed, grants and higher volume of undispersed balances for expired grants compared to OJP and the COPS Office, we believe additional actions are necessary. Therefore, we recommend OVW develop a sustainable plan to comply with federal closeout requirements. This plan should include regular monitoring of expired grants, address root causes of closeout issues, and ensure long-term adherence to federal closeout requirements.

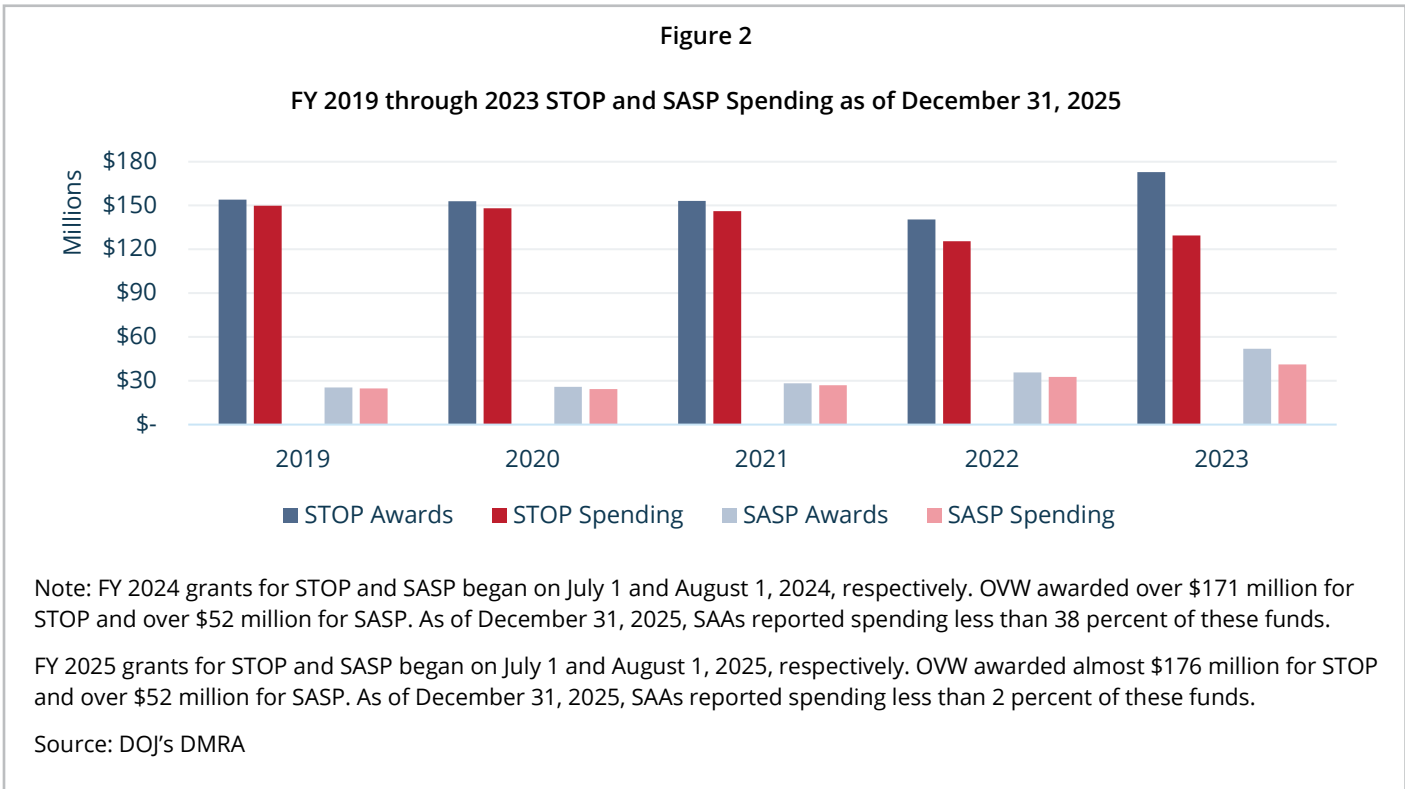
STOP and SASP Utilization

From FYs 2019 through 2023, OVW awarded over \$773 million to states and territories for STOP and over \$167 million for SASP. By December 31, 2025, SAAs reported spending approximately 90 percent of these funds—around \$700 million for STOP and \$150 million for SASP—leaving over \$91 million unspent. Figure 2 summarizes this information by fiscal year. FYs 2024 and 2025 were excluded from our analysis because, at the time

of testing, those grants remained within their original 2-year project period.

We determined that most funding is used, even if it takes far longer than OVW's initial 2-year project period. Delays are primarily due to the time required for SAAs to fulfill their pass-through responsibilities, including issuing grant solicitations, reviewing subrecipient applicants, and issuing subgrants. Approximately 3 percent of STOP funds and 6 percent of SASP funds (approximately \$4.6 million annually) are ultimately returned to OVW, as shown in Table 2 on the next page.

Although the percentage of unused funds is small relative to program totals, OVW should consider factors that may complicate fund utilization, especially given the increases in STOP and SASP funding in 2023 (as shown in Figure 2, STOP rose from approximately \$140 million in 2022 to \$173 million in 2023, and SASP increased from approximately \$36 million to \$52 million). To better understand fund utilization, we reviewed legislation, grant data, and gathered insights from OVW personnel and SAAs in eight states.⁴



⁴ We judgmentally selected a sample of nine SAAs (from eight U.S. states) and interviewed personnel responsible for administering STOP and SASP formula grant programs. In seven of the eight states, the same agency managed both programs, while one state used separate agencies. Therefore, this sample included eight SAAs for each program but totaled nine SAAs overall.

Table 2
FY 2019 through 2023 STOP and SASP
Unspent Funds as of December 31, 2025^a

| | Amount Awarded for Grants that Ended | Unspent Amount for Grants that Ended | Unspent Percentage for Grants that Ended |
|------|--------------------------------------|--------------------------------------|--|
| STOP | \$ 453.7 million | \$ 15.5 million | 3 % |
| SASP | \$ 130.3 million | \$ 7.6 million | 6 % |

^a OVW personnel stated that the COVID-19 pandemic impacted all grant programs, including STOP and SASP. Victim service providers were unable to deliver services or experienced reduced demand, leading subrecipients to return unused funds and states to request extensions to allow for reallocation of funds. The statutory requirement for STOP and SASP grants to be issued annually added to the amount of unused funds.

Source: DOJ's DMRA and OVW officials

We found that statutory requirements for STOP and SASP limit how funds can be allocated and spent. For STOP, specific percentages must be allocated to designated services.⁵ The OVW officials, as well as four out of eight of the STOP SAAs we interviewed, stated that the “court” allocation—as little as 5 percent of the grant—posed the biggest challenge to spend.⁶ SAAs explained that courts lacked interest due to the small amount of funding provided, especially in relation to the administrative

requirements that come with accepting a subgrant. Additionally, eligibility for sexual assault victims differ between STOP and SASP. STOP funds adult and youth (age 11-24) domestic violence and sexual assault victims whereas SASP, with its much smaller funding pool, serves sexual assault victims of all ages. Such specific requirements for allocations and purpose areas presented challenges in program administration.

Although it is too early to determine the long-term impact of the 2023 funding increases, as SAAs typically take over 2 years to complete grant activities, OVW should monitor fund utilization rates and consider adjustments if unused funds rise significantly in the future.

Recommendations

Given the results of our audit, we recommend that OVW:

1. Review and put to better use, as appropriate, the remaining \$6,844,788 of the \$22,068,208 in undisbursed balances in expired STOP and SASP grant accounts.
2. Remedy the remaining \$625,723 of the \$1,159,509 in unallowable costs, which are excess drawdowns due to OVW from the SAAs.
3. Develop a sustainable plan to comply with federal closeout requirements. This plan should include regular monitoring of expired grants, address root causes of closeout issues, and ensure long-term adherence to federal closeout requirements.

⁵ 34 U.S.C. § 10446 states that not less than the following percentages shall be allocated for: law enforcement (25 percent), victim services (30 percent), and state and local courts (5 percent). For additional statutory requirements, see [Appendix 3](#).

⁶ The “courts” allocation must be awarded to a court entity. This includes state, local, tribal, and juvenile courts to provide services as allowable under STOP.

APPENDIX 1: Audit Scope and Methodology

Scope and Methodology

To assess the utilization of STOP (Services, Training, Officers, and Prosecutors) Violence Against Women and Sexual Assault Services Program (SASP) funding from FY 2019 through FY 2025 and STOP and SASP grants that ended a year or more prior to December 31, 2025, but were not closed, we reviewed applicable laws, regulations, and Office on Violence Against Women (OVW) policies and procedures; interviewed relevant OVW officials and nine State Administering Agencies (SAA) from eight states; and analyzed December 31, 2025, Data Management, Reporting, and Analytics (DMRA) data and related grant documentation.

Statement on Compliance with Generally Accepted Government Auditing Standards

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

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of OVW to provide assurance on its internal control structure as a whole. OVW management is responsible for the establishment and maintenance of internal controls in accordance with OMB Circular A-123 and 2 C.F.R. § 200. Because we do not express an opinion on OVW's internal control structure as a whole, we offer this statement solely for the information and use of OVW.⁷

Our review of internal controls covered OVW's policies and procedures for administering and overseeing the STOP and SASP programs. We identified OVW management and staff responsible for the establishment and implementation of the policies and procedures for programmatic and financial management of STOP and SASP grants.

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

Compliance with Laws and Regulations

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

- 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- 28 C.F.R. § 90, Violence Against Women
- 34 U.S.C. §§ 10441, 10446 – 10451, 10454, Grants to combat violent crimes against women
- 34 U.S.C. § 12511, Sexual assault services program

This testing included interviewing OVW and SAA personnel, analyzing data, and assessing internal control procedures.

As noted in the Audit Results section of this report, we found that OVW had a significant number of STOP and SASP grants that were not closed a year or more after the grants ended, despite the 2 C.F.R. § 200 requirement to make every effort to complete all closeout actions no later than 1 year after the end of the grants.

Sample-Based Testing

To accomplish our audit objectives, we performed sample-based testing for a selection of SAAs associated with the utilization of STOP and SASP formula grant program funds. In this effort, we employed a judgmental sampling design to understand and compare the rate of spending, solicitation and awarding of funds to subrecipients, grant

⁷ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

reporting and monitoring, and the management and oversight of grant funds. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected.

Computer-Processed Data

During our audit, we obtained information from DMRA. We did not test the reliability of this system as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

We assessed the reliability of the DMRA data we used by (1) performing electronic testing of required data elements, (2) reviewing existing information about the data and the system that produced it, and (3) interviewing auditee officials knowledgeable about the data. We determined that the data was sufficiently reliable for the purposes of this report.

APPENDIX 2: Schedule of Dollar-Related Findings









| Description | Amount | Page |
|--|---------------------------|------|
| Funds to be Put to Better Use⁸ | | |
| Undisbursed balances in expired STOP and SASP grants | \$22,068,208 | 2-3 |
| Less Remedied Funds ⁹ | (<u>\$15,223,420</u>) | |
| Funds to be Put to Better Use | \$6,844,788 | |
| Questioned Costs¹⁰ | | |
| Unallowable Excess Drawdowns | \$1,159,509 | 2-3 |
| Less Remedied Costs ¹⁰ | (<u>\$533,786</u>) | |
| Questioned Costs | \$625,723 | |
| TOTAL DOLLAR-RELATED FINDINGS | <u>\$7,470,511</u> | |

⁸ **Funds to be Put to Better Use** are future funds that could be used more efficiently if management took actions to implement and complete audit recommendations.

⁹ Between December 31, 2025, and May 15, 2026, OVV remedied a portion of undisbursed balances in expired STOP and SASP grants and unallowable excess drawdowns that we identified during the audit.

¹⁰ **Questioned Costs** are expenditures that do not comply with legal, regulatory, or contractual requirements; are not supported by adequate documentation at the time of the audit; or are unnecessary or unreasonable. Questioned costs may be remedied by offset, waiver, recovery of funds, the provision of supporting documentation, or contract ratification, where appropriate.

APPENDIX 3: About STOP and SASP

| | STOP (Services, Training, Officers, and Prosecutors) Violence Against Women Formula Grant Program | Sexual Assault Services Formula Grant Program (SASP) |
|---|---|--|
|  Purpose | Enhance the capacity of local communities to develop and strengthen effective law enforcement and prosecution strategies to combat violent crimes against women and to develop and strengthen victim services in cases involving crimes against women. (34 U.S.C. §§ 10441, 10446 – 10451, 10454) | Support rape crisis centers and other nonprofit, nongovernmental organizations or tribal programs that provide services, direct intervention, and related assistance to victims of sexual assault and their families. (34 U.S.C. § 12511) |
|  Recipients | 56 designated state offices from states of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the United States Virgin Islands, American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands. | |
|  Award Period | STOP and SASP grants are awarded annually. The fiscal year's grants start on July 1 for STOP and August 1 for SASP. The project periods are 24 months unless the state or territory requests and OVW grants an extension of the period of performance. The states and territories can use funds from more than one grant at the same time, because the project periods overlap. | |
|  Award Process to SAAs | <div style="display: flex; flex-direction: column; align-items: center;"> <div style="display: flex; align-items: center; margin-bottom: 10px;"> <div style="background-color: #1a3d4d; color: white; padding: 10px; border-radius: 10px; text-align: center; width: 150px;">Federal Allocation to States/Territories</div> <div style="margin-left: 10px;">\$600,000 base amount to each state and territory; remaining funds distributed based on population</div> </div> <div style="margin-bottom: 10px;">  </div> <div style="display: flex; align-items: center; margin-bottom: 10px;"> <div style="background-color: #1a3d4d; color: white; padding: 10px; border-radius: 10px; text-align: center; width: 150px;">State/Territorial Administration</div> <div style="margin-left: 10px;">Subgrants awarded to eligible organizations*</div> </div> <div style="margin-bottom: 10px;">  </div> <div style="display: flex; align-items: center;"> <div style="background-color: #1a3d4d; color: white; padding: 10px; border-radius: 10px; text-align: center; width: 100px;">Eligible Subgrantees</div> <div style="margin-left: 10px;">Develop strategies and victim services</div> </div> </div> <p>*Not less than the following percentages shall be allocated for: law enforcement (25 percent), prosecutors (25 percent), victims services (30 percent), and state and local courts (5 percent).</p> <p>Up to 10 percent of the grant funds received by the state or territory may be used for administrative costs.</p> <p>25 percent match (i.e., cost sharing) requirement for subgrantees (with some exclusions/waivers).</p> | <div style="display: flex; flex-direction: column; align-items: center;"> <div style="display: flex; align-items: center; margin-bottom: 10px;"> <div style="background-color: #1a3d4d; color: white; padding: 10px; border-radius: 10px; text-align: center; width: 150px;">Federal Allocation to States/Territories</div> <div style="margin-left: 10px;">Base amount allocated; remaining funds distributed based on population*</div> </div> <div style="margin-bottom: 10px;">  </div> <div style="display: flex; align-items: center; margin-bottom: 10px;"> <div style="background-color: #1a3d4d; color: white; padding: 10px; border-radius: 10px; text-align: center; width: 150px;">State/Territorial Administration</div> <div style="margin-left: 10px;">Subgrants awarded to eligible organizations</div> </div> <div style="margin-bottom: 10px;">  </div> <div style="display: flex; align-items: center;"> <div style="background-color: #1a3d4d; color: white; padding: 10px; border-radius: 10px; text-align: center; width: 100px;">Eligible Subgrantees</div> <div style="margin-left: 10px;">Provide victim services</div> </div> </div> <p>*Base amount is not less than 1.5 percent (states, the District of Columbia, and Puerto Rico) or 0.5 percent (other territories) of the total amount appropriated.</p> <p>Not more than 5 percent of the grant funds received by the state or territory may be used for administrative costs.</p> |

APPENDIX 4: Office on Violence Against Women Response to the Draft Audit Report




U.S. Department of Justice

Office on Violence Against Women
Washington, DC 20530

May 15, 2026

MEMORANDUM

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

FROM: Ginger Baran Lyons 
Deputy Director for Grants Development
and Management (Supervisory Official)
Office on Violence Against Women

SUBJECT: Response to the Office of the Inspector General's Draft Audit Report, *Audit of the Utilization of the Office on Violence Against Women's STOP (Services, Training, Officers, and Prosecutors) Violence Against Women and Sexual Assault Services Formula Grant Programs*

This memorandum provides a response to the Office of the Inspector General's (OIG), draft audit report, *Audit of the Utilization of the Office on Violence Against Women's STOP (Services, Training, Officers, and Prosecutors) Violence Against Women and Sexual Assault Services Formula Grant Programs*. The Office on Violence Against Women (OVW) appreciates the opportunity to review and comment on the draft audit report.

OVW recognizes that the audit identified deficiencies in OVW's closing out of grants under its two largest formula grant programs. Before the audit began, OVW had already started a major effort to reconcile and close grant awards that had been languishing, as well as to enhance our policies and procedures to avoid closeout delays and backlogs in the future. Our approach has involved improving the quality and timeliness of programmatic tasks associated with closeouts and making staffing adjustments to dedicate more attention to closeouts, among other things. These efforts have resulted in measurable progress. OVW closed 677 awards in Fiscal Year 2024 and 691 awards in Fiscal Year 2025. As of the date of this memorandum, OVW has closed 852 awards in FY 2026, despite operational disruptions associated with the government shutdown. We have results to show for our effort (discussed later in the memorandum in response to the OIG's recommendations) and are focused on sustaining these improvements.

Prior to addressing the recommendations, however, it is important to provide context regarding the operational environment in which the identified balances, drawdowns, and closeout delays occurred.

During the audit scope period, DOJ transitioned from a legacy grants management system to JustGrants. As previously reported by OIG, when JustGrants went live in October 2020, users experienced significant technical issues that adversely affected award administration, financial management activities, and oversight functions. OIG further noted that, as of February 2023, DOJ components continued efforts to resolve technical issues and build system functionality.

Although JustGrants functionality has improved over time, the transition created significant operational and technical challenges that affected award administration and closeout processing across DOJ grant-making components, including OVW. These challenges included system workflow issues, financial reconciliation discrepancies, delays associated with migrated award information, unresolved grant award modification actions, and monitoring or reporting holds that prevented awards from progressing through the closeout process. The downstream impacts of these issues continued far beyond the initial launch and contributed to delays in award reconciliation and closeout activities during the audit scope period.

OVW also notes that recipient submission of closeout materials does not necessarily equate to immediate award closeout. Additional financial reconciliation, administrative review, and resolution activities may be required prior to final OVW closeout completion pursuant to 2 C.F.R. § 200.344. For STOP and SASP awards specifically, State Administering Agencies (SAAs) must complete subaward monitoring, reconciliation, and closeout activities before the prime award can be fully closed.

Additionally, portions of the audit period coincided with the operational impacts of the COVID-19 pandemic, which affected recipient and subrecipient staffing, financial administration, and program implementation. These conditions affected the pace at which recipients and subrecipients could fully expend, reconcile, and close awards.

Despite these challenges, OVW has continued to implement process improvements, strengthen internal procedures, coordinate with DOJ components, and enhance oversight practices to support timely reconciliation and closeout of awards.

Finally, as a technical matter, OVW wishes to note that while the draft report says: “In FY 2025, OVW awarded 541 grants totaling over \$463 million,” that was a point-in-time count and not a final total. OVW continues to make awards on a rolling basis under FY 2025 notices of funding opportunity as awards are approved by Department leadership. The draft audit report directed three recommendations to OVW. For ease of review, the recommendations are summarized below and followed by OVW’s response.

1. Review and put to better use, as appropriate, \$22,068,208 in undisbursed balances in expired STOP and SASP grant accounts.

OVW concurs with this recommendation. OVW has continued to prioritize the review, reconciliation, and closeout of expired STOP and SASP awards to ensure funds are appropriately reviewed and put to better use, as applicable.

As of May 15, 2026, OVW has completed closeout activities for 99 STOP awards identified within the audit scope. Of the approximately \$13,449,542 in undisbursed balances identified for those awards, OVW deobligated approximately \$5,843,977 following final reconciliation and closeout activities, while approximately \$7,605,565 was reconciled and paid to recipients for allowable expenditures prior to final closeout.

Similarly, as of May 15, 2026, OVW has completed closeout activities for 40 SASP awards identified within the audit scope. Of the approximately \$1,773,879 in undisbursed balances identified for those awards, OVW deobligated approximately \$1,541,835 following final reconciliation and closeout activities, while approximately \$232,044 was reconciled and paid to recipients for allowable expenditures prior to final closeout.

These reconciliations demonstrate that undisbursed balances identified at the time of award expiration do not necessarily represent funds immediately available for deobligation and reuse. Final financial reconciliation and administrative review activities are necessary to determine allowable expenditures, obligations, and reimbursement amounts owed to recipients prior to completing award closeout and deobligating any remaining balances.

The STOP and SASP statutes govern the authorized use of program funds. Any funds deobligated through the closeout process are returned to the available balance of the applicable program and may be used for future award purposes consistent with statutory requirements.

OVW will continue ongoing closeout and reconciliation efforts to ensure awards are properly administered and any remaining balances are appropriately resolved.

2. Remedy \$1,159,509 in unallowable costs, which are excess drawdowns due to OVW from the SAAs.

OVW concurs with the recommendation regarding the need to address excess drawdowns identified during the closeout process. However, the final determination of whether funds are truly excess or unallowable cannot be made until the full financial reconciliation process is completed for the award.

Recipients draw down funds on a reimbursement basis, and there is often a timing difference between recipient expenditures, recipient drawdowns, and the submission or amendment of the Final Federal Financial Report (FFR). In many cases, recipients may not have completed their final reconciliation or updated their Final FFR at the time the closeout package initially enters the review workflow.

In addition, once a closeout package is initiated, it must proceed through multiple levels of programmatic and financial review before reaching OVW's Grants Financial Management Division (GFMD) for final financial reconciliation. During this process,

remaining funds are frozen in Automated Standard Application for Payments (ASAP) pending reconciliation. Until the award reaches GFMD and reconciliation is completed, OVW cannot determine whether additional funds are owed to the recipient, whether a Final FFR amendment is necessary, or whether funds must ultimately be returned to OVW.

As part of this process, OVW works directly with recipients to reconcile expenditures, drawdowns, and reporting discrepancies prior to making a final determination regarding unobligated balances or questioned drawdowns. This process is necessary to ensure that determinations are accurate and based on final reconciled financial information rather than preliminary reporting data.

As of May 15, 2026, OVW has completed closeout activities for 99 STOP awards identified within the audit scope, which resulted in the resolution of \$937,352 identified in potential excess drawdowns by SAAs.

As of May 15, 2026, OVW has completed closeout activities for 40 SASP awards identified within the audit scope, which resulted in the resolution of \$770 identified in potential excess drawdowns by SAAs.

3. Develop a sustainable plan to comply with federal closeout requirements. This plan should include regular monitoring of expired grants, address root causes of closeout issues, and ensure long-term adherence to federal closeout requirements.

OVW concurs with the recommendation to develop a sustainable plan to comply with federal closeout requirements.

In March 2018, the OIG issued an audit related to DOJ grant closeout activities, including OVW's closeout processes. Since that time, OVW has continued efforts to strengthen closeout procedures through updated policies, enhanced recipient guidance, training and technical assistance, and the de-obligation of unused funds. However, several operational and systemic factors contributed to continued closeout challenges during the audit period reviewed.

OVW's closeout backlog was significantly affected by the transition from GMS (the legacy system) to the JustGrants system in FY 2020. Following migration to JustGrants, OVW processed closeouts within the new system environment; however, during the first several years of implementation, there were numerous system deficiencies and glitches that delayed closeout processing. Only 157 closeouts were migrated from GMS to JustGrants, limiting the number of awards already in the closeout process at the time of transition. Notes and budgets that should have been migrated from GMS were missing, unresolved GAM statuses required developer intervention, financial reconciliation errors were pervasive, monitoring holds remained on expired awards, there was absolutely no functional performance reporting feature for OVW grants, and workflow looping issues encumbered the closeout process. These problems created a significant backlog of

expired awards and stymied OVW's ability to reconcile and close awards in a timely manner.

OVW also contended with increased closeout volume, delays in obtaining required recipient documentation, and reconciliation timing issues that extended the time necessary to complete financial and administrative closeout activities. In many cases, final financial reconciliation could not be done until recipients updated final FFRs, resolved outstanding balances, or completed required supporting documentation. Additionally, updates to federal closeout requirements reduced the timeframe for agencies to complete closeouts, increasing the importance of timely reconciliation, proactive monitoring, and recipient responsiveness. These factors collectively contributed to closeout delays during the audited timeframe.

OVW acknowledges the OIG's concern that previous corrective actions did not fully resolve long-term closeout challenges and recognizes the need for continued process improvements and sustained oversight. To address ongoing closeout delays and ensure long-term compliance with federal closeout requirements, OVW will implement a sustainable closeout plan focused on proactive monitoring, process improvements, staff training, and system coordination.

To sustainably address these challenges, OVW has implemented and will continue strengthening the following actions:

- Regular monitoring of expired and expiring awards through standardized tracking and management oversight to identify awards at risk of delayed closeout.
- Continued coordination with JustGrants support teams to address recurring technical issues impacting closeout processing.
- Updated standard operating procedures, internal guidance, and escalation procedures to improve consistency and timeliness of closeout reviews.
- Ongoing staff training and updated review tools, including revised match calculation worksheets and closeout review resources, to improve efficiency and consistency.
- Enhanced financial reconciliation reviews to ensure expenditures, drawdowns, deobligations, and final FFRs are properly reconciled prior to closeout completion. OVW recognizes that recipients operate on a reimbursement basis and final reconciliation activities may take additional time before final determinations can be made.
- Improved coordination across financial, programmatic, monitoring, and system support teams to identify and resolve issues earlier in the award lifecycle.

OVW currently provides recipients training and technical assistance related to closeout requirements, including prerecorded training materials, detailed closeout guidance, reminder communications, and multiple points of contact for recipient support. OVW will continue assessing closeout, monitoring aging awards, and implementing process improvements to reduce backlog risks and support long-term adherence to federal closeout requirements.

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

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

The OIG provided a draft of this audit report to the Office on Violence Against Women (OVW). OVW's response is incorporated in Appendix 4 of this final report. In response to our audit report, OVW concurred with our recommendations and discussed the actions it will implement in response to our findings. As a result, the status of the audit report is resolved. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendations for OVW:

- 1. Review and put to better use, as appropriate, the remaining \$6,844,788 of the \$22,068,208 in undisbursed balances in expired STOP and SASP grant accounts.**

Resolved. OVW concurred with our recommendation. OVW stated in its response that as of May 15, 2026, OVW completed closeout activities for a total of 139 STOP and SASP awards and \$15,223,421 in undisbursed balances were de-obligated or paid to recipients, as appropriate. We verified these totals using the DOJ's Data Management, Reporting, and Analytics (DMRA) system. OVW stated it will continue efforts to reconcile and close awards to ensure the remaining awards are properly administered and any remaining balances are appropriately resolved. As a result, this recommendation is resolved.

This recommendation can be closed when we receive evidence that OVW has reviewed and put to better use, as appropriate, the remaining \$6,844,788 of the \$22,068,208 in undisbursed balances in expired STOP and SASP grant accounts.

- 2. Remedy the remaining \$625,723 of the \$1,159,509 in unallowable costs, which are excess drawdowns due to OVW from the SAAs.**

Resolved. OVW concurred with our recommendation. OVW stated in its response that a multi-step financial reconciliation is required to determine whether funds must be returned to OVW. We understand that the amounts may be adjusted based on the results of the financial reconciliation and we encourage OVW to complete the reconciliations to make this determination. In its response, OVW stated that as of May 15, 2026, it had completed closeout activities for a total of 139 STOP and SASP awards and resolved \$938,122 in potential excess drawdowns. As a result, this recommendation is resolved.

However, of the \$1,159,509 in unallowable costs, we only identified \$533,786 as remedied. OVW's remedied amount is higher than the OIG's remedied amount due to revisions in financial reporting made during the normal course of OVW's financial reconciliation process. As of May 15, 2026, DOJ's DMRA still shows \$625,723 in drawn down funds that exceeded the final expenditure amounts reported by the SAAs on 84 expired but not closed STOP and SASP awards.

This recommendation can be closed when we receive evidence that OWW has remedied the remaining \$625,723 of the \$1,159,509 in unallowable costs, which are excess drawdowns due to OWW from the SAAs.

- 3. Develop a sustainable plan to comply with federal closeout requirements. This plan should include regular monitoring of expired grants, address root causes of closeout issues, and ensure long-term adherence to federal closeout requirements.**

Resolved. OWW concurred with our recommendation. OWW stated in its response that there are several operational and systemic factors that contributed to continued closeout challenges, including process deficiencies caused by a system migration, increased closeout volume, delays in obtaining recipient documentation, and reduced timeframes to complete closeout. In its response, OWW acknowledged that previous corrective actions did not fully resolve its closeout challenges and identified several actions it intends to take and activities it will continue to strengthen to address these challenges, including regular monitoring, addressing technical issues, updating procedures, training, enhancing financial reconciliation reviews, and improving coordination among staff. As a result, this recommendation is resolved.

This recommendation can be closed when we receive evidence that OWW developed a sustainable plan to comply with federal closeout requirements.