



Audit of the Office of Justice Programs
Victim Assistance Funds Subawarded
by the Nevada Division of Child and Family
Services to Community Chest, Inc.,
Virginia City, Nevada



AUDIT DIVISION

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EXECUTIVE SUMMARY

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Background

The U.S. Department of Justice (DOJ), Office of Justice Programs (OJP) provided funds to the Nevada Division of Child and Family Services (Nevada DCFS) to make subawards to support victim assistance programs in the state of Nevada. The Nevada DCFS awarded \$515,155 in crime victim assistance funds to Community Chest, Inc. (CCI) under two subawards in 2022 and 2023. The goal of the CCI's subawards were to provide 300 new and unduplicated victims of crime access to mental health and other resources. As of February 2024, the Nevada DCFS had reimbursed the CCI for a cumulative amount of \$379,925 for the subawards we reviewed.

Audit Objective

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

Recommendations

Our report contains five recommendations for OJP to assist the Nevada DCFS and the CCI in improving their award management and administration. We requested a response to our draft audit report from the CCI, the Nevada DCFS, and OJP officials. The responses can be found in Appendices 3, 4 and 5, respectively. Our analysis of those responses can be found in Appendix 6.

Summary of Audit Results

We concluded that the CCI provided services to victims of crime in Nevada. However, we found that the CCI could improve certain areas of its subaward programmatic and financial management.

Program Performance

The audit concluded that the CCI provided reasonable assurance that it provided services to victims. However, due to a lack of controls over its victim files, the CCI could not provide support for its reported FY 2023 subaward performance metrics, and the FY 2024 metrics were inaccurate. We also found that the Nevada DCFS provided incorrect quarterly performance reporting instructions to its subrecipients and contributed to the CCI's inaccurate report of victims served. The CCI's goal of serving 300 victims was based on its historical performance, which was calculated based on flawed methodology from Nevada DCFS. Our analysis showed that the CCI may not be on track to reach its goal of serving 300 new and unduplicated victims in FY 2024. Thus, the CCI should re-evaluate its goal for future subawards.

Financial Management

The audit concluded that the CCI's financial management and internal controls were insufficient to ensure compliance with the DOJ Grants Financial Guide and federal award requirements. Specifically, we identified issues with segregation of duties, maintaining adequate supporting documentation for expenditures charged to its VOCA subawards, ensuring appropriate approval of expenditures, and proper allocation of expenditures. In total, we questioned \$9,448 in unsupported costs.

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Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of victim assistance funds received by Community Chest, Inc. (CCI), located in Virginia City, Nevada. The Office of Justice Programs (OJP) Office for Victims of Crime (OVC) provided this funding to the Nevada Division of Child and Family Services (Nevada DCFS), which serves as the state administering agency (SAA) for Nevada and makes subawards to direct service providers. As a direct service provider, the CCI received two subawards from the Nevada DCFS totaling \$515,155 between July 2022 and July 2023.¹ These funds originated from the Nevada DCFS' fiscal year (FY) 2020 and 2021 federal grants, as shown in Table 1.

Table 1

Audited Subawards to the CCI from the Nevada DCFS

Nevada DCFS Subaward Identifier	OJP Prime Award Numbers	Project Start Date	Project End Date	Subaward Amount
16575-20-107	2020-V2-GX-0049	07/01/2022	07/31/2023	\$269,711
16575-21-007	15POVC-21-GG-00589-ASSI	07/01/2023	07/31/2024	\$245,444
Total:				\$515,155

Source: Nevada DCFS

Established by the Victims of Crime Act (VOCA) of 1984, the Crime Victims Fund (CVF) is used to support crime victims through DOJ programs and state and local victim assistance and compensation initiatives.² According to OJP's program guidelines, victim assistance services eligible to receive VOCA support must: (1) respond to the emotional and physical needs of crime victims, (2) assist victims of crime to stabilize their lives after a victimization, (3) assist victims to understand and participate in the criminal justice system, and (4) provide victims of crime with a measure of safety and security. Direct service providers receiving VOCA victim assistance subawards thus may provide a variety of support to victims of crime, to include offering help filing restraining orders, counseling in crises arising from the occurrence of crime, crisis intervention, and emergency shelter.

Community Chest, Inc.

The CCI is a non-profit organization serving children and families in northwestern Nevada. The CCI was founded in 1991 and serves the areas of Storey, Lyon, and Mineral counties with various support programs. According to the CCI, its mission is to act as a catalyst for change and a center for resources to help people help themselves, as together they build healthy families and communities. The CCI has been a subrecipient

¹ The CCI's fiscal year spans from July 1 through June 30.

² The VOCA Victim Assistance Formula Grant Program is funded under 34 U.S.C. § 20101. Federal criminal fees, penalties, forfeited bail bonds, gifts, donations, and special assessments support the CVF. The total amount of funds that the OVC may distribute each year depends upon the amount of CVF deposits made during the preceding years and limits set by Congress.

of VOCA grants since at least 2020. The CCI provides a range of services to include counseling, advocacy, youth enrichment programs, and employment assistance to victims of crime.

OIG Audit Approach

The objective of this audit was to review how the CCI used the VOCA funds received through two subawards from the Nevada DCFS to assist crime victims and assess whether the CCI accounted for VOCA funds in compliance with select award requirements, terms, and conditions. To accomplish this objective, we assessed program performance and accomplishments, and financial management.

To gain a further understanding of victim assistance subaward oversight, as well as to evaluate subrecipient performance and administration of VOCA-funded programs, we solicited feedback from Nevada DCFS officials regarding the CCI's records of delivering crime victim services, accomplishments, and compliance with Nevada DCFS award requirements.³

We tested compliance with what we considered to be the most important conditions of the subawards. The DOJ Grants Financial Guide; VOCA Guidelines and Final Rule; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Nevada DCFS guidance; and the OVC and SAA award documents contain the primary criteria we applied during this audit.

The results of our analysis are discussed in detail in the following sections of this report. Appendix 1 contains additional information on this audit's objective, scope, and methodology. Appendix 2 presents the audit's Schedule of Dollar-Related Findings.

³ As an SAA, Nevada DCFS is responsible for ensuring that the CCI's subawards are used for authorized purposes, in compliance with federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. As such, we considered the results of our audit of victim assistance grants awarded to the Nevada Department of Health and Human Services, the parent organization of the Nevada DCFS, in performing this separate review. See U.S. Department of Justice Office of the Inspector General, [*Audit of the Office Justice Programs Office for Victims of Crime Victim Assistance Grants Awarded to the Nevada Department of Health and Human Services, Carson City, Nevada*](#), Audit Report GR-90-18-002 (March 2018), oig.justice.gov/reports/audit-office-justice-programs-office-victims-crime-victim-assistance-grants-awarded-nevada.

Audit Results

Program Performance and Accomplishments

As established by the VOCA legislation, VOCA subawards are available to subrecipients for the purpose of providing direct services to victims. The CCI received its VOCA funding from the Nevada DCFS to provide accessible support services to rural victims of crime. We obtained an understanding of the CCI's standard operating procedures in relation to the subaward-funded services. We also compared the subaward solicitations and agreements against available evidence of accomplishments to determine whether the CCI demonstrated adequate progress towards providing the services for which it was funded. We concluded that the CCI could not support the achievement of its stated goals and objectives.

Program Implementation

According to the DOJ Grants Financial Guide, recipients of federal awards should maintain a well-designed and tested system of internal controls. The DOJ Grants Financial Guide further defines internal controls as a process designed to provide reasonable assurance regarding the achievement of objectives in: (1) the effectiveness and efficiency of operations, (2) reliability of reporting for internal and external use, and (3) compliance with applicable laws and regulations.

To obtain an understanding of its standard operating procedures in relation to audited victim services, we conducted interviews with the CCI's senior officials, including the Chief Executive Officer (CEO), Chief Financial Officer (CFO), and Clinical Director. The CEO and Clinical Director informed us that the CCI does not have written policies and procedures that govern the VOCA-funded program. Based on our discussions, CCI staff stated that the CCI is a small organization, and they rely on frequent communication between service providers and one-on-one training to perform their work. We believe that to promote effective and efficient operations, reliable reporting, and compliance with federal grant requirements, the CCI must have written policies outlining standard operating procedures for officials and staff. We believe the absence of written policies and procedures contributed to the deficiencies discussed in this report. Therefore, we recommend that OJP work with the Nevada DCFS to ensure that the CCI develop, implement, and disseminate written policies and procedures specific to the VOCA-funded program administration.⁴

Program Services

According to the goals of the FYs 2023 and 2024 subawards, the CCI was to provide accessible services to 300 new and unduplicated rural victims of crime by providing emotional support and safety services in the form of evidence-based and trauma-informed counseling interventions, information and referrals, personal advocacy, shelter/housing supportive services, case management services, and criminal justice system assistance. We have reasonable assurance that the CCI is providing these services to its community based on our visits to CCI's offices, interviews with service providers, and reviews of CCI's victim logs. However, we were unable to determine whether the CCI was on track to meeting its goals because it could not provide

⁴ In the [Conclusion and Recommendation](#) section of this report, we make one recommendation that consolidates the individual policy-related issues identified in the different sections of the report.

support for its reported FY 2023 subaward performance metrics, and the FY 2024 subaward performance metrics are inaccurate.

The CCI Needs to Improve Its Management of Victim Records

The OVC Performance Measurement Tool (PMT) User Guide explains that subrecipients are responsible for maintaining documentation of individuals served and services provided to support data reported in the PMT. Additionally, the subaward special condition states that subrecipients must retain and provide access to performance measurement information, in addition to the financial records, supporting documents, statistical records, and other pertinent records indicated at 2 C.F.R. § 200.334, for a period of typically up to 3 years. The CCI could not support the accuracy of its reported programmatic achievements for its FYs 2023 and 2024 subawards. The CCI utilizes monthly spreadsheets to document its list of victims served and to assign victims to various funding sources, such as VOCA, state grants, Medicare, or other federal grants. The CCI maintains these spreadsheets on a shared drive and uses these spreadsheets to complete the Nevada DCFS Quarterly Performance Workbooks that are provided to Nevada DCFS. Nevada DCFS uses the information from the reports to complete PMT. We found that the spreadsheets provided to us did not reconcile with the files on the shared drive and did not match the numbers submitted to Nevada DCFS for quarterly reporting. The CCI staff explained that the files are not locked at the end of each month and may have been altered after the month's end. Additionally, CCI's Clinical Director stated that the spreadsheet for October 2022 had inadvertently been lost, and thus, the CCI could not provide complete support of meeting its goal of 300 new and unduplicated victims served in FY 2023.

For its FY 2024 subaward, a CCI staff member provided us its monthly victim spreadsheets covering the first and second quarters, July 2023 through December 2023. We reviewed these spreadsheets and attempted to reconcile them to the quarterly performance reports that the CCI provided to the Nevada DCFS. The numbers on the spreadsheets provided to the audit team did not match the numbers submitted on the CCI's quarterly performance reports. We found that the CCI's monthly victim spreadsheets contained duplicate entries, had inaccurate information, and misclassified existing victims as new. The CCI staff members stated that they rely on weekly staff meetings and service provider communication to ensure the accuracy of the monthly victim spreadsheets. A CCI staff member responsible for completing the Nevada DCFS quarterly performance reports stated that she relies on the numbers from the monthly victim spreadsheets to complete the quarterly performance reports for the Nevada DCFS, and that she provides the reports to the Clinical Director for review. However, we were not provided supporting evidence that the Clinical Director had reviewed the quarterly performance reports for accuracy. We believe that the CCI's review process for the monthly victim spreadsheets and the quarterly reports is inadequate as it failed to identify inaccuracies in the quarterly performance reports. As discussed, service providers relied on their knowledge or memory from staff meetings, and do not query victim spreadsheets from prior months to determine if a victim is new or a recurring victim. Also, we found that the practice of keeping separate monthly spreadsheets, as opposed to one master spreadsheet, does not allow for the proper validation of victim entries and contributed to duplicate new victims and incorrect victim names.

Due to the errors on the monthly victim spreadsheets, we tried to validate the CCI's reported number of victims served by comparing the figures to data from the CCI's electronic health record (EHR) database. We determined that this database was not sufficient for supporting the monthly victim spreadsheets because we observed the CCI's Clinical Director change records within the EHR database to match the monthly victim spreadsheets and the Clinical Director could not retrieve 2 victim files within our sample of 25 victim files. As a result of the CCI's lack of controls over its victim files, it could not support its reported number of

victims served. As discussed, CCI does not have written policies and procedures that govern the VOCA-funded program, which it should develop and include programmatic reporting guidelines and controls. Thus, we recommend that OJP work with the Nevada DCFS to ensure that the CCI develop, implement, and disseminate written policies and procedures specific to ensuring the integrity and accuracy of its victim records and ensuring its performance reports are accurate.

The Nevada DCFS Needs to Modify the Instructions Provided to Its Subrecipients

We determined that the Nevada DCFS' instructions are incorrect and have misled the CCI staff to respond inaccurately to the OVC's questions for the PMT. The Nevada DCFS provides Quarterly Reporting Workbooks to its subrecipients, with detailed instructions for subrecipients to provide their quarterly programmatic performance data. Using the completed workbooks, the Nevada DCFS enters the provided performance data into PMT. The Nevada DCFS instructs its subrecipients to report all victims as new in their second reporting period, which is October through December. This is not congruent with the OVC PMT User Guide that instructs users to count all individuals as new in the subaward's first reporting period, as seen in Figure 1. For the CCI, this period would be July through September.

Figure 1

Victim Assistance Performance Measurement Tool Population Demographics

Question 3 – Report the number of **NEW individuals served with VOCA plus match funds for the first time during the reporting period**. This number should be an unduplicated count of identified NEW clients served during a single reporting period, regardless of the number of services they received or victimization types with which they presented.

For the first reporting period of your subaward, ALL individuals should be counted as new.

Source: OVC

Further, the OVC PMT User Guide also states that the reported number of new victims should be unduplicated victims served during a single reporting period, regardless of the number of services they received or victimization types with which they presented. By the Nevada DCFS instructing its subrecipients to count all victims as new in the second quarter, victims previously counted as new in the first quarter are duplicated in the second quarter, resulting in an inflated number of victims. Finally, the Nevada DCFS' instruction "For Quarter 2 ALL clients in this quarter are NEW" is unclear and may mislead subrecipients to count every VOCA victim seen in October, November, and December as new, as we have encountered at the CCI, rather than counting them as new only once within the quarter. For example, if a victim received services in October, November, and December, CCI incorrectly counted the victim as a new victim on three separate occasions in the second quarter. This causes the CCI's reported second quarter numbers to be consistently over-inflated. Table 2 shows the drastic increase in the second quarter. Therefore, we recommend that OJP ensure that the Nevada DCFS instructions provided to subrecipients for quarterly performance reporting complies with the OVC guidance. Also, we recommend that OJP work with the Nevada DCFS to ensure that the CCI revise its quarterly performance reports for its FY 2024 subaward in compliance with the OVC guidance.

Table 2

The CCI's Reported Victims Served on Its FYs 2023 and 2024 Quarterly Performance Reports

	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total Victims
FY 2023	19	257	66	17	359
FY 2024	12	185	N/A	N/A	--

Source: CCI

Based on the errors, duplicate entries, and inconsistencies, we have determined that the CCI's previously reported programmatic data were inflated and are not a true depiction of the number of victims served. The CCI's CEO explained that the CCI's target to serve 300 new and unduplicated victims was based on historical data. However, as shown in Table 3, the CCI has not demonstrated reasonable assurance that it is on track to achieve its goal, and it appears that the CCI's actual unduplicated number of victims is significantly less than its current goal of 300 new and unduplicated victims.

Table 3

The CCI's FY 2024 Reported versus OIG Validated Victims Served

	Quarter 1	Quarter 2	Mid-subaward Period Totals
CCI Reported Victims Served	12	185	197
OIG Validated New and Unduplicated Victims Served	11	49	60

Note: FY 2023 figures could not be evaluated because the CCI had lost the file for October 2022.

Source: CCI and OIG

The CCI's goal of serving 300 new and unduplicated victims was based on a flawed methodology of counting all victims as new in the second quarter, resulting in an inflated count of the annual number of victims served. Based on our analysis of CCI's victim spreadsheets, we determined that the CCI's count of new and unduplicated victims served for the second quarter of FY 2024 was 49 victims instead of the reported 185 victims, which represents a significant difference. Therefore, we recommend that OJP work with the Nevada DCFS to ensure that the CCI re-evaluate its stated goal of serving 300 new and unduplicated victims to ensure the goal is attainable for future VOCA subaward applications.

The Nevada DCFS Needs to Improve Its Oversight of Its Subrecipients' Reported Programmatic Performance

The OIG's March 2018 audit report on the SAA found that Nevada needed to establish a process to verify that all quarterly performance reports are filed timely with accurate and supportable statistical information, and that the SAA needed to overcome resource challenges to ensure adequate monitoring of subrecipients through desk reviews and site visits. As a result of the review, Nevada DCFS updated policies and procedures indicating all subrecipients must have an on-site review every three years regardless of risk; however, higher levels of risk would subject subrecipients to more frequent communication and increased desk and on-site review frequency. The last review the Nevada DCFS conducted on the CCI was in 2021. The review did not mention any errors or concerns with performance reporting and the Nevada DCFS currently rated CCI as low risk with regards to its program goals. We believe a closer review of the CCI's quarterly performance reports should have raised concerns with the accuracy of the CCI's reported numbers.

The OVC PMT User Guide states that grantees are responsible for collecting all data required in the PMT and ensuring its accuracy, as well as communicate with subrecipients about reporting, monitoring subrecipient reporting, and reviewing subrecipient data before approving it in the PMT. Additionally, the Nevada DCFS' Grants Management Unit Policies and Procedures states that the Nevada DCFS will ensure subrecipient performance measurement data is inclusive of accurate information that will determine whether the subrecipient has achieved its goals and objectives, and the Nevada DCFS will provide training and technical assistance to assist subrecipients in accurate data collection and reporting. Due to the Nevada's DCFS' inaccurate instructions and lack of scrutiny over the CCI's quarterly performance reports, the CCI was unaware that its reported victims served were inaccurate. Thus, we recommend that OJP ensures that the Nevada DCFS incorporates controls to verify the accuracy of its subrecipients' quarterly performance reports.

Financial Management

According to the DOJ Grants Financial Guide, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records to accurately account for awarded funds. We conducted interviews with the CFO, the Finance Assistant, and the Clinical Director; examined policies and procedures; reviewed subaward documents; and performed expenditure testing to determine whether the CCI adequately accounted for the subaward funds we audited. Overall, we concluded that the CCI's financial management and internal controls could be improved with updated and enhanced written policies and procedures.

Fiscal Policies and Procedures

The CCI has written fiscal policies and procedures and the CCI created a classification code in its financial information system for each of its funding sources, which enables it to track all financial activity to the individual funding sources, including subawards. However, we found instances where the CCI's fiscal policies and procedures were insufficient to ensure compliance with the DOJ Grants Financial Guide and federal award requirements. For example, we found that the CCI did not obtain and maintain adequate supporting documentation for its expenses, as discussed in the *Transactions with Insufficient Documentation* section below. By addressing our recommendations in the following sections, the CCI will improve and better ensure its compliance with the DOJ Grants Financial Guide and federal award requirements.

Subaward Expenditures

The CCI requested reimbursement from the Nevada DCFS through a monthly request for reimbursement. For the subawards audited, the CCI's approved budget categories included personnel, travel and training, operating, other (which included funds for direct assistance to victims), and indirect costs. As of February 2024, we found that the Nevada DCFS paid a total of \$379,925 to the CCI through its FYs 2023 and 2024 VOCA subawards for costs incurred in these areas. Also, the CCI received a match waiver from the Nevada DCFS for its FYs 2023 and 2024 subawards.⁵

We reviewed a sample of the CCI's transactions to determine whether the costs charged to the subawards and paid with VOCA funds were accurate, allowable, supported, and in accordance with the VOCA program requirements. We judgmentally selected 22 transactions from the CCI's VOCA-funded expenses from July 2022 through December 2023. The transactions we reviewed included costs from the budget categories travel and training, operating, other, and indirect, totaling \$14,231. In addition, we reviewed all VOCA-funded personnel costs in July 2022 through October 2023, totaling \$242,714, to assess personnel time and associated benefits charged to the awards.

We did not identify any issues related to personnel and indirect costs. However, we found issues in our transaction testing and questioned a net amount of \$9,448 as unsupported. Unless noted below, the transactions tested were allowable and adequately supported.

Transactions with Improper Authorization

We determined that in 7 of the 22 sampled transactions, the CCI staff member requesting the expense on the check request form was also the approver of the check request form. According to the CCI's Fiscal Policies and Procedures, requests for disbursement require that a check request form be approved by the program manager prior to submission to the Director of Finance. However, the CCI's Fiscal Policies and Procedures did not address the scenario of when the requester and the designated approver are the same person, to ensure adequate separation of duties. Although the individual in each of these transactions was the Clinical Director, and therefore would know the allowable expenses on the subaward, the lack of an independent reviewer bypasses the intent of approval of the transactions. The CCI's policies are lacking controls to ensure there is a proper segregation of duties and do not consider such scenarios where an individual completing a check request is also the individual designated to approve the request.

Further, our sample included a \$4,187 expense for its EHR database. However, we found this transaction was not properly authorized. Based on the instructions on the check request form, all charges over \$1,000 need a verbal approval from the CEO or Chief Operating Officer (COO) prior to purchase and must be signed by the CEO or COO. However, not only was this transaction not signed by either the CEO or COO, but this transaction was also a transaction where the requester also signed as the approver. In following up with the CCI, the CFO stated that this was an oversight, and that the CEO did provide a verbal approval and was

⁵ The VOCA Fix to sustain the Crime Victims Fund Act of 2021 (VOCA Fix) (Public Law No: 117-27), which amended the Victims of Crime Act (VOCA) of 1984 requires the Nevada DCFS to issue a mandatory match waiver in its entirety on Victims of Crime Act assistance funds during a national emergency, which encompasses the COVID pandemic. Based on award documentation, the Nevada DCFS waived match for the CCI for the audited subawards. Therefore, we did not perform testing in this area except for verifying that the Nevada DCFS informed the CCI that it did not have matching costs for the audited subawards.

aware of this annual expense as the CCI has been using this database for the past 6 years. This is an instance where the CCI's existing fiscal policies and procedures were inadequate to ensure proper segregation of duties. As such, we recommend that OJP work with the Nevada DCFS to ensure that the CCI develop, implement, and disseminate written policies and procedures to ensure adequate controls over transactions being approved by designated approvers and segregation of duties are implemented, including in cases where the designated approver is also the requester.

Transactions with Improper Cost Allocation

In addition to not being properly authorized, the CCI failed to proportionally allocate the cost of its EHR database between VOCA and other funding sources supporting mental health and advocacy services. Therefore, we question the total amount of \$7,581 in the EHR database expense allocation from July 1, 2022, through December 19, 2023, as unsupported. While the CCI was approved \$2,000 in each of its VOCA subawards for the EHR database, we verified with the CFO and the Clinical Director that use of this database was not only limited to VOCA eligible victims, but included victims supported by other funding sources as well. According to 2 C.F.R. § 200.405, incorporated into the DOJ Grants Financial Guide and reaffirmed in the Nevada DHHS Grant Instruction and Requirements, if a cost benefits two or more projects or activities, the cost must be allocated to the projects based on the proportional benefit or any reasonable documented basis. The CCI uses the EHR database to manage its entire mental health and advocacy services, which is funded by VOCA and other grant programs. Thus, CCI should allocate this expense according to the proportional benefits obtained by each grant. We confirmed that, more often than not, the CCI charged the cost of the database completely to VOCA. In following up with the CCI, the CFO stated this was a missed opportunity to allocate the cost, and that not all grants have room for this expense. However, this does not comply with 2 C.F.R. § 200.405. Therefore, we recommend that OJP work with the Nevada DCFS to ensure that the CCI develop, implement, and disseminate written policies and procedures specific to allocating costs in proportion to the benefits obtained, or another reasonable basis.

Transactions with Insufficient Documentation

As stated earlier, the CCI's Fiscal Policies and Procedures state that staff requesting general disbursement must complete a check request form. However, we identified 3 of the 22 sampled transactions, totaling \$697, did not have the required form. The CFO explained that the prior Business Manager had waived this requirement and relied on the approval mechanism built into the credit card application and expense management solution. The CFO found that this shortened process did not require staff to provide adequate supporting documentation and did not include documented review and approval of the transaction. Since then, the CFO has reinstated the check request form procedures after taking the position. As a result, we do not make any recommendations specific to this issue.

We also identified three additional transactions totaling \$1,169 that did not have complete supporting documentation accompanying the check request forms, which we identified as unsupported questioned costs. The CCI's Fiscal Policies and Procedures state that printed checks and requests for general disbursement, such as for supplies and direct assistance for victims, require supporting documentation with receipts that are date stamped. However, we found one receipt for training materials that did not include a purchase date. Additionally, a recurring quarterly bill was not supported by the agreement establishing the CCI's property management costs. Lastly, one transaction involved paying rent for a victim. While the documentation provided had the victim's signature and handwritten date, the documentation lacked the dollar amount involved, the payment recipient, and the property involved. Without adequate supporting

documentation, the expenses cannot be adequately reconciled to the VOCA eligible recipient, as appropriate, and the CCI may be improperly paying expenses. Therefore, we recommend that OJP work with the Nevada DCFS to ensure that the CCI develop controls within its fiscal policies and procedures to ensure adequate supporting documentation is maintained for all VOCA-funded transactions.

In total we questioned \$9,448 in unsupported costs, as detailed in Appendix 2: Schedule of Dollar-Related Findings.⁶ We recommend that OJP work with the Nevada DCFS to ensure that the CCI remedy the \$9,448 in total unsupported questioned costs.

Unallowable Expense

Additionally, we identified a direct service transaction that was not properly refunded to the CCI's VOCA funds. The CCI had purchased a flight for a victim. However, the CCI's programmatic internal expense tracker indicated that the victim cancelled the flight. We obtained additional documentation of the transaction that showed that the flight was indeed cancelled, and the amount was refunded in the form of flight credit to the victim. When we asked the CCI's CFO why the corresponding amount was not refunded into the CCI's VOCA funds, the CFO explained that she was not aware of the flight cancellation. Additionally, the CFO stated that the victim's contact information no longer worked. According to 2 C.F.R. § 200.406(a), this flight credit must be credited to the VOCA funds either as a cost reduction or a cash refund, as appropriate.⁷ Additionally, while the CCI's Fiscal Policies and Procedures provides guidance on processing refunds when the CCI staff receive a refund for a program related expense, this amount was never refunded to the CCI, and the CCI service provider did not inform the CFO. This instance identified a gap in communication between the CCI's programmatic and financial teams, as mentioned above. Due to the materiality of the cost, we do not question the \$242 as an unallowable cost. However, we recommend that OJP work with the Nevada DCFS to ensure that the CCI develop, implement, and disseminate written policies and procedures specific to reconciliation of programmatic activities affecting financial outlays, to ensure that any victim direct assistance is utilized fully and that associated costs for any unused assistance is refunded to the CCI's VOCA funds appropriately.

⁶ Note: Any differences in the reported figures are due to rounding.

⁷ 2 C.F.R. § 200.406(a) states that applicable credits refer to those receipts or reduction-of-expenditure-type transactions that offset or reduce expense items allocable to the Federal award as direct or indirect costs. Examples of such transactions are purchase discounts, rebates or allowances, recoveries or indemnities on losses, insurance refunds or rebates, and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the non-Federal entity relate to allowable costs, they must be credited to the Federal award either as a cost reduction or cash refund, as appropriate.

Conclusion and Recommendations

As a result of our audit testing, we have reasonable assurance that the CCI provided services to victims of crime in the rural counties of Nevada. However, the CCI could not provide adequate support that it met its goal of serving 300 new and unduplicated victims. In addition to the CCI lacking written policies and procedures specific to the VOCA-funded program administration, the CCI also had inadequate practices and controls over its victim record management. Furthermore, we determined that Nevada DCFS' quarterly performance reporting instructions for its subrecipients are incongruent with the OVC PMT User Guide. We believe the CCI's true number of victims served falls short of its goal, and the CCI should reassess its subaward goal. We also found that the CCI's written fiscal policies and procedures were insufficient to ensure compliance with the DOJ Grants Financial Guide and federal award requirements. Specifically, we found sampled transactions lacked supporting documentation, lacked proper authorization, and inequitably allocated. Due to a gap in communication between departments, we found unallowable and unrefunded VOCA expenditures. We provide five recommendations in this audit to address these deficiencies and remedy \$9,448 in net questioned costs.

We recommend that OJP work with the Nevada DCFS to:

1. Ensure that the CCI develop, implement, and disseminate written policies and procedures specific to:
 - a. The VOCA-funded program administration;
 - b. Ensuring the integrity and accuracy of its victim records and ensuring its performance reports are accurate;
 - c. Ensure adequate controls over transactions being approved by designated approvers and segregation of duties are implemented, including in cases where the designated approver is also the requester;
 - d. Allocating costs in proportion to the benefits obtained or another reasonable basis; and
 - e. Reconciliation of programmatic activities affecting financial outlays, to ensure that any victim direct assistance is utilized fully and that associated costs for any unused assistance is refunded to the CCI's VOCA funds appropriately.
2. Ensure that the CCI:
 - a. Revise its quarterly performance reports for its FY 2024 subaward in compliance with the OVC guidance;
 - b. Re-evaluate its stated goal of serving 300 new and unduplicated victims to ensure the goal is attainable for future VOCA subaward applications; and

- c. Develop controls within its fiscal policies and procedures to ensure adequate supporting documentation is maintained for all VOCA-funded transactions.
- 3. Remedy CCI's unsupported questioned costs totaling \$9,448.

We recommend that OJP:

- 4. Ensure that the Nevada DCFS instructions provided to subrecipients for quarterly performance reporting complies with the OVC guidance.
- 5. Ensure that the Nevada DCFS incorporates controls to verify the accuracy of its subrecipients' quarterly performance reports.

APPENDIX 1: Objective, Scope, and Methodology

Objective

The objective of this audit was to review how Community Chest, Inc. (CCI) used the Victims of Crime Act (VOCA) funds received through two subawards from the Nevada Division of Child and Family Services (Nevada DCFS) to assist crime victims and assess whether it accounted for VOCA funds in compliance with select award requirements, terms, and conditions. To accomplish this objective, we assessed program performance and accomplishments and grant financial management.

Scope and Methodology

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

This was an audit of two subawards to the CCI. These subawards, totaling \$515,155, were funded by the Nevada DCFS from primary VOCA grants 2020-V2-GX-0049 and 15POVC-21-GG-00589-ASSI awarded by the Office of Justice Programs (OJP) Office for Victims of Crime (OVC). As of February 2024, the Nevada DCFS had reimbursed the CCI \$379,925 in subaward funds.

Our audit concentrated on, but was not limited to, the period of July 2022 through December 2023. The Department of Justice (DOJ) Grants Financial Guide; the VOCA Guidelines and Final Rule; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Nevada DCFS guidance; and the Office of Victim of Crime and Nevada DCFS award documents contain the primary criteria we applied during this audit.

To accomplish our objective, we tested compliance with what we considered to be the most important conditions of the CCI's activities related to the audited subawards. Our work included conducting interviews with CCI senior officials and staff members, examining policies and procedures, and reviewing subaward documentation and financial records. We performed judgmental sample-based audit testing for programmatic reporting and subaward expenditures, to include expenditures under budget categories of Personnel and Indirect costs. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the subawards reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected.

During our audit, we obtained information from OJP's Performance Measurement Tool, as well as the CCI's financial system specific to the management of DOJ funds during the audit period. We reconciled and compared information received to assess the reliability of the information the CCI provided us. However, we did not test the reliability of those systems as a whole; therefore, any findings identified involving information from those systems were verified with documentation from other sources.

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objective. We did not evaluate the internal controls of the CCI to provide assurance on its internal control structure as a whole. The CCI 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 the CCI's internal control structure as a whole, we offer this statement solely for the information and use of the CCI, Nevada DCFS, and OJP.⁸

In performing our audit, we identified internal control components and underlying internal control principles as significant to the audit objective. Specifically, we reviewed the design and implementation of the CCI's written policies and procedures. We also tested the existence, implementation, and operating effectiveness of the CCI's controls over management of VOCA funds and expenditures, as well as 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 objective of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

⁸ 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

Description	OJP Prime Number	SAA Subaward Identifier	Amount	Page
Questioned Costs:⁹				
Unsupported EHR Database	2020-V2-GX-0049	16575-20-107	\$4,187	8, 9
Additional Unsupported EHR Database Charges	2020-V2-GX-0049	16575-20-107	2,510	9
	15POVC-21-GG-00589-ASSI	16575-21-007	884	9
<i>Subtotal Unsupported EHR Database</i>			\$7,581	
Unsupported Direct Service – Car Insurance	2020-V2-GX-0049	16575-20-107	\$137	9
Unsupported Travel cost – Staff Training	2020-V2-GX-0049	16575-20-107	318	9
Unsupported Direct Service – Airfare	2020-V2-GX-0049	16575-20-107	242^a	9
<i>Subtotal Unsupported Check Request Form</i>			\$697	
Unsupported Materials for Victim Services	2020-V2-GX-0049	16575-20-107	84	9
Unsupported Property Management Maintenance Fees	2020-V2-GX-0049	16575-20-107	386	9
Unsupported Direct Service – Rent	2020-V2-GX-0049	16575-20-107	700	9
<i>Subtotal Unsupported – Incomplete Documentation</i>			\$1,170	
Total Unsupported Costs			\$9,448	
Total Questioned Costs			<u>\$9,448</u>	

Note: Any differences in the table amounts are due to rounding.

^a Although we do not question the \$242 as an unallowable expense due to immateriality, we do question this amount for not having the required check request form.

⁹ **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: Community Chest, Inc.'s Response to the Draft Audit Report



Community Chest, Inc.

PO Box 980
Virginia City, NV 89440
(775) 847-9311

July 19, 2024

David J. Gaschke, Regional Audit Manager
San Francisco Regional Audit Office
Office of the Inspector General
U.S. Department of Justice
90 7th Street
San Francisco, CA 94103

Dear Mr. Gaschke,

This letter is in response to the audit report completed by OIG, which was received by Community Chest, Inc. on July 3, 2024, and issued to the State of Nevada Division of Child and Family Services (DCFS) on July 8, 2024. The audit covered Sub-Award Numbers 16575-20-107 and 16575-21-007, made by DCFS, under OJP's Victims of Crime Act, Victim Assistance Formula Grant Program, Grant Numbers 2020-V2-GX-0049 and 15POVC-21-GG 00589-ASSI, to Community Chest, Inc. (CCI). The report included five recommendations in total, three of which directly applied to Community Chest and two of which were directed to DCFS.

Community Chest, Inc. concurs with each of three recommendations that applied directly to CCI as indicated below:

Recommendation 1.a-e: Community Chest, Inc. concurs with the recommendation. CCI will work with DCFS to ensure CCI develops, implements, and disseminates the identified written policies and procedures by December 1, 2024.

Recommendation 2.a-c: Community Chest, Inc. concurs with the recommendation. CCI will work with DCFS to ensure CCI revises its quarterly performance reports for its FY2024 subaward in compliance with the OVC guidance, reevaluates its goal of 300 new and unduplicated victims served, and develops internal controls to ensure supporting documentation is maintained for all VOCA-funded transactions by December 1, 2024.

Recommendation 3: Community Chest, Inc. concurs with the recommendation. CCI will work with DCFS to ensure CCI remedies the unsupported questioned costs totaling \$9,448 by December 1, 2024.

Community Chest, Inc. appreciated the time and attention that it took for OIG staff to complete this audit. We are always looking to improve our processes and performance, and the feedback from this audit will help us to do so.

Sincerely,

A handwritten signature in blue ink, reading "Erik E. Schoen". The signature is fluid and cursive, with the first name "Erik" and last name "Schoen" clearly legible.

Erik Schoen, CEO

APPENDIX 4: Nevada Division of Child and Family Services' Response to the Draft Audit Report



July 18, 2024

David J. Gaschke
Regional Audit Manager
San Francisco Regional Audit Office
Office of the Inspector General
U.S. Department of Justice
90 7th Street
San Francisco, CA 94103

Dear Mr. Gaschke,

This letter is in response to the audit report completed by OIG, which was issued to the State of Nevada Division of Child and Family Services (DCFS) on July 8, 2024. The audit covered Sub-Award Numbers 16575-20-107 and 16575-21-007, made by DCFS, under OJP's Victims of Crime Act, Victim Assistance Formula Grant Program, Grant Numbers 2020-V2-GX-0049 and 15POVC-21-GG-00589-ASSI, to Community Chest, Inc. (CCI). The report included five recommendations in total, with which DCFS concurs.

Recommendation 1.a-e: DCFS concurs with the recommendation. DCFS will work with CCI to ensure CCI develops, implements, and disseminates the identified written policies and procedures by December 1, 2024.

Recommendation 2.a-c: DCFS concurs with the recommendation. DCFS will work with CCI to ensure CCI revises its quarterly performance reports for its FY2024 subaward in compliance with the OVC guidance, reevaluates its goal of 300 new and unduplicated victims served, and develops internal controls to ensure supporting documentation is maintained for all VOCA-funded transactions by December 1, 2024.

Recommendation 3: DCFS concurs with the recommendation. DCFS will work with CCI to ensure CCI remedies the unsupported questioned costs totaling \$9,448 by December 1, 2024.

Recommendation 4: DCFS concurs with the recommendation. DCFS will revise the instructions provided to subrecipients for quarterly performance reporting to comply with the OVC guidance by December 1, 2024.

Recommendation 5: DCFS concurs with the recommendation. DCFS will incorporate controls to verify the accuracy of its subrecipients' quarterly performance reports by December 1, 2024.

Sincerely,

Marla McDade Williams
Marla McDade Williams, MPA
Administrator

APPENDIX 5: 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 30, 2024

MEMORANDUM TO: David J. Gaschke
Regional Audit Manager
San Francisco Regional Audit Office
Office of the Inspector General

FROM: Jeffery A. Haley *Jeffery A Haley*
Deputy Director, Audit and Review Division

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs Victim Assistance Funds, Subawarded by the Nevada Division of Child and Family Services to Community Chest, Inc., Virginia City, Nevada*

This memorandum is in reference to your correspondence, dated July 8, 2024, transmitting the above-referenced draft audit report for Community Chest, Inc. (CCI). CCI received subaward funds from the Nevada Division of Child and Family Services (Nevada DCFS), under the Office of Justice Programs' (OJP), Office for Victims of Crime (OVC), Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 2020-V2-GX-0049 and 15POVC-21-GG-00589-ASSI. We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains **five** recommendations and **\$9,448** in questioned costs. The following is OJP's analysis of the draft audit report recommendations. For ease of review, the recommendations are restated in bold and are followed by OJP's response.

1. **We recommend that OJP work with the Nevada DCFS to ensure that the CCI develop, implement, and disseminate written policies and procedures specific to:**
 - a) **The VOCA funded program administration;**
 - b) **Ensuring the integrity and accuracy of its victim records and ensuring its performance reports are accurate;**
 - c) **Ensuring adequate controls over transactions being approved by designated approvers, and segregation of duties are implemented, including in cases where the designated approver is also the requester;**

- d) Allocating costs in proportion to the benefits obtained or another reasonable basis; and**
- e) Reconciliation of programmatic activities affecting financial outlays, to ensure that any victim direct assistance is utilized fully and that associated costs for any unused assistance is refunded to the CCI's VOCA funds appropriately.**

OJP agrees with each subpart of this recommendation. In its response, dated July 18, 2024, the Nevada DCFS stated that it will work with CCI to develop, implement, and disseminate written policies and procedures identified in this recommendation, by December 1, 2024.

Accordingly, we will coordinate with the Nevada DCFS to obtain a copy of CCI's written policies and procedures, developed and implemented, specific to: a) its VOCA-funded program administration; b) ensuring the integrity and accuracy of its victim records and ensuring its performance reports are accurate; c) ensuring adequate controls over transactions being approved by designated approvers and segregation of duties are implemented, including in cases where the designated approver is also the requester; d) allocating costs in proportion to the benefits obtained or another reasonable basis; and e) reconciliation of programmatic activities affecting financial outlays, to ensure that any victim direct assistance is utilized fully and that associated costs for any unused assistance is refunded to the CCI's VOCA funds appropriately. We will also obtain evidence that CCI disseminated their policies and procedures to staff responsible for managing Federal grant funds.

2. We recommend that OJP work with the Nevada DCFS to ensure that the CCI:

- a) Revise its quarterly performance reports for its FY 2024 subaward in compliance with the OVC guidance;**
- b) Re-evaluate its stated goal of serving 300 new and unduplicated victims to ensure the goal is attainable for future VOCA subaward applications; and**
- c) Develop controls within its fiscal policies and procedures to ensure adequate supporting documentation is maintained for all VOCA funded transactions.**

OJP agrees with each subpart of this recommendation. In its response, dated July 18, 2024, the Nevada DCFS stated that it will work with CCI to ensure CCI revises its quarterly performance reports for its Fiscal Year (FY) 2024 subaward in compliance with the OVC guidance; reevaluates its goal of the 300 new and unduplicated victims served; and develops internal controls to ensure supporting documentation is maintained for all VOCA funded transactions, by December 1, 2024.

Accordingly, we will coordinate with the Nevada DCFS to obtain evidence that CCI has: a) revised its quarterly performance reports for its FY 2024 subaward in compliance with the OVC guidance; b) re-evaluated its stated goal of serving 300 new and unduplicated victims to ensure the goal is attainable for future VOCA subaward applications; and c) developed and implemented written policies and procedures to ensure adequate supporting documentation is maintained for all VOCA-funded transactions, for future auditing purposes.

3. We recommend that OJP work with the Nevada DCFS to remedy CCT's unsupported questioned costs totaling \$9,448.

OJP agrees with the recommendation. In its response, dated July 18, 2024, the Nevada DCFS stated that it will work with CCI to remedy the \$9,448 in unsupported questioned costs, by December 1, 2024.

Accordingly, we will review the \$9,448 in questioned costs, related to unsupported expenditures charged to the subaward under Grant Numbers 2020-V2-GX-0049 (\$8,564) and 15POVC-21-GG-00589-ASSI (\$884), and will work with the Nevada DCFS to remedy, as appropriate.

4. We recommend that OJP ensure that the Nevada DCFS instructions provided to subrecipients for quarterly performance reporting complies with the OVC guidance.

OJP agrees with the recommendation. In its response, dated July 18, 2024, the Nevada DCFS stated that it will revise the instructions provided to subrecipients for quarterly performance reporting to comply with the OVC guidance, by December 1, 2024.

Accordingly, we will coordinate with the Nevada DCFS to obtain a copy of its written policies and procedures, developed and implemented, to ensure its instructions to subrecipients for quarterly performance reporting comply with the OVC guidance.

5. We recommend that OJP ensure that the Nevada DCFS incorporates controls to verify the accuracy of its subrecipients' quarterly performance reports.

OJP agrees with the recommendation. In its response, dated July 18, 2024, the Nevada DCFS stated that it will incorporate controls to verify the accuracy of its subrecipients' quarterly performance reports, by December 1, 2024.

Accordingly, we will coordinate with the Nevada DCFS to obtain a copy of its written policies and procedures, developed and implemented, to ensure that appropriate controls are incorporated to verify the accuracy of subrecipients' quarterly performance reports.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact Linda J. Taylor, Lead Auditor, Audit Coordination Branch, of my staff, on (202) 514-7270.

cc: Maureen A. Henneberg
Deputy Assistant Attorney General
for Operations and Management

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

Linda J. Taylor
Lead Auditor, Audit Coordination Branch
Audit and Review Division
Office of Audit, Assessment, and Management

Kristina Rose
Director
Office for Victims of Crime

Katherine Darke Schmitt
Principal Deputy Director
Office for Victims of Crime

James Simonson
Director of Operations, Budget, and
Performance Management Division
Office for Victims of Crime

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Deputy Director of Operations, Budget, and
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Willie Bronson
Director, State Victim Resource Division
Office for Victims of Crime

Joel Hall
Deputy Director, State Victim Resource Division
Office for Victims of Crime

Frederick Rogers
Grants Management Specialist
Office for Victims of Crime

Charlotte Grzebien
Deputy General Counsel

cc: Katherine Brown
Principal Deputy Director
Office of Communications

Rachel Johnson
Chief Financial Officer

Christal McNeil-Wright
Associate Chief Financial Officer
Grants Financial Management Division
Office of the Chief Financial Officer

Joanne M. Suttington
Associate Chief Financial Officer
Finance, Accounting, and Analysis Division
Office of the Chief Financial Officer

Aida Brumme
Manager, Evaluation and Oversight Branch
Grants Financial Management Division
Office of the Chief Financial Officer

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

OJP Executive Secretariat
Control Number OCOM001018

APPENDIX 6: 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 of Justice Programs (OJP), Nevada Division of Child and Family Services (Nevada DCFS), and Community Chest, Inc. (CCI). OJP's response is incorporated in Appendix 5, the Nevada DCFS's response is incorporated in Appendix 4, and the CCI's response is incorporated in Appendix 3 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. The Nevada DCFS concurred with our recommendations. The CCI concurred with the three recommendations that pertained to its operations. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendations for OJP and the Nevada DCFS to:

- 1) Ensure that the CCI develop, implement, and disseminate written policies and procedures specific to:**
 - a) The VOCA-funded program administration;**
 - b) Ensuring the integrity and accuracy of its victim records and ensuring its performance reports are accurate;**
 - c) Ensure adequate controls over transactions being approved by designated approvers and segregation of duties are implemented, including in cases where the designated approver is also the requester;**
 - d) Allocating costs in proportion to the benefits obtained or another reasonable basis; and**
 - e) Reconciliation of programmatic activities affecting financial outlays, to ensure that any victim direct assistance is utilized fully and that associated costs for any unused assistance is refunded to the CCI's VOCA funds appropriately.**

Resolved. OJP agreed with each subpart of this recommendation. OJP stated in its response that it will coordinate with the Nevada DCFS to obtain a copy of the CCI's written policies and procedures, developed and implemented specific to: (a) its VOCA-funded program administration; (b) ensuring the integrity and accuracy of its victim records and ensuring its performance reports are accurate; (c) ensuring adequate controls over transactions being approved by designated approvers and segregation of duties are implemented, including in cases where the designated approver is also the requester; (d) allocating costs in proportion to the benefits obtained or another reasonable basis; and (e) reconciliation of programmatic activities affecting financial outlays, to ensure that any victim direct assistance is utilized fully and that associated costs for any unused assistance is refunded to the CCI's VOCA funds appropriately. OJP will also obtain evidence that CCI disseminated its policies and procedures to staff responsible for managing federal grant funds. As a result, this recommendation is resolved.

The Nevada DCFS concurred with the recommendation. The Nevada DCFS stated in its response that it will work with CCI to ensure CCI develops, implements, and disseminates the identified written policies and procedures by December 1, 2024.

The CCI concurred with the recommendation. The CCI stated in its response that it will work with Nevada DCFS to ensure the CCI develops, implements, and disseminates the identified written policies and procedures by December 1, 2024.

This recommendation can be closed when we receive evidence that written policies have been developed, implemented, and disseminated specific to: (a) the VOCA-funded program administration; (b) ensuring the integrity and accuracy of its victim records and ensuring its performance reports are accurate; (c) ensuring adequate controls over transactions being approved by designated approvers and segregation of duties are implemented, including in cases where the designated approver is also the requester; (d) allocating costs in proportion to the benefits obtained or another reasonable basis; and (e) reconciliation of programmatic activities affecting financial outlays, to ensure that any victim direct assistance is utilized fully and that associated costs for any unused assistance is refunded to the CCI's VOCA funds appropriately. Evidence should be provided that shows the CCI disseminated the policies and procedures to staff responsible for managing federal grant funds.

2) Ensure that the CCI:

- a) Revise its quarterly performance reports for its FY 2024 subaward in compliance with the OVC guidance;**
- b) Re-evaluate its stated goal of serving 300 new and unduplicated victims to ensure the goal is attainable for future VOCA subaward applications; and**
- c) Develop controls within its fiscal policies and procedures to ensure adequate supporting documentation is maintained for all VOCA-funded transactions.**

Resolved. OJP agreed with each subpart of this recommendation. OJP stated in its response that it will coordinate with the Nevada DCFS to obtain evidence that the CCI has: (a) revised its quarterly performance reports for its FY 2024 subaward in compliance with the OVC guidance; (b) re-evaluated its stated goal of serving 300 new and unduplicated victims to ensure the goal is attainable for future VOCA subaward applications; and (c) developed and implemented written policies and procedures to ensure adequate supporting documentation is maintained for all VOCA-funded transactions, for future auditing purposes. As a result, this recommendation is resolved.

The Nevada DCFS concurred with the recommendation. The Nevada DCFS stated in its response that it will work with the CCI to ensure the CCI revises its quarterly performance reports for its FY 2024 subaward in compliance with OVC guidance, reevaluates its goal of 300 new and unduplicated victims served, and develops internal controls to ensure supporting documentation is maintained for all VOCA-funded transactions by December 1, 2024.

The CCI concurred with the recommendation. The CCI stated in its response that it will work with the Nevada DCFS to ensure the CCI revises its quarterly performance reports for its FY 2024 subaward in compliance with the OVC guidance, reevaluates its goal of 300 new and unduplicated victims served, and develops internal controls to ensure supporting documentation is maintained for all VOCA-funded transactions by December 1, 2024.

This recommendation can be closed when we receive evidence that the CCI has: (a) revised its quarterly performance reports for its FY 2024 subaward in compliance with OVC guidance; (b) re-evaluated its stated goal of serving 300 new and unduplicated victims to ensure the goal is attainable for future VOCA subaward applications; and (c) developed and implemented written policies and procedures to ensure adequate supporting documentation is maintained for all VOCA-funded transactions.

3) Remedy CCI's unsupported questioned costs totaling \$9,448.

Resolved. OJP agreed with the recommendation. OJP stated in its response that it will review the \$9,448 in questioned costs, related to unsupported expenditures charged to the subaward under Grant Numbers 2020-V2-GX-0049 (\$8,564) and 15POVC-21-GG-00589-ASSI (\$884), and will work with the Nevada DCFS to remedy the costs, as appropriate. As a result, this recommendation is resolved.

The Nevada DCFS concurred with the recommendation. The Nevada DCFS stated in its response that it will work with the CCI to ensure that the CCI remedies the unsupported questioned costs totaling \$9,448 by December 1, 2024.

The CCI concurred with the recommendation. The CCI stated in its response that it will work with the Nevada DCFS to ensure that the CCI remedies the unsupported questioned costs totaling \$9,448 by December 1, 2024.

This recommendation can be closed when we receive evidence that the unsupported questioned costs totaling \$9,448 have been remedied by the CCI.

We recommend that OJP:

4) Ensure that the Nevada DCFS instructions provided to subrecipients for quarterly performance reporting complies with the OVC guidance.

Resolved. OJP agreed with the recommendation. OJP stated in its response that it will coordinate with the Nevada DCFS to obtain a copy of its written policies and procedures, developed and implemented to ensure its instructions to subrecipients for quarterly performance reporting comply with the OVC guidance. As a result, this recommendation is resolved.

The Nevada DCFS concurred with the recommendation. The Nevada DCFS stated in its response that the Nevada DCFS will revise the instructions provided to subrecipients for quarterly performance reporting to comply with the OVC guidance by December 1, 2024.

This recommendation can be closed when we receive evidence that the Nevada DCFS revised the instructions provided to subrecipients for quarterly performance reporting to comply with the OVC guidance.

5) Ensure that the Nevada DCFS incorporates controls to verify the accuracy of its subrecipients' quarterly performance reports.

Resolved. OJP agreed with the recommendation. OJP stated in its response that it will coordinate with the Nevada DCFS to obtain a copy of its written policies and procedures, developed and implemented to ensure appropriate controls are incorporated to verify the accuracy of subrecipients' quarterly performance reports. As a result, this recommendation is resolved.

The Nevada DCFS concurred with the recommendation. The Nevada DCFS stated in its response that the Nevada DCFS will incorporate controls to verify the accuracy of its subrecipients' quarterly performance reports by December 1, 2024.

This recommendation can be closed when we receive evidence that the Nevada DCFS incorporated controls to verify the accuracy of its subrecipients' quarterly performance reports.