



**AUDIT OF THE OFFICE ON VIOLENCE AGAINST WOMEN
AWARDS TO THE WEST VIRGINIA FOUNDATION FOR
RAPE INFORMATION AND SERVICES
FAIRMONT, WEST VIRGINIA**

U.S. Department of Justice
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Audit Division

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EXECUTIVE SUMMARY

The Department of Justice (DOJ) Office of the Inspector General (OIG), completed an audit of two grants totaling \$2,374,456 awarded by the Office on Violence Against Women (OVW) to the West Virginia Foundation for Rape Information and Services (FRIS) in Fairmont, West Virginia as shown in Exhibit 1.

Exhibit 1: OVW Grants Awarded to FRIS

Award Number	Project Start Date	Project End Date	Amount (\$)
2007-WR-AX-0012	10/01/2007	09/30/2014	2,143,242
2012-SW-AX-0014	09/01/2012	03/31/2015	231,214
TOTAL			\$2,374,456

Source: OJP Grants Management System (GMS) award documentation

Grant number 2007-WR-AX-0012 was part of the OVW's Rural Sexual Assault, Domestic Violence, Dating Violence, and Stalking Assistance program, funded to enhance the safety of victims and address and prevent these crimes in rural areas. Grant number 2012-SW-AX-0014 included funding from two grant programs: (1) the coalition grant program which supports coordination of victim services and collaboration with partner entities and (2) the sexual assault services program (SASP) which supports the maintenance and expansion of state and territorial sexual assault coalitions.

We conducted this audit to determine whether costs claimed under the grant were allowable, reasonable, and in accordance with applicable laws, regulations, guidelines, and the terms and conditions of the award, and to ascertain FRIS's progress towards meeting its program goals and objectives. We assessed performance in the key areas of grant management that are applicable and appropriate for the grants under review. These areas include: (1) internal control environment, (2) drawdowns, (3) grant expenditures, (4) budget management and control, (5) financial status and progress reports, (6) program performance and accomplishments, (7) property management, and (8) monitoring of sub-grantees and consultants.

Our audit found that the transactions were, in general, properly authorized, classified, supported, and charged to the respective grants. We provided a draft report for review and comments to OVW and FRIS. Our report did not include any findings or recommendations and neither entity provided comments on our report. No further actions are necessary and this report is issued closed.

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INTRODUCTION

The Office of the Inspector General (OIG) completed an audit of Office on Violence Against Women (OVW) grants numbered 2007-WR-AX-0012 and 2012-SW-AX-0014 totaling \$2,374,456 awarded to the West Virginia Foundation for Rape Information and Services (FRIS) in Fairmont, West Virginia, as shown in Exhibit 2.

Exhibit 2: Summary of Awards Audited

Awards	Type of Award	Project Period	Award Amount (\$)
2007-WR-AX-0012	Grant	10/01/07 — 09/30/14	644,508
	Supplement		500,000
	Supplement		998,734
<i>Subtotal</i>			\$2,143,242
2012-SW-AX-0014	Grant	09/01/12 — 03/31/15	117,344
	Supplement		113,870
<i>Subtotal</i>			\$231,214
TOTAL			\$2,374,456

Source: OJP Grants Management System (GMS) award documentation

The 2007 grant was part of the OVW's Rural Sexual Assault, Domestic Violence, Dating Violence, and Stalking Assistance program that provides OVW grantees with funds to enhance the safety of victims and address and prevent these crimes in rural areas. FRIS was awarded the 2007 rural grant to coordinate the efforts of the state's rape crisis centers and of several statewide partners in targeting seven rural areas in the state. FRIS designed its rural project to establish accessible direct services for victims, create a viable infrastructure for an effective community response, and build the capacity of local professionals and volunteers to both respond to the needs of victims and begin to focus on the issues of awareness and prevention.

The 2012 award included funding from two grant programs, the coalition grant program and the sexual assault services program (SASP). The primary purpose of OVW's coalition grant program is to coordinate victim service activities as well as to collaborate and coordinate with federal, state, territory, and local

entities. The SASP funding supports the maintenance and expansion of sexual assault coalitions in states and territories. FRIS was awarded the 2012 grant to fund its proposed goals of expanding the capacity for victim services, increasing state awareness of sexual violence and stalking issues, and promoting collaboration of relevant entities – such as healthcare professionals, law enforcement officers, and advocates – to improve victim service systems. As West Virginia’s state sexual assault coalition, FRIS also received SASP funding through the 2012 grant to support and maintain its activities, as well as to monitor SASP funding provided to the state’s crisis centers.

Audit Approach

The purpose of this audit was to determine whether reimbursements claimed for costs under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grants; and whether the awardee was meeting its program goals and objectives.

The objective of our audit was to assess performance in the key areas of grant management that are applicable and appropriate for the grants under review. These areas include: (1) internal control environment, (2) drawdowns, (3) grant expenditures, (4) budget management and control, (5) financial status and progress reports, (6) program performance and accomplishments, (7) property management, and (8) monitoring of sub-grantees and consultants.

We tested compliance with what we considered the most important conditions of the grants. Unless otherwise stated in the report, we used the 2013 OVW Financial Grants Management Guide (Financial Management Guide), and the award documents to assess FRIS performance and compliance with the requirements of the grants.¹ Specifically, we tested what we believed to be critical award requirements necessary to meet the objectives of the audit, including:

- **Internal Control Environment** to determine whether the internal controls in place for the processing and payment of funds were adequate to safeguard the funds awarded to FRIS, and to ensure compliance with the terms and conditions of the grants;
- **Drawdowns** to determine whether drawdowns were adequately supported and if the auditee was managing receipts in accordance with federal requirements;
- **Grant Expenditures** to determine if costs charged to the grants were accurate and allowable;

¹ The OVW *Financial Grants Management Guide* serves as a reference of information to assist OVW award recipients in financial management and grants administration of OVW grant programs. OVW requires award recipients to abide by the requirements in conjunction with the provisions of OMB circulars and other government-wide common rules applicable to grants and cooperative agreements, program guidelines, special conditions, terms and conditions, and regulations and statutes.

- **Budget Management and Control** to ensure that FRIS appropriately tracked costs to approved budget categories;
- **Reporting** to determine if the required federal financial reports and progress reports were timely and if they accurately reflected the activity of the grants;
- **Program Performance and Accomplishments** to determine whether FRIS has met the grant objectives;
- **Property Management** to determine if property items acquired with grant funds are tracked in a system of property records, adequately protected from loss, and used for grant purposes; and
- **Monitoring of Sub-grantees and Consultants** to determine whether FRIS was in compliance with monitoring its sub-grantees and consultants.

We determined that there were no special requirements for either grant; post-grant end date activities did not exist because both grants were ongoing; and program income, local match, and indirect costs were not applicable to these grants. The results of our analysis are discussed in detail in the Audit Results section of the report. Appendix I contains additional information on our objective, scope, and methodology.

AUDIT RESULTS

COMPLIANCE WITH ESSENTIAL AWARD REQUIREMENTS

Our audit found that the transactions were, in general, properly authorized, classified, supported, and charged to the grants. FRIS spent its grant funds in accordance with proposed budgets and in support of activities outlined in its grant applications. We found FRIS complied with grant conditions and maintained adequate support for tested transactions and deliverables.

Internal Control Environment

According to the OVW Financial Management Guide, grant recipients are responsible for establishing and maintaining an adequate system of accounting and internal controls. An acceptable internal control system provides cost controls to ensure optimal use of funds. Grant recipients must adequately safeguard funds and ensure they are used solely for authorized purposes. While our audit did not assess FRIS's overall system of internal controls, we did review the internal controls of FRIS's financial management system specific to the administration of grant funds during the period under review. Specifically, we interviewed pertinent FRIS officials, reviewed written policies and procedures that governed the handling of OVW awards, and reviewed the FRIS single audit reports to assess the organization's risk of noncompliance with laws, regulations, guidelines, and terms and conditions of the grants.

Overall, we determined that FRIS had adequate controls in place to ensure the appropriate use of OVW-awarded funds. Specifically, FRIS had adequate written policies and procedures in place to guide its operations and appropriate segregation of duties over financial operations.

Single Audits

The special conditions of the grants require that FRIS comply with the requirements of the Office of Management and Budget (OMB) Circular A-133: *Audits of States, Local Governments and Non-Profit Organizations*.² We found FRIS had Single Audits performed annually, in accordance with federal requirements. We reviewed the fiscal year 2011, 2012, and 2013 Single Audit reports, which were unqualified, and did not include any findings, material weaknesses, or significant deficiencies with the internal control over financial reporting or major programs.

² OMB Circular A-133 requires non-federal entities that expend at least \$500,000 a year in federal awards to have a single audit conducted of its financial statements. The purpose of the single audit is to determine whether the financial statements and schedule of expenditures of federal awards are presented fairly in all material respects and in conformity with generally accepted accounting principles.

Drawdowns

To obtain DOJ award money, recipients must electronically request funds via drawdowns. According to the Financial Management Guide, award recipients should only request federal award funds when they incur or anticipate project costs. Therefore, recipients should time their requests for award funds to ensure they will have only the minimum federal cash on hand required to pay actual or anticipated costs within 10 days.

According to FRIS personnel, drawdown requests are based on reimbursements and are electronically deposited into one approved financial institution account. FRIS maintains written policies and procedures which guide drawing down of funds. The FRIS Financial Operations Manual requires that drawdowns be completed on a monthly basis, but done so as to ensure that an excess balance is not maintained. To ensure that FRIS requested funds properly and kept minimum cash on hand, we analyzed its drawdowns through May 30, 2014 for each grant and compared the overall drawdown amount for each grant to the accounting records for the respective grants. Overall, we found that the amounts drawn down did not exceed the expenditures in the accounting records for each grant.

Grant Expenditures

According to 2 C.F.R. § 230 *Cost Principles for Non-Profit Organizations*, costs are allowable if they are reasonable, consistently applied, adequately documented, comply with policies and procedures, and conform to any limitations or exclusions specified in applicable criteria. As of June 2, 2014, FRIS's accounting records reported \$1,652,874 in project costs associated with grant number 2007-WR-AX-0012, and \$101,365 in project costs associated with grant number 2012-SW-AX-0014 as of May 29, 2014. We tested 40 transactions or \$71,370 in personnel, travel, supplies, consultants, sub-grantee, and other costs charged to grant number 2007-WR-AX-0012, and determined that the reviewed expenses were allowable. For grant number 2012-SW-AX-0014, we tested 31 transactions or \$4,971 in personnel, travel, supplies, consultants, and other costs charged to the grant, and determined that the reviewed expenses were allowable.

Personnel and Fringe Benefits

According to its accounting records, FRIS spent about \$285,960 on employee salaries and \$49,805 on personnel benefits under grant number 2007-WR-AX-0012 and about \$76,240 on employee salaries and \$17,710 on personnel benefits under grant number 2012-SW-AX-0014. To gain an understanding of the payroll process, we interviewed FRIS's finance coordinator. We found FRIS payroll is processed bi-weekly by the FRIS finance coordinator. Employees are required to complete timesheets and activity logs each pay period, which must be signed by the employee and then reconciled and approved by the state coordinator. Timesheets are broken down by the different grants and employees are required to track and report their time based on the amount of time worked on each grant. The salary

and fringe benefit payments for employees are generated each pay period based on the employees' timesheets, activity logs, and approved rates for fringe benefit costs. Overtime pay is not authorized under either grant we audited.

For grant number 2007-WR-AX-0012, we selected four non-consecutive pay periods, totaling \$5,743 for detailed testing to determine if salary and benefit charges were supported and allowable.³ For grant number 2012-SW-AX-0014, we selected seven non-consecutive pay periods, totaling \$3,290 for detailed testing to determine if salary and benefits charges were supported and allowable.⁴ For the sampled pay periods, we found that the approved employee timesheets and activity logs supported the charges made to the grants.

We reviewed the OVW-approved fringe benefit cost pool elements and assessed whether the elements were reasonable and in accordance with the approved grant budgets. We reviewed the fringe benefits charged to the 2007-WR-AX-0012 grant, totaling about \$2,580, and determined that the benefit expenditures associated with the personnel costs were reasonable and properly charged to the grant. We reviewed the fringe benefits charged to the 2012-SW-AX-0014 grant, totaling over \$680, and determined that the benefit expenditures associated with the personnel costs were reasonable and properly charged to the grant.

Other Direct Costs

We selected a judgmental sample of 32 transactions from the categories of travel, supplies, contracts, and "other" associated with grant number 2007-WR-AX-0012, totaling about \$65,630, and 12 transactions from the travel, supplies, and contracts categories associated with grant number 2012-SW-AX-0014, totaling nearly \$1,700, in order to determine if the charges were allowable and allocable to the grant awards.⁵ Based on our testing, we determined that the sampled transactions were allowable, supported with documentation, and allocated in accordance with the applicable laws, regulations, and guidelines.

³ A total of eight salary and benefit expenditures were tested under the 2007-WR-AX-0012 grant. Salary transactions were pulled from four non-consecutive pay periods, as were fringe benefit transactions.

⁴ A total of nineteen salary and benefit expenditures were tested under the 2012-SW-AX-0014 grant. Nine salary transactions were pulled from seven non-consecutive pay periods and ten fringe benefit transactions were pulled from seven non-consecutive pay periods.

⁵ FRIS contractual costs consisted primarily of sub-grantee and consultant costs.

Budget Management and Control

Awardees should expend funds according to the budget approved by the awarding agency and included in the final award. Approved award budgets document how much the recipient is authorized to spend in high-level budget categories, such as Personnel, Supplies, and Contracts. The Financial Management Guide also states that award recipients may request a modification to approved award budgets to reallocate amounts among various budget categories within the same award. No prior approval is required if the reallocations between budget categories do not exceed 10 percent of the total award amount. We compared the actual amounts spent in each budget category to the budgeted amounts in the same categories. We found FRIS adhered to the Financial Management Guide budget requirements for grants 2007-WR-AX-0012 and 2012-SW-AX-0014.

Reporting

The OVW Financial Management Guide requires that award recipients submit both financial and program progress reports to inform the awarding agency on the status of each award. Federal Financial Reports (FFRs) are due quarterly and should detail the actual expenditures incurred for each quarterly reporting period; progress reports are due semiannually and should describe the performance activities and achievements of the project supported by each award. Accurate and timely FFRs and progress reports are necessary to ensure that DOJ awarding agencies can effectively monitor award activities and expenditures.

For both grants 2007-WR-SW-0012 and 2012-SW-AX-0014, we reviewed the four most recent FFRs and progress reports available at the start of our audit. As detailed in the following sections, the required FFRs and progress reports were accurate and submitted on time.

Federal Financial Reports

DOJ awarding agencies monitor the financial performance of each award via FFRs. According to the OVW Financial Management Guide, FFRs should be submitted within 30 days of the end of each quarterly reporting period. To verify the timeliness of the FFRs, we tested the four most recent reports available at the start of our audit, which included award activity for both the 2007 and 2012 grants through March 31, 2014. We compared the submission date of each report to the date each report was due and found that all of the FFRs were submitted on time, each within a week of the end of the respective reporting periods.

The OVW Financial Management Guide indicates that an awardee's accounting system for reporting must support all amounts reported on the FFRs. We discussed the process for submitting FFRs with the responsible FRIS officials and found FRIS uses its accounting system profit/loss statement as well as corresponding Excel monitors to keep track of grant expenditures and determine the amounts to be recorded on the FFRs. To verify the accuracy of the FFRs, we compared the amounts reported on the sampled FFRs to expenditures recorded in

the awardee's accounting records. We determined that the FFRs for the last four quarters of each grant reconciled with FRIS accounting records.

Progress Reports

While FFRs reflect an award's financial activity, progress reports capture the project status and accomplishments with regard to the objectives in the approved award application. Progress reports should compare actual accomplishments to anticipated program objectives. According to the OVW Financial Management Guide, progress reports are due 30 days after the end of each semi-annual reporting period, June 30 and December 31.

To verify the timeliness of the progress reports, we tested the four most recent progress reports for the 2007 grant and the three reports for the 2012 grant available at the start of our audit, which included award activity through December 2013. We compared the submission date of each report to the date each report was due and found that all of the progress reports were submitted on time.

We reviewed program achievements detailed in the progress reports and available evidence to verify performance claims for the last two years of the grants were consistent with the program goals and objectives. We found that for grants 2007-WR-AX-0012 and 2012-SW-AX-0014, reported progress aligned with the goals and objectives outlined in the approved grant application documents. Further, we found sufficient evidence to support progress reported to the OVW.

Program Performance and Accomplishments

To assess FRIS success in meeting the goals and objectives for the 2007 and 2012 grants, we reviewed the respective OVW grant solicitations, application documents, award packages, grant adjustment notices, and progress reports. We also interviewed FRIS personnel regarding project accomplishments and reviewed evidence of grant deliverables, such as training content and sign-in sheets.

2007-WR-AX-0012 Rural Grant

We determined that the 2007 rural grant originally had three primary goals: (1) to provide accessible, responsive services to victims of stalking and sexual assault in rural areas in West Virginia; (2) to increase the coordinated community response to enable victims to safely utilize all points of entry into the service delivery system; and (3) to create awareness of stalking and sexual assault, with a focus on prevention and accountability. As the project progressed through two subsequent phases of supplemental funding, FRIS proposed to expand these activities, include more points of entry into the victim service delivery system, and devote particular attention to serving victims with disabilities.

Based on our discussions with FRIS personnel, along with our review of FRIS records and progress report activity, we found FRIS has already accomplished many

of its planned activities in support of these goals and scheduled the remaining activities. As a central aspect of the 2007 project, FRIS hired a rural coordinator and facilitated the hiring of rural advocates based out of seven of the crisis centers, who served to expand victim services in remote areas. FRIS established and then expanded local Sexual Assault Response Teams (SART) to include responders who could become involved in circumstances of a sexual assault, such as rural advocates, law enforcement, medical staff, counselors, prosecutors, emergency medical personnel, and in some cases disability service providers or protective services. FRIS provided the SARTs with training on the basics of SART activities, as well as the specific topics of disability service and stalking. Through the grant-funded rural advocates, FRIS assisted the rural rape crisis centers in utilizing volunteers, supporting and addressing the needs of the SARTs, and completing audits of victim service accessibility. Before the end of the rural grant period in September 2014, FRIS also had scheduled prevention trainings for the SARTs, to be followed by the development and implementation of a prevention action plan addressing the victimization of persons with disabilities.

In addition to our general review of proposed and completed 2007 grant activities, we also selected five specific deliverables for in-depth testing. We verified that reported figures for the number of students educated, victims served, and child protective service workers trained were supported and accurate for the respective reporting periods. We also confirmed the completion of both stalking and disability training for the SARTs.

2012-SW-AX-0014 Coalition and SASP Grant Funding

According to the 2012 original abstract, the 2012 coalition project involved the following goals: (1) to increase the capacity of the rape crisis centers and allied professionals in providing services to victims of sexual assault and stalking through training and technical assistance; (2) to engage in activities that promote coalition building and collaboration to improve services and effect systems change; (3) to provide resources to increase awareness in West Virginia of the issues of sexual violence and stalking. In addition, the goals for the Sexual Assault Services Program (SASP) included facilitating and monitoring the implementation of the SASP in West Virginia, as well as maintaining and expanding the role and staff of the sexual assault coalition (FRIS).

Based on our discussions with FRIS personnel, along with our review of FRIS records and progress report activity, we found FRIS has accomplished planned activities for the first round of funding and appears to be on track to complete the remaining activities funded by the 2012 grant supplement before the end of the grant period in March 2015. In furtherance of project goals, FRIS reported hosting a large annual statewide training symposium and providing resources and expertise to allied professionals including service providers, point of entry personnel, and legislators. FRIS facilitated collaborative listservs and held regular meetings for entities including the state's Intercollegiate Council and Sexual Assault Nurse Examiners (SANE) Advisory Board. In accordance with approved grant objectives, FRIS worked to expand the in-state SANE nurse capacity by training SANE nurses,

and recently launched a more accessible online SANE training as part of its new Sexual Assault Services Training Academy. FRIS also oversaw the distribution of SASP funding and conducted monitoring of the recipient crisis centers. In the remaining period of the grant, FRIS plans to help work toward implementing relevant legislative mandates such as the Prison Rape Elimination Act.

In addition to our general review of proposed and completed 2012 grant activities, we also selected three specific deliverables for in-depth testing. We verified that FRIS provided two-day training for disability service providers and reviewed both the training content and participant evaluations which indicated the training was helpful and informative for most respondents. We also reviewed training agendas and sign-in sheets to corroborate the number of sexual assault forensic examiners/sexual assault nurse examiners that FRIS reported training during a reporting period. Lastly, we also obtained the materials FRIS uses to help applicants for SASP funding, along with a sample SASP monitoring form evidencing FRIS checks of SASP sub-grantee performance, which are described further in the "Monitoring of Sub-grantees" section below.

In conclusion, FRIS was readily able to provide thorough evidence supporting reported activities, and we found that FRIS has achieved or is on track to achieve the goals and objectives of both the 2007 and 2012 OVW grants.

Property Management

Grant recipients and sub-recipients are required to be prudent in the acquisition and management of property with federal funds. We assessed the FRIS management of property, to the extent that this applied under the 2007 and 2012 grants. The only notable property purchase FRIS made with either the 2007 or 2012 grant funds was for computers for the rural coordinator and each rural advocate.⁶ OVW purchased eight desktop computers and several printers in 2007 and was in the process of distributing newer laptop computers – which FRIS bought as updates to original computers over 6 years later – during our fieldwork in June 2014. While each individual computer cost did not meet the accountable property dollar threshold and therefore FRIS was not required to maintain an inventory or conduct physical verification, FRIS was able to provide an inventory of this property and we were able to reconcile these computer purchases in our testing of grant expenditures. During its annual site visits, FRIS also verbally verified that the computers were still in use for the grant, as long as they remained operable.

⁶ The OVW Financial Management Guide defines equipment as tangible, nonexpendable personal property having a useful life of more than 1 year and an acquisition cost of \$5,000 or more per unit. FRIS defines capital property as items with a value over \$5,000.

Monitoring of Sub-grantees and Consultants

According to the OVW Financial Management Guide, grantees should ensure that they monitor sub-grantees' activities to provide reasonable assurance that the sub-grantees administered federal awards in compliance with federal requirements.

For the 2007-WR-AX-0012 rural grant, OVW approved a FRIS project incorporating seven rape crisis centers and several statewide partners in an effort to enhance the availability and quality of services for victims of sexual assault and stalking in rural locations. FRIS submitted a Memorandum of Understanding for each round of rural grant funding, clearly outlining the respective responsibilities of each party, and reflecting any changes in partners from year to year. FRIS selected its statewide partners on the basis of their role in the victim service system and expertise as it related to trainings FRIS wanted to facilitate as part of the rural project.

We found FRIS adequately monitored the sub-grantees to ensure compliance with the requirements and effective implementation of the rural program. With regard to program performance, the rural coordinator reviews the goals and objectives of the grants and relevant protocols with the sub-grantees. The rural advocates provide the FRIS rural coordinator with monthly reports which include progress reports and daily activity logs. The rural coordinator also attends almost all rural trainings and therefore is able to monitor grant-funded statewide partner performance at these trainings. The rural coordinator collects rural training agendas, sign-in sheets, and course evaluations as part of the monitoring of sub-grantee performance.

The FRIS rural coordinator meets at least quarterly with the sub-grantees and is in frequent communication with the rural advocates via the rural listserv or email list that FRIS facilitates as part of its grant activities. In addition, FRIS performs annual site visits of the rural sub-grantees, during which it provides guidance on requirements relating to recordkeeping, audits, agency documentation, required certifications, inventories, and financial reporting, among other topics. FRIS has developed formalized site monitoring forms that include a set of standard checks, including verification that the sub-grantees are conducting required single audits and addressing any findings. FRIS has also held trainings for sub-grantees on appropriate grant financial management practices. In addition, FRIS provides templates for the sub-grantees, including Request for Reimbursement, Project Financial Report, and Financial Recap forms, as well as sample activity logs and training evaluation forms, which assist the sub-grantees in properly managing their grant funds and accounting for grant-funded activity.

The FRIS rural coordinator reviews monthly expenditure reports and reimbursement requests to ensure all expenditures are adequately supported. The FRIS finance coordinator performs a second check to make sure all of the amounts are correct and supported by the documentation. Once FRIS has verified the

reimbursement request information, the FRIS finance coordinator enters the information into the FRIS accounting system and processes the payment.

As part of the 2012-SW-AX-0014 grant, FRIS is responsible for facilitating and monitoring the Sexual Assault Services Program (SASP) sub-awards to the state's rape crisis centers. FRIS oversees the distribution of SASP funding to all of the West Virginia rape crisis centers and one domestic violence center that is working to become a dual center which will serve victims of both rape and domestic violence. FRIS provides the centers with a SASP application manual and sample application, along with an application checklist. A portion of the formal FRIS site monitoring checks is devoted to the sub-grantees' SASP activity. FRIS conducts checks to ensure these recipients are properly tracking grant funds and equipment, documenting grant-funded activity, and using funds for allowable and approved purposes. Additionally, the FRIS financial assistant works to report on sub-recipient SASP grant activity to the state.

We found that FRIS adequately reviews sub-grantees' financial management as it relates to both OVW awards. FRIS works with the finance staff member at each rape crisis center to ensure that costs are being tracked separately among the grants and that supporting documentation is maintained by the sub-grantees. In general, we found that FRIS staff expressed the attitude that FRIS was ultimately responsible for the sub-grantees' use of funds, and demonstrated thorough and regular monitoring of their sub-grantees' compliance with requirements and implementation of the OVW-funded activities.

OBJECTIVES, SCOPE, AND METHODOLOGY

The purpose of this audit was to determine whether reimbursements claimed for costs under the grants reviewed were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grants; and whether the awardee was meeting its program goals and objectives. The objective of our audit was to review performance in the following areas: (1) internal control environment, (2) drawdowns, (3) grant expenditures, (4) budget management and control, (5) financial status and progress reports, (6) program performance and accomplishments, (7) property management, and (8) monitoring of sub-grantees and consultants.

We conducted this 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 conclusions based on our audit objectives.

We audited two grants awarded by the Office on Violence Against Women (OVW) to the West Virginia Foundation for Rape Information and Services (FRIS): grant number 2007-WR-AX-0012 in the amount of \$2,143,242 and grant number 2012-SW-AX-0014 in the amount of \$231,214.

We reviewed grant activities and transactions from the start date of the first rural award period in October 2007 through the end of our audit field work in June 2014. We interviewed pertinent FRIS personnel to determine progress toward program objectives as well as assess the controls FRIS had in place over OVW grant funds. To determine compliance with the terms and conditions of the grants and assess risk, we reviewed FRIS written policies and procedures that affect the OVW award, including those relevant to procurement, payroll, drawdowns, reimbursement, and sub-grantee monitoring. We found that FRIS maintained careful records of grant-related activity and had established written policies and procedures that helped ensure the appropriate financial management of grant funds. With regard to its sub-grantees, we determined that FRIS maintains regular contact, performs thorough monitoring, and ensures several staff review and approve requests for reimbursement.

In conducting our audit, we performed sample testing in the following areas:

- **Drawdowns.** We analyzed FRIS's overall drawdowns of \$1,641,165 for the 2007 grant and \$93,000 for the 2012 grant, as of May 30, 2014. FRIS conducts drawdowns on a reimbursement basis and we found the overall drawdowns did not exceed the total expenditures per the accounting records for the respective grants.

- **Payroll.** We interviewed FRIS personnel regarding the charging of personnel and benefits costs to the grants. We reviewed the FRIS payroll procedures and determined that employees track their hours separately by grant and complete a biweekly timesheet and activity log for review by the FRIS finance coordinator and state coordinator before payment. To determine whether grant number 2007-WR-AX-0012 labor and fringe benefits costs were supported and allowed, we judgmentally selected employees to test from four non-consecutive pay periods for salary, and four non-consecutive pay periods for benefits, totaling \$5,743. Total personnel costs charged to the grant were \$335,762. To determine whether grant number 2012-SW-AX-0014 labor and fringe benefits costs were supported and allowed, we judgmentally selected employees to test from seven non-consecutive pay periods for salary, and seven non-consecutive pay periods for benefits, totaling \$3,290. Total personnel costs charged to the grant were \$93,948. We found the payroll and fringe benefit costs charged to the grants were supported and allowable.
- **Transactions.** To test transactions for authorizations, approvals, and sufficient supporting documentation, we judgmentally selected 32 non-payroll transactions totaling about \$65,630 out of \$1,317,112 charged to grant number 2007-WR-AX-0012. We also judgmentally selected 12 non-payroll transactions totaling nearly \$1,700 out of \$7,417 charged to grant number 2012-SW-AX-0014. We analyzed the transactions to determine if the costs were properly authorized, classified, recorded, and supported. We found that sampled transactions were generally allowable, supported with documentation, and allocated in accordance with the applicable laws, regulations, and guidelines.

In addition, we reviewed the timeliness and accuracy of financial status and progress reports and reviewed the internal controls of the financial management system specific to the administration of grant funds during the period under review.

We provided a draft report for review and comments to the Office on Violence Against Women (OVW) and the West Virginia Foundation for Rape Information and Services (FRIS). Our report did not include any findings or recommendations and neither entity provided comments on our report. No further actions are necessary and this report is issued closed.