

FS23-10



Audit of the Office of Justice Programs Victim  
Assistance Funds Subawarded by the Virginia  
Department of Criminal Justice Services to the  
Alexandria Sexual Assault Center and  
Domestic Violence Program,  
Alexandria, Virginia



23-061

**APRIL 2023**

REDACTED FOR PUBLIC RELEASE

Redactions were made to the full version of this report for proprietary/commercial reasons. The redactions are contained only in Appendix 2, the grantee's response, and are the name of a company and product.



# EXECUTIVE SUMMARY

## **Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Virginia Department of Criminal Justice Services to the Alexandria Sexual Assault Center and Domestic Violence Program, Alexandria, Virginia**

### **Background**

The U.S. Department of Justice, Office of Justice Programs (OJP) provided funds to the Virginia Department of Criminal Justice Services (Virginia DCJS) to make subawards to support victim assistance programs in the state of Virginia. Virginia DCJS awarded \$1,012,418 in crime victim assistance funds to the City of Alexandria (Alexandria) Sexual Assault Center and Domestic Violence Program (Alexandria SADV Program) under one subaward in 2021. The purpose of this subaward was to provide crisis counseling, support, information, and referrals to victims of sexual assault and domestic violence crimes and their families and friends, and train staff and allied professionals on building safe and inclusive services for victims of sexual assault and domestic violence. As of December 2022, Virginia DCJS had reimbursed Alexandria \$641,900 under the SADV Program subaward.

### **Audit Objective**

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

### **Summary of Audit Results**

We concluded that the Alexandria SADV Program provided services and support to both victims of sexual assault and domestic violence crimes in accordance with award requirements. However, we found that Alexandria could improve how it tracks federal financial assistance from other sources of subaward funds.

#### **Program Performance Accomplishments**

The audit found sufficient evidence that the Alexandria SADV Program used the subaward to provide a range of services to victims of crime in Alexandria. We selected victim case files to review and confirmed case files contained the pertinent information, such as a victim's eligibility, intake date, services rendered, and service providers referred.

#### **Financial Management**

The audit concluded that Alexandria maintained financial management controls to budget and classify subaward funds; however, we determined that Alexandria needs to identify the funding source for expenditures at a transaction level, as required by both federal and DOJ-specific award guidelines.

### **Recommendation**

Our report contains one recommendation to OJP and Virginia DCJS to ensure Alexandria implements a process to distinguish and track the source of subaward expenses between federal and state financial assistance. We requested a response to our draft audit report from relevant parties. Responses from Alexandria, Virginia DCJS, and OJP can be found respectively in Appendix 2, 3, and 4. Our analysis of those responses is included in Appendix 5.

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## Introduction

The Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of victim assistance funds received by the City of Alexandria (Alexandria) Sexual Assault Center and Domestic Violence (Alexandria SADV Program). The Office of Justice Programs (OJP) Office for Victims of Crime (OVC) provided this funding to the Virginia Department of Criminal Justice Services (Virginia DCJS), which serves as the State Administering Agency (SAA) for Virginia and makes subawards to direct service providers. As a direct service provider, the Alexandria SADV Program received a subaward derived from the FY 2019 and FY 2020 Victims of Crime Act (VOCA) victim assistance grants that OJP awarded to Virginia DCJS. As shown in Table 1, Virginia DCJS also included \$132,000 in Virginia state funds as part of the overall subaward.

**Table 1**

**Audited Subaward to the City of Alexandria, Alexandria Sexual Assault Center and Domestic Violence Program from Virginia DCJS**

SAA Subaward Identifier	OJP Prime Award Numbers	Project State Date	Project End Date	Source	Subaward (\$)
22-C3458VP20	2019-V2-GX-0054 and	07/01/2021	06/30/2023	VOCA Victim Assistance	880,418
	2020-V2-GX-0048			Virginia DCJS	132,000
Total					\$1,012,418

Sources: OJP and Virginia DCJS

Established by VOCA, the Crime Victims Fund (CVF) is used to support crime victims through DOJ programs and state and local victim assistance and compensation initiatives.<sup>1</sup> 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 primary and secondary 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.

### Alexandria Sexual Assault Center and Domestic Violence Program

The Alexandria Department of Community and Human Services (DCHS) provides a variety of services to residents of Alexandria, Virginia, to improve their well-being, safety, and self-sufficiency. The Alexandria SADV Program seeks to serve victims supported by the Alexandria Sexual Assault Center (SAC) and the

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<sup>1</sup> 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.

Domestic Violence Program (DVP). The SAC offers support to sexual assault survivors and their family and friends, as well as sexual harassment and stalking victims, while the DVP offers support to victims of domestic violence and their families and friends. Victim services provided by the Alexandria SADV Program include legal services, mental health services, a 24-hour hotline, crisis intervention and emotional support, and an emergency shelter that offers housing, food, and emotional support. The DCHS maintains a fiscal team that manages and oversees the financial aspects of the Alexandria SADV Program.

## **OIG Audit Approach**

The objective of this audit was to review how the Alexandria SADV Program used the VOCA funds received through a subaward from Virginia DCJS to assist crime victims and assess whether the Alexandria SADV Program accounted for VOCA funds in compliance with 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, we solicited feedback from Virginia DCJS officials regarding the subrecipient's record of delivering crime victim services, accomplishments, and compliance with SAA award requirements.<sup>2</sup> Virginia DCJS officials did not express significant concerns and found no financial or programmatic deficiencies to date regarding the Alexandria SADV Program. Virginia DCJS conducted a site visit on the Alexandria SADV Program in December 2021 and reported that it was impressed by the Alexandria SADV Program's efforts.

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; Virginia DCJS guidance; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform 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.

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<sup>2</sup> As an SAA, Virginia DCJS is responsible for monitoring the performance of, providing technical assistance to, collecting data from, and processing victim assistance reimbursements requested by the Program. As such, we considered the results of our audit of victim assistance grants awarded to Virginia DCJS in performing this separate review. See U.S. Department of Justice Office of the Inspector General, [Audit of the Office of Justice Programs Victim Assistance Grants Awarded to the Virginia Department of Criminal Justice Services, Richmond, Virginia](https://www.oversight.gov/sites/default/files/oig-reports/20-100.pdf), Audit Report 20-100 (September 2020), <https://www.oversight.gov/sites/default/files/oig-reports/20-100.pdf>

# Audit Results

## Program Performance and Accomplishments

Providers of direct services to victims can receive Victims of Crime Act (VOCA) subawards to support their work. The City of Alexandria (Alexandria) Sexual Assault Center and Domestic Violence Program (Alexandria SADV Program) received VOCA funding from the Virginia Department of Criminal Justice Services (DCJS) to offer support to sexual assault and domestic violence victims and their friends and families. We obtained an understanding of the Alexandria SADV Program's standard operating procedures in relation to the subaward funded services. We also compared the subaward solicitation, project proposal and application, and subaward agreement against available evidence of accomplishments to determine whether the Alexandria SADV Program demonstrated evidence of providing the services for which it was funded. Overall, we concluded that the Alexandria SADV Program demonstrated achievement of the subaward's stated goals and objectives.

## Program Implementation and Services

According to the DOJ Grants Financial Guide (Guide), recipients of federal awards should maintain a well-designed and tested system of internal controls. The 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.

As outlined in its subaward application and approval package, the Alexandria SADV Program subaward was to provide crisis counseling, support, information, and referrals to survivors and support people who call the sexual assault hotline and the domestic violence hotline, and support the needs of survivors from underserved communities.

To obtain an understanding of its standard operating procedures in relation to victim services, we requested written policies and procedures that governed the Alexandria SADV Program, reviewed resource materials available to clients, and interviewed both cognizant Alexandria officials and program personnel involved with client intake.

According to Alexandria SADV Program staff, there are several referral points through which clients can make contact. While a majority of client requests derive from the 24-hour crisis hotline, some clients receive referrals from courthouse employees, police officers, and hospital staff. Once a client makes contact, the Alexandria SADV Program completes an intake form to assess needs, obtain background information, and determine what services best fit the client's needs.<sup>3</sup> The Alexandria SADV Program staff manual contains many resources for staff such as guidelines and procedures for available services, program administrative policies and procedures, and personnel and administrative guidelines.

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<sup>3</sup> The Alexandria SADV Program tries to follow-up with clients within 12 hours of initial contact but can offer services immediately depending on the urgency of a client's need. If the needs of the requesting client cannot be met by the Alexandria SADV Program, it refers the client to other partnering entities.

We reviewed a judgmental sample of 61 victim claims files and found evidence that Alexandria SADV Program staff referred or provided various services to address the needs of the victim. We validated that each case file contained the pertinent information, such as a victim's eligibility, intake date, case notes, services rendered or service providers referred, case status (open, closed), and case notes. Additionally, we interviewed Alexandria SADV Program officials and reviewed available services data and material developed and distributed regarding programs and services. Based on this work we concluded that the Alexandria SADV Program demonstrated that it provided a range of services to crime victims within the goals and objectives of the subaward.

## **Financial Management**

According to the DOJ Grants Financial Guide, grant recipients and subrecipients must establish and maintain adequate accounting systems and financial records to accurately account for awarded funds. We thus interviewed Alexandria officials, examined policies and procedures, and reviewed award documents to determine whether it properly accounted for subaward funds. Overall, we concluded that while Alexandria generally maintained adequate financial controls over approvals, it did not identify the funding source for expenditures at a transaction level, as required by the DOJ Grants Financial Guide and the Uniform Guidance at 2 C.F.R. § 200.302.

### **Fiscal Policies and Procedures**

The Alexandria Department of Community and Human Services' (Alexandria DCHS) Finance Team managed and oversaw the financial aspects of the Alexandria SADV Program subaward. Alexandria DCHS accountants received and reviewed Alexandria SADV Program financial transaction documentation for accuracy, allowability, and fund availability. An Alexandria DCHS Grant Manager was responsible for authorizing purchases and a Grant Accountant prepared subaward quarterly reimbursement requests to Virginia DCJS.

The Alexandria DCHS maintained a schedule of award expenditures and processed payments. Its accounting system established a separate code to track subaward expenditures. Within this code, the accounting system also recognized budget object categories so transactions could be budgeted and expended within the appropriate cost categories. At our request, the Alexandria DCHS generated a listing from its general ledger of subaward transactions and expenses tabulated by cost category and revenue.

The Alexandria DCHS reported expenses to Virginia DCJS via quarterly reimbursement requests. These reimbursement requests allocated costs between federal and state funds by applying the percentage of funds each source (federal or state) comprised of the total value of the subaward. For example, the Alexandria DCHS submitted a claim reimbursement request for Virginia DCJS's second quarter of FY 2022. This request included \$124,953 in federal funds and \$18,743 in state funds. The federal portion accounted for 87 percent of the total request, which is consistent with the percentage of the subaward's source of funds. As quarterly reimbursement requests each comprised many transactions, this effectively meant that federal and state funds comprised a percentage of every subaward expense contained in the request.

Thus, while the Alexandria DCHS reimbursement requests show expenditure activity funded by source, its accounting system did not distinguish the source of subaward expenditures between federal and state funds. The DOJ Grants Financial Guide states that a recipient of an award is required to keep detailed



accounting records and documentation to track federal funds awarded and expensed. Accounting systems must be able to account for award funds separately, to include expenditures and obligations of federal funds. The Uniform Guidance at 2 C.F.R. § 200.302(b)(3) states that a financial system used by a recipient to account for funds must identify adequately the source and application of funds for federally funded activities. In addition, 2 C.F.R. § 200.302(a) states that a financial system must trace funds to a level of expenditures adequate to establish that such funds have been used according to the federal statutes, regulations, and the terms and conditions of the federal award.

While the Alexandria DCHS accounting records separately accounted for the source of subaward funds, such records did not track federal from state financial assistance at the expenditure level. As Virginia DCJS applied the same program requirements and conditions to the entirety of the subaward, this did not affect our ability to test subaward costs. Nevertheless, we could not verify which specific funding source (federal or state) supported individual subaward transactions. Such information is critical for Alexandria to be able to demonstrate how much federal funding it spent over any given time for Single Audit purposes per 2 C.F.R. § 200.501.

We recommend that OJP work with Virginia DCJS to ensure that Alexandria implements a process to distinguish and track the source of subaward expenses between federal and state financial assistance.

### **Subaward Expenditures**

Alexandria requested payment from Virginia DCJS for reimbursement of expenses. The approved budget for the Alexandria SADV Program subaward included personnel, employee benefits, cell phones, and parking leases. As of December 2022, the Alexandria SADV Program received \$641,900 in subaward reimbursement.<sup>4</sup>

The largest cost area for which the Alexandria SADV Program received reimbursement was personnel costs. Virginia DCJS reimbursed the Alexandria SADV Program \$634,801 for personnel and associated fringe benefits costs (99 percent of the total reimbursement of \$641,900). This subaward funded five full-time positions and one part-time position. We thus judgmentally sampled 2 non-consecutive pay periods, which included five individual bi-weekly employee payments, totaling \$29,339. We also tested \$2,177 in fringe benefit costs associated with the personnel charges in our sample.

Time and attendance records for the pay periods sampled contained adequate support and evidence of review. General ledger entries for payroll and fringe benefits were allowable and reasonable as delineated within the grant's budget narrative.

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<sup>4</sup> Following guidance from the VOCA Fix to Sustain the Crime Victims Fund Act of 2021, Virginia DCJS allowed the subrecipient to waive the requirement to provide matching funds from non-federal sources. Therefore, we did not perform testing in this area except for verifying that the waiver was provided and in place for the life of this subaward.



## **Conclusion and Recommendation**

As a result of our audit testing, we conclude that the Alexandria SADV Program demonstrated achievement of the grant's stated goals and objectives but did not adhere to all grant requirements we tested. We did not identify significant issues regarding the Alexandria SADV Program's required program performance and personnel costs. However, we found that Alexandria needs to distinguish and track the source of subaward expenses between federal and state financial assistance. We provide one recommendation to OJP and Virginia DCJS to address this deficiency.

We recommend that OJP and Virginia DCJS:

1. Ensure that Alexandria implements a process to distinguish and track the source of subaward expenses between federal and state financial assistance.

# **APPENDIX 1: Objective, Scope, and Methodology**

## **Objective**

The objective of this audit is to review how the City of Alexandria (Alexandria) Sexual Assault Center and Domestic Violence Program (Alexandria SADV Program) used the Victims of Crime Act (VOCA) funds received through a subaward from the Virginia Department of Criminal Justice Services (Virginia DCJS) to assist crime victims and assess whether the Alexandria SADV Program accounted for VOCA funds in compliance with 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This was an audit of a subaward to the City of Alexandria (Alexandria) Sexual Assault Center and Domestic Violence Program (Alexandria SADV Program). This subaward, totaling \$1,012,418, was funded by the Virginia DCJS from primary VOCA grant 2019-V2-GX-0054 and 2020-V2-GX-0048 awarded by the Office of Justice Programs (OJP) Office for Victims of Crime. As of December 2022, the Alexandria SADV Program had received \$641,900 from Virginia DCJS in subaward reimbursement.

Our audit concentrated on, but was not limited to, Alexandria's FYs 2022 and 2023. The DOJ Grants Financial Guide; the VOCA Guidelines and Final Rule; DCJS guidance; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; and OJP and DCJS award documents constitute the primary criteria we applied during the audit.

To accomplish our objectives, we tested compliance with what we considered to be the most important conditions of the Alexandria SADV Program activities related to the audited grants. Our work included conducting interviews with Alexandria's Department of Community and Human Services financial and program staff, examining policies and procedures, and reviewing grant documentation and financial records. We performed sample-based audit testing for victims claim files and grant expenditures including payroll and fringe benefit charges. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grants 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 DOJ's JustGrants System, various systems that DCJS used to account for VOCA victim assistance funds, and city-level systems that Alexandria used to control its general ledger and account for payroll specific to the management of DOJ subaward funds during the audit period. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

## Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objective. We did not evaluate the internal controls of the Alexandria SADV Program to provide assurance on its internal control structure as a whole. The Alexandria SADV Program's management is responsible for the establishment and maintenance of internal controls in accordance with OMB Circular A-123 and 2 C.F.R. § 200. Because we do not express an opinion on the Alexandria SADV and Alexandria DCHS's internal control structure as a whole, we offer this statement solely for the information and use of the Alexandria SADV Program, Virginia DCJS and OJP.<sup>5</sup>

We assessed the design, implementation, and operating effectiveness of these internal controls and identified deficiencies that we believe could affect the Alexandria SADV Program's ability to effectively operate, to correctly state financial and performance information, and to ensure compliance with laws and regulations.

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

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<sup>5</sup> This restriction is not intended to limit the distribution of this report, which is a matter of public record.

## APPENDIX 2: Alexandria Sexual Assault and Domestic Violence Program Response to the Draft Report



Department of Community & Human Services  
Sexual Assault Center and Domestic Violence Program  
123 Pitt Street, Suite 225  
Alexandria, Virginia 22314

March 14, 2023

John Manning  
Regional Audit Manager  
Washington Regional Audit Office  
Office of the Inspector General  
U.S. Department of Justice  
Jefferson Plaza, Suite 900  
Washington, DC 20530

Dear Mr. Manning:

We appreciate the opportunity to respond to the Office of the Inspector General (OIG) draft audit report, related to Subaward # 22-C3458VP20 and Federal Grant Numbers 2019-V2-GX-0054 and 2020-V2-GX-0048. The Draft Audit Report includes one recommendation:

**Ensure that Alexandria implements a process to distinguish and track the source of subaward expenses between federal and state financial assistance.**

We believe that this recommendation is not necessary for the following reasons:

1. Per the Department of Justice (DOJ) Financial Guide – October 2022, §2.2 Standards for Financial Management Systems states that *"If the recipient's or subrecipient's automated general ledger accounting system cannot comply with this requirement, a system should be established to adequately track funds according to each budget category."* The City has such a system which involves the use of an [REDACTED] spreadsheet to track the allocation of expenditures. The City currently reviews all related expenses (including invoices) to allocate expenditures up to the 87% Federal maximum rate. These reviews have consistently been done, and DCHS has not exceeded the allotted percentage allowable. The most recent related audit shows that DCHS met the required allowable expense by allocating costs to revenue sources accordingly.
2. The DOJ expects the sub-recipient (DCHS) to properly delineate Federal versus State and other expenditures in its reporting/tracking system, which is currently done. Accounting fulfills the organization-wide obligation to accurately report Federal dollars in the annual Schedule for Expenditures for Federal Awards (SEFA).
3. The audit recommendation will unduly burden the City of Alexandria by creating a requirement to change the [REDACTED] system currently used by the City. While the [REDACTED] system is capable of tracking revenues from their sources, it is not structured to track expenditures in the same manner. The [REDACTED] system tracks programs such as this grant at the Organization (Org) level. Within the Org are several Objects which are the smallest accounting characterization. Objects isolate various

Domestic Violence Hotline  
703.746.4911  
Fax 703.746.3280

[alexandriava.gov/DomesticViolence](http://alexandriava.gov/DomesticViolence)

Sexual Assault Crisis Line  
703.683.7273

sources of revenue (e.g., State and Federal). It is not possible within our system to attribute expenditures to specific revenues without creating a separate Org. If there is no distinction as to what needs to be funded by State versus Federal revenue, the split would be entirely arbitrary as it relates to what is posted to the Federal Org and what is posted to the State Org. It would not be prudent to inundate the system with superfluous objects which impact other grants and unduly complicate the chart of accounts.

4. Based on these factors, the City requests that the recommendation be withdrawn. The City will continue to comply with the requirement listed in §2.2 Department of Justice Financial Guide by maintaining a system that will track the expenditures.

Thank you,

*Debra Evans*

Debra Evans  
Division Chief, Sexual Assault Center and Domestic Violence Program  
Department of Community and Human Services  
City of Alexandria

*Raphael Obenwa*

Raphael Obenwa  
Chief Fiscal Officer, Department of Community and Human Services  
City of Alexandria

*Kate Garvey*

Kate Garvey  
Director, Department of Community and Human Services  
City of Alexandria

Domestic Violence Hotline  
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Fax 703.746.3280

[alexandriava.gov/DomesticViolence](http://alexandriava.gov/DomesticViolence)

Sexual Assault Crisis Line  
703.683.7273

# APPENDIX 3: Virginia Department of Criminal Justice Services Response to the Draft



## COMMONWEALTH of VIRGINIA

### *Department of Criminal Justice Services*

The Honorable Jackson H. Miller  
Director

Tracy Louise Winn Banks, Esq.  
Chief Deputy Director

Washington Building  
1100 Bank Street  
Richmond, Virginia 23219  
(804) 786-4000  
[www.dcjs.virginia.gov](http://www.dcjs.virginia.gov)

March 13, 2023

Mr. John Manning  
Regional Audit Manager  
U.S. Department of Justice  
Office of the Inspector General  
950 Pennsylvania Ave., NW  
Washington, D.C. 20530

Dear Mr. Manning:

We appreciate the opportunity to respond to the Office of the Inspector General (OIG) draft audit report, related to Subaward # 22-C3458VP20 and Federal Grant Numbers 2019-V2-GX-0054 and 2020-V2-GX-0048. The draft audit report includes one recommendation:

***Ensure that Alexandria implements a process to distinguish and track the source of subaward expenses between federal and state financial assistance.***

We agree with this recommendation and will work with the Office of Justice Programs and Alexandria to implement a process to distinguish and track the source of subaward expenses between federal and state financial assistance by the end of the upcoming state fiscal year, June 30, 2024. This will include technical assistance provision and fiscal/programmatic monitoring.

Sincerely,

A handwritten signature in black ink, appearing to read "Jackson H. Miller".

Jackson Miller  
Director

## APPENDIX 4: The Office of Justice Programs Response to the Draft



U.S. Department of Justice

Office of Justice Programs

Office of Audit, Assessment, and Management

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Washington, D.C. 20531

March 24, 2023

MEMORANDUM TO: John J. Manning  
Regional Audit Manager  
Washington Regional Audit Office  
Office of the Inspector General

FROM: Ralph E. Martin *Ralph E. Martin*  
Director

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs Victim Assistance Funds, Subawarded by the Virginia Department of Criminal Justice Services to the Alexandria Sexual Assault Center and Domestic Violence Program, Alexandria, Virginia*

This memorandum is in reference to your correspondence, dated February 23, 2023, transmitting the above-referenced draft audit report for the City of Alexandria (Alexandria) Sexual Assault Center and Domestic Violence Program. Alexandria received sub-award funds from the Virginia Department of Criminal Justice Services (Virginia DCJS), under the Office of Justice Programs' (OJP), Office for Victims of Crime, Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 2019-V2-GX-0054 and 2020-V2-GX-0048. We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains one recommendation and no questioned costs. The following is OJP's analysis of the draft audit report recommendation. For ease of review, the recommendation is restated in bold and is followed by OJP's response.

1. **We recommend that OJP and Virginia DCJS ensure that Alexandria implements a process to distinguish and track the source of subaward expenses between Federal and state financial assistance.**

OJP agrees with the recommendation. In its response, dated March 13, 2023, the Virginia DCJS stated that, by the end of the upcoming state fiscal year, June 30, 2023, it will work with Alexandria to implement a process to distinguish and track the source of subaward expenses between Federal and state financial assistance, which will include providing technical assistance and fiscal/programmatic monitoring.



Accordingly, we will coordinate with the Virginia DCJS to obtain a copy of Alexandria's written policies and procedures, developed and implemented, to ensure that Alexandria implements a process to distinguish and track the source of subaward expenses between Federal and state financial assistance.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact Jeffery A. Haley, Deputy Director, Audit and Review Division, on (202) 616-2936.

cc: Maureen A. Henneberg  
Deputy Assistant Attorney General

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

Jeffery A. Haley  
Deputy Director, 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

Kathrina S. Peterson  
Deputy Director  
Office for Victims of Crime

James Simonson  
Associate Director for Operations  
Office for Victims of Crime

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

Frederick Rogers  
Grants Management Specialist  
State Victim Resource Division  
Office for Victims of Crime

Charlotte Grzebien  
Deputy General Counsel

cc: Jennifer Plozai  
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 OCOM000176

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

The OIG provided a draft of this audit report to the Office of Justice Programs (OJP), Virginia Department of Criminal Justice Services (Virginia DCJS), and Alexandria Sexual Assault and Domestic Violence Program (Alexandria SADV Program). Alexandria's SADV Program response is incorporated in Appendix 2, Virginia DCJS's response is incorporated in Appendix 3, and OJP's response is incorporated in Appendix 4 of this final report. In response to our draft audit report, OJP agreed with the recommendation and, as a result, the status of the audit report is resolved. Virginia DCJS agreed with the recommendation and Alexandria's SADV Program neither agreed nor disagreed with the recommendation. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

### **Recommendation for OJP and Virginia DCJS:**

- 1. Ensure that Alexandria implements a process to distinguish and track the source of subaward expenses between federal and state financial assistance.**

Resolved. OJP stated in its response that it agreed with the recommendation. OJP stated that it will work with Alexandria to implement a process to distinguish and track the source of subaward expenses between federal and state financial assistance, which will include providing technical assistance and fiscal and programmatic monitoring. OJP also stated that it will coordinate with the Virginia DCJS to obtain a copy of the Alexandria SADV Program's written policies and procedures and ensure they were properly developed and implemented.

The Virginia DCJS agreed with this recommendation and will work with OJP and the Alexandria SADV Program to implement a process to distinguish and track the source of subaward expenses between federal and state financial assistance by the end of the upcoming state fiscal year, June 30, 2024. This will include technical assistance provision and fiscal and programmatic monitoring.

The Alexandria SADV Program stated in its response that it believes that this recommendation is not necessary and requested that it be withdrawn because: (1) Alexandria has such a system that involves the use of a spreadsheet to track the allocation of expenditures; (2) the DCHS accounting delineates federal versus state and other expenditures in its reporting and tracking system; and (3) while its financial system is capable of tracking revenue sources, it is not structured to track expenditures. The Alexandria SADV Program also stated, however, that it will comply with the DOJ Grants Financial Guide by maintaining a system that will track the expenditures. As stated in the audit report, the auditee's accounting records separately accounted for the source of subaward revenue, but the official accounting system did not delineate federal from state financial assistance at the expenditure level. The DOJ Grants Financial Guide states that a recipient of an award is required to keep detailed accounting records and documentation to track federal funds awarded and expensed.

We consider this recommendation resolved based on OJP's agreement with the recommendation and the planned corrective action discussed in the responses from both OJP and Virginia DCJS. This recommendation can be closed when we receive evidence that OJP and Virginia DCJS have worked with the Alexandria SADV Program to implement a process to distinguish and track the source of subaward expenses between federal and state financial assistance.