



Audit of the Office of Justice Programs Grants  
Awarded to the Palm Beach County Sheriff's Office,  
West Palm Beach, Florida



22-042

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**FEBRUARY 2022**

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# EXECUTIVE SUMMARY

## **Audit of the Office of Justice Programs Grants Awarded to the Palm Beach County Sheriff's Office, West Palm Beach, Florida**

### **Objectives**

The Office of Justice Programs (OJP) awarded the Palm Beach County Sheriff's Office (PBCSO) four grants totaling \$3,023,152. The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the awards; and to determine whether the grantee demonstrated adequate progress towards achieving program goals and objectives.

### **Results in Brief**

As a result of our audit, we concluded that PBCSO generally adhered to the grant requirements that we tested. This audit did not identify significant concerns regarding PBCSO's program performance and accomplishments, grant financial management, grant expenditures, budget management and control, drawdowns, and federal financial reports.

### **Recommendations**

Our report contained no recommendations. We requested a response to our draft report from OJP and PBCSO. OJP's response can be found in Appendix 2. PBCSO declined to provide a response.

### **Audit Results**

The purpose of the four OJP grants that we reviewed were to address violent crime issues in distressed, high-crime neighborhoods; support collaboration to improve responses and outcomes for individuals with mental illnesses and substance abuse who come into contact with the justice system; decrease turnaround times for the analysis of criminal investigation evidentiary material; and to support the development and enhancement of approaches to combat human trafficking. The project periods for the grants range from October 2018 to December 2022. As of September 30, 2021, PBCSO had drawn down a cumulative amount of \$1,614,196 for all grants reviewed.

#### **Program Goals and Accomplishments**

PBCSO demonstrated adequate progress toward achieving the grants' goals and objectives, and information reported in the required progress reports was accurate.

#### **Grant Financial Management**

We examined PBCSO's policies and procedures, reviewed PBCSO's Single Audit Reports for fiscal years 2019 and 2020, and performed testing in areas relevant to the management of the grants. We did not identify significant concerns related to PBCSO's grant financial management.

#### **Grant Expenditures**

We judgmentally selected and tested 100 transactions totaling \$703,297 by comparing the transactions to supporting documentation. We determined that the transactions were properly supported, allowable, properly allocated, and compliant with grant award requirements.

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## Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of four grants awarded to the Palm Beach County Sheriff's Office (PBCSO) by the Office of Justice Programs (OJP). The four grants, administered by OJP's Bureau of Justice Assistance (BJA) and National Institute of Justice (NIJ), totaled \$3,023,152 as shown in Table 1.

**Table 1**

**Grants Awarded to the Palm Beach County Sheriff's Office**

Grant Program and Award Number	Program Office	Award Date	Project Period Start Date	Project Period End Date	Award Amount
Innovations in Community-Based Crime Reduction Program (2018-BJ-BX-0004)	BJA	10/01/2018	10/01/2018	09/30/2022	\$1,000,000
Justice and Mental Health Collaboration Program (2018-MO-BX-0009)	BJA	09/26/2018	01/01/2019	12/31/2022	\$750,000
Enhanced Collaborative Strategy to Combat Human Trafficking (2019-VT-BX-K018)	BJA	09/29/2019	10/01/2019	09/30/2022	\$900,000
Deoxyribonucleic Acid (DNA) Capacity Enhancement and Backlog Reduction Program (2019-DN-BX-0028)	NIJ	09/12/2019	01/10/2020	12/31/2021	\$373,152
<b>Total:</b>					<b>\$3,023,152</b>

Source: OJP Grants Management System

The Innovations in Community-Based Crime Reduction Program is intended to reduce violent crime, increase trust, and improve community safety as part of a comprehensive strategy to rebuild and revitalize neighborhoods. The Justice and Mental Health Collaboration Program is intended to support cross-system collaboration in an effort to improve responses and outcomes for individuals with mental illnesses or co-occurring mental illness and substance abuse who encounter the justice system. The Enhanced Collaborative Strategy to Combat Human Trafficking is intended to support the development and enhancement of multidisciplinary human trafficking task forces that implement collaborative approaches to combat all forms of human trafficking. The goal of the DNA Capacity Enhancement for Backlog Reduction Program is intended to decrease the backlog of crime evidence and improve casework processing efficiencies.

## **The Grantee**

PBCSO is the largest law enforcement agency in Palm Beach County, Florida. As of October 2021, the county had 1,584 law enforcement officers, 697 corrections officers, and 1,905 civilian support staff. PBCSO provides law enforcement and civil and corrections services to residents of Palm Beach County. PBCSO governs a population of about 1.4 million residents in 20 districts, and its mission is to safeguard lives and property, reduce crime, and enhance public safety.

## **OIG Audit Approach**

The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant; and to determine whether the grantee demonstrated adequate progress towards achieving the program goals and objectives. To accomplish these objectives, we assessed performance in the following areas of grant management: program performance, financial management, expenditures, budget management and control, drawdowns, and federal financial reports. We tested compliance with what we consider to be the most important conditions of the grants. The DOJ Grants Financial Guide, the DOJ Guide to Procurements under DOJ Grants and Cooperative Agreements, and the award documents contain the primary criteria we applied during the audit. The results of our analysis are discussed in detail later in this report. Appendix 1 contains additional information on this audit's objectives, scope, and methodology.

# Audit Results

## Program Performance and Accomplishments

Award recipients must agree to collect data appropriate for facilitating reporting requirements established by the Government Performance and Results Act Modernization Act. According to the DOJ Grants Financial Guide, the funding recipient should ensure that valid and auditable source documentation is available to support all data collected for each performance measure specified in the program solicitation. We reviewed required performance reports, reviewed grant documentation, and interviewed grantee officials to determine whether PBCSO demonstrated adequate progress towards achieving the program goals and objectives. We also reviewed the performance reports to determine if the required reports were accurate. Finally, we reviewed PBCSO's compliance with the special conditions identified in the awards' documentation.

## Program Goals and Objectives

To assess PBCSO's accomplishment of its grant goals, we selected the entity's three most recent progress reports and compared the reports to supporting documentation. We discuss the grant goals and testing results below.

### Innovations in Community-Based Crime Reduction Program

The goals of the Innovations in Community-Based Crime Reduction Program grant are to: (1) develop a multidisciplinary council to include community members and community stakeholders; (2) make data-driven decisions based on the prevalence, scope, and nature of crime drivers, crimes, and population; (3) engage community members through outreach, community education, and council participation; (4) develop and implement a comprehensive, evidence based law enforcement strategy to reduce crime in targeted neighborhoods; and (5) provide an array of services to meet the critical needs of persons living within the community. Based on our review, there were no indications that PBCSO was not adequately achieving the stated goals and objectives of the grant.

### Justice and Mental Health Collaboration Program

The goals of the Justice and Mental Health Collaboration Program are to: (1) develop a specialized task force; (2) make data-driven decisions; (3) implement a comprehensive, evidence-based implementation plan; and (4) conduct a public awareness and education campaign. Based on our review, there were no indications that PBCSO was not adequately achieving the stated goals and objectives of the grant.

### Enhanced Collaborative Strategy to Combat Human Trafficking

The goals of the Enhanced Collaborative Strategy to Combat Human Trafficking cooperative agreement are to: (1) continue and expand the Palm Beach County Human Trafficking Task Force; (2) make data-driven decisions based on the prevalence and scope of human trafficking in Palm Beach County; (3) identify all types of human trafficking victims through coordinated training, public awareness, and outreach efforts; (4) conduct proactive, victim-centered investigations and labor and sex trafficking; (5) provide comprehensive

restorative services to human trafficking victims; and (6) develop a task force sustainability plan.<sup>1</sup> Based on our review, there were no indications that PBCSO was not adequately achieving the stated goals and objectives of the grant.

### **DNA Capacity Enhancement and Backlog Reduction Program**

The goals of the DNA Capacity Enhancement and Backlog Reduction Program are to: (1) increase the capacity of PBCSO's Forensic Biology Unit, (2) decrease non-casework related activities through contracts, and (3) maintain continuing education for all analysts in PBCSO's forensic laboratory. Based on our review, there were no indications that PBCSO was not adequately achieving the stated goals and objectives of the grant.

### **Required Performance Reports**

According to the DOJ Grants Financial Guide, the funding recipient should ensure that valid and auditable documentation is available to support all data collected for each performance measure specified in the program solicitation. To verify the information in the progress reports for the four grant awards that we tested, we selected a sample of performance measures from the two most recent reports submitted for each grant.<sup>2</sup> We then traced the items to supporting documentation maintained by PBCSO. Based on our progress report testing, we did not identify any instances where the accomplishments described in the required reports did not match the supporting documentation.

### **Compliance with Special Conditions**

Special conditions are the terms and conditions that are included with the awards. We evaluated the special conditions for four grants and selected a judgmental sample of requirements significant to grant performance that are not addressed in another section of this report. We evaluated three special conditions from the Innovations in Community-Based Crime Reduction Program, one special condition from the Justice and Mental Health Collaboration Program, two special conditions from the Enhanced Collaborative Strategy to Combat Human Trafficking grant, and two special conditions from the DNA Capacity Enhancement and Backlog Reduction Program. We did not identify any instances of PBCSO violating the special conditions that we reviewed.

### **Grant Financial Management**

According to the DOJ Grants Financial Guide, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds

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<sup>1</sup> In January 2017, the Palm Beach County Human Trafficking Task Force was formed in direct response to the growing epidemic of human trafficking in Palm Beach County and surrounding areas. The Task Force was established to combat all forms of human trafficking by identifying, rescuing, and restoring victims; investigating and prosecuting trafficking crimes; and building awareness about trafficking in and around the community.

<sup>2</sup> We judgmentally selected 12 performance measures for testing from the Innovations in Community-Based Crime Reduction Program, 22 measures from the Justice and Mental Health Collaboration Program, 8 measures from the DNA Capacity Enhancement and Backlog Reduction Program, and 7 measures from the Enhanced Collaborative Strategy to Combat Human Trafficking Program, resulting in a total sample size of 49.

awarded to them. To assess PBCSO's financial management of the grants covered by this audit, we conducted interviews with PBCSO's financial staff, examined its policies and procedures, and inspected grant documents to determine whether PBCSO adequately safeguards grant funds. We also reviewed PBCSO's Single Audit Reports for fiscal years (FYs) 2019 and 2020 to identify internal control weaknesses and significant non-compliance issues related to federal awards. Finally, we performed testing in the areas that were relevant for the management of the grants, as discussed throughout this report. Based on our review, we did not identify significant concerns related to PBCSO's grant financial management.

## Single Audit

Non-federal entities that receive federal financial assistance are required to comply with the *Single Audit Act of 1984*, as amended. The Single Audit Act provides for recipients of federal funding above a certain threshold to receive an annual audit of their financial statements and federal expenditures. Under 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), such entities that expend \$750,000 or more in federal funds within the entity's fiscal year must have a "single audit" performed annually covering all federal funds expended that year. We identified no material weaknesses, significant deficiencies, or findings pertaining to federal programs in Palm Beach County's FYs 2019 and 2020 Single Audit Reports.

## Grant Expenditures

For the four grants that we audited, PBCSO's approved budgets included categories for personnel, fringe benefits, travel, equipment, supplies, and contracts. PBCSO was required to expend \$212,086 in local funds for Grant Number 2018-MO-BX-0009 and \$325,000 in local funds for Grant Number 2019-VT-BX-K018, which represented 22 and 27 percent of the local match, respectively. To determine whether costs charged to the awards were allowable, supported, and properly allocated in compliance with award requirements, we tested a judgmental sample of 100 transactions. We reviewed documentation, accounting records, and verified grant-funded property. We determined that the transactions were properly supported, allowable, properly allocated, and in compliance with grant award requirements. The following provides additional details of our testing of transactions recorded in PBCSO's accounting records as of March 31, 2021.

- We tested 25 transactions totaling \$208,166 or 43 percent of the \$484,889 PBCSO expended for Grant Number 2018-BJ-BX-0004.
- We tested 25 transactions totaling \$130,142 or 44 percent of the \$297,988 PBCSO expended for Grant Number 2018-MO-BX-0009.
- We tested 25 transactions totaling \$174,921 or 54 percent of the \$321,161 PBCSO expended for Grant Number 2019-VT-BX-K018.
- We tested 25 transactions totaling \$190,068 or 58 percent of the \$325,977 PBCSO expended for Grant Number 2019-DN-BX-0028.

## Personnel Costs

We judgmentally selected nine pay periods to test. From these pay periods, we tested the salaries and fringe benefits costs of eight employees by comparing the costs to supporting documentation. We also tested overtime costs paid to 101 employees. We identified no issues with PBCSO's personnel costs.

## Contractor Costs

According to the DOJ Grants Financial Guide, grant recipients may enter into contracts to purchase goods and services from another entity. Grantees must maintain written standards for the awarding and administration of contracts and to ensure that contractors perform in accordance with the terms and specifications of their awards. For procurement transactions using federal award funds, grantees must use their own documented procurement procedures with applicable state, local, and tribal laws, and regulations. PBCSO entered into five contracts worth \$272,826 that were paid from the four grants we audited.

We reviewed PBCSO's contract management practices for all five contracts: one contract under Grant Number 2018-BJ-BX-0004, two contracts under Grant Number 2018-MO-BX-0009, one contract under Grant Number 2019-VT-BX-K018, and one contract under Grant Number 2019-DN-BX-0028.

- For Grant Number 2018-BJ-BX-0004, the contract was for \$11,550 with a contract period from July 2019 to January 2020. The contract's purpose was to develop a community survey for a target area of Palm Beach County to identify, verify, and prioritize crime hot spots. We verified the completion of the survey.
- For Grant Number 2018-MO-BX-0009, PBCSO entered into two contracts. The first contract was for \$98,000 with a contract period from April 2019 to December 2021. A PBCSO official told us they are currently in the process of increasing the contract amount to \$150,000 and extending the contract through the end of the grant period. The contract's purpose was to develop a task force to identify and address persons of risk of committing future acts of violence or recidivism. As of December 2021, PBCSO paid the contractor \$50,500, for five of eight required reports.
- The second contract under Grant Number 2018-MO-BX-0009 was for \$100,000 with a contract period from April 2020 to September 2021. PBCSO extended the contract to December 31, 2021. A PBCSO official told us they plan to provide another extension for this contract through the end of the grant period. The contract's purpose was to coordinate behavioral health services and related ancillary services in support of behavioral healthcare and wellness. As of December 2021, PBCSO paid the contractor \$57,223 for residential drug treatment, medical center visits, payroll costs, and counseling sessions.
- For Grant Number 2019-VT-BX-K018, the contract was not to exceed \$55,000 and had a contract period of October 2020 to September 2022. The purpose of the contract was for PBCSO to partner with a university and task force partners to combat human trafficking. As of December 2021, PBCSO paid the contractor \$12,222 for participating in meetings, conducting interviews, identifying project goals and desired outcomes, continually assessing the project's progress and direction, providing

verbal or written feedback, as needed; and establishing victim participation criteria with project partners.<sup>3</sup>

- For Grant Number 2019-DN-BX-0028, the contract was for \$8,276 with a contract period from May 2015 to August 2015 with an extension to August 2021. According to the extension, PBCSO increased the contract to \$9,590. As of October 2021, PBCSO paid this amount to the contractor. The purpose of the contract was to provide an employee to work in PBCSO's Forensic Biology Unit.<sup>4</sup>

We also reviewed the five contracts to determine if each contained the required provisions outlined in the Guide to Procurements Under DOJ Grants and Cooperative Agreements, Chapter 11, Contract Provisions (provisions). To assess PBCSO's compliance with these provisions, we reviewed background information of the contractors, assessed the roles the contractors and the services provided, and reviewed contractor costs. We determined the contracts contained the required provisions, and the transactions tested were accurately recorded, computed correctly, and paid in accordance with the approved budgets and contracts.

### Contract Performance Monitoring

When conducting procurements under grants and cooperative agreements, grant recipients must establish and maintain written procurement policies and procedures that conform to federal law. According to PBCSO's Procurement Manual, upon the award of a bid, request for quote, or request for proposal, a contract between PBCSO and the vendor is created. After specifications are defined and all parties are in agreement, the contract is approved by the executed parties of the contract, PBCSO's Procurement Management and the legal department. Subsequent to contract award, PBCSO enters each contract into a master spreadsheet which is maintained by a Contract Analyst. The Contract Analyst uses the spreadsheet to: (1) review contracts for upcoming renewal, (2) work with contractors and PBCSO staff for required amendments or addendums, and (3) ensure contract copies are appropriately stored. A PBCSO official told us the project and grant managers meet monthly or quarterly with contractors, in-person, over the phone, or through email to review each project's status, progress, and milestones completed, which we verified to supporting documentation.

### Accountable Property

PBCSO purchased equipment for Grant Number 2018-BJ-BX-0004 and Grant Number 2019-DN-BX-0028. To determine whether PBCSO maintained adequate inventory records and used property for allowable purposes, we reviewed PBCSO's inventory records of all property purchased with grant funds, which consisted of 12 items valuing \$171,460. Additionally, we performed a remote physical verification of the property by comparing PBCSO supplied property pictures to the entity's inventory records. We also obtained a certification from PBCSO's Sheriff attesting to the validity of the pictures and documentation. We

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<sup>3</sup> Specifically, the contractor was required to: (1) assist with data collection, data management, and data analysis; (2) participate in multidisciplinary task force meetings; and (3) provide a thorough project evaluation at the completion of the grant period.

<sup>4</sup> According to the performance report for the 6-month period ended June 30, 2021, the Technical Assistant arrived on-site at PBCSO's Forensic Biology Unit in June 2021 and is completing performance checks on equipment. We verified this to supporting documents.

determined that PBCSO maintained adequate inventory records and used grant-funded property for allowable purposes.

## Matching Costs

Matching costs are the non-federal recipient's share of the total project costs. PBCSO was required to provide matching costs of \$212,086 for Grant Number 2018-MO-BX-0009 and \$325,000 for Grant Number 2019-VT-BX-K018, which was 22 and 27 percent of total project costs for each grant, respectively. The approved budgets identified part-time salaries, special risk retirement, and health insurance as matching costs. For Grant Number 2018-MO-BX-0009, PBCSO provided \$212,087 in matching costs for the salaries of six employees who worked part-time on the grant project. For Grant Number 2019-VT-BX-K018, PBCSO provided \$325,000 in matching costs for retirement (\$144,948) and health insurance (\$180,053).<sup>5</sup> To assess these matching costs, we reviewed PBCSO's accounting records and determined that PBCSO met the match requirement.

## Subaward

Grantees may delegate another entity to perform program activities. This delegation is generally considered a subaward. Subrecipients use federal funds to carry out a program for a public purpose. Subrecipient performance is measured in relation to whether objectives of the grant program are met. Grantees must monitor subawards closely and have written monitoring policies and procedures. Subawards often have written agreements or memorandum of understanding (MOU) with the grantee in the implementation of the grant program activities.

PBCSO entered into a MOU with a university to develop, implement, and execute a crime reduction strategy in Palm Beach County for a cost not to exceed \$100,000. To assess PBCSO's monitoring of the university, we interviewed PBCSO officials and reviewed an August 2021 monitoring report. A PBCSO official told us the university participates in monthly meetings to share data and updates with community leaders and residents and participates quarterly with the grant project team to share evaluation data. We identified no issues related to the subaward. As of March 31, 2021, PBCSO paid \$50,000 under the MOU for two data collection analyses and an early action project.<sup>6</sup> These costs were allowable and were charged in accordance with the subaward.

## Budget Management and Control

According to the DOJ Grants Financial Guide, the recipient is responsible for establishing and maintaining an adequate accounting system, which includes the ability to compare actual expenditures or outlays with budgeted amounts for each award. Additionally, the grant recipient must initiate a Grant Adjustment

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<sup>5</sup> The total matching costs do not agree with the sum of the detailed matching costs due to rounding.

<sup>6</sup> The purpose of the early action project was to engage residents in community change. The project included a community-engaged participatory approach that explored residents' perceptions of personal safety, whether they are confident in the neighborhood's future, how connected they feel to other neighbors, and the extent to which they feel able to control what happens in the neighborhood.

Modification for a budget modification that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount.

We compared the grant expenditures to the approved budgets for all grants reviewed to determine whether PBCSO transferred funds among budget categories in excess of 10 percent. We determined that the cumulative difference between category expenditures and approved budget category totals was not greater than 10 percent.

## Drawdowns

According to the DOJ Grants Financial Guide an adequate accounting system should be established to maintain documentation to support all receipts of federal funds. If, at the end of the grant award, recipients have drawn down funds in excess of federal expenditures, unused funds must be returned to the awarding agency. At the end of each quarter, a PBCSO Financial Analyst compares a financial management system analysis report to a subledger to reconcile the two records. After reconciliation, the Financial Analyst prepares the reimbursement claim. The claim is reviewed and approved by PBCSO’s Grant Sections Supervisor then entered into OJP’s Automated Standard Application for Payments to draw the funds. From April 2019 to September 2021, PBCSO drew down a total of \$1,614,196 for the four grants we audited.

**Table 2**

**Palm Beach County Sheriff’s Office Drawdowns as of September 2021**

Award Number	Drawdowns as of September 30, 2021	Expenditures as of September 30, 2021	Difference
2018-BJ-BX-0004	\$559,711	\$633,367	(\$73,656)
2018-MO-BX-0009	\$340,871	\$366,123	(\$25,252)
2019-VT-BX-K018	\$387,637	\$456,793	(\$69,156)
2019-DN-BX-0028	\$325,977	\$347,609	(\$21,632)
<b>Total:</b>	<b>\$1,614,196</b>	<b>\$1,803,892</b>	<b>(\$189,696)</b>

Source: Justice Enterprise Data Integration and PBCSO’s accounting records.

To assess whether PBCSO managed grant receipts in accordance with federal requirements, we compared the total amount reimbursed to total expenditures in the accounting records. During this audit, we did not identify significant deficiencies related to the recipient’s process for developing drawdown requests and determined that the drawdowns were adequately supported. Grant Number 2019-DN-BX-0028 expired on December 31, 2021, with a remaining balance of \$4,788.

## Federal Financial Reports

According to the DOJ Grants Financial Guide, recipients shall report the actual expenditures and unliquidated obligations incurred for the reporting period on each financial report as well as cumulative

expenditures. To determine whether PBCSO submitted accurate Federal Financial Reports (FFRs), we compared PBCSO's four most recent FFRs submitted to its accounting records. We found that the FFRs did not match PBCSO's accounting records for Grant Number 2018-BJ-BX-0004 and Grant Number 2018-MO-BX-0009. For Grant Number 2018-BJ-BX-0004, \$1,250 was not reported because the expenditure was recorded in the accounting records but was not paid until the next reporting period. For Grant Number 2018-MO-BX-0009, \$18,347 was also recorded in the accounting records but was not paid until the following reporting period. According to PBCSO, these differences were caused by timing for the recording and payment of grant expenditures in accounting records; therefore, we make no recommendation.

## **Conclusion**

As a result of our audit testing, we concluded that PBCSO generally managed the grants that we reviewed appropriately and demonstrated adequate progress towards achieving the grants' goals and objectives. We found that all tested expenditures were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and the terms and conditions of the grants. Additionally, we did not identify significant concerns regarding PBCSO's grant financial management, budget management and control, drawdowns, and federal financial reports.

# APPENDIX 1: Objectives, Scope, and Methodology

## Objectives

The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant; and to determine whether the grantee demonstrated adequate progress towards achieving the program goals and objectives. To accomplish these objectives, we assessed performance in the following areas of grant management: program performance, financial management, expenditures, budget management and control, drawdowns, and federal financial reports.

## Scope and Methodology

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

This was an audit of four Office of Justice Programs (OJP) grants awarded to the Palm Beach County Sheriff's Office (PBCSO). The four following grants were administered by the Bureau of Justice Assistance or National Institute of Justice.

- Innovations in Community-Based Crime Reduction Program (Grant Number 2018-BJ-BX-0004). As of September 2021, PBCSO had drawn down \$559,711.
- Justice and Mental Health Collaboration Program (Grant Number 2018-MO-BX-0009). As of September 2021, PBCSO had drawn down \$340,871.
- Enhanced Collaborative Strategy to Combat Human Trafficking (Grant Number 2019-VT-BX-K018). As of September 2021, PBCSO had drawn down \$387,637.
- DNA Capacity Enhancement and Backlog Reduction Program (Grant Number 2019-DN-BX-0028). As of September 2021, PBCSO had drawn down \$325,977.

None of the grants had closed at the time of our audit. Our audit concentrated on, but was not limited to October 1, 2018, the award date for Grant Number 2018-BJ-BX-0004, to November 2021. As a result of the COVID-19 pandemic, we performed our audit fieldwork remotely.

We reviewed contractor costs charged to the four grants. To support matching costs for Grant Number 2018-MO-BX-0009, we reviewed a spreadsheet that PBCSO used to track six employees who worked part-time on the award project. We also reviewed the general ledger to support matching costs charged to Grant Number 2019-VT-BX-K018.

To accomplish our objectives, we tested compliance with what we consider to be the most important conditions of PBCSO's activities related to the audited grants. We performed sample-based audit testing for grant expenditures including payroll and fringe benefit charges, financial reports, and progress reports. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grants reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected. The DOJ Grants Financial Guide and the award documents contain the primary criteria we applied during the audit.

During our audit, we obtained information from OJP's Grants Management System, and JustGrants System as well as PBCSO's accounting system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems as a whole; therefore, any findings identified involving information from those systems were verified with documentation from other sources. We discussed our audit results with PBCSO officials.

### **Internal Controls**

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of PBCSO to provide assurance on its internal control structure as a whole. PBCSO's management is responsible for the establishment and maintenance of internal controls in accordance with 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Because we do not express an opinion on PBCSO's internal control structure as a whole, we offer this statement solely for the information and use of PBCSO and OJP.<sup>7</sup>

The scope of our internal control testing included a review of internal control principles related to PBCSO's control environment, control activities, and information and communication. We reviewed the established policies and procedures for grant management and examined how PBCSO used its accounting system to manage DOJ grant funds. We assessed the implementation of these internal controls and did not identify deficiencies that we believe could affect PBCSO's ability to ensure compliance with laws and regulations. However, because our review was limited to those internal control components and underlying principles that we found significant to the audit objectives, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

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

# APPENDIX 2: 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

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Washington, D.C. 20531

January 27, 2022

MEMORANDUM TO: Barbara R. Williams  
Acting Regional Audit Manager  
Atlanta Regional Audit Office  
Office of the Inspector General

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

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs' Grants Awarded to the Palm Beach County Sheriff's Office, West Palm Beach, Florida*

This memorandum is in response to your correspondence, dated January 7, 2022, transmitting the subject draft audit report for the Palm Beach County Sheriff's Office. The draft audit report does not contain any recommendations directed to the Office of Justice Programs (OJP). OJP has reviewed the draft audit report and does not have any comments.

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.

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