



Audit of the Office of Justice Programs Victim
Assistance Grants Awarded to the New Hampshire
Department of Justice,
Concord, New Hampshire



AUDIT DIVISION

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EXECUTIVE SUMMARY

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Objective

The objective of the audit was to evaluate how the New Hampshire Department of Justice (New Hampshire DOJ) designed and implemented its crime victim assistance program. To accomplish this objective, we assessed performance in the following areas of grant management: (1) grant program planning and execution, (2) program requirements and performance reporting, (3) grant financial management, and (4) monitoring of subrecipients.

Results in Brief

As a result of our audit, we concluded that New Hampshire DOJ obligated, disbursed, and managed Victims of Crime Act funding to support its victim assistance program. This audit did not identify significant concerns regarding New Hampshire DOJ's selection of subrecipients, utilization and tracking of VOCA funds, and communication of grant requirements to subrecipients. However, we found that the award agreement between New Hampshire DOJ and a subrecipient also acting as a pass-through entity lacked mention of single audit requirements that ensure that the pass-through entity fulfills its responsibilities to monitor lower-tier subrecipients. We also found that a New Hampshire DOJ subrecipient did not comply with a subaward special condition that requires the subrecipient to report potential fraud, waste, and abuse to the U.S. Department of Justice Office of the Inspector General. Finally, we identified an opportunity for New Hampshire DOJ to enhance its written policies related to program income.

Recommendations

Our report contains three recommendations to the Office of Justice Programs (OJP) to assist New Hampshire DOJ in improving its grant management and administration. We requested a response to our draft audit report from New Hampshire DOJ and OJP officials, which can be found in Appendices 2 and 3, respectively. Our analysis of those responses is included in Appendix 4.

Audit Results

The DOJ OIG completed an audit of two Victims of Crime Act victim assistance formula grants awarded by the OJP Office for Victims of Crime (OVC) to the New Hampshire DOJ in Concord, New Hampshire. The OVC awarded these formula grants, totaling \$16,852,035 for fiscal years 2019 and 2020, from the Crime Victims Fund to enhance crime victim services throughout New Hampshire. As of June 2023, New Hampshire DOJ drew down a cumulative amount of \$13,500,539 for all of the grants we reviewed.

Program Accomplishments

We determined New Hampshire DOJ served survivors and victims of crime by awarding subawards to more than 30 victim service providers with its 2019 and 2020 grants.

Subaward Requirements

We determined New Hampshire DOJ adequately communicated award requirements through its solicitation, award agreements, and throughout the award program periods. However, we found an instance where a subrecipient did not adhere to a special condition related to reporting potential fraud, waste, abuse, and employee misconduct to the U.S. Department of Justice Office of the Inspector General.

Grant Financial Management

We found that New Hampshire DOJ has written grant financial management policies and procedures in place; however, we believe New Hampshire DOJ could enhance its written policies related to program income.

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Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of two victim assistance formula grants awarded by the Office of Justice Programs (OJP) Office for Victims of Crime (OVC) to the New Hampshire Department of Justice (New Hampshire DOJ) in Concord, New Hampshire. The OVC awards victim assistance grants annually from the Crime Victims Fund (CVF) to state administering agencies (SAA). As shown in Table 1, from fiscal years (FY) 2019 to 2020, these OVC grants totaled \$16,852,035.

Table 1

Audited Grants

Fiscal Years 2019 – 2020

Award Number	Award Date	Award Period Start Date	Award Period End Date	Award Amount
2019-V2-GX-0050	9/13/2019	10/1/2018	9/30/2023	\$9,627,656
2020-V2-GX-0042	9/20/2020	10/1/2019	9/30/2024	\$7,224,379
Total:				\$ 16,852,035

Notes: Grant funds are available for the fiscal year of the award plus 3 additional fiscal years. Both the 2019 and 2020 grants received 12-month extensions.

Source: JustGrants

Established by the Victims of Crime Act (VOCA) of 1984, the CVF is used to support crime victims through DOJ programs and state and local victim services.¹ The CVF is supported entirely by federal criminal fees, penalties, forfeited bail bonds, gifts, donations, and special assessments. The OVC annually distributes proceeds from the CVF to states and territories. 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 (the cap).

Beginning in FY 2015, Congress significantly raised the cap on CVF disbursements from prior years, which increased funding for victim assistance grants from \$456 million in 2014 to a high of \$3 billion in 2018. Since 2018, the cap has decreased along with deposits into CVF, with the most recent cap set at \$1.9 billion for FY 2023. The OVC allocates the annual victim assistance program awards based on the amount available for victim assistance each year and the states’ population. As such, the annual VOCA victim assistance grant funds available to New Hampshire DOJ increased to an average of \$8.45 million between FY 2015 and 2022, with the highest amount of \$13,954,297 in 2018 and lowest amount of \$4,659,827 in 2021.

VOCA victim assistance grant funds support the provision of direct services—such as crisis intervention, assistance filing restraining orders, counseling in crises arising from the occurrence of crime, and

¹ The VOCA victim assistance formula program is funded under 34 U.S.C. § 20103.

emergency shelter—to victims of crime. The OVC distributes these assistance grants to states and territories, which in turn fund subawards to public and private nonprofit organizations that directly provide the services to victims. Eligible services are efforts that: (1) respond to the emotional and physical needs of crime victims, (2) assist victims of crime to stabilize their lives after a victimization, (3) assist victims to understand and participate in the criminal justice system, and (4) provide victims of crime with a measure of safety and security.

The Grantee

As the New Hampshire SAA, New Hampshire DOJ is responsible for administering the CVF victim assistance program. According to the New Hampshire DOJ website, the mission of New Hampshire DOJ is to serve the people of New Hampshire with diligence, independence, and integrity by performing the constitutional, statutory and common law duties of the Attorney General as the state's chief legal officer and chief law enforcement officer, to seek to do justice in all prosecutions, to provide the state with legal representation and counsel of the highest quality, to protect the state's environment and the rights of its consumers, and to provide supervision and leadership of New Hampshire law enforcement. The New Hampshire DOJ's Grants Management Unit (GMU) is responsible for managing federal grants assigned to New Hampshire DOJ by the Governor of New Hampshire. New Hampshire DOJ subawards funding to victim services programs such as Court Appointed Special Advocates, rural mental health agencies, and child advocacy centers.

OIG Audit Approach

The objective of the audit was to evaluate how New Hampshire DOJ designed and implemented its crime victim assistance program. To accomplish this objective, we assessed performance in the following areas of grant management: (1) grant program planning and execution, (2) program requirements and performance reporting, (3) grant financial management, and (4) monitoring of subrecipients.

We tested compliance with what we considered the most important conditions of the grants. The VOCA legislation, the VOCA victim assistance program guidelines and Final Rule (VOCA Guidelines); 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance); the DOJ Grants Financial Guide; and the award documents contain the primary criteria we applied during the audit. We also reviewed relevant New Hampshire DOJ policy and procedures and interviewed New Hampshire DOJ personnel to determine how they administered the VOCA funds.

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.

Audit Results

Grant Program Planning and Execution

The main purpose of the VOCA victim assistance grants is to support crime victim services. New Hampshire DOJ, which is the primary recipient of victim assistance grants at the state level in New Hampshire, must distribute the majority of the funding to organizations that provide direct services to victims, such as crisis centers, child advocacy centers, county attorney offices, and other community-based victim coalitions and support organizations. As the SAA, New Hampshire DOJ has the discretion to select subrecipients from among eligible organizations, although the VOCA Guidelines require state administering agencies give priority to victims of sexual assault, domestic abuse, and child abuse. SAAs must also make funding available for previously underserved populations of violent crime victims.² As long as a SAA allocates at least 10 percent of available funding to victim populations in each of these victim categories, it has the discretion in determining the amount of funds each subrecipient receives.

As part of our audit, we assessed New Hampshire DOJ's overall plan to allocate and award the victim assistance funding. We reviewed how New Hampshire DOJ planned to distribute its available victim assistance grant funding, made subaward selection decisions, and informed its subrecipients of necessary VOCA requirements. We also assessed whether New Hampshire DOJ met the priority areas funding and subaward reporting requirements. As discussed below, in our overall assessment of grant program planning and execution, we found that New Hampshire DOJ appropriately identified and planned to sustain victim service needs with reduced VOCA funding in FY 2023 and in subsequent fiscal years. We found that New Hampshire DOJ implemented an effective allocation plan to maintain victim services during reduced levels of funding. We did not take any issues with the subrecipient selection process and found that New Hampshire DOJ adequately communicated to its subrecipients applicable VOCA requirements. However, we found that a New Hampshire DOJ subrecipient did not properly report potential employee misconduct as required by the grant special conditions.

Subaward Allocation Plan

The OVC's FY 2019 VOCA Victim Assistance Formula Solicitation required the state and territory applicants to submit a subrecipient funding plan that detailed their efforts to identify additional victim service needs. Between January and May 2019, a policy research and consulting firm conducted a needs assessment on behalf of New Hampshire DOJ. The objective of this effort was, "designed to inform New Hampshire's strategy for supporting victims of crime through effective and efficient services for those victims." The assessment documented the types of victimization experienced statewide, service providers responses, and the gaps in services and training to providers. A grant official told us that New Hampshire DOJ utilized the needs assessment to develop its strategic planning, funding decisions, and funding priorities that consisted of mental health, housing, legal services, and assisting crime victims in rural areas.

² The VOCA Guidelines state these underserved victims may include, but are not limited to, victims of federal crimes; survivors of homicide victims; or victims of assault, robbery, gang violence, hate and bias crimes, intoxicated drivers, bank robbery, economic exploitation and fraud, and elder abuse. The Guidelines also indicate that in defining underserved victim populations, states should also identify gaps in available services by victims' demographic characteristics.

For the 2019 and 2020 grants, New Hampshire DOJ allocated a minimum of 10 percent of the VOCA funds to each of the following priority categories: (1) child abuse, (2) domestic abuse, (3) sexual assault, and (4) previously underserved, as required. For domestic violence and sexual assault, New Hampshire DOJ subawarded VOCA funds to a subrecipient acting as a pass-through entity responsible for overseeing lower-tier subawards to 12 crisis centers throughout the state. New Hampshire DOJ also subawarded VOCA funds to organizations that provided Adverse Childhood Experiences Response Team programs to address child abuse. For the underserved population, New Hampshire DOJ selected a subrecipient that provides support services to victims of crime in rural areas of New Hampshire.

In addition, we found that New Hampshire DOJ requested and was approved 12-month extensions for both audited VOCA grants to allocate and sustain the crime victim services mentioned above. To maintain a consistent level of funding given a decrease in VOCA grant funding, New Hampshire DOJ utilized other funding sources, such as the American Rescue Plan Act, to supplement its VOCA funds. By timing its subawards of VOCA funds in a specific manner, particularly towards the back end of the award period, it allowed New Hampshire DOJ to maintain crime victim services from prior years.

To assess New Hampshire DOJ's use of VOCA funding for 2019 and 2020, we reviewed the New Hampshire DOJ Office for Victims of Crime Sustainability Subcommittee funding recommendations prepared by outside consultants. According to a New Hampshire DOJ grant official, the recommendations were used to identify and secure current and future sources of funding for victim services. In addition, a New Hampshire DOJ official told us that there is a VOCA Steering Committee (Committee) that is made up of the Grant Administrator, Grant Manager, the pass-through entity, and other officials, such as judges, prosecutors, and tribal representatives, from around the state. The Committee meets on a quarterly basis to discuss funding. The Committee discussed the potential reduction in funding and strategies to account for up to a 30 percent reduction in funding by FY 2025.³ We did not identify any deficiencies related to New Hampshire DOJ's subaward allocation plan.

Subaward Selection Process

According to a New Hampshire DOJ official, as of July 2023, New Hampshire DOJ had made subawards to 31 organizations with 2019 award funds, and 4 organizations with 2020 award funds. To assess how New Hampshire DOJ granted its subawards, we identified the steps that New Hampshire DOJ used to inform, evaluate, and select subrecipients for VOCA funds. New Hampshire DOJ's primary and current method for selecting subrecipients is a non-competitive process. Subrecipients are required to submit applications for VOCA funding that are reviewed by GMU. Following GMU's review, the Grant Manager generates a list of potential subrecipients that is submitted to the Director of Administration and the Attorney General for approval. Once approved, the Grant Manager prepares for an additional level of approval from the Governor and Executive Council. After the Governor and Executive Council approve the list of subrecipients, New Hampshire DOJ creates award letter packages that are reviewed by the Grant Administrator prior to being sent to the subrecipients. Based on the steps described above, and our review of relevant documentation, we did not take issue with New Hampshire DOJ's subaward selection process.

³ For FY 2021 and 2022, New Hampshire received \$4,659,827 and \$6,327,276 in VOCA funding, respectively.

Subaward Requirements

SAAAs must adequately communicate VOCA requirements to their subrecipients. We reviewed New Hampshire DOJ's subaward solicitations and award packages to determine how New Hampshire DOJ communicated its subaward requirements and conveyed to potential applicants the VOCA-specific requirements. We found that New Hampshire DOJ communicated program requirements through its website, award documentation, and during monitoring activities. As a result, we did not identify any significant issues with New Hampshire DOJ's subrecipient agreements. However, we found an instance where a New Hampshire DOJ subrecipient did not adhere to the special condition related to reporting potential fraud, waste, abuse, and employee misconduct to the DOJ OIG. At the beginning of our audit, a New Hampshire DOJ official informed us of potential employee misconduct by an employee of a subrecipient. The subrecipient had previously notified New Hampshire DOJ, which resulted in an investigation by the New Hampshire Office of the Attorney General. However, instead of the subrecipient also notifying the DOJ OIG, as required by the special condition, the subrecipient notified the Legal Services Corporation (LSC) OIG about the potential employee misconduct.⁴ According to a New Hampshire DOJ official, the subrecipient also received funding from LSC. When we discussed this matter with New Hampshire DOJ officials, we were told that these officials were under the impression that the notification to the LSC OIG was adequate to meet the special condition requiring notification to the DOJ OIG. As a result of our audit, New Hampshire DOJ contacted the DOJ OIG about the potential employee misconduct. While New Hampshire DOJ notified the DOJ OIG of this instance, to ensure proper notification for potential future matters related to fraud, waste, abuse, and employee misconduct, we recommend that OJP ensure that New Hampshire DOJ reiterates to its subrecipients the requirement to report potential fraud, waste, abuse, or misconduct involving grant funds to the DOJ OIG.

Priority Areas Funding Requirement

The VOCA Guidelines require that New Hampshire DOJ award a minimum of 10 percent of the total grant funds to programs that serve victims in each of the four following categories: (1) child abuse, (2) domestic abuse, (3) sexual assault, and (4) previously underserved. The VOCA Guidelines give each SAA the latitude for determining the method for identifying "previously underserved" crime victims.⁵ New Hampshire DOJ defined underserved as crime victims in rural areas due to the lack of resources, especially in the northern part of the state.

We examined how New Hampshire DOJ allocated VOCA subawards to gauge whether it was on track to meet the program's priority area distribution requirements. We determined that New Hampshire DOJ allocated, at minimum, 10 percent of the award funds to the top four priority areas. We found that New Hampshire DOJ used a spreadsheet to track its compliance with meeting the minimum required for the priority funding areas. We also checked whether the subrecipient goals and objectives aligned with the respective funding areas on New Hampshire DOJ's tracking spreadsheet. In addition, we reconciled the total

⁴ LSC is a non-profit independent agency created by the Congress. LSC's mission is to promote equal access to justice in our Nation and to provide high quality civil legal assistance to low-income persons. LSC is a grant-making organization, distributing nearly 94 percent of its federal appropriation to eligible non-profit organizations delivering civil legal aid. LSC receives the majority of its annual funding from the House and Senate Appropriations Subcommittee on Commerce, Justice, Science and Related Agencies.

⁵ Methods for identifying "previously underserved" victims may include public hearings, needs assessments, task forces, and meetings with statewide victim services agencies.

federal expenditures listed on New Hampshire DOJ's priority funding spreadsheet to New Hampshire DOJ's underlying accounting records. We did not identify any discrepancies during these reconciliations and determined that the amounts listed on the spreadsheet accurately reflected the amounts reimbursed to subrecipients in the different priority areas, as well as other areas of victim services. As a result, we believe that New Hampshire DOJ has made adequate progress towards meeting the priority area funding requirement.

Monitoring of Subrecipients

According to the DOJ Grants Financial Guide, the purpose of subrecipient monitoring is to ensure that subrecipients: (1) use grant funds for authorized purposes; (2) comply with the federal program and grant requirements, laws, and regulations; and (3) achieve subaward performance goals. As the primary grant recipient, New Hampshire DOJ must develop policies and procedures to monitor subrecipients.

Monitoring Practices

New Hampshire DOJ has written policies and procedures for its subrecipient monitoring. According to its policies and procedures, New Hampshire DOJ will keep in regular contact with subrecipients to monitor compliance with all applicable federal, state, or other program requirements. In addition, New Hampshire DOJ's policies and procedures detail how it will monitor each subrecipient's compliance with financial and programmatic requirements through: (1) desk reviews, (2) desk monitoring, and (3) on-site monitoring. As discussed below, we believe New Hampshire DOJ's written monitoring policies and procedures are adequately designed to ensure subrecipients are properly monitored throughout the award period.

To assess the adequacy of New Hampshire DOJ's monitoring of its VOCA subrecipients, we interviewed New Hampshire DOJ personnel, identified New Hampshire DOJ monitoring procedures, and obtained records of interactions between New Hampshire DOJ and its subrecipients. We also observed an on-site monitoring visit that New Hampshire DOJ conducted during our audit with one of its subrecipients.

As noted above, New Hampshire DOJ monitors each subrecipient's compliance with financial and programmatic requirements through desk reviews, desk monitoring, and on-site monitoring. Desk reviews are not an extensive review of subrecipient financial records or supporting documentation, but rather a cursory review of expenditure reports, and it does not include a review of programmatic performance. For example, a desk review begins when the assigned Grant Manager analyzes the subrecipient expenditure reports for inconsistencies from prior reports. If the expenditure reports appear to be inconsistent or incongruous from previously submitted reports, they will contact the subrecipient for an explanation. If the Grant Manager identifies a significant deficiency, they will consult with the Director of Grants Management to determine the best recourse.

Desk monitoring involves a complete review of one quarter's worth of expenditures to ensure subrecipient expenditures are within budget, supported, allowable, and reasonable according to federal laws, regulations, and guidance. One month prior to the desk monitoring, the assigned Grant Manager will contact the subrecipient for supporting documentation of all its subaward expenditures. After reviewing the documentation provided, New Hampshire DOJ will create an action plan for any deficiencies identified. When the recommendations are remedied, the desk monitoring will be complete, and a closure email will be issued. Like the desk reviews, desk monitoring does not include a review of programmatic performance.

On-site-monitoring is an all-inclusive programmatic and financial review of the subrecipient to ensure it is in compliance with federal laws and regulations and program goals. An on-site visit includes a program-specific checklist and a review of claimed grant expenses to verify accuracy, support, reasonableness, and allowability. The frequency of on-site monitoring visits is dependent on the subrecipient's risk assessment rating, as discussed below, and those guidelines are to be incorporated into the planning and scheduling of on-site monitoring visits. However, an on-site monitoring visit is conducted at least every other year for each subrecipient. An on-site monitoring event is initiated with an official monitoring letter that outlines the areas of review that will be covered. The Grant Manager will also provide the subrecipient with a grant monitoring form. New Hampshire DOJ will work with the subrecipient to clear any instances of noncompliance and when all recommendations are remedied it will send a closure letter to end the on-site monitoring review. New Hampshire DOJ may withhold funding at its discretion if recommendations are not remedied in a timely manner.

As noted above, monitoring frequency is based upon New Hampshire DOJ's risk assessment of the subrecipient; this assessment is performed at the beginning of each calendar year. A Grant Manager will base their risk assessments on their knowledge and experience with VOCA grants and similar programs. New Hampshire DOJ utilizes a template that uses programmatic and financial risk measures to rate the subrecipient at a (1) high, (2) medium, or (3) low rating. High risk subrecipients receive on-site monitoring on an annual basis and are also required to submit all supporting documents for expenditures on a quarterly basis. Medium risk subrecipients receive on-site monitoring on an annual basis and desk monitoring every other year. Low risk subrecipients receive an on-site visit every 2 years. A subrecipient organization may have their risk level adjusted at any time based on information learned by GMU, and information that may change an agency's risk level will be discussed with the assigned Grant Manager(s) and the GMU Administrator.

During our fieldwork we found that New Hampshire DOJ complied with its own monitoring process and schedule. We physically observed an on-site monitoring visit with a subrecipient. During this visit, we were able to verify the Grant Manager was verifying financial and programmatic support. In our overall assessment of the New Hampshire DOJ's subrecipient monitoring, we found New Hampshire DOJ's monitoring practices and procedures, especially during on-site monitoring, was sufficient and adequately designed to ensure financial and programmatic performance is adequately monitored.

Monitoring of Subaward Expenditures

Subrecipients request reimbursement from New Hampshire DOJ via quarterly expenditure reports. As of February 2023, we found that New Hampshire DOJ paid a total of \$11,447,050 to its subrecipients with the VOCA victim assistance program funds in the scope of our audit.

To evaluate New Hampshire DOJ's financial controls over VOCA victim assistance grant expenditures, we reviewed a sample of subrecipient transactions to determine whether the payments were accurate, allowable, and in accordance with the VOCA Guidelines. We judgmentally selected eight subrecipients that were recently monitored by New Hampshire DOJ, including four on-site visits and four desk monitoring events. The amount paid to these eight subrecipients totaled \$1,141,406 for the transactions we reviewed and included costs in the following categories: (1) personnel, (2) fringe, (3) travel, (4) contracts/consultants, (5) supplies, (6) training, and (7) indirect expenditures.

We determined New Hampshire DOJ appeared to properly monitor the financial expenditures claimed by its subrecipients, and all expenditures we reviewed were allowable, reasonable, and properly supported.

Monitoring of Subrecipients with Lower-tier Subawards

According to the Uniform Guidance, pass-through entities responsible for oversight are required to issue a management decision on audit findings within 6 months after receipt of the single audit report and ensure that the subrecipient takes appropriate and timely corrective action.⁶ We reviewed the award agreement between New Hampshire DOJ and its subrecipient acting as a pass-through entity and found that the agreement lacked mention of single audit oversight requirements under 2 CFR Subpart F. As a result, we recommend OJP ensure New Hampshire DOJ enhances its award agreement with subrecipients acting as pass-through entities to ensure lower-tier subrecipients are adequately monitored and related single audit requirements are fulfilled.

Performance Monitoring

As discussed earlier, New Hampshire DOJ's policies and procedures identify that monitoring of programmatic performance is performed through on-site monitoring events. New Hampshire DOJ's on-site monitoring included programmatic review to ensure the selected subrecipient complies with applicable laws, regulations, and guidelines, and is making adequate progress towards meeting its goals and objectives.

During on-site monitoring, the Grant Manager utilizes a grant monitoring form that includes specific questions related to performance, particularly services that were provided to victims of crime. The monitoring form contains questions to identify the types of services provided, outreach activities, and whether staff conduct referrals to other victim services. Additionally, the form includes questions to assess victims' satisfaction with the different types of services received, as well as the quality of those services. The form also includes a section that allows subrecipients to describe the program goals and how the program is meeting these goals. Finally, the form provides the subrecipient with an opportunity to provide feedback about its experience with New Hampshire DOJ and to suggest areas for improvement. We selected four subrecipients to test whether New Hampshire DOJ effectively monitored subrecipient performance during on-site monitoring. In total, we selected 13 items from the monitoring form. Based on our review, we did not find any issues with the checklist items on New Hampshire DOJ's monitoring form, such as policies and procedures, memoranda of understanding and agreements, and other supporting documentation that New Hampshire DOJ collected during on-site monitoring of subrecipients. We found the checklist items and the different sections of the Grant Monitoring Policies and Procedures checklist were comprehensive in covering financial, programmatic, and compliance requirements.

We found that New Hampshire DOJ's policies and procedures ensure that performance is adequately monitored and that the grant monitoring form facilitates a review of a subrecipients' progress towards meeting its goals and objectives.

⁶ Non-federal entities that receive federal financial assistance are required to comply with the Single Audit Act of 1984, as amended. We discuss this further in the [Single Audit Requirements](#) section.

Annual Performance Reports

For the victim assistance grants, states must report the number of agencies funded, VOCA subawards, victims served, and victim services funded by these grants. Additionally, states must collect, maintain, and provide to the OVC data that measures the performance and effectiveness of activities funded by the award. Each SAA must annually report to the OVC activities funded by any VOCA awards active during the federal fiscal year. The OVC requires states to submit performance data quarterly through its Performance Measurement Tool (PMT). States may provide subrecipients with direct access to the system to report quarterly data, but states must approve the data.

New Hampshire DOJ submitted annual performance reports to the OVC for FYs 2019 through 2022. We discussed with a New Hampshire DOJ grant official how they compiled performance report data from their subrecipients. According to this individual, New Hampshire DOJ delegates the responsibility of entering data in PMT to its subrecipients. Quarterly PMT reports are reviewed to ensure totals are tabulated correctly and to identify significant variances in victim services reported from the previous quarter. New Hampshire DOJ also performs a detailed review of supporting documentation during on-site monitoring to ensure reported data is accurate and supported. We did not take any issues with New Hampshire DOJ procedures to ensure that reported figures were accurate and supported. In addition, we selected a judgmental sample of six quarterly performance reports that subrecipients submitted to the OVC. We selected 10 reported figures from each of the quarterly performance reports to help assess New Hampshire DOJ's performance reporting monitoring practices. We obtained documentation used to prepare the quarterly performance reports we reviewed. Based on our review, we did not take any issues with the reported figures or how New Hampshire DOJ reconciled those reported figures with the collected data.

Based on New Hampshire DOJ's reporting procedures and the results of our quarterly performance report testing, we determined that the statewide performance reports fairly represented the performance of the program, as the validated quarterly PMT reports serve as a reasonable basis to support the annual performance figures reported to OJP.

Subaward Reporting

States must submit a Subgrant Award Report (SAR) to the OVC via PMT for each subrecipient of the VOCA victim assistance funds within 90 days of awarding funds to subrecipients. Any changes or revisions to the awards that occur before the end of the project period must be made in the SAR within 30 days of the change taking effect. The SAR allows the OVC to collect basic information from states on subrecipients and the program activities to be implemented with VOCA funds. States are also required to report similar data separately, under the Federal Funding Accountability Transparency Act of 2006, for awards greater than \$25,000.

According to a grant official, New Hampshire DOJ reviews all the SARs at the beginning of the award period, which starts on July 1st of each year. Any significant changes to the SAR, particularly the amount budgeted to different priority areas, requires subrecipients to update the SAR. We obtained New Hampshire DOJ's subaward universe to see whether there were any discrepancies with the subrecipients listed on the SAR. We were able to reconcile the two sets of records. Based on our review, we found that New Hampshire DOJ records accurately reflected basic information such as award number, award amount, project start and end date, and priority and underserved areas. As a result, we did not take any issues with New Hampshire DOJ subaward reporting.

Single Audit Requirements

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 the 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.

According to the DOJ Grants Financial Guide, primary recipients are required to ensure subrecipients have single audits completed when required and, as appropriate, corrective actions on all audit findings have been implemented. We found that New Hampshire DOJ has written policies and procedures to ensure subrecipients have single audits completed when required, and that when corrective actions on grant-related findings are required the state is to follow up to ensure those findings are addressed. New Hampshire DOJ uses a Subrecipient Single Audit Report Schedule to execute these responsibilities each fiscal year. This schedule includes tracking measures, such as when the single audit is due, whether the findings were related to VOCA grants, and the date reviewed. As part of our audit, we requested a follow-up letter for one subrecipient we identified having significant findings related to the VOCA subaward. New Hampshire DOJ provided us with a Single Audit Exceptions Management Letter dated June 19, 2020, that addressed the single audit findings and evidence of a follow up site monitoring visit on July 7, 2020, to ensure the findings were addressed.

Grant Financial Management

Award recipients must establish an adequate accounting system and maintain financial records that accurately account for awarded funds. To assess the adequacy of New Hampshire DOJ's financial management of the VOCA grants, we reviewed the process New Hampshire DOJ used to administer these funds by examining expenditures charged to the grants, drawdown requests, match contributions, and financial reports. To further evaluate New Hampshire DOJ's financial management of the VOCA grants, we also reviewed the state of New Hampshire's Single Audit Reports for FYs 2019 through 2021 and did not identify any significant deficiencies or material weaknesses related to New Hampshire DOJ. We also interviewed New Hampshire DOJ personnel who were responsible for financial aspects of the grants, reviewed New Hampshire DOJ written policies and procedures, inspected award documents, and reviewed financial records.

As discussed below, in our overall assessment of grant financial management, we determined that New Hampshire DOJ complied with the administrative expenditures, drawdowns, financial reporting, and matching costs requirements. However, we did identify an opportunity for New Hampshire DOJ to enhance its policies related to program income, as discussed below.

Administrative Expenditures

SAA victim assistance expenses fall into two overarching categories: (1) reimbursements to subrecipients—which constitute the vast majority of total expenses, and (2) administrative expenses—which are allowed to total up to 5 percent of each award to pay for administering its crime victim assistance program and for training. According to the VOCA Final Rule, such costs must derive from efforts to expand, enhance, or improve how the agency administers the state crime victim assistance program and to support activities and costs that impact the delivery and quality of services to crime victims throughout the state. While federal

grant-funded administrative costs generally must relate to a specific program, for VOCA victim assistance awards, the VOCA Final Rule states that funds for administration may be used to pay for costs directly associated with administering a state's victim assistance program.⁷

For the victim assistance grant program, we tested the New Hampshire DOJ's compliance with the 5-percent limit on the administrative category of expenses, as shown in Table 2.

Table 2

Administrative Expenditures

Award Number	Total Award	State Administrative Expenditures	Administrative Percentage
2019-V2-GX-0050	\$9,627,656	\$244,393	2.54%
2020-V2-GX-0042	\$7,224,379	\$24,486	0.34%

Source: OIG Analysis of New Hampshire DOJ records

We found that New Hampshire DOJ complied with the 5-percent administrative expenses allowance and had adequate procedures in place to ensure administrative costs did not exceed the threshold prior to the end of the grant award period.

In addition to testing the New Hampshire DOJ's compliance with the 5-percent administrative allowance, we also tested a sample of these administrative transactions. We judgmentally selected five administrative expenditure transactions from the accounting records, including personnel, training, and indirect costs. We found New Hampshire DOJ administrative costs charged to the VOCA grants were allowable, reasonable, and properly supported. In addition, we found administrative expenditures were based on a reasonable allocation methodology and New Hampshire DOJ did not use VOCA funds to pay for a disproportionate share of non-victim related expenses.

Drawdowns

Award recipients should request funds based upon immediate disbursement or reimbursement needs, and should time drawdown requests to ensure that the federal cash on hand is the minimum needed for reimbursements or disbursements made immediately or within 10 days. To assess whether New Hampshire DOJ managed grant receipts in accordance with these federal requirements, we compared the total amount reimbursed to the total expenditures in New Hampshire DOJ's accounting system and accompanying financial records.

⁷ OVC officials have indicated that the definition of a state's "victim assistance program" may include both VOCA and non-VOCA activities supported by the state administering agency, as long as the activities relate to victim assistance.

For the VOCA victim assistance awards, New Hampshire DOJ requested funding on a reimbursement basis each quarter. During this audit, we did not identify significant deficiencies related to the New Hampshire DOJ's process for developing drawdown requests.

Table 3

Amount Drawn Down for Each Grant as of June 2023

Award Number	Total Award	Award Period End Date	Amount Drawn Down	Amount Remaining
2019-V2-GX-0050	\$9,627,656	09/30/2023	\$9,490,526	\$137,130
2020-V2-GX-0042	\$7,224,379	09/30/2024	\$4,010,013	\$3,214,366
Total:	\$16,852,035		\$13,500,539	\$3,351,496

Source: JustGrants

Financial Reporting

According to the DOJ Grants Financial Guide, recipients shall report the actual expenditures, program income, and unliquidated obligations incurred for the reporting period on each financial report as well as cumulative expenditures. To determine whether New Hampshire DOJ submitted accurate Federal Financial Reports (FFR), we compared the most recent report for each of the VOCA grants audited to New Hampshire DOJ's accounting records. We determined that quarterly and cumulative expenditures for the reports matched the accounting records.

Program Income

According to the DOJ Grants Financial Guide, program income is gross income earned by the non-federal entity that is directly generated by a supported activity or earned as a result of the federal award during the period of performance. This income may be used to further the program objectives or refunded to the federal Government. We found that two of New Hampshire DOJ's subrecipients claimed program income during our audit. According to New Hampshire DOJ officials, one of the subrecipient's program income was derived from insurance reimbursements for victims that are served through the subrecipient program. The other subrecipient earned program income from fees associated with in-person education training. According to the VOCA Guidelines, subrecipients must provide VOCA-funded direct services at no charge, unless the SAA grants a waiver allowing the subrecipient to generate program income by charging for services. We reviewed documentation and confirmed with an New Hampshire DOJ grant official that victims and their families were not directly charged fees for the services provided and the program income was properly offset within each related reimbursement request.

The VOCA Guidelines also state that any program income be restricted to the same uses as the subaward funds and expended during the grant period in which it is generated. During our review, we observed the execution of program income-related controls to help ensure compliance with associated requirements. We noted an instance where the Grant Manager instructed a subrecipient that New Hampshire DOJ will not fund additional expenditures until the program income is expended on allowable program costs. Also, in

New Hampshire DOJ's quarterly expenditure report, there was a signed certification for the subrecipient to identify program income earned and program income expended.

Based on our review, we have reasonable assurance that New Hampshire DOJ ensured subrecipient compliance with this requirement. However, we found New Hampshire DOJ did not have a robust set of policies and procedures describing these processes for future compliance, as there was little mention of program income in its current written policies and procedures. During our audit, New Hampshire DOJ provided the team with a draft copy of its updated program income policies and procedures. Therefore, we recommend OJP work with New Hampshire DOJ to implement written policies and procedures for program income that ensure compliance with the DOJ Grants Financial Guide and the VOCA Guidelines.

Matching Requirement

VOCA Guidelines require that subrecipients match 20 percent of the project cost. Match contributions must come from non-federal sources and can be either cash or an in-kind match.⁸ The SAA has primary responsibility for ensuring subrecipient compliance with the match requirements.

On September 20, 2021, OVC issued an Updated Match Waiver Approval Process bulletin. It stated, 'Beginning on the date a national emergency is declared under the National Emergencies Act (50 U.S.C. §1601 et seq.) with respect to a pandemic and ending on the date that is one year after the date of the end of such national emergency, SAAs shall issue waivers for any matching requirement, in its entirety, for all eligible crime victim assistance programs contracted to provide services at that time.'⁹ In response to this bulletin, New Hampshire DOJ provided VOCA Match Waiver Determination Forms to all of its subrecipients on September 27, 2021. Several of New Hampshire DOJ's subrecipients opted to continue match contributions for the 2019 and 2020 grants.

We tested a sample of the three highest match contributions from the 2019 and 2020 grants in the amount of \$171,288 out of a \$1,521,680 total universe. We obtained the appropriate documents to support the transactions and ascertained whether the match contributions were allowable and reasonable per the DOJ Grants Financial Guide and the Uniform Guidance. We also ensured the match support was properly allocated within the scope of the program and whether the subrecipient met the match. We determined that all transactions in our sample were allowable, reasonable, properly allocated, and all match requirements were met.

⁸ In-kind match contributions may include donations of expendable equipment, office supplies, workshop or classroom materials, workspace, or the value of time contributed by those providing integral services to the funded project.

⁹ 34 U.S.C. 20103 (a) (8)

Conclusion and Recommendations

Overall, we concluded that New Hampshire DOJ appropriately designed and implemented its crime victim assistance program and supported victim services. We found New Hampshire DOJ created and instituted policies and procedures for awarding VOCA funds, as required under the VOCA Guidelines. In addition, we found that New Hampshire DOJ documented its monitoring activities, conducted a formal risk assessment, and completed periodic site visits. However, we found opportunities for New Hampshire DOJ to enhance its subrecipient monitoring and written policies and procedures. In total, we provide three recommendations to OJP to address these deficiencies.

We recommend that OJP:

1. Ensure that New Hampshire DOJ reiterates to its subrecipients the requirement to report potential fraud, waste, abuse, or misconduct involving grant funds to the DOJ OIG.
2. Ensure New Hampshire DOJ enhances its award agreement with subrecipients acting as pass-through entities to ensure lower-tier subrecipients are adequately monitored and related single audit requirements are fulfilled.
3. Work with New Hampshire DOJ to implement written policies and procedures for program income that ensure compliance with the DOJ Grants Financial Guide and the VOCA Guidelines.

APPENDIX 1: Objective, Scope, and Methodology

Objective

The objective of the audit was to evaluate how the New Hampshire Department of Justice (New Hampshire DOJ) designed and implemented its crime victim assistance program. To accomplish this objective, we assessed performance in the following areas of grant management: (1) grant program planning and execution, (2) program requirements and performance reporting, (3) grant financial management, and (4) monitoring of subrecipients.

Scope and Methodology

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

This was an audit of Victims of Crime Act (VOCA) victim assistance formula grants 2019-V2-GX-0050 and 2020-V2-GX-0042 from the Crime Victims Fund awarded to New Hampshire DOJ. The Office of Justice Programs (OJP), Office for Victims of Crime awarded these grants totaling \$16,852,035 to New Hampshire DOJ, which serves as the State Administering Agency. Our audit concentrated on, but was not limited to, the period of October 2020 through June 2023. As of June 2023, the New Hampshire DOJ had drawn down a total of \$13,500,539 from the two audited grants.

To accomplish our objective, we tested compliance with what we consider to be the most important conditions of the New Hampshire DOJ's activities related to the audited grants, which included conducting interviews with state of New Hampshire financial staff, examining policies and procedures, and reviewing grant documentation and financial records. We performed sample-based audit testing for subrecipient monitoring, financial reports, match requirements, administrative expenditures, 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 authorizing VOCA legislation, the VOCA victim assistance program guidelines; the DOJ Grants Financial Guides; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; and the award documents contain the primary criteria we applied during the audit.

During our audit, we obtained information from JustGrants and Performance Measurement Tool systems, as well as New Hampshire DOJ 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 was verified with documents from other sources.

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 New Hampshire DOJ to provide assurance on its internal control structure as a whole. New Hampshire DOJ management is responsible for the establishment and maintenance of internal controls in accordance with 2 C.F.R. § 200. Because we do not express an opinion on the New Hampshire DOJ's internal control structure as a whole, we offer this statement solely for the information and use of New Hampshire DOJ and OJP.¹⁰

In planning and performing our audit, we identified internal control components and underlying internal control principles as significant to the audit objective. Specifically, we reviewed the design and implementation of New Hampshire DOJ's written grant policies and procedures and process controls pertaining to aspects of grant planning, performance reporting, and financial management. We also tested the implementation and operating effectiveness of specific controls over grant execution and compliance with laws and regulations in our audit scope. The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to those internal control components and underlying principles that we found significant to the objective of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

¹⁰ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

APPENDIX 2: The New Hampshire Department of Justice Response to the Draft Audit Report

ATTORNEY GENERAL DEPARTMENT OF JUSTICE

33 CAPITOL STREET
CONCORD, NEW HAMPSHIRE 03301-6397

JOHN M. FORMELLA
ATTORNEY GENERAL



JAMES T. BOFFETTI
DEPUTY ATTORNEY GENERAL

August 29, 2023

Thomas O. Puerzer
Regional Audit Manager
Office of the Inspector General
U.S. Department of Justice
Philadelphia Regional Audit Office
701 Market Street, Suite 2300
Philadelphia, PA
VIA: Electronic Mail at: Thomas.O.Puerzer@usdoj.gov

Dear Mr. Puerzer:

The New Hampshire Department of Justice ("NHDOJ") appreciates the opportunity to respond to the Draft Audit Report received by our office on August 23, 2023. The Draft Audit Report covered the Office of Justice Programs ("OJP") Victims of Crime Act Formula Grants for Federal Fiscal 2019 and 2020. The purpose of this letter is to provide a formal response to the recommendations contained in the Draft Audit Report.

The Draft Audit Report contains three recommendations:

- **Recommendation #1** – Ensure that New Hampshire DOJ reiterates to its subrecipients the requirement to report potential fraud, waste, abuse, or misconduct involving grant funds to the DOJ OIG.
 - **Response #1** – The NHDOJ concurs with this recommendation. NHDOJ will update policies and procedures to ensure that all NHDOJ staff reiterates to its subrecipients that the requirement to report potential fraud, waste, abuse, or misconduct involving grant fund to DOJ OIG. The NH DOJ anticipates this recommendation will be remedied on or before October 2, 2023.
- **Recommendation #2** – Ensure New Hampshire DOJ enhances its award agreement with subrecipients acting as pass-through entities to ensure lower-tier subrecipients are adequately monitored and related single audit requirements are fulfilled.

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- **Response #2** – The NHDOJ concurs with this recommendation. NHDOJ will update policies and procedures to ensure that all NHDOJ staff enhances award agreements with subrecipients acting as pass-through entities to ensure lower tier subrecipients are adequately monitored and related single audit requirements are fulfilled. This information will be communicated, in writing to all subrecipients acting as pass-through entities. NH DOJ anticipates this recommendation will be remedied on or before October 2, 2023.
- **Recommendation #3** – OJP work with New Hampshire DOJ to implement written policies and procedures for program income that ensure compliance with DOJ Grants Financial Guide and the VOCA Guidelines.
 - **Response #3** – The NHDOJ concurs with this recommendation and has immediately implemented a program income policy that ensures compliance with the DOJ Grants Financial Guide and the VOCA Guidelines. Please see the attached NH DOJ policy dated June 27, 2023. This policy was shared with all NH DOJ GMU staff.

Thank you for the opportunity to respond to these recommendations. Should you have any questions, please feel free to contact the Grants Management Unit Director, Lisa Lamphere, at (603) 271-8090 or via e-mail at Lisa.J.Lamphere@doj.nh.gov

Respectfully Submitted,



Kathleen Carr
Director of Administration

cc: Linda Taylor -OJP

APPENDIX 3: The Office of Justice Programs Response to the Draft Audit Report



U.S. Department of Justice

Office of Justice Programs

Office of Audit, Assessment, and Management

Washington, D.C. 20531

September 7, 2023

MEMORANDUM TO: Thomas O. Puerzer
Regional Audit Manager
Philadelphia Regional Audit Office
Office of the Inspector General

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

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs Victim Assistance Grants Awarded to the New Hampshire Department of Justice, Concord, New Hampshire*

This memorandum is in reference to your correspondence, dated August 23, 2023, transmitting the above-referenced draft audit report for the New Hampshire Department of Justice (New Hampshire DOJ). We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains three recommendations and no questioned costs. The following is the Office of Justice Programs' (OJP) analysis of the draft audit report recommendations. For ease of review, the recommendations are restated in bold and are followed by OJP's response.

1. **We recommend that OJP ensure that New Hampshire DOJ reiterates to its subrecipients the requirement to report potential fraud, waste, abuse, or misconduct involving grant funds to the DOJ OIG.**

OJP agrees with the recommendation. In its response, dated August 29, 2023, the New Hampshire DOJ stated that it will update its policies and procedures to ensure that all staff reiterates to its subrecipients the requirement to report potential fraud, waste, abuse, or misconduct involving Federal grant funds to the U.S. Department of Justice (DOJ), Office of the Inspector General (OIG). Also, the New Hampshire DOJ stated that it anticipates the policies and procedures will be completed by October 2, 2023.

Accordingly, we will coordinate with the New Hampshire DOJ to obtain a copy of its revised written policies and procedures, developed and implemented, to ensure that its subrecipients report potential fraud, waste, abuse, or misconduct involving Federal grant funds to the DOJ OIG. In addition, we will obtain evidence that the New Hampshire DOJ distributed the revised policies and procedures to its staff and subrecipients.

2. **We recommend that OJP ensure New Hampshire DOJ enhances its award agreement with subrecipients acting as pass-through entities to ensure lower-tier subrecipients are adequately monitored and related single audit requirements are fulfilled.**

OJP agrees with the recommendation. In its response, dated August 29, 2023, the New Hampshire DOJ stated that it will update its policies and procedures, to amend its award agreements with subrecipients acting as pass-through entities, to ensure lower-tier subrecipients are adequately monitored and related single audit requirements are fulfilled. Also, the New Hampshire DOJ stated that the policies and procedures will be communicated in writing to all subrecipients acting as pass-through entities, which it anticipates will be completed by October 2, 2023.

Accordingly, we will coordinate with the New Hampshire DOJ to obtain a copy of its revised written policies and procedures, developed and implemented, which includes amended award agreements with subrecipients acting as pass-through entities, to ensure lower-tier subrecipients are adequately monitored and related single audit requirements are fulfilled. In addition, we will obtain evidence that the New Hampshire DOJ distributed the policies and procedures to its staff and subrecipients.

3. **We recommend that OJP work with New Hampshire DOJ to implement written policies and procedures for program income that ensure compliance with the DOJ Grants Financial Guide and the VOCA Guidelines.**

OJP agrees with the recommendation. In its response, dated August 29, 2023, the New Hampshire DOJ stated that it immediately implemented a program income policy to ensure compliance with the DOJ Grants Financial Guide and the Victims of Crime Act (VOCA) Guidelines. However, the program income policy was not signed by a New Hampshire DOJ authorized official, and does not include an implementation date.

Accordingly, we will coordinate with New Hampshire DOJ to obtain a copy of its written policies and procedures for program income, developed and implemented, to ensure compliance with the DOJ Grants Financial Guide and the VOCA Guidelines.

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

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

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

cc: Linda J. Taylor
Lead Auditor, Audit Coordination Branch
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Office of the Inspector General

OJP Executive Secretariat
Control Number OCOM000513

APPENDIX 4: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report

The Office of the Inspector General (OIG) provided a draft of this audit report to the Office of Justice Programs (OJP) and the New Hampshire Department of Justice (New Hampshire DOJ). New Hampshire DOJ's response is incorporated in Appendix 2, and OJP's response is incorporated in Appendix 3 of this final report. In response to our draft audit report, OJP agreed with our recommendations. As a result, the status of the audit report is resolved. New Hampshire DOJ concurred with the three recommendations. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendations for OJP:

1. Ensure that New Hampshire DOJ reiterates to its subrecipients the requirement to report potential fraud, waste, abuse, or misconduct involving grant funds to the DOJ OIG.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the New Hampshire DOJ to obtain a copy of its revised written policies and procedures, developed and implemented, to ensure that its subrecipients report potential fraud, waste, abuse, or misconduct involving Federal grant funds to the DOJ OIG. In addition, OJP will obtain evidence that the New Hampshire DOJ distributed the revised policies and procedures to its staff and subrecipients.

New Hampshire DOJ agreed with our recommendation and stated in its response that it will update its policies and procedures to ensure that all New Hampshire DOJ staff reiterates to its subrecipients that the requirement to report potential fraud, waste, abuse, or misconduct involving grant funds to DOJ OIG.

This recommendation can be closed when we receive documentation demonstrating that New Hampshire DOJ implemented and distributed to its staff revised policies and procedures to ensure that all staff reiterates to its subrecipients that the requirement to report potential fraud, waste, abuse, or misconduct involving grant funds to DOJ OIG.

2. Ensure New Hampshire DOJ enhances its award agreement with subrecipients acting as pass-through entities to ensure lower-tier subrecipients are adequately monitored and related single audit requirements are fulfilled.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the New Hampshire DOJ to obtain a copy of its revised written policies and procedures, developed and implemented, which includes amended award agreements with subrecipients acting as pass-through entities, to ensure lower-tier subrecipients are adequately monitored and related single audit requirements are fulfilled. In addition, OJP will obtain evidence that the New Hampshire DOJ distributed the policies and procedures to its staff and subrecipients.

New Hampshire DOJ agreed with our recommendation and stated in its response that it will update its policies and procedures to ensure that all New Hampshire DOJ staff enhances award agreements with its subrecipients acting as pass-through entities to ensure lower-tier subrecipients are adequately monitored and single audit requirements are fulfilled.

This recommendation can be closed when we receive documentation demonstrating New Hampshire DOJ implemented and distributed to its staff updated policies and procedures to include enhancing its award agreement with subrecipients acting as pass-through entities to ensure lower-tier subrecipients are adequately monitored and related single audit requirements are fulfilled.

3. Work with New Hampshire DOJ to implement written policies and procedures for program income that ensure compliance with the DOJ Grants Financial Guide and the VOCA Guidelines.

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with New Hampshire DOJ to obtain a copy of its written policies and procedures for program income, developed and implemented, to ensure compliance with the DOJ Grants Financial Guide and the VOCA Guidelines.

New Hampshire DOJ agreed with our recommendation and stated in its response that it has implemented a program income policy that ensures compliance with the DOJ Grants Financial Guide and the VOCA Guidelines. With its response, New Hampshire DOJ provided a copy of this policy, which was dated June 27, 2023. OJP noted in its response that the policy was not signed by an New Hampshire DOJ authorized official and did not include an implementation date.

This recommendation can be closed when we receive OJP acceptance that the updated policies and procedures for program income ensure compliance with the DOJ Grants Financial Guide and the VOCA Guidelines.