



Audit of the Office of Justice Programs  
Victim Assistance Funds Subawarded by  
the Oklahoma District Attorneys Council to  
Northwest Domestic Crisis Services, Inc.,  
Woodward, Oklahoma



AUDIT DIVISION

25-012

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DECEMBER 2024

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# EXECUTIVE SUMMARY

## **Audit of the Office of Justice Programs Victim Assistance Funds Subawarded by the Oklahoma District Attorneys Council to Northwest Domestic Crisis Services, Inc., Woodward, Oklahoma**

### **Background**

The U.S. Department of Justice (DOJ), Office of Justice Programs (OJP) provided funds to the Oklahoma District Attorneys Council (Oklahoma DAC) to make subawards to support victim assistance programs in the state of Oklahoma. The Oklahoma DAC awarded \$504,560 in crime victim assistance funds to Northwest Domestic Crisis Services, Inc. (NWDCS), under two subawards from October 2022 to September 2024. The purpose of NWDCS's subawards was to support the salaries and fringe benefits of victim advocates, as well as a shelter manager, volunteer coordinator and parent educator, and a counselor, who each provide advocacy and other support services to victims of crime. As of July 2024, the Oklahoma DAC had reimbursed NWDCS for a cumulative amount of \$479,196 for the subawards we reviewed.

### **Audit Objective**

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

### **Summary of Audit Results**

We concluded that NWDCS provided advocacy and other support services to victims of crime in Woodward, Oklahoma, including intervention, shelter, transportation, advocacy, transitional housing, and counseling services. However, we found that NWDCS could improve its subaward management by documenting its program performance and financial management policies and procedures in writing. We also found that NWDCS should develop a policy to ensure that bonus payments adhere to federal requirements for such expenses.

#### **Program Performance and Accomplishments**

The audit concluded that NWDCS generally demonstrated progress toward achieving its stated subaward goals and objectives. However, the audit found that NWDCS does not have written policies and procedures related to performance reporting.

#### **Financial Management**

The audit concluded that while NWDCS's expenditures for personnel and fringe benefits under the subawards were generally allowable and supported, NWDCS's financial management could be improved with written policies and procedures specific to the payroll process and incentive compensation payments.

### **Recommendations**

Our report contains three recommendations for OJP to work with the Oklahoma DAC to assist NWDCS in improving its subaward management and administration. We requested a response to our draft audit report from NWDCS, the Oklahoma DAC, and OJP officials. Those responses can be found in Appendices 2, 3, and 4, respectively. Our analysis of those responses can be found in Appendix 5.

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## Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of victim assistance funds received by Northwest Domestic Crisis Services, Inc. (NWDCS), which is located in Woodward, Oklahoma. The Office of Justice Programs (OJP) Office for Victims of Crime (OVC) provided this funding to the Oklahoma District Attorneys Council (Oklahoma DAC) which serves as the state administering agency (SAA) for Oklahoma and makes subawards to direct service providers. As a direct service provider, NWDCS received two subawards from the Oklahoma DAC totaling \$504,560. These funds derived from the Oklahoma DAC's fiscal year (FY) 2020 and 2022 Victims of Crime Act (VOCA) victim assistance grants that OJP awarded to the Oklahoma DAC, as shown in Table 1.

**Table 1**

**Audited Subawards to NWDCS from the Oklahoma DAC**

Oklahoma DAC Subaward Identifier	OJP Prime Award Numbers	Project Start Date	Project End Date	Subaward Amount
2022-VOCA-NWDCS-141	2020-V2-GX-0002	10/01/2022	09/30/2023	\$100,000
	15POVC-22-GG-00792-ASSI			\$152,280
2023-VOCA-NWDCS-129	15POVC-22-GG-00792-ASSI	10/01/2023	09/30/2024	\$252,280
<b>Total:</b>				<b>\$504,560</b>

Source: JustGrants and Oklahoma DAC

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

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<sup>1</sup> The VOCA Victim Assistance Formula Grant Program is funded under 34 U.S.C. § 20101. Federal criminal fees, penalties, forfeited bail bonds, gifts, donations, and special assessments support the CVF. The total amount of funds that the OVC may distribute each year depends upon the amount of CVF deposits made during the preceding years and limits set by Congress.



## **Northwest Domestic Crisis Services, Inc.**

NWDCS is a 501(c)(3) non-profit organization located in Woodward, Oklahoma, whose mission is to provide support to victims of crime through intervention, prevention, education, and information services. Founded in 1981, NWDCS provides intervention, shelter, transportation, advocacy, transitional living, and counseling services to 10 counties covering more than 13,300 square miles. As of April 2024, NWDCS was operating two emergency shelters, two transitional living apartment complexes, and six crisis centers, located throughout the Northwest region of Oklahoma.

## **OIG Audit Approach**

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

To gain a further understanding of victim assistance subaward oversight, as well as to evaluate subrecipient performance and administration of VOCA-funded programs, we solicited feedback from Oklahoma DAC officials regarding NWDCS's records of delivering crime victim services, accomplishments, and compliance with the Oklahoma DAC award requirements.<sup>2</sup>

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

The results of our analysis are detailed in the report sections that follow. Appendix 1 contains additional information on this audit's objective, scope, and methodology.

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<sup>2</sup> As an SAA, the Oklahoma DAC is responsible for ensuring that NWDCS's subawards are used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. As such, we considered the results of our audit of victim assistance grants awarded to the Oklahoma DAC in performing this separate review. See U.S. Department of Justice Office of the Inspector General, [Audit of the Office of Justice Programs Victim Assistance Grants Awarded to the Oklahoma District Attorneys Council, Oklahoma City, Oklahoma](#), Audit Report 24-072, (June 2024), [oig.justice.gov/reports/audit-office-justice-programs-victim-assistance-grants-awarded-oklahoma-district-attorneys](https://oig.justice.gov/reports/audit-office-justice-programs-victim-assistance-grants-awarded-oklahoma-district-attorneys).



## Audit Results

### Program Performance and Accomplishments

As established by the VOCA legislation, VOCA subawards are available to subrecipients for the purpose of providing direct services to victims. Through the VOCA funding it received from the Oklahoma DAC, NWDCS supported the salaries and benefits of victim advocates, as well as a shelter manager, volunteer coordinator and parent educator, and a counselor. By funding victim service providers, NWDCS was able to provide intervention, shelter, transportation, advocacy, transitional housing, and counseling services to victims of crime. We obtained an understanding of NWDCS's standard operating procedures in relation to the subaward funded services. We also compared the subaward solicitations, project applications, and subaward agreements against available evidence of accomplishments to determine whether NWDCS demonstrated progress towards providing the services for which it was funded. Overall, we concluded that, although NWDCS generally demonstrated progress toward achieving the stated goals and objectives of its subawards and provided a range of services to victims of crime, NWDCS should improve its subaward management by establishing written policies and procedures for program performance reporting and distribute this guidance to relevant personnel.

### Program Implementation

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

To obtain an understanding of NWDCS's standard operating procedures, including internal controls, in relation to the audited victim services, we reviewed NWDCS's written policies and procedures that govern the VOCA-funded programs. We also conducted interviews with NWDCS's Executive Director, Assistant Director, and multiple staff members who provide direct victim services. These individuals informed us of NWDCS's program-related operational procedures, which include intervention, shelter, and counseling services. Based on NWDCS's procedures reviewed, interviews conducted, and our verification of progress reports, we found that NWDCS provided the services to victims, for which it received VOCA funds.

Specifically, as a subrecipient of VOCA funds, NWDCS is required to compile and report programmatic information to the Oklahoma DAC detailing the number of victims served, as well as the frequency of specific services provided. We asked NWDCS for written policies related to the completion and validation of its programmatic information. An NWDCS official stated that although there are no written policies related to performance reporting, a specific process is followed. According to NWDCS officials, the performance reporting process involves NWDCS staff maintaining manual service logs and inputting the victim service information directly into NWDCS's internal system. Once the performance information has been entered, an advocate and the Assistant Director reconcile this information back to the manual service logs to ensure complete and accurate information is submitted to the Oklahoma DAC. The Assistant Director then submits the performance reports through the Oklahoma DAC system.



We believe that to ensure compliance with federal grant reporting requirements, written policies and procedures are pivotal to communicate and execute controls to help ensure that programmatic information reported is accurate and consistent. Additionally, written policies and procedures would define NWDCS staff roles and responsibilities for collecting and summarizing programmatic information and improve the continuity of producing future programmatic information in the event of staff turnover. Therefore, we recommend that OJP work with the Oklahoma DAC to ensure that NWDCS establishes written policies and procedures specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant personnel.

## **Program Services**

According to the program narrative in NWDCS's 2022 and 2023 subaward applications, the services provided by NWDCS to victims of crime were to include intervention, shelter, transportation, advocacy, transitional housing, and counseling services. To verify NWDCS's progress towards meeting the goals of its subawards, we interviewed NWDCS officials, confirmed four performance metrics from two Performance Measurement Tool Reports, and reviewed case files and victim surveys. For subaward 2022-VOCA-NWDCS-141 (2022 subaward) and 2023-VOCA-NWDCS-129 (2023 subaward), we found that the four performance metrics tested generally reconciled to the supporting documentation provided by NWDCS. Based on interviews with NWDCS officials, our analysis of supporting documentation, and review of case files and victim surveys, we concluded that NWDCS provided the aforementioned services as part of the subaward programs.

In addition, we selected one goal from each subaward targeted to increase knowledge of NWDCS services and outreach within NWDCS's service area. For the 2022 subaward, we found that NWDCS generally met its goal of updating a Memorandum of Understanding with 26 of the 33 law enforcement agencies in its service area. For the 2023 subaward, at the time of our fieldwork, we found that it did not appear NWDCS would achieve its goal to recruit and train at least five additional volunteers to provide direct victim services and add another 50 general volunteers before the subaward ended on September 30, 2024. Specifically, we found that NWDCS had evidence that it had added 10 of the sought-after 50 general volunteers but was unable to provide evidence that it had recruited and trained five additional direct service volunteers. The NWDCS official we interviewed explained that the COVID-19 pandemic contributed to the low number of individuals wanting to volunteer and be in close contact with other individuals. Additionally, the official stated that volunteers who want to provide direct victim services to victims must go through NWDCS's 40-hour training and this official opined that this may be a significant commitment for potential volunteers. The NWDCS official explained that when NWDCS staff conduct a community outreach event or presentation, staff continue to focus efforts on recruiting volunteers. Because, at the time of our fieldwork, the subaward period had not yet ended and some of these circumstances were largely out of NWDCS's control, we do not take issue with the status of this goal at the time we reviewed the efforts. Notwithstanding the matter of volunteers, we concluded that NWDCS generally demonstrated progress toward achieving the stated goals and objectives of its subawards.

## **Financial Management**

According to the DOJ Grants Financial Guide, all award recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records to accurately account for awarded funds. To assess the adequacy of NWDCS's financial management of the VOCA subawards, we interviewed NWDCS staff who were responsible for financial aspects of the subawards, examined fiscal policies and procedures, reviewed subaward documents, and performed expenditure testing to determine whether NWDCS



adequately accounted for the subaward funds we audited. Overall, we concluded that while NWDCS's expenditures for personnel and fringe benefits under the VOCA subawards were generally allowable and supported, NWDCS's financial management could be improved with written policies and procedures specific to the payroll process. Additionally, we determined that NWDCS should develop and implement an incentive compensation policy that adheres to the requirements of the Uniform Guidance.

## Fiscal Policies and Procedures

To test fiscal policies and procedures, we reviewed NWDCS's policies related to subaward fiscal oversight, interviewed NWDCS's Executive Director regarding financial procedures, and verified the execution of activities in accordance with the financial procedures. Recognizing that a lack of internal controls increases the risk of theft, the DOJ Grants Financial Guide states that accounting and internal control systems should, at a minimum, include documented written procedures.

While NWDCS maintained written policies and procedures related to general accounting processes, we did not identify any policies and procedures that specifically addressed the payroll process. When we asked NWDCS for written policies related to the payroll process, an NWDCS official stated that although there are no written payroll policies and procedures, a specific process is followed. According to the NWDCS official, the payroll process involves employees tracking their time spent on each funding source throughout the pay period and certifying their timesheet with a signature. Next, the Executive Director reviews employee timesheets, including any overtime hours, to ensure accuracy and submits the timesheets to the bookkeeper. The bookkeeper prepares payroll, and the Executive Director approves and makes the payroll payments to the employees, which require two signatures—preferably board members—and, if needed, the Executive Director will sign as one of the two signatures. As described in the [Personnel and Fringe Benefit Costs](#) section of this report, we determined that the payroll process outlined above was adequate to ensure that expenditures for personnel and fringe benefits charged to the subawards were supported, allowable, and properly allocated. However, we believe that to ensure compliance with federal grant reporting requirements, having written policies and procedures would help to ensure the financial information included in the general ledger and provided within the reimbursement requests is accurate and consistent, as well as the continuity of the payroll process when there is a possibility of staff turnover. Therefore, we recommend that OJP work with the Oklahoma DAC to ensure that NWDCS establishes written policies and procedures specific to the payroll process and distributes this guidance to relevant personnel.

## Subaward Expenditures

NWDCS requested reimbursement from the Oklahoma DAC through monthly requests for funds, which contained the reimbursement amount requested for the month, total reimbursements to date, and the remaining balances for each budget category of the subaward.<sup>3</sup> For the subawards we audited, NWDCS's approved VOCA budgets included personnel, fringe benefits, and indirect costs.

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<sup>3</sup> The VOCA Fix to Sustain the Crime Victims Fund Act of 2021 (VOCA Fix), Pub. L. No. 117-27, § 3(b), 135 Stat. 302, which amended the Victims of Crime Act (VOCA) of 1984, requires the Oklahoma DAC to issue a mandatory match waiver in its entirety on Victims of Crime Act assistance funds during a national emergency, including the COVID-19 pandemic. Based on award documentation, the Oklahoma DAC waived the match requirement for NWDCS for the audited subawards. Therefore, we did not perform testing in this area except for verifying that the Oklahoma DAC informed NWDCS that it did not have matching costs for the two subawards.



As of July 2024, the Oklahoma DAC reimbursed the NWDCS a total of \$479,196 in VOCA funds for costs incurred in these areas. We reviewed a sample of NWDCS transactions from the approved budget categories to determine whether the costs charged to the VOCA subawards were accurate, allowable, supported, and in accordance with the VOCA program requirements. We judgmentally selected \$46,749 in personnel and fringe benefit transactions and \$22,674 in indirect cost transactions.

### *Personnel and Fringe Benefit Costs*

We determined the Oklahoma DAC reimbursed NWDCS \$452,058 in personnel and associated fringe benefit costs, which represented approximately 94 percent of the \$479,196 in subaward reimbursements. Since NWDCS requested monthly reimbursements from the Oklahoma DAC, we judgmentally sampled 1 month of reimbursement from each subaward. Our sample consisted of two pay periods from the 2022 subaward and three pay periods from the 2023 subaward, totaling \$46,749 in salaries and fringe benefit costs charged to the subawards.

To test these expenditures, we reviewed the approved subaward budget, payroll and financial records, and available supporting documents. Through our testing, we found that expenditures for personnel and fringe benefits charged to the subawards were generally allowable and supported. Additionally, our review of NWDCS's accounting records identified expenditures for holiday bonuses totaling \$700 from the 2022 subaward and \$1,400 from the 2023 subaward, that did not adhere to the Uniform Guidance requirements. According to 2 C.F.R. § 200.430(f) of the Uniform Guidance,

Incentive compensation to employees based on cost reduction, or efficient performance, suggestion awards, safety awards, etc., is allowable to the extent that the overall compensation is determined to be reasonable and such costs are paid or accrued pursuant to an agreement entered into in good faith between the non-Federal entity and the employees before the services were rendered, or pursuant to an established plan followed by the non-Federal entity so consistently as to imply, in effect, an agreement to make such payment.

Although we determined that total NWDCS employee compensation appeared reasonable, an NWDCS official we interviewed confirmed that the holiday bonuses paid to NWDCS employees were not based on job performance or other job-related activity and were not supported by an agreement or plan, as required under the Uniform Guidance.

Additionally, we found that NWDCS charged both the 2022 subaward and 2023 subaward 100 percent of the holiday bonuses paid to each employee rather than allocating the bonuses in accordance with the VOCA percentage approved for each employee as submitted to the Oklahoma DAC. An NWDCS official we interviewed confirmed that the holiday bonuses were not allocated among funding sources, rather NWDCS charged 100 percent of the bonuses to each employee's primary funding source. According to 2 C.F.R. § 200.405(d) of the Uniform Guidance, if a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. Even though we found that holiday bonus payments were not properly allocated to the subawards and were not handled as required by incentive compensation requirements in the Uniform Guidance, we did not identify questioned costs associated with the total amount of the bonuses paid because NWDCS incurred and is on track to incur more in personnel expenditures than the



total amount of the bonuses reimbursed under each subaward. However, because we anticipate the possibility that the NWDCS will continue to pay bonuses in the future, we recommend that OJP work with the Oklahoma DAC to ensure that NWDCS develop and implement an incentive compensation policy that adheres to the requirements of the Uniform Guidance.

### *Indirect Costs*

Indirect costs are costs of an organization that are not readily assignable to a particular project but are necessary to the operation of the organization and the performance of the project. According to the DOJ Grants Financial Guide, if no approved federally negotiated indirect cost rate exists at the subrecipient level, the pass-through entity is responsible for determining the appropriate indirect cost rate in collaboration with such subrecipients requesting indirect costs associated with a subaward. Such rates are either negotiated between the pass-through entity and the subrecipient, or the subrecipient can utilize the de minimis indirect cost rate allowed under 2 C.F.R. § 200.<sup>4</sup> NWDCS elected to use a 6-percent indirect cost rate for both subawards in our scope, which the Oklahoma DAC approved in NWDCS's award application.

We reviewed NWDCS's accounting records and reimbursement requests and determined that NWDCS charged a total of \$22,674 in indirect costs to both subawards. For the 2022 subaward, NWDCS charged \$14,280 in indirect costs, and for the 2023 subaward NWDCS had charged \$8,394 as of March 2024. Overall, we noted that indirect costs were generally allowable, calculated accurately, and appropriately charged to the subawards.

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<sup>4</sup> See 2 C.F.R. § 200.332(a)(4)(i)(B).



## Conclusion and Recommendations

As a result of our audit testing, we concluded that NWDCS generally demonstrated progress towards achievement of the goals and objectives of the subawards. However, we found that NWDCS should improve its written policies and procedures related to performance reporting and financial management to ensure compliance with federal award requirements, as well as the continuity of processes in the event of staff turnover. Further, NWDCS should develop and implement an incentive compensation policy that adheres to the requirements of the Uniform Guidance. We provide three recommendations to OJP to work with the Oklahoma DAC to address these deficiencies.

We recommend that OJP work with the Oklahoma DAC to:

1. Ensure that NWDCS establishes written policies and procedures specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant personnel.
2. Ensure that NWDCS establishes written policies and procedures specific to the payroll process and distributes this guidance to relevant personnel.
3. Ensure that NWDCS develop and implement an incentive compensation policy that adheres to the requirements of the Uniform Guidance.

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

## **Objective**

The objective of this audit was to review how Northwest Domestic Crisis Services, Inc. (NWDCS) used the Victims of Crime Act (VOCA) funds received through two subawards from the Oklahoma District Attorneys Council (Oklahoma DAC) to assist crime victims and assess whether it accounted for VOCA funds in compliance with select award requirements, terms, and conditions. To accomplish this objective, we assessed program performance and accomplishments and grant financial management.

## **Scope and Methodology**

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

This was an audit of two subawards to NWDCS, subaward numbers 2022-VOCA-NWDCS-141 and 2023-VOCA-NWDCS-129. These subawards, totaling \$504,560, were funded by the Oklahoma DAC from primary VOCA grants 2020-V2-GX-0002 and 15POVC-22-GG-00792-ASSI awarded by the Office of Justice Programs (OJP) Office for Victims of Crime (OVC). As of July 2024, the Oklahoma DAC had reimbursed NWDCS \$479,196 in subaward funds.

Our audit concentrated on, but was not limited to, the period of October 2022 through March 2024. The Department of Justice (DOJ) Grants Financial Guide; the VOCA Guidelines and Final Rule; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; and the OVC and Oklahoma award documents contain the primary criteria we applied during the audit.

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

During our audit, we obtained information from DOJ's JustGrants System, as well as NWDCS's and the Oklahoma DAC's Grant Management System. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.



## Internal Controls



In this audit, we performed testing of internal controls significant within the context of our audit objective. We did not evaluate the internal controls of NWDCS to provide assurance on its internal control structure as a whole. NWDCS 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 NWDCS's internal control structure as a whole, we offer this statement solely for the information and use of NWDCS, the Oklahoma DAC, and OJP.<sup>5</sup>

In planning and performing our audit, we identified internal control components and underlying internal control principles as significant to the audit objective. Specifically, we assessed the design and implementation of NWDCS policies and procedures. We also tested the implementation and operating effectiveness of specific controls over subaward 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.

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

## APPENDIX 2: Northwest Domestic Crisis Services, Inc. Response to the Draft Audit Report

 <p><i>"When it hurts, We can help"</i></p>	<b>NORTHWEST DOMESTIC CRISIS SERVICES, INC.</b>
<p>Business Office 580-256-1215 1024 22nd St. Ste. 100 Woodward, OK 73801</p>	<p>October 30, 2024</p> <p>Linda Talor, This email is in response to the draft audit of NW Domestic Crisis Services, Inc in Woodward Oklahoma. The recommendations were made with no findings. This is NWDCS, Inc.'s response to those three items.</p> <ol style="list-style-type: none"><li>1. NWDCS, Inc. will expand it's annual program evaluation policies to include VOCA specific language which accounts for how the information is entered, by whom it is entered, and when information is entered into the data base. We will also put in writing how this information is checked for accuracy and who generates the needed report to give progress update to the DAC.</li><li>2. NWDCS, Inc. has been talking with Brian Hendricks about providing sample payroll policies. Upon receipt of those examples the board will promulgate our own payroll policies including how employees track their time and who enters the information into quickbooks.</li><li>3. We choose not to develop an incentive compensation plan as that is not the intention behind Christmas bonuses. That has nothing to do with performance. NWDCS, Inc. will however, make sure private funds are always used to support any Christmas bonuses.</li></ol>
<p>Guymon Satellite 580-338-2780 1106 N. Ellison Guymon, OK 73942</p>	<p>I hope this is what was expected of my in my roll as executive director. Should you require any further information please contact me at the business office at 580-256-1215 or email me at <a href="mailto:executivedirector@nwdcs.org">executivedirector@nwdcs.org</a></p>
<p>Alva Satellite 580-327-6648 1330 Oklahoma Blv. Alva, OK. 73717</p>	<p>Thank you for your time.  Paul Fockler Executive Director NWDCS, Inc. 580-256-1215</p>
<p>Crisis Line 1-888-256-1215</p>	



## APPENDIX 3: The Oklahoma District Attorneys Council Response to the Draft Audit Report

KATHRYN B. BREWER  
Executive Coordinator

RYAN STEPHENSON  
Assistant Executive Coordinator



STATE OF OKLAHOMA  
**DISTRICT ATTORNEYS COUNCIL**

421 NW 13<sup>th</sup> Street, Suite 290 • Oklahoma City, Oklahoma 73103

**Victims Services Division**

Ph: 405-264-5006 • Fax: 405-264-5097

Monday, November 4, 2024

U.S. Department of Justice  
Office of Justice Programs  
Office of the Inspector General  
Denver Regional Audit Office  
Attention: Kimberly Rice  
1120 Lincoln Street, Suite 1500  
Denver, CO 80203  
VIA Electronic Mail at: [Kimberly.L.Rice@usdoj.gov](mailto:Kimberly.L.Rice@usdoj.gov)

Dear Ms. Rice:

The Oklahoma District Attorneys Council (DAC) appreciates the opportunity to provide a response to the three recommendations listed in the draft audit report for Sub-Award Numbers 2022-VOCA-NWDCS-141 and 2023-VOCA-NWDCS-129 made by the Oklahoma District Attorneys Council (Oklahoma DAC), under OJP's Victims of Crime Act, Victims Assistance Formula Grant Program, Grant Numbers 2020-V2-GX-0002 and 15POVC-22-GG-00792-ASSI, to Northwest Domestic Crisis Services, Inc.

**Recommendation 1: The OIG recommended that DAC ensure NWDCS establishes written policies and procedures specific to the performance reporting of VOCA-funded services and distributes the guidance to relevant personnel.**

The DAC acknowledges this recommendation and Concurs with the recommendation.

The DAC has taken the following steps to resolve the recommendation:

The DAC provided a copy of the *OVC Tips & Template for Policy Development* to the Executive Director of NWDCS. See attachment 1 **OVC Tips & Template for Policy Development**.

**Recommendation 2: The OIG recommended that DAC ensure NWDCS establishes written policies and procedures specific to the payroll process and distributes this guidance to relevant personnel.**

The DAC acknowledges this recommendation and Concurs with the recommendation.

Page 1 of 2

The DAC has taken the following steps to resolve the recommendation:

The DAC provided a copy of the *OVC Tips & Template for Policy Development* to the Executive Director of NWDCS. See attachment **OVC Tips & Template for Policy Development**.

**Recommendation 3: The OIG recommended that DAC ensure NWDCS develop and implement an incentive compensation policy that adheres to the requirements of Uniform Guidance.**

The DAC acknowledges this recommendation and Concurs with the recommendation.

The DAC has taken the following steps to resolve the recommendation:

The DAC provided a copy of the *OVC Tips & Template for Policy Development* to the Executive Director of NWDCS. See attachment **OVC Tips & Template for Policy Development**.

Brian Hendrix, Victims Division Director, is the contact person responsible for the corrective action plan listed above. Mr. Hendrix can be reached at (405) 264-5006 or [brian.hendrix@dac.state.ok.us](mailto:brian.hendrix@dac.state.ok.us).

Sincerely,



Brian Hendrix  
Director of Victims Services  
Oklahoma District Attorneys Council

cc: Katherine Brewer  
Executive Coordinator  
District Attorneys Council

Linda Taylor  
Lead Auditor, Audit Coordination Branch  
Audit and Review Division

Paul Fockler  
Executive Director  
Northwest Domestic Crisis Services, Inc.



## APPENDIX 4: 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

November 7, 2024

MEMORANDUM TO:

Kimberly Rice  
Regional Audit Manager  
Denver Regional Audit Office  
Office of the Inspector General

FROM:

Iyauta I. Green  
Director

Iyauta Iyeesha Green

Digitally signed by Iyauta Iyeesha Green  
Date: 2024.11.07 15:58:28 -0500

SUBJECT:

Response to the Draft Report, *Audit of the Office of Justice Programs Victim Assistance Funds, Subawarded by the Oklahoma District Attorneys Council to Northwest Domestic Crisis Services, Inc., Woodward, Oklahoma*

This memorandum is in reference to your correspondence, dated October 10, 2024, transmitting the above-referenced draft audit report for Northwest Domestic Crisis Services, Inc. (NWDCS). NWDCS received subaward funds from the Oklahoma District Attorneys Council (Oklahoma DAC), under the Office of Justice Programs' (OJP), Office for Victims of Crime (OVC), Victims of Crime Act (VOCA), Victim Assistance Formula Grant Program, Grant Numbers 2020-V2-GX-0002 and 15POVC-22-GG-00792-ASSI. 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 our response.

- 1. We recommend that OJP work with the Oklahoma DAC to ensure that NWDCS establishes written policies and procedures specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant personnel.**

OJP agrees with this recommendation. In its response, dated November 4, 2024, the Oklahoma DAC stated that it has provided a copy of its *OVC Tips & Template for Policy Development* to NWDCS, to use as a guide for developing written policies and procedures to address this recommendation.

Accordingly, we will work with the Oklahoma DAC to obtain a copy of the NWDCS's written policies and procedures, developed and implemented, specific to the performance reporting of VOCA-funded services, and evidence that NWDCS distributed the policies and procedures to relevant personnel responsible for managing Federal grant funds.

2. **We recommend that OJP work with the Oklahoma DAC to ensure that NWDCS establishes written policies and procedures specific to the payroll process and distributes this guidance to relevant personnel.**

OJP agrees with this recommendation. In its response, dated November 4, 2024, the Oklahoma DAC stated that it has provided a copy of its *OVC Tips & Template for Policy Development* to NWDCS, to use as a guide for developing written policies and procedures to address this recommendation.

Accordingly, we will work with the Oklahoma DAC to obtain a copy of the NWDCS's written policies and procedures, developed and implemented, to ensure that payroll costs charged to Federal awards are supported, allowable, and properly allocated, in compliance with the U.S. Department of Justice Grants Financial Guide and Federal award requirements.

3. **We recommend that OJP work with Oklahoma DAC to ensure that NWDCS develop and implement an incentive compensation policy that adheres to the requirements of the Uniform Guidance.**

OJP agrees with this recommendation. In its response, dated November 4, 2024, the Oklahoma DAC stated that it has provided a copy of its *OVC Tips & Template for Policy Development* to NWDCS, to use as a guide for developing written policies and procedures to address this recommendation.

Accordingly, we will work with the Oklahoma DAC to obtain a copy of the NWDCS's written policies and procedures, developed and implemented, to ensure that incentive compensation to employees adheres to the requirements of the Uniform Guidance.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact Jeffrey Haley, Deputy Director, Audit and Review Division, of my staff, at (202) 598-0529.

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

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

Jeffery A. Haley  
Deputy Director, Audit and Review Division  
Office of Audit, Assessment, and Management

Kristina Rose  
Director  
Office for Victims of Crime



cc: Katherine Darke Schmitt  
Principal Deputy Director  
Office for Victims of Crime

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

Jeffrey Nelson  
Deputy Director of Operations, Budget, and  
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Louise Duhamel  
Assistant Director, Audit Liaison Group  
Internal Review and Evaluation Office  
Justice Management Division

Jorge L. Sosa  
Director, Office of Operations – Audit Division  
Office of the Inspector General

OJP Executive Secretariat  
Control Number OCOM001240



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

The U.S. Department of Justice Office of the Inspector General provided a draft of this audit report to the Office of Justice Programs (OJP), the Oklahoma District Attorneys Council (Oklahoma DAC), and Northwest Domestic Crisis Services, Inc. (NWDCS). NWDCS's response is incorporated in Appendix 2, the Oklahoma DAC's response is incorporated in Appendix 3, and OJP's response is incorporated in Appendix 4 of this final report. In response to our draft audit report, OJP agreed with our recommendations, and as a result, the status of the audit report is resolved. The Oklahoma DAC concurred with our recommendations. NWDCS disputed one of our recommendations. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

### Recommendations for OJP and the Oklahoma DAC:

- 1. Ensure that NWDCS establishes written policies and procedures specific to the performance reporting of VOCA-funded services and distributes this guidance to relevant personnel.**

Resolved. OJP agreed with our recommendation. OJP stated that it will coordinate with the Oklahoma DAC to obtain a copy of NWDCS's written policies and procedures, developed and implemented, specific to the performance reporting for VOCA-funded services to ensure compliance with federal award requirements and continuity of operations.

The Oklahoma DAC concurred with the recommendation and stated in its response it provided a copy of the *Office for Victims of Crime (OVC) Tips & Template for Policy Development* to the Executive Director of NWDCS.

NWDCS did not dispute this recommendation and stated in its response that it will expand its annual program evaluation policies to include VOCA-specific language related to data entry. Additionally, NWDCS stated that it will include language on the accuracy of that information and role responsibility for reporting progress updates to the Oklahoma DAC.

Based on the responses outlined above, we consider this recommendation resolved. This recommendation can be closed when we receive evidence that OJP and the Oklahoma DAC have ensured that NWDCS has established written policies and procedures specific to the performance reporting of VOCA-funded services and distributed this guidance to relevant personnel.

- 2. Ensure that NWDCS establishes written policies and procedures specific to the payroll process and distributes this guidance to relevant personnel.**

Resolved. OJP agreed with our recommendation. OJP stated that it will coordinate with the Oklahoma DAC to obtain a copy of NWDCS's written policies and procedures, developed and implemented, to ensure that payroll costs charged to the federal awards are supported, allowable, and properly allocated in compliance with DOJ Grants Financial Guide and federal award requirements.



The Oklahoma DAC concurred with the recommendation and stated it provided a copy of the *OVC Tips & Template for Policy Development* to the Executive Director of NWDCS.

NWDCS did not dispute this recommendation and stated in its response that it will create and distribute payroll policies upon receipt of sample payroll policies from the Oklahoma DAC, including how employees track time and role responsibility for data entry.

Based on the responses outlined above, we consider this recommendation resolved. This recommendation can be closed when we receive evidence that OJP and the Oklahoma DAC have ensured that NWDCS established written policies and procedures specific to the payroll process and distributed this guidance to relevant personnel.

**3. Ensure that NWDCS develop and implement an incentive compensation policy that adheres to the requirements of the Uniform Guidance.**

Resolved. OJP agreed with our recommendation. OJP stated that it will coordinate with the Oklahoma DAC to obtain a copy of NWDCS's written policies and procedures, developed and implemented, to ensure that incentive compensation to employees adheres to the requirements of the Uniform Guidance.

The Oklahoma DAC concurred with the recommendation and stated in its response it provided a copy of the *OVC Tips & Template for Policy Development* to the Executive Director of NWDCS.

NWDCS disputed this recommendation and stated in its response that it will not develop an incentive compensation policy as it does not consider holiday bonuses to fall into that category. However, NWDCS also indicated that it would ensure private funds are always used to support any future holiday bonuses.

Based on the responses outlined above, we consider this recommendation resolved. This recommendation can be closed when we receive evidence that OJP and the Oklahoma DAC have ensured that NWDCS developed and implemented either an incentive compensation policy that adheres to the requirements of the Uniform Guidance or a policy indicating that NWDCS will only use private funds, and not Crime Victims Fund victim assistance funds, to support any future holiday bonuses.