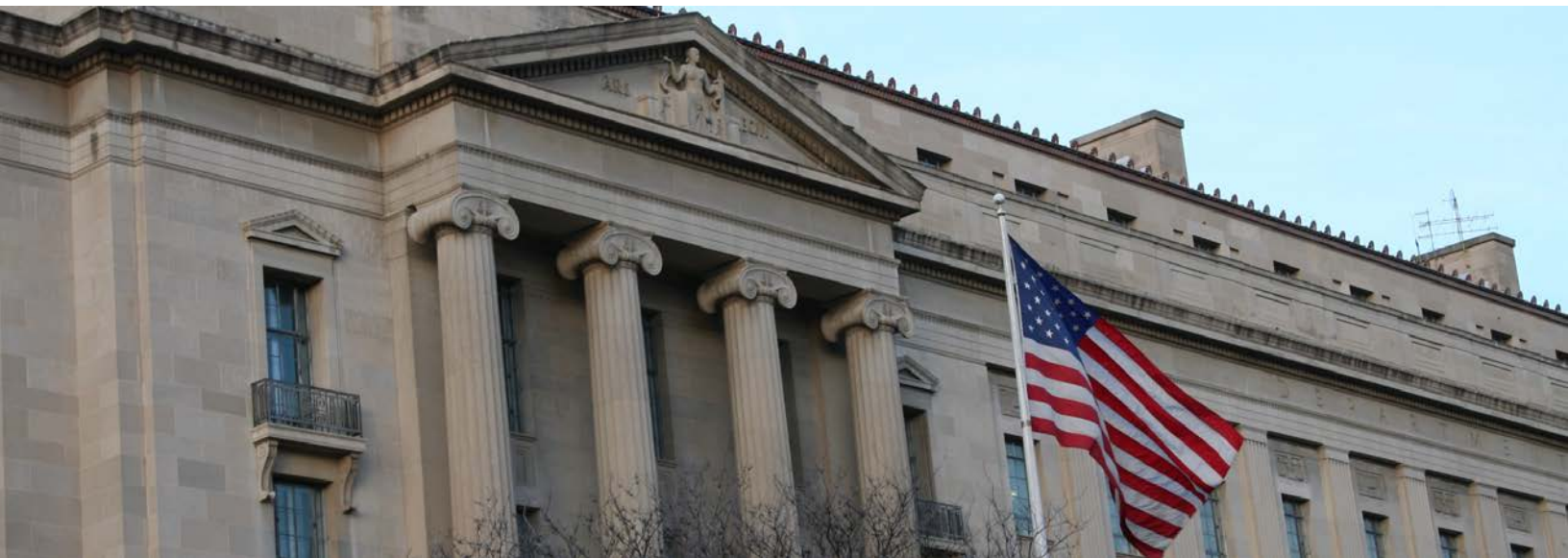




Office of the Inspector General U.S. Department of Justice

OVERSIGHT ★ INTEGRITY ★ GUIDANCE



Audit of the Office on Violence Against Women Grants Awarded to the DeKalb County Magistrate Court, Decatur, Georgia



Executive Summary

Audit of the Office on Violence Against Women Grants Awarded to the DeKalb County Magistrate Court, Decatur, Georgia

Objectives

The Office on Violence Against Women (OVW) awarded the DeKalb County Magistrate Court (the Court) a total of \$1,449,094 for a 2016 Improving Criminal Justice Responses Program grant and a 2017 Justice Systems Response to Families Program grant. The objectives of this audit were to determine whether costs claimed under the grants were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the award; and to determine whether the grantee demonstrated adequate progress towards achieving program goals and objectives.

Results in Brief

Our audit concluded that the Court is working to achieve its stated goals and objectives for the awards. This audit did not identify any significant concerns with the Court's drawdowns or financial reporting. However, we determined that the Court's reported performance was not always accurate. The Court approved subrecipient reimbursement requests for unsupported and unallowable costs totaling \$29,337, and the Court does not compare actual to budgeted costs. We also found that the Court's subrecipient monitoring procedures require improvement to ensure performance reports are accurate and expenditures are made in accordance with federal requirements.

Recommendations

Our report contains seven recommendations to OVW. We requested a response to our draft audit report from OVW and the Court, which can be found in Appendices 3 and 4, respectively. Our analysis of those responses is included in Appendix 5.

Audit Results

The 2016 Improving Criminal Justice Response Program grant was intended to increase compliance with protective orders and strengthen legal advocacy services for victims. The 2017 Justice Systems Response to Families Program grant was intended to improve the response of the justice system to families with a history of violence, stalking, or allegations of child sexual abuse. The project period for the 2016 grant was from October 2016 through September 2019, and the project period for the 2017 grant was from October 2017 through September 2020. The Court drew down a cumulative amount of \$816,610 as of June 2019 for both grants we reviewed.

Program Goals and Accomplishments - We reviewed the Court's stated accomplishments for the award, and found that the Court and its subrecipients are providing services in accordance with the grant objectives. However, we determined that the Court reported performance data for both grants that was not accurate. For the 2016 grant, four performance measures we tested were not accurate. For the 2017 grant, none of the three performance measures we tested were accurate.

Grant Expenditures - For the 2016 grant, we questioned \$13,763 in unsupported subrecipient costs and \$1,642 in unallowable subrecipient costs. For the 2017 grant, we questioned \$13,932 in unsupported subrecipient costs.

Budget Management and Control - We found that the Court does not have a process to routinely compare actual grant costs to budgeted costs, which could result in it expending more grant funds in certain budget categories than approved in its grant budgets.

Monitoring of Subrecipients - We found that the Court does not have a formal monitoring process for subrecipients. Although the Court maintains regular communication with the subrecipients, inaccurate performance reports and unsupported subrecipient expenditures demonstrate that increased monitoring is necessary.

**AUDIT OF THE OFFICE ON VIOLENCE WOMEN GRANTS
AWARDED TO THE DEKALB COUNTY MAGISTRATE COURT,
DECATUR, GEORGIA**

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AUDIT OF THE OFFICE ON VIOLENCE AGAINST WOMEN GRANTS AWARDED TO THE DEKALB COUNTY MAGISTRATE COURT, DECATUR, GEORGIA

INTRODUCTION

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of two grants awarded by the Office on Violence Against Women (OVW) under its Improving Criminal Justice Responses Program and Justice Systems Response to Families Program to the DeKalb County Magistrate Court (the Court) in Decatur, Georgia. The Court was awarded a total of \$1,449,094, as shown in Table 1.

Table 1

OVW Grants Awarded to the DeKalb County Magistrate Court

Award Number	Award Date	Project Period Start Date	Project Period End Date	Award Amount
2016-WE-AX-0006	9/27/2016	10/1/2016	9/30/2019	\$750,000
2017-FJ-AX-0006	9/14/2017	10/1/2017	9/30/2020	699,094
Total:				\$1,449,094

Source: Office of Justice Programs' Grants Management System

The Improving Criminal Justice Responses Program is intended to enhance victim safety and offender accountability in cases of sexual assault, domestic violence, dating violence, and stalking by encouraging jurisdictions to implement pro-arrest policies as an effective intervention as part of a coordinated community response. The Justice System Response to Families Program is intended to support the following activities for improving the capacity of courts and communities to respond to families affected by the targeted crimes: (1) court-based and court-related programs; (2) supervised visitation and safe exchange by and between parents; (3) training and technical assistance for people who work with families in the court system; (4) civil legal services; (5) provision of resources in juvenile court matters; and (6) development and promotion of legislation, model codes, policies, and best practices.

The Grantee

The DeKalb County Magistrate Court serves an estimated population of 734,871. The Court was created in 1983 and handles civil and criminal matters in DeKalb County, Georgia.¹ The Court provides services to victims of domestic violence and enforces protective order compliance. In 2016, 2,918 individuals filed Temporary Protective Orders in DeKalb County and 517 applied for Domestic Violence-related arrest warrants.

¹ Civil matters can include abandoned motor vehicles, dispossessory, small claims, garnishments, nuisance abatement, personal property foreclosures, protection orders, and weddings. Criminal matters can include warrants, bad checks, first appearance hearings, preliminary hearings, and pretrial services.

OIG Audit Approach

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

We tested compliance with what we consider to be the most important conditions of the grants. The DOJ Grants Financial Guide and the award documents contain the primary criteria we applied during the audit.

The results of our analysis are discussed in detail later in this report. Appendix 1 contains additional information on this audit's objectives, scope, and methodology. The Schedule of Dollar-Related Findings appears in Appendix 2.

AUDIT RESULTS

Program Performance and Accomplishments

We reviewed required performance reports, reviewed the grant solicitations and grant documentation, and interviewed Court officials to determine whether the Court demonstrated adequate progress towards achieving the program goals and objectives. We also reviewed progress reports to determine if the required reports were accurate. Finally, we reviewed the Court's compliance with selected special conditions identified in the award documentation.

Program Goals and Objectives

Grant number 2016-WE-AX-0006 supported the DeKalb County Protective Order Compliance Project through OVW's improving the Criminal Justice Response Program. The goals for this grant were to increase compliance with protective orders and strengthen legal advocacy services for victims. In addition, other planned activities included providing: culturally and linguistically appropriate advocacy to underserved populations during and after protective order hearings; legal counsel to indigent survivors; and advocacy for victims as they apply for T and U visas.²

Grant number 2017-FJ-AX-0006 supported OVW's Justice for Families Program. The goal for this grant was to improve the response of all aspects of the civil and criminal justice systems to families with a history of domestic violence, dating violence, sexual assault, stalking, or in cases involving allegations of child sexual abuse. To accomplish this goal, the Court and its collaborative partners, planned to: (1) provide supervised visitation and safe exchange of children services for victims; (2) enhance the domestic violence court by providing a dedicated case coordinator; (3) provide on-site advocacy and civil legal assistance; and (4) provide culturally-specific advocacy services.

Required Performance Reports

According to the DOJ Grants Financial Guide, the funding recipient should ensure that valid and auditable source documentation is available to support all data collected for each performance measure specified in the program solicitation. To verify progress reports, we selected a sample of five performance measures for the 2016 grant and three performance measures for the 2017 grant from the two most recent reports submitted for each grant at the time of our testing. We compared the reported performance to the supporting documentation maintained by the Court.

We determined that the performance data reported by the court for both grants was not accurate. For the 2016 grant, four of the five performance

² The T visa is an immigration benefit for victims of human trafficking who meet certain eligibility requirements. The U visa is an immigration benefit for victims of certain crimes who meet eligibility requirements.

measures we tested were not accurate. For the 2017 grant, none of the three performance measures we tested were accurate. Table 2 summarizes our results.

Table 2
Performance Reporting

Award	Performance Measure	Reporting Period	Number Reported	Number Supported	Difference
2016	Respondents Coming to Court	7/1/17-12/31/17	240	240	-
		1/1/18-6/30/18	187	177	(10)
	Individuals that Completed the Family Intervention Program	7/1/17-12/31/17	82	82	-
		1/1/18-6/30/18	60	51	(9)
	Number of Victims Served/Partially Served	7/1/17-12/31/17	266	346	80
		1/1/18-6/30/18	406	404	(2)
	Training Events	7/1/17-12/31/17	11	11	-
		1/1/18-6/30/18	10	10	-
2017	Domestic Violence/Dating Protection Orders	7/1/17-12/31/17	330	175	(155)
		1/1/18-6/30/18	216	120	(96)
	Families Served	7/1/17-12/31/17	54	106	52
		1/1/18-6/30/18	269	242	(27)
	Victims Served	7/1/17-12/31/17	37	54	17
		1/1/18-6/30/18	46	42	(4)
	Victims Served	7/1/17-12/31/17	182	203	21
		1/1/18-6/30/18	415	409	(6)

Source: U.S. Department of Justice Office on Violence Against Women Semi-Annual Progress Reports for Grants to Encourage Arrest Policies and Enforcement of Protection Orders Program and Grants to Support Families in the Justice System and source documents provided by the Court.

For both grants, the Court prepared performance data for each measure except for the number of victims served. Aggregate data for the number of victims served was reported to the Court by the subrecipients and no support was provided along with that data. Because the Court does not require subrecipients to provide support for reported data, it does not perform any validation of reported program accomplishments prior to submitting progress reports to OVW. For data prepared by the Court, we reviewed source documents to determine if reported performance data was supported. For data submitted to the Court by the subrecipients, we obtained from the subrecipients the available support for the data.

For the inaccuracies in Court-prepared performance data, a Court official told us that the number of people trained was not fully supported because sign-in sheets were not always maintained for training events. The official also said that the differences for data on Domestic Violence/Dating Protection Orders may have resulted from incorrect query dates used to determine the number of victims served during the reporting period. The official was unable to explain the cause for other differences we identified between the numbers reported and supported.

For the subrecipient performance data on victims served, we discussed with officials from each of the three subrecipients the support for their data. For one subrecipient, the performance data reported to the Court was fully supported. For another subrecipient, the performance data was inaccurate because of a formula error in a spreadsheet. For the final subrecipient, the performance data was

inaccurate because of a data compilation error. We recommend that OVW ensure that the Court develops and implements procedures to ensure that all reported performance is accurate and fully supported.

Compliance with Special Conditions

Special conditions are the terms and conditions that are included with the awards. We evaluated the special conditions for each grant and selected a judgmental sample of the requirements that are significant to performance under the grants and are not addressed in another section of this report. We selected two special conditions for each grant for review. For the 2016 grant, we reviewed: (1) compliance with provisions of 42 U.S.C. § 13925(b)(2), nondisclosure of confidential or private information and attendance; and (2) participation in OVW-sponsored technical assistance. For the 2017 grant, we reviewed: (1) supervision of regular and emergency project attorneys practicing less than 5 years who are providing on-site legal services in non-legal settings; and (2) attendance and participation in OVW-sponsored technical assistance. We found that the Court complied with the selected special conditions we tested.

Grant Financial Management

According to the DOJ Grants Financial Guide, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for awarded funds. To assess the DeKalb County Magistrate Court's financial management of the audited grants and determine if the Court adequately safeguards grant funds, we interviewed financial staff, examined policy and procedures, and inspected grant documents. We also reviewed the Court's Single Audit Reports for 2016 and 2017 to identify internal control weaknesses and significant non-compliance issues related to federal awards. Finally, we performed testing in the areas that were relevant for the management of this grant, as discussed throughout this report.

We concluded that grant financial management related to grant expenditures could be improved. Specifically, we identified an inadequate process for reviewing subrecipient reimbursement requests. This concern is discussed in more detail in the Grant Expenditures section of this report.

Single Audit

Non-federal entities that receive federal financial assistance are required to comply with the *Single Audit Act of 1984*, as amended. The Single Audit Act provides for recipients of federal funding above a certain threshold to receive an annual audit of their financial statements and federal expenditures. Under 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), such entities that expend \$750,000 or more in federal funds within the entity's fiscal year must have a single audit.

The Court did not have a separate Single Audit completed and, instead, was included in a comprehensive Single Audit of DeKalb County. We reviewed the Single Audit reports for the years ending December 31, 2016, and 2017. We did not identify any specific findings directly related to the Court.

Grant Expenditures

For Grant Numbers 2016-WE-AX-0006 and 2017-FJ-AX-0006 the Court's approved budgets included personnel, fringe benefits, travel, subrecipients, and "other" categories. To determine whether costs charged to the awards were allowable, supported, and properly allocated in compliance with award requirements, we tested a sample of subrecipient reimbursement requests and Court costs charged to the grants. We tested \$88,954 for the 2016 grant, which is 22 percent of total costs for that grant, and \$133,069 for the 2017 grant, which is 50 percent of total costs for that grant at the time of our testing. The following sections describe the results of our testing.

Personnel Costs

The DOJ Grants Financial Guide states that charges made to federal awards for salaries and fringe benefits must be based on records that accurately reflect the work performed and comply with the established policies and practices of the organization. To determine if the Court's charges were computed correctly, properly authorized, accurately recorded, and properly allocated to the grants, we reviewed four payroll transactions totaling \$9,697. Two transactions were from the 2016 grant, and two were from the 2017 grant for two non-consecutive pay periods. We compared expenditures in the general ledger to timesheets, payroll journals and budgeted amounts. We found that costs were accurate, allowable and properly allocated to the grants. We identified one exception related to employer's insurance costs charged to the 2017 grant.³ We discuss this exception in detail in the Budget Management and Control section below.

Subrecipient Expenditures

The three subrecipients each submit to the Court a monthly reimbursement request. Each reimbursement request includes only an invoice issued by the subrecipient to the Court identifying total costs for services provided on behalf of the Court during the prior month. A Court official determines whether the amount requested is within the allowable budgeted amount, then the invoice is sent to the Chief Judge for approval. Once approved, the invoice goes back to the Court official who enters the reimbursement request into the financial system. The Chief Judge then receives an email stating that the reimbursement request data has been entered into the financial system. The Chief Judge verifies that the requested amount does not exceed the monthly budget amount for each subrecipient. After that review, the Chief Judge approves or rejects the subrecipient reimbursement request. Once approved, the reimbursement request is sent to the DeKalb County's

³ Employer's insurance includes Accidental/Death Life Insurance, Dependent Life Insurance, County Medical Premium, County Dental Premium, and County Life Insurance.

Finance and Capital and Grant Department for payment. Once all subrecipient reimbursement checks are generated for the month, a DeKalb County finance official sends an email to the Chief Judge stating the total amount drawn down by each subrecipient for the month.

We sought to determine if subrecipient costs were computed correctly, properly authorized, accurately recorded, and properly allocated to the grants. So that we could accomplish these tests, we requested that the Court obtain from each subrecipient the support for each reimbursement request submitted for the period October 2016 through December 2018. During this period, the subrecipients submitted a total of 74 reimbursement requests for the 2016 grant and 36 reimbursement requests for the 2017 grant. For the 2016 grant, all three subrecipients submitted reimbursement requests. For the 2017 grant, only two subrecipients submitted requests. From these reimbursement requests, we selected for testing 22 requests for the 2016 grant and 25 requests for the 2017 grant. We selected the highest dollar reimbursement requests for each grant. We also judgmentally selected transactions representing all cost categories. For those 47 reimbursement requests, we verified to supporting documentation all of the costs for which the subrecipients requested reimbursement.

Of the 22 subrecipient reimbursement requests we tested for the 2016 grant, we identified 17 reimbursement requests totaling \$63,725 for which \$13,763 in costs were not supported. These costs were unsupported because documentation for \$4,480 in health insurance costs was not provided by one subrecipient, documentation for the calculation of \$6,450 in personnel and fringe benefit costs was unclear for another subrecipient, and \$2,833 in personnel costs was not provided by the third subrecipient. We also identified \$1,642 in fringe benefits for subrecipient costs not approved in the Court's grant budget. Consequently, we question \$13,763 in unsupported costs and \$1,642 in unallowable costs and recommend that OVW remedy the questioned costs.

Of the 25 subrecipient reimbursement requests we tested for the 2017 grant, we identified 12 reimbursement requests totaling \$14,296 for which \$13,932 in costs were not supported. These costs were unsupported because documentation for a \$712 hotel charge was not provided by a subrecipient and the documentation for a calculation of \$13,220 in personnel and fringe benefits costs was unclear for one subrecipient. A Court official told us that she did not know how the subrecipient calculated the reimbursement it requested for personnel costs and she did not recalculate the amount reimbursed to the subrecipient. Consequently, we question \$13,932 in unsupported costs and recommend that OVW remedy the questioned costs.

We also determined that one of the Court's subrecipients for the 2017 grant was reimbursed by the Court for individual transactions totaling \$2,703 but for which the subrecipient could not provide appropriate support. However, the subrecipient did provide support for other allowable transactions totaling more than \$2,703 that were not reimbursed because they exceeded the subrecipient's allowable grant budget. We did not question the \$2,703 in unsupported costs because the subrecipient had offsetting supported costs greater than that amount.

The Court does not require subrecipients to submit supporting documentation along with their reimbursement requests. Consequently, the Court official responsible for reviewing reimbursement requests does not review any documentation to determine if the requests are accurate and properly supported. The official explained the only determination made in the Court's process is whether the requested reimbursement amount is within the allowable budgeted amount. We believe the Court should reimburse subrecipients only for allowable costs that are properly supported. To accomplish this, the Court could require the subrecipients to provide supporting documentation along with reimbursement requests and review that documentation prior to making reimbursements to the subrecipients. We discussed the documentation concern with the Chief Judge who told us that as of April 2019, she had implemented this practice. We recommend that OVW ensure that the Court reimburses subrecipients only for properly supported costs.

Court Travel Costs

We selected four travel expenses totaling \$4,152 from the 2016 grant for testing. All the expenses tested were properly supported.

Budget Management and Control

According to the DOJ Grants Financial Guide, the grant recipient is responsible for establishing and maintaining an adequate accounting system, which includes the ability to compare actual expenditures or outlays with budgeted amounts for each award. Additionally, the grant recipient must initiate a Grant Adjustment Notice for a budget modification that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount. We compared grant expenditures to the approved budgets to determine whether the Court transferred funds among budget categories in excess of 10 percent. We determined that the cumulative difference between category expenditures and approved budget category totals was not greater than 10 percent.

During our review of salaries and benefits, we noted that claimed costs for employer's insurance exceeded the budgeted amounts by \$149 for each of the two pay periods we tested for the 2017 grant. We reviewed the general ledger for each pay period from October 2017 through December 2018 and determined that actual employer's insurance costs charged to the 2017 grant exceed budgeted amount by \$6,173 for that period. Over the 3-year grant period, the amount claimed for such costs could exceed the budgeted amount by nearly \$20,000. A County official told us that the County's medical premium could have been underestimated because actual medical premiums depend on an employee's selection of health insurance coverage.

The Chief Judge told us that the Court was aware of the ability to reallocate funds from one budget category to another so long as the cumulative change is less than 10 percent of the award. The Chief Judge also told us that she was unaware of a Court policy to compare actual expenditures with budgeted amounts, but is willing to implement such a policy. We recommend that OVW ensure that the Court

establishes procedures to compare actual expenditures with OVW-approved budget amounts consistent with the DOJ Grants Financial Guide to ensure compliance with grant requirements regarding expenditures within approved budget categories.

Drawdowns

According to the DOJ Grants Financial Guide, an adequate accounting system should be established to maintain documentation to support all receipts of federal funds. If, at the end of the grant award, recipients have drawn down funds in excess of federal expenditures, unused funds must be returned to the awarding agency. The Court has written procedures for drawing down funds. Drawdowns are prepared monthly on a reimbursement basis. The total monthly expenditures from the accounting system are used to determine the drawdown amount. As of June 2019, the time of our testing, the Court made 44 drawdowns, totaling \$816,610 from the 2 grants we audited. We verified that all 44 drawdowns were received on a reimbursement basis. We determined that the Court has proper policies and procedures to ensure compliance with cash management requirements.

To assess whether the Court managed grant receipts in accordance with federal requirements, we compared the total amount reimbursed for each grant to total expenditures in the accounting records. We did not identify deficiencies related to the Court's process for developing drawdown requests. However, we identified concerns regarding support for subrecipient transactions, and we addressed those concerns in the Grant Expenditures section in this report.

Federal Financial Reports

According to the DOJ Grants Financial Guide, recipients shall report the actual expenditures and unliquidated obligations incurred for the reporting period on each financial report as well as cumulative expenditures. To determine whether the Court submitted accurate federal financial reports (FFR) for each grant, we compared the four most recent reports at the time of our audit to the Court's accounting records. We determined that the FFRs matched the accounting records for all eight FFRs we tested.

Monitoring of Subrecipients

According to the DOJ Grants Financial Guide, the purpose of subrecipient monitoring is to ensure that subawards are being used: for the authorized purpose; in compliance with the federal program and grant requirements, laws, and regulations; and to achieve performance goals. All pass-through entities are required to monitor their subrecipients and must have established written policies regarding subrecipient monitoring. To assess how the Court monitored its OVW subrecipients, we interviewed Court officials and the Chief Judge, who told us that subrecipient monitoring activities consist of:

- actively observing the subrecipient staff performing their duties while in open court, in the hallways outside the courtroom, and in Court conference rooms; and

- actively observing subrecipient staff assisting victims with the temporary protection order application process, escorting victims to court, and sitting with victims during ex-parte hearings.

The Chief Judge also said that more intensive monitoring of confidential communications involving subrecipient attorneys or advocates would violate privileged relationships with clients and victims. We agree that no more intensive monitoring of these relationships is necessary. However, the Court performs only limited activities that address the subrecipient monitoring requirements of the DOJ Grants Financial Guide and DeKalb County criteria for subrecipient monitoring. As noted in the Guide:

Some of the mechanisms that may be used to monitor subrecipient activities throughout the year include regular communication with subrecipients, and appropriate inquiries concerning program activities; performing subrecipient site visits to examine financial and programmatic records and observe operations; and reviewing detailed financial and program data and information submitted by the subrecipient.

The DeKalb County Government's *Sub-recipient Guide for Agencies Receiving Funds* provides that County offices administering grants should determine if subrecipients deliver services in accordance with federal guidelines and review financial records. It also provides that county offices should determine if subrecipient expenditures are made in accordance with federal requirements and that the subrecipient has proper controls in place to document financial transactions.

We recognize that the Court is maintaining regular communication with the subrecipients as described above by the Chief Judge. We also recognize that the sensitive and confidential nature of some victim services provided by the subrecipients may preclude certain review work at the subrecipients' locations. Despite this, we believe that our previously discussed findings regarding performance reports and subrecipient expenditures demonstrate that increased monitoring is necessary. A more-effective subrecipient monitoring process would help ensure that grant funds are being used in compliance with requirements and could reduce the risk of the mismanagement of grant funds. We also believe that such monitoring can be structured to avoid violating the confidentiality of victims. Consequently, we recommend that OVW ensure that the Court establishes subrecipient monitoring procedures consistent with the DOJ Grants Financial Guide and DeKalb County criteria to ensure that grant funds are being used in compliance with grant requirements.

CONCLUSION AND RECOMMENDATIONS

We concluded that the Court demonstrated progress towards achieving the grants' stated goals and objectives. We did not identify significant issues regarding drawdowns or federal financial reports. However, we found that the Court did not comply with essential award conditions related to performance reporting, grant expenditures, budget management and control, and monitoring of subrecipients. We provide seven recommendations to OVW to address these deficiencies.

We recommend that OVW:

1. Ensure the Court develops and implements procedures to ensure that all reported performance is accurate and fully supported.
2. Remedy \$13,763 in unsupported subrecipient costs for the 2016 award.
3. Remedy \$1,642 in unallowable subrecipient costs for the 2016 award.
4. Remedy \$13,932 in unsupported subrecipient costs for the 2017 award.
5. Ensure the Court reimburses subrecipients only for allowable and properly supported costs.
6. Ensure that the Court establishes procedures to compare actual expenditures with budgeted amounts consistent with the DOJ Grants Financial Guide to ensure compliance with grant requirements regarding expenditures within approved budget categories.
7. Ensure the Court establishes subrecipient monitoring procedures consistent with the DOJ Grants Financial Guide and DeKalb County criteria to ensure that grant funds are being used in compliance with grant requirements.

APPENDIX 1

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

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

Scope and Methodology

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

This was an audit of the Department of Justice's (DOJ) Office on Violence Against Women (OVW) grants awarded to the DeKalb County Magistrate Court (the Court) under the Improving Criminal Justice Responses Program and the Justice for Families Program. The Court was awarded \$750,000 under Grant Number 2016-WE-AX-0006 and \$699,094 under Grant Number 2017-FJ-AX-0006. As of June 19, 2019, the Court had drawn down \$816,610 of the total grant funds awarded. Our audit concentrated on, but was not limited to October 1, 2016, the project period start date for Grant Number 2016-WE-AX-0006 through June 2019.

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

During our audit, we obtained information from the Office of Justice Programs' Grants Management System as well as the Court's accounting system specific to the management of DOJ funds. 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.

APPENDIX 2

SCHEDULE OF DOLLAR-RELATED FINDINGS

<u>Description</u>	<u>Amount</u>	<u>Page</u>
Questioned Costs⁴:		
Unallowable Subrecipient Costs		
2016 Award	<u>\$1,642</u>	7
Unallowable Costs	\$1,642	
Unsupported Subrecipient Costs		
2016 Award	13,763	7
2017 Award	<u>13,932</u>	7
Unsupported Costs	\$27,695	
Total Questioned Costs	\$29,337	

⁴ Questioned Costs are expenditures that do not comply with legal, regulatory, or contractual requirements; are not supported by adequate documentation at the time of the audit, or are unnecessary or unreasonable. Questioned costs may be remedied by offset, waiver, recovery of funds, or provision of supporting documentation, where appropriate.

APPENDIX 3

OFFICE ON VIOLENCE AGAINST WOMEN RESPONSE TO THE DRAFT AUDIT REPORT



U.S. Department of Justice

Office on Violence Against Women

Washington, DC 20530

August 9, 2019

MEMORANDUM

TO: Ferris B. Polk
Regional Audit Manager

FROM: Nadine M. Neufville *NMN*
Deputy Director, Grants Development and Management

Donna Simmons *DS*
Associate Director, Grants Financial Management Unit

Rodney Samuels *RS*
Audit Liaison/Staff Accountant

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grants Awarded to the DeKalb County Magistrate Court (DCMC), Decatur, Georgia

This memorandum is in response to your correspondence dated July 17, 2019 transmitting the above draft audit report for DCMC. We consider the subject report resolved and request written acceptance of this action from your office.

The report contains seven recommendations with \$29,337 Questioned Costs. OVW is committed to addressing and bringing the open recommendations identified by your office to a close as quickly as possible. The following is our analysis of each recommendation.

Your Office recommends that OVW through DCMC:

1. Ensure the Court develops and implements procedures to ensure that all reported performance is accurate and fully supported.

OVW concurs: We will coordinate with DCMC to ensure that they develop and implement procedures to ensure that all reported performance is accurate and fully supported.

MEMORANDUM

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women (OVW) Grants Awarded to the DeKalb County Magistrate Court, Decatur, Georgia

2. Remedy \$13,763 in unsupported subrecipient costs for the 2016 award.

OVW concurs: We will work with DCMC to remedy \$13,763 in unsupported subrecipient costs for the 2016 award.

3. Remedy \$1,642 in unallowable subrecipient costs for the 2016 award.

OVW concurs: We will work with DCMC to remedy \$1,642 in unallowable subrecipient costs for the 2016 award.

4. Remedy \$13,932 in unsupported subrecipient costs for the 2017 award.

OVW concurs: We will work with DCMC to remedy \$13,932 in unsupported subrecipient costs for the 2017 award.

5. Ensure the Court reimburses subrecipients only for allowable and properly supported costs.

OVW concurs: We will coordinate with DCMC to ensure that they reimburse subrecipients only for allowable and properly supported costs.

6. Ensure that the Court establishes procedures to compare actual expenditures with budgeted amounts consistent with the DOJ Grants Financial Guide to ensure compliance with grant requirements regarding expenditures within approved budget categories.

OVW concurs: We will coordinate with DCMC to ensure that they establish procedures to compare actual expenditures with budgeted amounts consistent with the DOJ Grants Financial Guide to ensure compliance with grant requirements regarding expenditures within approved budget categories.

7. Ensure the Court establishes subrecipient monitoring procedures consistent with the DOJ Grants Financial Guide and DeKalb County criteria to ensure that grant funds are being used in compliance with grant requirements.

OVW concurs: We will coordinate with DCMC to ensure that they establish subrecipient monitoring procedures consistent with the DOJ Grants Financial Guide and DeKalb County criteria to ensure that grant funds are being used in compliance with grant requirements.

We appreciate the opportunity to review and comment on the draft report. If you have any questions or require additional information, please contact Rodney Samuels at (202) 514-9820.

MEMORANDUM

SUBJECT: Draft Audit Report – Audit of the Office on Violence Against Women
(OVW) Grants Awarded to the DeKalb County Magistrate Court, Decatur, Georgia

cc Richard P. Theis
Assistant Director, Audit Liaison Group
Internal Review and Evaluation Office
Justice Management Division

Shannon Maulsby
Program Manager
Office on Violence Against Women

Charlotte Turpin
Program Manager
Office on Violence Against Women

**DEKALB COUNTY MAGISTRATE COURT'S
RESPONSE TO THE DRAFT AUDIT REPORT**



MAGISTRATE COURT OF DEKALB COUNTY

BERRYL A. ANDERSON, CHIEF JUDGE
CURTIS W. MILLER, JUDGE
NORA L. POLK, JUDGE
RHATHELIA STROUD, PRESIDING JUDGE
MISDEMEANOR MENTAL HEALTH COURT
R. JAVOYNE HICKS, CLERK OF COURT

DEKALB COUNTY COURTHOUSE
1200 JUDICIAL TOWERS
556 NORTH McDONOUGH STREET
DECATUR, GEORGIA 30030

August 13, 2019

Ferris B. Polk
Regional Audit Manager
Atlanta Regional Audit Office
Office of the Inspector General
U.S. Department of Justice
75 Ted Turner Drive, Southwest, Suite 1130
Atlanta, Georgia 30303

Dear Mr. Polk:

After conducting the audit, the Office of the Inspector General, Audit Division has found that the Court and its subrecipients are providing services in accordance with the grant objectives and that it is working to achieve its stated goals and objectives for the awards. However, we need to improve our systems of calculating measurements of improvement, adopt and implement formal procedures to monitor our subrecipients, and adopt a method to routinely compare actual to budgeted costs.

The Court is in agreement with the finding of the audit that it does not have a process to routinely compare actual grant costs to budgeted costs. The Court is in agreement that it does not have a formal monitoring process for subrecipients. Last, the Court agrees that our reported performance was not always accurately reported.

To address all of the issues identified in the audit, I have appointed Judge Shannon McNeal as the Court's Grants Compliance Officer. Her responsibilities include managing the subrecipients and Court personnel to insure that the Court is in compliance with the applicable laws, regulations, guidelines, and terms and conditions of the grant. Specifically, I have tasked her with developing written policies regarding subrecipient monitoring. In this position she is responsible for the oversight of the development of the following measures and will report directly to me on a weekly basis.

The Court shall develop and implement procedures to ensure that all reported performance is accurate and fully supported within the next three (3) months. The Court shall

Page 1 of 2


identify \$13,763.00 in new allowable charges to offset the \$13,763.00 in unsupported subrecipient costs for the 2016 award within 60 days. The Court shall identify \$1,642.00 in allowable subrecipient costs to offset those unallowable costs for the 2016 award within 60 days. The Court shall identify \$13,932.00 in supported subrecipient costs for the 2017 award to offset the unsupported costs within 90 days.

The Court shall develop and implement a checks and balances system to insure that the Court only reimburses subrecipients for allowable and properly supported costs within the next three (3) months. The system will require subrecipients to submit supporting documentation along with their reimbursements requests, as we have already begun in April 2019.

The Court shall establish procedures to compare actual expenditures with budgeted amounts consistent with the DOJ Grants Financial Guide to ensure compliance with grant requirements regarding expenditures within approved budget categories within the next six (6) months.

The Court shall establish subrecipient monitoring procedures consistent with the DOJ Grants Financial Guide and DeKalb County criteria to ensure that grant funds are being used in compliance with grant requirements within the next three (3) months.

Sincerely,



Beryl A. Anderson, Chief Judge
DeKalb County Magistrate Court

APPENDIX 5

OFFICE OF THE INSPECTOR GENERAL ANALYSIS AND SUMMARY OF ACTIONS NECESSARY TO CLOSE THE REPORT

The OIG provided a draft of this audit report to the Office on Violence Against Women (OVW) and the DeKalb County Magistrate Court (the Court). OVW's response is incorporated in Appendix 3 and the Court's response is incorporated in Appendix 4 of this final report. OVW concurred with all of our recommendations and discussed the actions it plans to complete to address our recommendations. The Court agreed with our findings and provided its planned corrective actions to address our recommendations, although it did not state its agreement with each recommendation, individually. As a result, the status of the audit report is resolved. The following provides the OIG analysis of the responses and a summary of the actions necessary to close the report.

Recommendations for OVW:

1. Ensure the Court develops and implements procedures to ensure that all reported performance is accurate and fully supported.

Resolved. OVW concurred with the recommendation. OVW stated that it will coordinate with the Court to ensure that it develops and implements procedures to ensure that all reported performance is accurate and fully supported.

The Court stated that it will develop and implement procedures to ensure that all reported performance is accurate and fully supported within the next 3 months.

This recommendation can be closed when we receive documentation that Court developed and implemented procedures to ensure that all reported performance is accurate and fully supported.

2. Remedy \$13,763 in unsupported subrecipient costs for the 2016 award.

Resolved. OVW concurred with the recommendation. OVW stated that it will work with the Court to remedy \$13,763 in unsupported subrecipient costs for the 2016 award.

The Court stated that it will identify \$13,763 in new allowable charges to offset the \$13,763 in unsupported costs for the 2016 award within 60 days.

This recommendation can be closed when we receive documentation that the \$13,763 in unsupported costs have been remedied.

3. Remedy \$1,642 in unallowable subrecipient costs for the 2016 award.

Resolved. OVW concurred with the recommendation. OVW stated that it will work with the Court to remedy \$1,642 in unallowable subrecipient costs for the 2016 award.

The Court stated that it will identify \$1,642 in allowable subrecipient costs to offset those unallowable costs for the 2016 award within 60 days.

This recommendation can be closed when we receive documentation that the \$1,642 in unallowable costs have been remedied.

4. Remedy \$13,932 in unsupported subrecipient costs for the 2017 award.

Resolved. OVW concurred with the recommendation. OVW stated that it will work with the Court to remedy \$13,932 in unsupported subrecipient costs for the 2017 award.

The Court stated that will identify \$13,932 in supported subrecipient costs for the 2017 award to offset the unsupported costs in 90 days.

This recommendation can be closed when we receive documentation that the \$13,932 in unsupported costs have been remedied.

5. Ensure the Court reimburses subrecipients only for allowable and properly supported costs.

Resolved. OVW concurred with the recommendation. OVW stated that it will coordinate with the Court to ensure that it reimburses subrecipients only for allowable and properly supported costs.

The Court stated it will develop and implement a checks and balances system to ensure that the Court only reimburses subrecipients for allowable and properly supported costs within the next 3 months. The Court further stated that beginning in April 2019, it required subrecipients to submit supporting documentation along with reimbursement requests.

This recommendation can be closed when we receive documentation that the Court developed and implemented procedures to ensure that it reimburses subrecipients only for allowable and properly supported costs.

6. Ensure that the Court establishes procedures to compare actual expenditures with budgeted amounts consistent with the DOJ Grants Financial Guide to ensure compliance with grant requirements regarding expenditures within approved budget categories.

Resolved. OVW concurred with the recommendation. OVW stated that it will coordinate with the Court to ensure that it establishes procedures to compare actual expenditures with budgeted amounts consistent with the DOJ Grants

Financial Guide to ensure compliance with grant requirements regarding expenditures within approved budget categories.

The Court stated it will establish procedures to compare actual expenditures with budgeted amounts consistent with the DOJ Grants Financial Guide to ensure compliance with grant requirements regarding expenditures within approved budget categories within the next 6 months.

This recommendation can be closed when we receive documentation that the Court developed and implemented procedures to ensure that it compares actual expenditures with budgeted amounts consistent with the DOJ Grants Financial Guide to ensure compliance with grant requirements regarding expenditures within approved budget categories.

7. Ensure the Court establishes subrecipient monitoring procedures consistent with the DOJ Grants Financial Guide and DeKalb County criteria to ensure that grant funds are being used in compliance with grant requirements.

Resolved. OVW concurred with the recommendation. OVW stated that it will coordinate with the Court to ensure that it establishes subrecipient monitoring procedures consistent with the DOJ Grants Financial Guide and DeKalb County criteria to ensure that grant funds are being used in compliance with grant requirements.

The Court stated that it will establish subrecipient monitoring procedures consistent with the DOJ Grants Financial Guide and DeKalb County criteria to ensure that grant funds are being used in compliance with grant requirements within the next 3 months.

This recommendation can be closed when we receive documentation that Court developed and implemented subrecipient monitoring procedures consistent with the DOJ Grants Financial Guide and DeKalb County criteria to ensure that grant funds are being used in compliance with grant requirements.



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