



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



# **Audit of Risks Associated with the Office of Justice Programs' Management of the Crime Victims Fund Grant Programs**

# **AUDIT OF RISKS ASSOCIATED WITH THE OFFICE OF JUSTICE PROGRAMS' MANAGEMENT OF THE CRIME VICTIMS FUND GRANT PROGRAMS**

## **EXECUTIVE SUMMARY**

The Crime Victims Fund (CVF) was created by the Victims of Crime Act of 1984 (VOCA) as a separate account made up entirely of federal criminal fees, forfeited bail bonds, penalties, gifts, donations, and special assessments collected by U.S. Attorneys' Offices (USAO), federal courts, and the Federal Bureau of Prisons. The CVF receives no tax dollars and is used to support crime victims through Department of Justice (DOJ or Department) programs and state and local victim services.

The Office for Victims of Crime (OVC) within the Office of Justice Programs (OJP) distributes funds among seven program areas in accordance with the statutory distribution authorized by the VOCA. OVC allocates the majority of CVF funds to two formula grant programs awarded to State Administering Agencies (SAA) in each U.S. state and territory. The largest program, which received over \$2.2 billion in fiscal year (FY) 2016, funds victim assistance grants that are mostly subawarded by SAAs to public and nonprofit organizations that operate counseling centers, domestic violence shelters, rape crisis centers, and other victim services. The second largest CVF-funded program received \$164.4 million in FY 2016 for victim compensation grants that reimburse victims for certain crime-related expenses, such as medical and funeral costs. Other CVF-funded program areas include USAO victim-witness coordinators who assist victims of federal crimes, and Federal Bureau of Investigation (FBI) victim specialists who help keep victims of federal crimes informed of case developments and appropriate resources.

In FY 2015, Congress increased the amount of CVF funds available for obligation to more than \$2.36 billion, thereby tripling the prior year's funding. The increased funding was intended to allow crime victim service providers to address long-standing challenges such as reaching and serving all crime victims, addressing staffing concerns, and allowing states and territories to fund programs that otherwise would not receive funding. Further, the FY 2015 appropriation increased administrative funds that enable states and territories to update their data collection technology to comply with the OVC's new data collection performance measurement requirements.

The funding increases present new challenges for OVC to manage the significantly larger grant funding, and to monitor grant recipient and subrecipient performance. The DOJ Office of the Inspector General (OIG) undertook this audit to: (1) evaluate the control processes in place for the solicitation, peer review, and award of CVF-funded grants; (2) evaluate the oversight and monitoring of the crime victim grant funds and grantees; and (3) assess the risk among grant recipients of CVF-funded grants.

We found that the OVC had sufficient and appropriate internal control processes for the solicitation, selection, and awarding of CVF-funded grants. In addition, OVC ensured that CVF grant awards were computed and allocated appropriately to states and territories according to legislatively mandated formulas. We determined that OVC made progress in meeting new Congressional requirements for CVF grant recipients to certify their nonprofit status and for subrecipients to make financial statements publicly available. OVC also required grant recipients to establish plans for monitoring subrecipients and to provide grant performance data.

We also identified areas of risk for which OVC's management of CVF-funded grant programs should be strengthened. Specifically, we found improvements were necessary regarding the frequency and adequacy of OVC monitoring efforts. More specifically, we identified risks associated with OVC's historical monitoring of SAAs that manage the victim assistance grants. Considering that these SAAs manage most of the CVF grant funds and also oversee thousands of subrecipients, OVC's regular onsite monitoring of SAAs is critical to mitigating the risk of mismanagement by both SAAs and their subrecipients. However, we found that OVC was not consistently performing onsite reviews of these SAAs within the 3-year frequency identified in the VOCA Victim Assistance Program Guidelines, and had not established a strategy to consistently review all SAAs within a reasonable frequency. While we found that between 2008 to 2016 OVC performed onsite visits to 18 of the 56 victim assistance SAAs with a frequency or "review cycle" of 3 to 4 years, another 18 SAAs received their 2 most recent onsite reviews within a period that ranged from 5 to 8 fiscal years. There was support for only one review for each of the remaining 20 agencies during FYs 2008 to 2016. While OVC performed other monitoring activities for these SAAs, including enhanced programmatic desk reviews performed remotely to serve as a less costly alternative to onsite reviews, we determined that such reviews are not as effective as onsite monitoring whereby monitors can have direct access to grant managers, view grant management processes and documentation on location, and provide technical assistance.

Despite its historical performance, we found that OVC's more recent onsite monitoring indicates that it is improving the timeliness of reviews. Specifically, during FY 2015 and 2016, OVC annual site visits increased substantially and almost tripled the site visits performed the prior 2 years. The 13 onsite visits that OVC performed in 2016 would facilitate an approximate 4-year review cycle if OVC maintains this frequency. However, we identified 20 SAAs that had not received an onsite review during the 4 years prior to November 2016 despite having received a cumulative total of more than \$1.6 billion in CVF funds during that period. Given the volume of funds that are being allocated to SAAs, we believe that OJP should establish an oversight strategy that ensures a consistent, reasonable, and achievable review cycle for onsite visits to SAAs. We believe that this will facilitate an effective evaluation of grant management.

In addition to the frequency of OVC's monitoring, our audit found risks associated with OJP staff's understanding and performance of grant recipient monitoring procedures. Specifically, we found that some OJP program specialists and financial monitors did not fully understand grant monitoring procedures, and

that OJP did not have sufficient procedures for completing some of the financial-related questions in the OJP monitoring checklists. This increases the risk that OJP monitors will fail to identify deficiencies at SAAs in areas such as subrecipient oversight, financial management, and performance reporting. We also found that OJP monitors did not always verify the accuracy of SAAs' reported Victims Compensation certification payouts and revenues, which are the basis of the annual Victims Compensation awards made by OJP to SAAs. Without verifying these payouts, OJP is at risk of misallocating millions of CVF funds to SAAs based on inaccurate information.

As examples of the risks associated with deficiencies in proper monitoring of grant recipients, recent OIG audits have routinely identified deficiencies with recipients' management of grants. We recently audited 11 CVF grant recipients, including SAAs, subrecipients, and a non-formula grant recipient, and identified deficiencies in each of the grantees' grant management practices for the CVF grants awarded. Those deficiencies were: (1) not monitoring subrecipients (found in 4 audits), (2) charging unallowable and unsupported costs to the grants (found in 8 audits), and (3) not verifying or reporting performance data accurately (found in 5 audits). To help mitigate the risks associated with OJP's monitoring practices, in this audit we identified opportunities to improve training for the OJP monitoring staff, including cross-training of programmatic and financial monitoring staff, as well as additional and on-going training for monitors.

Finally, our audit identified risks associated with OJP's performance measures for CVF-funded activities. We concluded that OJP's strategic goal and objectives for the CVF-funded programs are consistent with the Department's strategic plan. However, the goal and its objectives are neither outcome-oriented nor expressed in a quantitative and measureable form, such as the quality of services provided to victims and improvements in their lives as a result of the services. Additionally, the strategic goal and objectives do not pertain to five other CVF-funded activities managed by OJP and are not reported as part of OJP's budget. We reviewed the existing performance measures established for all of the CVF-funded activities. For the CVF-funded activities, OJP had made some progress but still generally lacked outcome-oriented measures. Once appropriate performance measures are established, OJP needs a more effective system to collect, analyze, and report performance data for all CVF activities. Although the CVF programs were not initially designed to readily permit measurement of the programs quality and success, OVC is working to reevaluate existing measures and establish new measures for the CVF programs it manages.

Our report includes 11 recommendations to address the risk areas identified in OJP's management of the CVF fund. Absent the improvements identified in our audit, the Department will be less than fully effective in ensuring CVF grant funds are properly used to provide services and benefits for crime victims.

## CONCLUSION AND RECOMMENDATIONS

OJP and the OVC have completed several actions designed to improve the management of the CVF programs. As summarized in Appendix 3, this included strengthening subrecipient monitoring, performance reporting, risk assessment processes, grantee training, and grantee oversight. However, we still identified risks associated with the management and oversight of CVF grantees, and with performance measurements for the CVF-funded programs.

Regarding the monitoring of CVF grants, we noted that the OVC generally met its requirement to annually monitor 10 percent of its grants. We also determined that OJP's OCFO was annually monitoring what appeared to be a reasonable number of CVF grantees. However, we found that OJP's historical onsite monitoring frequency of SAAs was inconsistent and fell short of targets it established. Largely because of resource limitations, during FYs 2012, 2013, and 2014, the OVC monitoring efforts principally relied on enhanced programmatic desk reviews and enhanced financial desk reviews rather than onsite monitoring. The OVC and the OCFO managers and staff believed that onsite monitoring provides more effective oversight, and during FYs 2015 and 2016 the level of onsite monitoring increased, which indicates that OJP may be on a trajectory to improve its historical trend if it maintains or increases this frequency. However, OJP has not established a strategy for ensuring that consistent onsite monitoring is provided for all SAAs on a reasonable and appropriate frequency that would ensure effective oversight over billions of CVF grant funds.

In addition, we identified risks associated with OJP's SAA monitoring procedures, particularly those pertaining to OJP's checks of grantees' financial management. Of particular concern, OJP has not verified SAA payouts of state funds for victim compensation as part of its routine monitoring activities. Because these payouts constitute the basis for annual Victim Compensation Program formula grants to SAAs, inaccurate payout data could result in millions of misallocated CVF compensation grants. To address some of these issues, we identified opportunities to enhance training for the OVC Program Specialists and the OCFO Financial Monitors. To ensure effective monitoring, we believe that OJP should implement continual training requirements for grant monitors, as well as cross-training for programmatic and financial monitoring staff. Instituting these improvements will help reduce the risk that deficiencies in SAA grant management are missed by OJP monitors during monitoring activities.

We also identified risks associated with performance measurements for the CVF-funded programs. OJP developed a CVF strategic goal and objectives consistent with the Department's strategic goals and objectives, but the CVF goal and objectives do not permit a full assessment of program results. Additionally, the strategic goal and objectives do not pertain to all the CVF activities and are not reported as part of OJP's budget. Performance indicators were not established for all of the CVF activities, and most indicators that were established focused on program outputs rather than outcomes. OJP plans to make improvements in these areas, but given the billions of CVF funds being allocated for various activities, we believe more progress is needed to ensure that the achievements and impact of

CVF-funded activities are identifiable to OJP, the Department, Congress, and the public.

We recommend that OJP:

1. Ensure that the OVC evaluate its monitoring practices to ensure the effectiveness and sufficiency of its reviews of program results and of State Administering Agencies' oversight of subrecipients' activities.
2. Establish an oversight strategy that ensures a consistent, reasonable, achievable, and risk-informed review cycle for onsite visits to State Administering Agencies on a frequency that facilitates effective and appropriate monitoring of CVF grant funds.
3. Ensure that the OVC establishes written procedures for the additional checklists, forms, and questionnaires used by formula Program Specialists when completing onsite monitoring activities of formula grants.
4. Ensure that the OVC develops improved instructions and training for Program Specialists when completing financial-related monitoring steps in the OJP standard onsite checklist.
5. Ensure that the OCFO develops improved instructions and training for Financial Monitors when completing financial monitoring steps in the OCFO onsite financial monitoring onsite checklist.
6. Ensure that the OVC and the OCFO develop written procedures for use in verifying the State Administering Agency certifications for the accuracy of total compensation payouts.
7. Strengthen grant management and financial training requirements for new and experienced Program Specialists and Financial Monitors by annually surveying those staff members regarding their training needs.
8. Develop training requirements that will allow for cross-training between the OVC Program Specialists and the OCFO Financial Monitors to ensure staff appropriately and consistently monitor and provide accurate and consistent guidance on the programmatic and financial aspects of the grant program.
9. Seek to establish CVF-strategic goal and objectives for CVF-funded activities reported in the budget that are outcome-oriented to allow for a meaningful future assessment of whether the strategic goal and objectives are being achieved.
10. Ensure that performance indicators are developed and results are reported for activities within the CVF decision unit.
11. Ensure that the OVC documents the procedures to review, verify, and validate the accuracy of the performance data reported for CVF activities.

## APPENDIX 3

### ADDITIONAL ACTIONS TAKEN TO IMPROVE THE MANAGEMENT OF CRIME VICTIMS FUND GRANTS

Performance Improvement Area	Action Taken by the OVC
Require Victim Assistance Grant Subrecipient Monitoring Plans	Revised FY 2015 VOCA Victim Assistance Program Formula Solicitation to include the following language: States and territories will provide a plan for monitoring subrecipients.
Plan for collecting data for performance measures	Revised FY 2015 VOCA Victim Assistance and VOCA Victim Compensation Program Formula Solicitations: Beginning October 1, 2015, award recipients will be required to provide relevant data by submitting quarterly performance metrics through the OVC online Performance Measurement Tool.
Measure of performance and effectiveness of grants	Revised FY 2015 VOCA Victim Assistance and VOCA Victim Compensation Program Formula Special Conditions: Draft performance standards required that the recipient must collect, maintain, and provide to OJP, data that measure the performance and effectiveness of activities under this award, in the manner, and within the timeframes, specified in the program solicitation, or as otherwise specified by OJP. Performance standards were finalized in FY 2016.
Increase frequency of reporting and improve assessing the effects of victim assistance funds on crime victim services	Revised FY 2015 VOCA Victim Assistance Formula Program Special Conditions: The recipient agrees to submit (and, as necessary, require subrecipients to submit) performance reports on the performance metrics identified by the OVC, and in the time and manner required by the OVC. Beginning October 1, 2015, the recipient agrees to submit such information quarterly.
Prepare quarterly risk indicator reports	In October 2016, with OVC management input, OAAM drafted its first quarterly risk indicator report to identify and address potential concerns with grantees. This effort was modeled after the reports produced for the Recovery Act programs. It provides a summary of number and dollar amounts of awards and includes other information such as draw down activity trends, financial and progress report delinquencies, risk scores, performance data and issues, and other grantee characteristics. OAAM expect the report to be finalized and operational in the early part of the second quarter of FY 2017.
Expand applicant questions regarding management and monitoring of the subaward process	In December 2016, OJP planned to expand the Financial Management and System of Internal Controls Questionnaire to obtain a better understanding of an applicant's management and monitoring of the subaward process.
Require grantees to obtain OJP approval for all subawards	For all FY 2016 awards, OJP added a special condition to the award package that requires grantees to obtain OJP approval, either through the application process or through a grant adjustment notice, for all subawards.

Performance Improvement Area	Action Taken by the OVC
For all existing, new, designated high risk, and pre-award high risk rated grantees, require that grant points of contact or and financial points of contact complete Grants Financial Management training <sup>28</sup>	For all FY 2016 awards, OJP added special conditions to award packages to require that grant points of contact and financial points of contact complete Grants Financial Management training after January 1, 2015 or if the registered grant points of contact or financial points of contact change. Grant funds may be frozen if the training is not completed.
Establish a quality review process within OJP to evaluate the overall quality of the monitoring site visit work completed by Program Specialists	In FY 2017, OAAM plans to launch a quality review process to measure the overall quality of the Program Specialists' monitoring site visit work. This is intended to include evaluating older onsite reviews work against the onsite reviews that occurred after monitoring checklists were revised and Program Specialists were trained in using those checklists. OAAM plans to conduct the quality review quarterly.
Establish guidance for subrecipient management and monitoring	In the summer of 2015, a working group updated the DOJ Financial Guide regarding Subrecipient Management Monitoring to include guidance on the pre-award through post-award activities for subrecipients.

Source: OJP and Office of the Inspector General Analyses

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<sup>28</sup> Beginning in calendar year 2017, OJP will offer award recipients and members of their organizations two Advanced Financial Management training seminars. The 2-day optional seminars will covers topics ranging from the types of financial monitoring reviews performed, the grant selection and preparation processes to completing the risk assessment and common errors uncovered during the reviews. To qualify for the advanced training, award recipients must have completed the Financial Management training either in person or on-line.

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

The Department of Justice (Department) Office of the Inspector General (OIG) provided a draft of this audit report to the Office of Justice Programs (OJP). OJP's response is incorporated in Appendix 6 of this final report. In response to our audit report, OJP concurred with our recommendations and discussed the actions it will implement in response to our findings. As a result, the status of the audit report is resolved. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

**Recommendations for OJP:**

- 1. Ensure that the OVC evaluate its monitoring practices to ensure the effectiveness and sufficiency of its reviews of program results and of State Administering Agencies' oversight of subrecipients' activities.**

Resolved. OJP concurred with our recommendation. OJP stated that, as with Fiscal Year (FY) 2017, it will require State Administering Agencies (SAA) that apply for Victims of Crime Act of 1984 (VOCA) Victim Assistance formula grants to describe their monitoring activities for sub-awards in FY 2018. OJP stated that the Office of Audit, Assessment, and Management (OAAM) issued guidance to grant recipients regarding the prime recipient responsibilities for the oversight of subrecipient activities. OJP also stated that the Office for Victims of Crime (OVC) will continue to coordinate with the OAAM and the Office of the Chief Financial Manager (OCFO) to evaluate the effectiveness of its monitoring practices to ensure the effectiveness and sufficiency of its reviews of program results and of SAA oversight of subrecipients' activities. Based on the results of that coordination, the OVC will implement additional monitoring practices as deemed necessary.

This recommendation can be closed when we receive evidence showing that: (1) the OVC coordinated with the OAAM and OCFO to evaluate the effectiveness of its monitoring practices, and (2) any additional monitoring practices resulting from the OAAM and OCFO coordination efforts were implemented.

- 2. Establish an oversight strategy that ensures a consistent, reasonable, achievable, and risk-informed review cycle for onsite visits of State Administering Agencies on a frequency that facilitates effective and appropriate monitoring of CVF grant funds.**

Resolved. OJP concurred with our recommendation. OJP stated that in May 2017, the OAAM began developing a comprehensive, risk-informed monitoring oversight strategy for SAAs that would include specific goals for onsite monitoring. By the end of FY 2018, OJP stated that the OAAM hopes to complete and implement the oversight strategy. The OJP did not provide additional details regarding its strategy, but we will work with OJP on obtaining this information to ensure it adequately addresses our recommendation.

This recommendation can be closed when we receive evidence that the OAAM completed and implemented a comprehensive, risk-informed monitoring strategy for SAAs that includes specific goals for onsite monitoring, and ensures a consistent, reasonable, and achievable review cycle for onsite visits of SAAs on a frequency that facilitates effective and appropriate monitoring of CVF grant funds.

- 3. Ensure that the OVC establishes written procedures for the additional checklists, forms, and questionnaires used by formula Program Specialists when completing onsite monitoring activities of formula grants.**

Resolved. OJP concurred with our recommendation. OJP stated that the OVC plans to update its current programmatic checklists including more detailed written procedures for use by Program Specialists when completing onsite or Enhanced Programmatic Desk Reviews of formula grants. OJP also stated that, to the extent practicable, the OVC plans to work with the OAAM to consolidate the additional checklists with the OJP standard onsite checklist.

This recommendation can be closed when we receive evidence showing that: (1) the OVC updated and implemented its current programmatic checklist with more detailed written procedures, and (2) the OVC and OAAM efforts to consolidate the additional checklists with OJP's standard onsite checklist were implemented.

- 4. Ensure that the OVC develops improved instructions and training for Program Specialists when completing financial-related monitoring steps in the OJP standard onsite checklist.**

Resolved. OJP concurred with our recommendation. OJP stated that in the third quarter of FY 2017, the OAAM trained OVC Program Specialists on the financial questions from the OJP standard onsite checklist. OJP also stated that the OVC would determine if additional training is needed regarding the

financial-related monitoring steps and coordinate with the OAAM for additional training as deemed necessary.

This recommendation can be closed when we receive evidence showing: (1) the OVC performed additional training for Program Specialists on financial-related monitoring steps in the OJP standard onsite checklist; and (2) the results of the coordination with the OAAM for additional and ongoing training identified for Program Specialists, and that additional and ongoing training on financial-related monitoring steps was implemented.

**5. Ensure that the OCFO develops improved instructions and training for Financial Monitors when completing financial monitoring steps in the OCFO onsite financial monitoring onsite checklist.**

Resolved. OJP concurred with our recommendation. OJP stated that the OCFO had a comprehensive site visit checklist to guide Financial Monitors in monitoring Department of Justice grants, and the checklist serves as both a guide and a procedures document for the site visit. OJP stated that the OCFO provides structured training for all new Financial Monitors that includes training on the use of the financial monitoring onsite checklist. As part of the training, new Financial Monitors perform a pre-site visit review and complete the steps in the checklist under supervisory review. OJP also stated that the OCFO has a training plan that identifies courses to be taken in the first several weeks of assignment as a new Financial Monitor. In addition, OJP stated that by December 31, 2017, the OCFO planned to develop additional checklist items and procedures specifically for the review of the Crime Victim Compensation State Certification Form that would be included into the existing training program. However, OJP did not address the concern we expressed on page 24 of this report regarding a need for the OCFO to develop improved instructions in other areas for the financial monitors, as identified by those monitors. We will work with OJP on obtaining this information to ensure it adequately addresses our recommendation.

This recommendation can be closed when we receive evidence that the OCFO: (1) completed and implemented the additional checklist items developed specifically for the review of the Crime Victim Compensation State Certificate Form and incorporated that into its existing training program, and (2) developed improved instructions identified as needed by the financial monitors.

**6. Ensure that the OVC and the OCFO develops written procedures for use in verifying the State Administering Agency certifications for the accuracy of total compensation payouts.**

Resolved. OJP concurred with our recommendation. OJP stated that by March 2018, the OVC and OCFO would develop written procedures for

reviewing the Victim Compensation State Certification Form for the accuracy of total compensation payouts.

This recommendation can be closed when we receive evidence that the OVC and the OCFO developed and implemented written procedures for reviewing the certifications for the accuracy of total compensation payouts.

**7. Strengthen grant management and financial training requirements for new and experienced Program Specialists and Financial Monitors by annually surveying those staff members regarding their training needs.**

Resolved. OJP concurred with our recommendation. OJP stated that, subject to the availability of funds, the OCFO requires that all grant financial management personnel complete an established Federal Financial Management Certificate Program consisting of grants management and auditing courses to ensure staff have the technical knowledge needed to perform their work effectively. OJP also stated that the OCFO has a comprehensive annual training guide to assess the OCFO staff training needs. In addition, OJP stated that the OCFO is working with the OAAM and OJP's Human Resources Division to develop a formal OJP policy on training requirements for grants financial management. Further, OJP stated that it plans to develop a process to annually survey Program Specialists and Financial Monitors to assess their specific training needs related to monitoring.

This recommendation can be closed when we receive evidence showing that: (1) the OAAM and OJP have completed and implemented a formal policy on training requirements for grants financial management personnel, and (2) OJP's development of a process for annually surveying Program Specialists and Financial Monitors for their specific monitoring training needs were implemented.

**8. Develop training requirements that will allow for cross-training between the OVC Program Specialists and the OCFO Financial Monitors to ensure staff appropriately and consistently monitor and provide accurate and consistent guidance on the programmatic and financial aspects of the grant program.**

Resolved. OJP concurred with our recommendation. OJP stated that, since FY 2015, the OCFO has coordinated with OJP program offices to keep abreast of program changes and provide program offices with updates on financial monitoring procedures. OJP stated that the OCFO plans to continue that practice with all program offices annually and, beginning with the OVC, the OCFO will formalize and document plans and agendas for these cross-training programs by March 31, 2018. Further, OJP stated that, as part of the development and guidance to be provided for Recommendations 3 through 7, the OAAM will also work with the OVC and OCFO to develop a process to

cross-train Financial and Programmatic monitors on the financial and programmatic requirements related to programs administered under CVF grant programs.

This recommendation can be closed when we receive evidence showing that: (1) the OCFO has worked with the OVC to develop and implement plans and agendas for its cross training efforts; and (2) as part of the development and guidance provided for Recommendation 3 through 7, the OAAM, OVC, and OCFO implemented a cross-training process for the financial and programmatic monitoring of the CVF grant programs' administration.

- 9. Seek to establish CVF-strategic goal and objectives for CVF-funded activities reported in the budget that are outcome-oriented to allow for a meaningful future assessment of whether the strategic goal and objectives are being achieved.**

Resolved. OJP concurred with our recommendation. OJP stated that the OVC is working with the OCFO to establish outcome-oriented CVF strategic goal and objectives for an OVC plan. This is intended to align the CVF goal and objectives under the Department's Strategic Plan to include specific objectives for the major CVF-funded activities such as, Improving Services for Victims of Crime in the Federal Criminal Justice System and Implementation of the Vision 21 Initiative. OJP also stated that the OVC has partnered with the Justice Research and Statistics Association (JRSA) to create a national resource center focused on research and evaluation activities for victim service providers. Through this partnership with JRSA, the OVC plans to gather outcome-oriented program evaluations to better assess overall program effectiveness and progress toward meeting the CVF strategic goal and objectives.

This recommendation can be closed when we receive evidence that the OVC: (1) established outcome-oriented CVF strategic goal and objectives for each CVF-funded activity reported in the budget, and (2) implemented plans to gather outcome-oriented program evaluations to better assess overall program effectiveness and progress toward meeting the CVF strategic goal and objectives for each CVF-funded activity reported in the budget.

- 10. Ensure that performance indicators are developed and results are reported for activities within the CVF decision unit.**

Resolved. OJP concurred with our recommendation. OJP stated that the OVC plans to work with the OCFO to develop new performance indicators to more accurately measure performance as it relates to the revised CVF strategic goal and objectives. OJP further stated that the revised performance indicators, along with other documentation, will allow the OVC to track, interpret, and improve progress toward meeting the CVF strategic goal and objectives.

This recommendation can be closed when we receive evidence showing: (1) that the OVC and the OCFO developed and implemented new performance indicators for activities within the CVF decision unit to more accurately measure performance for the revised CVF strategic goal and objectives, and (2) how the OVC will track the progress toward meeting the CVF strategic goal and objectives for the CVF activities.

**11. Ensure that the OVC documents the procedures to review, verify, and validate the accuracy of the performance data reported for CVF activities.**

Resolved. OJP concurred with our recommendation. OJP stated that the OVC has a four-step analytic validation process in place that includes automated system validations, verification through data analysis, and detailed reviews by grant managers. OJP stated that it plans to review and document the process to make sure that best practices are followed at all steps. OJP also said that the OVC plans to continue to improve the process for reviewing, verifying, and validating the accuracy of all performance data, including grantee-reported data. In addition, OJP stated that the OVC will continue to work with the OAAM and OFCO to incorporate questions, as appropriate, into the OJP standard onsite monitoring checklist to review, verify, and validate the accuracy of performance data reported for CVF activities during in-depth monitoring.

This recommendation can be closed when we receive evidence showing the OJP has reviewed and documented its processes to make sure that best practices are followed at all steps, including demonstrating: (1) how the OVC improved the processes for reviewing, verifying, and validating the accuracy of all performance data reported for CVF activities, including grantee-reported data; and (2) the results of the OVC, OAAM, and OCFO efforts to incorporate questions into OJP's standard monitoring checklist to review, verify, and validate the accuracy of performance data reported for CVF activities during in-depth monitoring.