

# Department of Homeland Security **Office of Inspector General**

The State of Arizona's Management  
of Urban Areas Security Initiative Grants  
Awarded During Fiscal Years  
2007 through 2009





Homeland  
Security

MAR 23 2012

## Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the Department.

This report addresses the State of Arizona's management of Urban Areas Security Initiative grants awarded during fiscal years 2007 through 2009. We contracted with the independent public accounting firm Williams, Adley & Company-DC, LLP to perform the audit. The contract required that Williams, Adley & Company-DC, LLP perform its audit according to generally accepted government auditing standards. Williams, Adley & Company-DC, LLP's report identifies one reportable condition where State management of the grant funds could be improved, resulting in two recommendations addressed to the Assistant Administrator, Grant Programs Directorate. Williams, Adley & Company-DC, LLP is responsible for the attached auditor's report dated February 23, 2012, and the conclusions expressed in the report.

The recommendations herein have been developed to the best knowledge available to our office, and have been discussed in draft with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in cursive script that reads "Anne L. Richards".

ANNE L. RICHARDS

Assistant Inspector General for Audits



February 23, 2012

Anne L. Richards  
Assistant Inspector General for Audits  
Office of Inspector General  
U.S. Department of Homeland Security  
245 Murray Drive, SW, Building 410  
Washington, DC 20528

Dear Ms. Richards:

Williams, Adley & Company-DC, LLP performed an audit of the State of Arizona's management of the Department of Homeland Security's Urban Areas Security Initiative grants for Fiscal Years 2007 through 2009. The audit was performed in accordance with our Task Order No. TPD-FIG-BPA-07-013A-0001, dated September 27, 2010. This report presents audit results and includes recommendations to help improve the State's management of the audited Urban Areas Security Initiative grants.

We conducted our audit in accordance with applicable *Government Auditing Standards*. The audit was a performance audit as defined by Chapter 1 of the *Standards* and included a review and report of program activities with a compliance element. Although this audit report comments on costs claimed by the State, we did not perform a financial audit, the purpose of which would be to render an opinion on the State of Arizona's financial statements or funds claimed in the Financial Status Reports submitted to the Department of Homeland Security.

We appreciate the opportunity to have conducted this audit. Should you have any questions, or if we can be of any further assistance, please contact me at 202-371-1397.

Sincerely,

Williams, Adley & Company-DC, LLP

A handwritten signature in cursive script that reads 'Jocelyn Hill'.

Jocelyn A. Hill  
Partner

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## Abbreviations

DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
FY	fiscal year
OIG	Office of Inspector General

# OIG

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*Department of Homeland Security  
Office of Inspector General*

## **Executive Summary**

Public Law 110-53, *Implementing Recommendations of the 9/11 Commission Act of 2007*, requires the Department of Homeland Security, Office of Inspector General, to audit individual states' management of State Homeland Security Program and Urban Areas Security Initiative grants. This report responds to the reporting requirement for the State of Arizona and its Urban Areas Security Initiative grants.

The objectives of the audit were to determine if the State of Arizona distributed and spent Urban Areas Security Initiative grant funds (1) effectively and efficiently and (2) in compliance with applicable federal laws and regulations. We were to also address the extent to which grant funds enhanced the State of Arizona's ability to prevent, prepare for, protect against, and respond to natural disasters, acts of terrorism, and other man-made disasters. The audit included a review of approximately \$48.5 million in Urban Areas Security Initiative grants awarded to the State of Arizona during fiscal years 2007 through 2009.

Generally, the State of Arizona did an effective and efficient job of administering the program requirements, distributing grant funds, and ensuring that all available funds were used. The State of Arizona formed strategic planning working groups to ensure that the State strategy and the Urban Areas Security Initiative strategy were in alignment with the target capabilities, and to identify gaps in the strategy and corrective action needed to close the gaps. The State of Arizona monitored performance and measured preparedness improvement. The State of Arizona spent grant funds in accordance with grant requirements and State-established priorities, and allocated funding based on threats, vulnerabilities, capabilities, and priorities.

However, we identified one area for improvement: compliance with exercise reporting requirements. Our recommendations call for the Federal Emergency Management Agency (FEMA) to initiate improvements which, when implemented, should help strengthen program management, performance, and oversight. FEMA concurred with the recommendations.

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## **Background**

The Homeland Security Grant Program provides federal funding to help state and local agencies enhance capabilities to prevent, protect against, respond to, and recover from terrorist attacks, major disasters, and other emergencies.

The State of Arizona (State) received \$95.1 million in Homeland Security Grant Program funds during fiscal years (FY) 2007, 2008, and 2009. This included \$48.5 million in Urban Areas Security Initiative grants. Appendix A provides details on the purpose, scope, and methodology for this audit.

The Governor of Arizona designated the Arizona Department of Homeland Security as the State Administrative Agency, the entity responsible for administering the Homeland Security Grant Program. The State Administrative Agency is responsible for managing the financial and reporting aspects of the grant programs in accordance with established federal guidelines and allocating funds to local, regional, and other state government agencies. FEMA designated the cities of Phoenix and Tucson as the Urban Areas for the State. The Phoenix and Tucson Urban Area Working Groups are responsible for the programmatic and performance aspects of the grant programs. The Arizona Department of Homeland Security organization is depicted in appendix D.

## **Results of Audit**

### **Urban Area Grant Management Practices Were Generally Effective, But Require Some Improvements**

Overall, the State Administrative Agency did an efficient and effective job of administering the Urban Areas Security Initiative grant program requirements, distributing grant funds, and ensuring that all available funds were used. The State Administrative Agency formed strategic planning working groups to ensure that the State strategy and the Urban Areas Security Initiative strategy were in alignment with the target capabilities, and to identify gaps in the strategy and corrective action needed to close the gaps. The State Administrative Agency monitored performance and measured preparedness improvement. The State Administrative Agency spent grant funds in accordance with grant requirements and State-established priorities, and allocated funding based on threats, vulnerabilities, capabilities, and priorities.

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However, as demonstrated by the results contained in this report, improvements are needed with respect to compliance with exercise reporting requirements.

## **Exercise Reporting Requirements**

The State Administrative Agency and the Urban Area Working Groups for the Phoenix and Tucson Urban Areas were unable to provide documentation to support that all After Action Reports and Improvement Plans for FEMA-supported exercises were completed and submitted to FEMA within 60 days. The Phoenix and Tucson Urban Area Working Groups are responsible for the performance aspects of the Urban Areas Security Initiative program. The subgrantee hosting the exercise is responsible for preparing and submitting the After Action Report and Improvement Plan to the respective Urban Area, but none of the subgrantees retained records documenting the completion of the program requirement to submit the After Action and Improvement Plans to FEMA.

The Homeland Security Grant Program Guidance Application Kit for FYs 2007 to 2009 states that the exercises implemented with grant funds should be threat-based and performance-based, and should evaluate performance of critical prevention and response tasks required to respond to the exercise scenario. Guidance on conducting exercise evaluations and implementing improvement is defined in the *Homeland Security Exercise and Evaluation Program (HSEEP) Volume II: Exercise Evaluation and Improvement*. Grant recipients must report on scheduled exercises and ensure that an After Action Report and Improvement Plan are prepared for each exercise conducted with FEMA support (grant funds or direct support) and submitted to FEMA within 60 days following completion of the exercise.

The Arizona Department of Homeland Security does not have procedures in place to ensure that After Action Reports and Improvement Plans are prepared. These reports are a critical management tool that documents weaknesses identified by exercises and provides a basis to track corrective actions needed to improve the first responders' capability to respond to all hazard events. This could hamper FEMA, the State Administrative Agency and the Urban Area Working Groups' ability to properly assess capability gaps and corrective actions needed to enhance the State's first responder capabilities. Also, Urban Areas Security Initiative program resources could be wasted repeating exercises or conducting exercises that do not focus on the Urban Area's preparedness deficiencies.

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## Recommendations

We recommend that the Assistant Administrator, Grant Programs Directorate, direct the State Administrative Agency to:

**Recommendation #1:** Submit After Action Reports and Improvement Plans for those exercises where it has not already done so, or question the costs associated with exercises for which the State Administrative Agency does not produce the required report.

**Recommendation #2:** Develop and implement policies and procedures to prepare After Action Reports and Improvement Plans and submit those reports to FEMA within 60 days following completion of the exercise.

## Management Comments and Auditors' Analysis

FEMA officials concurred with the recommendations. The officials said that the corrective actions outlined by the Arizona Department of Homeland Security in their response to this report sufficiently address the intent of both recommendations. According to FEMA, the State has verified its timely submission of all relevant After Action reports and Improvement Plans.

State of Arizona officials did not agree with the nature of the finding reported. State officials said that all Exercise After Action Reports and Improvement Plans were submitted to FEMA. The officials also stated that they will implement enhancements to policies and procedures for the FY 2011 funding cycle to improve monitoring and tracking of Exercise After Action Reports and Improvement Plans. Specifically, the State will take the following actions:

- Request exercise hosts to post all exercises within 180 days of completion,
- Email copies of the reports to County, State, and FEMA Regional and headquarters officials, and
- Incorporate into the grant closeout process the validation of reports in subgrantee files.

The actions taken by FEMA and the State are responsive to address the intent of recommendation 1, which is considered resolved and closed. The actions proposed by FEMA and the State, when fully implemented, will address the conditions

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identified during the audit. Recommendation 2 is considered resolved, and will remain open pending implementation of the proposed corrective actions beginning with the FY 2011 funding cycle.

## **Appendix A**

### **Purpose, Scope, and Methodology**

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The objective of this audit was to determine whether the State distributed and spent Urban Areas Security Initiative grant funds strategically, effectively, and in compliance with laws, regulations, and guidance. The goal of this audit was to identify problems and solutions in order to assist FEMA and the State to improve the nation's ability to prevent and respond to all hazards on a local as well as a statewide level.

The scope of this audit included the plans developed by the State to improve preparedness and all hazards response, the goals set within those plans, the measurement of progress towards the goals, and the assessments of performance improvement that result from this activity. Further, the scope included the assessment of these activities within the context of risk to determine if the State's plans produced strategic performance improvements related to the highest areas of risk rather than merely producing improvements in a broader sense.

Together, the entire Homeland Security Grant Program and its five interrelated grant programs fund a range of preparedness activities, including planning, organization, equipment purchase, training, exercises, and management and administration costs. Because of the interrelationship of these grant programs, all were considered when evaluating the planning cycle and the effectiveness of the overall grant program. However, only Urban Areas Security Initiative funding, and equipment and programs supported by the grant funding, were reviewed for compliance. State Homeland Security Program grants were addressed in the Department of Homeland Security (DHS) Office of Inspector General (OIG) report "The State of Arizona's Management of State Homeland Security Grants Awarded During Fiscal Years 2004 through 2006," OIG-08-99, September 2008.

The scope of the audit included the Urban Areas Security Initiative grant awards for FYs 2007, 2008, and 2009 as shown in the following table:

**Appendix A**  
**Purpose, Scope, and Methodology**

<b>Homeland Security Grant Program Awards FYs 2007 through 2009</b>				
<b>Funded Activity</b>	<b>FY 2007</b>	<b>FY 2008</b>	<b>FY 2009</b>	<b>Total</b>
Urban Areas Security Initiative	\$16,820,000	\$16,315,500	\$15,335,150	\$48,470,650
State Homeland Security Program	\$9,120,000	\$13,400,000	\$13,086,500	\$35,606,500
Law Enforcement Terrorism Prevention Program	\$6,520,000	Not Applicable	Not Applicable	\$6,520,000
Citizen Corps Program	\$281,549	\$291,932	\$290,414	\$863,895
Metropolitan Medical Response System Program	\$1,032,581	\$1,284,884	\$1,284,884	\$3,602,349
<b>Grand Total</b>	<b>\$33,774,130</b>	<b>\$31,292,316</b>	<b>\$29,996,948</b>	<b>\$95,063,394</b>

Source: Federal Emergency Management Agency

Within the State of Arizona, the State Administrative Agency subawarded Urban Areas Security Initiative funds to two urban areas that consist of Tucson and its surrounding counties, cities and towns, and Phoenix and its surrounding counties and cities; and seven state agencies. In accordance with the audit guide, we visited the following subgrantees:

**State Agencies**

- Arizona Department of Agriculture
- Arizona Department of Corrections
- Arizona Department of Homeland Security (State Administrative Agency)
- Arizona Department of Public Safety
- Arizona Department of Transportation
- Arizona Government Information Technology Agency
- Arizona Radiation Regulatory Agency

**Tucson Urban Area**

- Marana Police Department
- Northwest Valley Fire Department
- Oro Valley Police Department
- Pima County Office of Emergency Management
- Pima County Sheriff's Department
- Sahuarita Police Department
- Tucson Fire Department
- Tucson Police Department

## Appendix A

### Purpose, Scope, and Methodology

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#### Phoenix Urban Area

- Buckeye Police Department
- Gilbert Fire Department
- Gilbert Police Department
- Glendale Fire Department
- Glendale Police Department
- Goodyear Fire Department
- Goodyear Police Department
- Maricopa County Sheriff's Department
- Mesa Fire Department
- Mesa Police Department
- Phoenix Office of Emergency Management
- Phoenix Fire Department
- Phoenix Police Department
- Peoria Fire Department
- Peoria Police Department
- Scottsdale Fire Department
- Surprise Fire Department
- Tempe Fire Department
- Tempe Police Department

The team reviewed a sample of the Urban Areas Security Initiative's expenditures representing 80% of the dollar value expended for each grant year to determine the sufficiency of internal controls.

To ensure compliance with DHS OIG sample selection requirements, we selected 27 first responders and 7 state agencies per grant year. Based on our review of the listing of subrecipients (after totaling the expenditures per recipient for the grant year) we selected 100% of the subrecipients in the Tucson Urban Area to visit. For the Phoenix Urban Area, we selected 100% of the state agencies and the 19 local recipients with the largest expenditures for each grant year to visit.

We conducted this performance audit between October 2010 and May 2011 pursuant to the *Inspector General Act of 1978*, as amended, and according to 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 upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

## **Appendix A**

### **Purpose, Scope, and Methodology**

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Although this audit included a review of costs claimed, we did not perform a financial audit of those costs. This was a performance audit as defined by Chapter 1 of the Standards and included a review and report of program activities with a compliance element. Williams, Adley & Company-DC, LLP was not engaged to and did not perform a financial statement audit, the objective of which would be to express an opinion on specified elements, accounts, or items.

Accordingly, Williams, Adley & Company-DC, LLP was neither required to review, nor express an opinion on, the costs claimed for the grant programs included in the scope of the audit. Had Williams, Adley & Company-DC, LLP been required to perform additional procedures, or conduct an audit of financial statements in accordance with generally accepted auditing standards, other matters might have come to their attention that would have been reported. This report relates only to the programs specified and does not extend to any financial statements of the State of Arizona.

While the audit work was performed and the report was prepared under contract, the audit results are being reported by the DHS Office of the Inspector General to appropriate FEMA and State of Arizona officials.

**Appendix B**  
**Management Comments to the Draft Report**

U.S. Department of Homeland Security  
Washington, DC 20472



**FEMA**

**JAN 23 2012**

MEMORANDUM FOR: Anne L. Richards  
Assistant Inspector General for Audits  
Office of Inspector General

FROM: David J. Kaufman   
Director  
FEMA Office of Policy and Program Analysis

SUBJECT: Comments to OIG Draft Report, *The State of Arizona's Management of Urban Areas Security Initiative Grants Awarded During Fiscal Years 2007 through 2009*

Thank you for the opportunity to comment on the draft report. The findings in the report will be used to strengthen the effectiveness and efficiency of how we execute and measure our programs. We recognize the need to continue to improve the process, including addressing the recommendations raised in this report. Our responses to the recommendations are as follows:

**Recommendation #1:** We recommend that the Assistant Administrator, Grant Programs Directorate, direct the State Administrative Agency to submit outstanding After Action Reports and Improvement Plans for those exercises where it has not already done so or question the costs associated with exercises for which the State Administrative Agency does not produce the required report.

**Recommendation #2:** We recommend that the Assistant Administrator, Grant Programs Directorate, direct the State Administrative Agency to develop and implement internal policies and procedures to prepare, track and account for the submissions of After Action Reports (AARS) and Improvement Plans (IPs) to FEMA, within the required number of days as stated in the applicable year's grant guidance and application kit, following completion of the exercise.

**FEMA Response:** FEMA concurs with both recommendations.

FEMA believes that corrective actions outlined by the Arizona Department of Homeland Security (AZDOHS) in its response to the subject report sufficiently address the intent of both recommendations. The AZDOHS has verified its timely submission of all relevant AARs/IPs into

## Appendix B

### Management Comments to the Draft Report

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the HSEEP Toolkit for the period 2002-2012. AZDOHS also indicated that it will take the following actions to improve the monitoring and tracking of future AAR and IP reporting:

- Require exercise hosts/lead agencies to post all exercises, documentation, and AARs/IPs via the HSEEP Toolkit within 180 days of completion.
- E-mail copies of the reports to the County Emergency Manager, AZDOHS, FEMA Region and DHS headquarters.
- AZDHS will obtain access to HSEEP in order to track compliance
- The AZDOHS closeout process will incorporate a validation to ensure that AARs/IPs are included in the subgrantee file.

FEMA believes that these actions satisfy the intent of the recommendations and requests that both be resolved and closed.

Again, we thank you for the opportunity to review your report. If you have further questions, please do not hesitate to call Gina A. Norton, FEMA Audit Liaison Office, 202-646-4287.

## Appendix B Management Comments to the Draft Report



Governor Janice K. Brewer

### State of Arizona Department of Homeland Security



Director Gilbert M. Orrantia

December 16, 2011

Ms. Jocelyn Hill  
Williams, Adley & Company  
1250 H. Street Suite 1150  
Washington, D.C. 20005

Dear Ms. Hill:

The Arizona Department of Homeland Security (AZDOHS) appreciates the opportunity to comment on this report. We appreciate the Office of the Inspector General's (OIG) interest in our programs. We have provided a response for the Audit recommendation.

*Finding: Exercise Reporting Requirements: The State Administrative Agency and the Urban Area Working Groups for the Phoenix and Tucson Urban Areas were unable to provide documentation to support that all After Action Reports and Improvement Plans for FEMA-supported exercises were completed and submitted to FEMA within 60 days.*

AZDOHS disagrees that this should be a finding; based upon the removal of the online access to the secure FEMA Preparedness Portal on September 14, 2009. This was the location where all of Arizona's 2007-2009 After Action Report (AAR)/Improvement Plans (IP) were uploaded to FEMA. Neither FEMA nor the Phoenix and Tucson UASIs have support documentation that these AARs were uploaded within the 90-day requirement because the Portal was dismantled. The Phoenix and Tucson UASIs do have copies of FFY 2007-2009 UASI grant funded Exercise AAR/IPs.

The FFY 2011 Grant Guidance states, "Grantees must develop After Action Report/Improvement Plans (AAR/IPs) following the completion of exercises funded under this program; the use of HSEEP is strongly encouraged. AAR/IPs are to be submitted to [hseep@dhs.gov](mailto:hseep@dhs.gov). Grantees may use systems such as the HSEEP Corrective Action Program (CAP) for the tracking of corrective actions. Grantees may also share their AAR/IPs via Lessons Learned Information Sharing (LLIS.gov)."

However, per direction from the NED (National Exercise Division), Arizona began uploading the AAR/IP's to the HSEEP Toolkit where the exercise is required to be posted if Federal funds are being used to support the exercise. A comprehensive list of Arizona's exercises for 2002-2012 is posted in the HSEEP Toolkit. All AAR's were uploaded within 90-days after the completion of exercises. Currently the HSEEP Toolkit does not have a Summary Report for State use to validate time of completion. The AZDOHS plans to submit a request to FEMA recommending they consider adding a field or columns in the HSEEP Toolkit to allow the State Administrative Agencies (SAA) the ability to track by funding source and to monitor timely submissions of AAR/IPs.

1700 West Washington Street Phoenix, Arizona 85007  
Office: (602) 542-7030 Fax: (602) 364-1521 [www.azdohs.gov](http://www.azdohs.gov)

## Appendix B

### Management Comments to the Draft Report

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December 16, 2011  
Page 2

The AZDOHS will implement the following process enhancements for the FFY2011 funding cycle to improve monitoring and tracking Exercise AAR/IPs.

- Require exercise hosts/lead agencies to post all exercises, documentation, and AAR/IPs via the HSEEP Toolkit within 90 days of completion of the event. This will be the primary method used to track AAR completion.
- In addition to uploading AARs in the HSEEP Toolkit, exercise hosts will be required to email the AAR to the County Emergency Manager, FEMA Region IX Exercise POC, and the [HSEEP@dhs.gov](mailto:HSEEP@dhs.gov) email address per grant guidance with a courtesy copy to the AZDOHS Strategic Planner and ADEM Exercise Officer.
- The AZDOHS Strategic Planners will also obtain access to the HSEEP Toolkit in order to track compliance with AAR reporting based on the funding source indicated.
- The AZDOHS subgrant closeout process will also incorporate a validation to ensure a copy of the AAR/IPs are included in the subgrantee file.

We appreciate the work completed by your office to assist the State of Arizona in improving the management of homeland security grants. AZDOHS is taking this opportunity to enhance its exercise program and reporting requirements.

Please advise if we can provide further information or clarification.

Sincerely,



Gilbert M. Orrantia  
Director

GMO/llh

cc: Michael Sivey, Director, Grants Management, Office of the Inspector General  
Anne L. Richards, Assistant Inspector General for Audits, Office of the Inspector General

## Appendix C

### Homeland Security Grant Program Background

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The Homeland Security Grant Program provides federal funding to help state and local agencies enhance their capabilities to prevent, protect against, respond to, and recover from terrorist attacks, major disasters, and other emergencies. The Homeland Security Grant Program encompasses several interrelated federal grant programs that together fund a range of preparedness activities, including planning, organization, equipment purchase, training, and exercises, as well as management and administration costs. Programs include:

- **State Homeland Security Program** provides financial assistance directly to each of the states and territories to prevent, respond to, and recover from acts of terrorism and other catastrophic events. The program supports the implementation of the State Homeland Security Strategy to address the identified planning, equipment, training, and exercise needs.
- **Urban Areas Security Initiative** provides financial assistance to address the unique planning, equipment, training, and exercise needs of high risk urban areas, and to assist in building an enhanced and sustainable capacity to prevent, respond to, and recover from threats or acts of terrorism and other disasters. Allowable costs for the urban areas are consistent with the State Homeland Security Program. Funding is expended based on the Urban Area Homeland Security Strategies.

In addition, the Homeland Security Grant Program includes other interrelated grant programs with similar purposes. Depending on the fiscal year these include:

- Metropolitan Medical Response System
- Citizen Corps Program
- Law Enforcement Terrorism Prevention Program (through FY 2007)

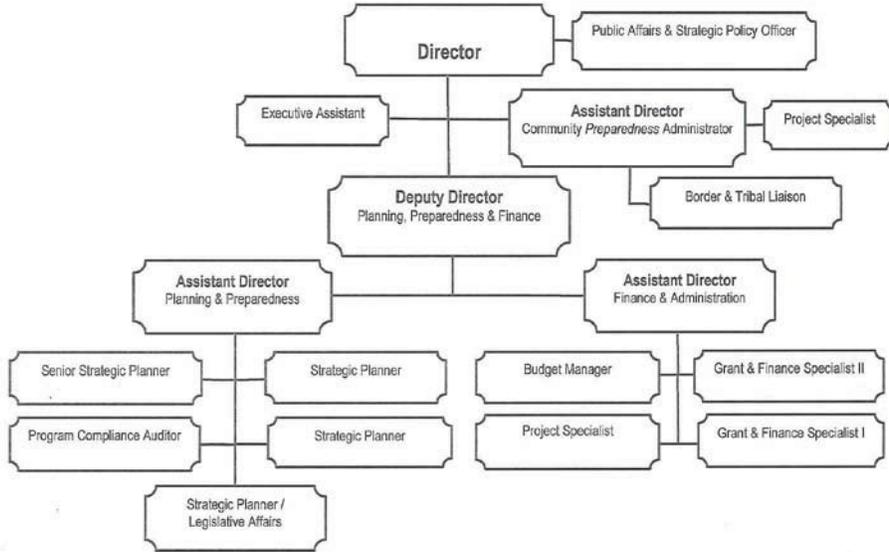
**Appendix D**  
**Arizona Department of Homeland Security Organization Chart**



**State of Arizona**  
**Department of Homeland Security**



Effective October 5, 2010



Source: Arizona Department of Homeland Security

**Appendix E**  
**Report Distribution**

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**Department of Homeland Security**

Secretary  
Deputy Secretary  
Chief of Staff  
Deputy Chief of Staff  
General Counsel  
Executive Secretariat  
Director, GAO/OIG Liaison Office  
Assistant Secretary for Office of Policy  
Assistant Secretary for Office of Public Affairs  
Assistant Secretary for Office of Legislative Affairs

**Federal Emergency Management Agency**

Administrator  
Assistant Administrator, Grant Programs Directorate  
Federal Emergency Management Agency Audit Liaison  
Grant Programs Directorate Audit Liaison

**Office of Management and Budget**

Chief, Homeland Security Branch  
DHS OIG Budget Examiner

**Congress**

Congressional Oversight and Appropriations Committees, as appropriate

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DHS Office of Inspector General/MAIL STOP 2600,  
Attention: Office of Investigation - Hotline,  
245 Murray Drive SW, Building 410  
Washington, DC 20528

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