

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

Vermont's Management of State Homeland Security Program Grants Awarded During Fiscal Years 2010 Through 2012





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Department of Homeland Security

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MEMORANDUM FOR: Brian E. Kamoie
Assistant Administrator
Grant Programs Directorate
Federal Emergency Management Agency

FROM: Mark Bell 
Acting Assistant Inspector General for Audits

SUBJECT: *Vermont's Management of State Homeland Security Program Grants Awarded During Fiscal Years 2010 Through 2012*

Attached for your information is our final report, *Vermont's Management of State Homeland Security Program Grants Awarded During Fiscal Years 2010 Through 2012*. We incorporated the formal comments from the Associate Administrator for Policy, Program Analysis and International Affairs in the final report.

The report contains eight recommendations aimed at improving Vermont's management of Homeland Security Grant Program awards. Your office concurred with all of the recommendations. Based on information provided in your response to the draft report, we consider recommendations #1 and #2 resolved and closed. Recommendations #3 through #8 will remain open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout request to us within 30 days so that we may close the recommendations. The request should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts. Please email a signed PDF copy of all responses and closeout requests to OIGAuditsFollowup@oig.dhs.gov.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to appropriate congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Sandra John, Acting Deputy Assistant Inspector General for Audits, at (202) 254-4100.

Attachment



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Abbreviations

CFR	Code of Federal Regulations
DEMHS	Division of Emergency Management and Homeland Security
DHS	Department of Homeland Security
DPS	Department of Public Safety
FEMA	Federal Emergency Management Agency
FY	fiscal year
HSGP	Homeland Security Grant Program
OIG	Office of Inspector General
OMB	Office of Management and Budget
SAA	State Administrative Agency
SHSP	State Homeland Security Program
SMART	specific, measurable, achievable, results-oriented, time-limited
SPR	State Preparedness Report
THIRA	Threat and Hazard Identification and Risk Assessment



Executive Summary

Public Law 110-53, *Implementing Recommendations of the 9/11 Commission Act of 2007*, as amended, requires the Department of Homeland Security (DHS) Office of Inspector General (OIG) 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 Vermont.

The audit objectives were to determine whether the State distributed, administered, and spent State Homeland Security Program grant funds strategically, effectively, and in compliance with laws, regulations, and guidance. We also addressed the extent to which funds awarded enhanced the ability of State grantees to prevent, prepare for, protect against, and respond to natural disasters, acts of terrorism, and other manmade disasters. The State of Vermont received grant awards of approximately \$14.6 million in State Homeland Security Program grant funds for fiscal years 2010 through 2012.

In most instances, the Vermont Department of Public Safety administered its grant programs in compliance with requirements in Federal grant guidance and regulations and DHS guidelines. State Homeland Security Program grant funds were spent on allowable items and activities, and there were adequate controls over the approval of expenditures and reimbursement of funds.

However, the State needs to improve its homeland security strategies by including specific, measurable, results-oriented, and time-limited objectives and tools to assess progress toward attaining its goals. In addition, the State should improve the timeliness of fund obligation, property management and inventory controls, compliance with procurement requirements, and the monitoring of its subgrantees.

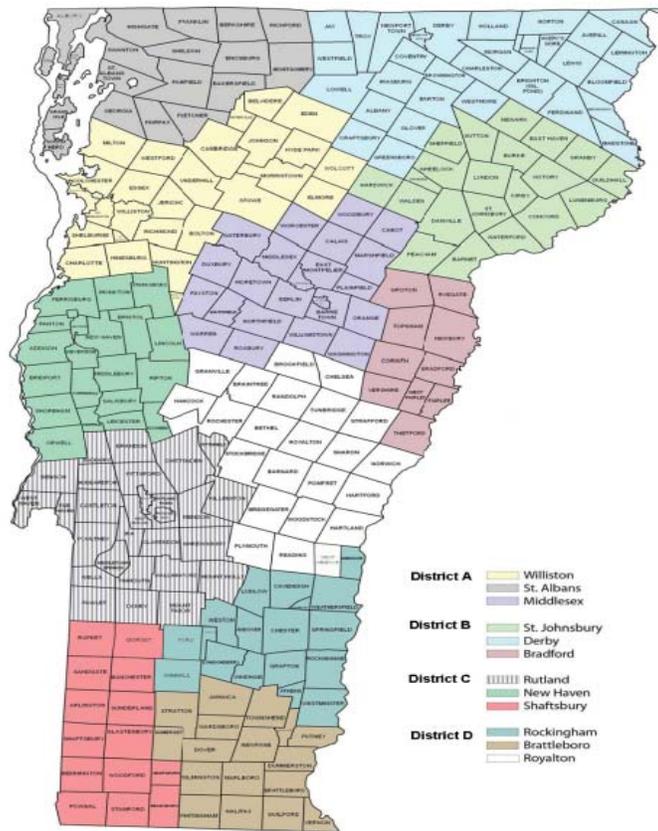
We made eight recommendations to the Federal Emergency Management Agency (FEMA) which when implemented, should strengthen program management, performance, and oversight. FEMA concurred with all eight recommendations.



Background

DHS provides Federal funding through the Homeland Security Grant Program (HSGP) to help State and local agencies enhance capabilities to prevent, deter, respond to, and recover from terrorist attacks, major disasters, and other emergencies. Within DHS, FEMA is responsible for administering the HSGP. To support preparedness, FEMA develops policies, ensures that adequate plans exist and are validated, defines capabilities required to address threats, provides resources and technical assistance to States, and synchronizes preparedness efforts throughout the Nation. Appendix C contains a detailed description of the grant programs that constitute the HSGP.

The State of Vermont designated the Vermont Department of Public Safety (DPS) as the State Administrative Agency (SAA) responsible for administering the Homeland Security Grant Program. The Division of Emergency Management and Homeland Security (DEMHS) has primary responsibility to ensure emergency responders are adequately prepared to prevent, deter, detect, respond to, and recover from incidents. DEMHS provides aid and support to Vermont's Local Emergency Management Directors, Local Emergency Planning Committees, Regional Planning Commissions, Community Emergency Response Teams, state agencies, and emergency response providers in four Public Safety Districts.



District Map of Vermont
Source: Vermont Department of Public Safety

DEMHS is also responsible for maintaining the State Homeland Security Strategy (State strategy) and coordinates its day-to-day implementation. The Division of Administration is responsible for grants management.

For fiscal years (FY) 2010–12, the State received awards that total approximately \$15.7 million in HSGP funds, including about \$14.6 million for the State Homeland Security



Program (SHSP). Appendix A describes the objectives, scope, and methodology for this audit.

Results of Audit

The State of Vermont developed written procedures for program administration; ensured that grant expenditures for equipment and planning, training, exercises, and administrative activities were allowable per the grant guidance; and complied with grant reporting requirements. Also, the State's Homeland Security strategies linked goals and objectives to national priorities and DHS mission areas in compliance with applicable Federal guidance.

However, the State needs to improve its homeland security strategies by including specific, measurable, results-oriented, and time-limited objectives and tools to assess progress toward attaining its goals. In addition, the State should improve the timeliness of fund obligation, property management and inventory control, compliance with procurement requirements, and the monitoring of its subgrantees.

Improve Strategy Objectives

Vermont's State strategies for FYs 2010–12 included goals and objectives that were linked to the national priorities and the DHS mission areas, as required by FEMA guidance. However, the objectives were not always specific, measurable, results-oriented, and time-limited. This condition existed because FEMA approved the State's FYs 2010–12 strategies without providing constructive comments to improve the strategies. In this regard, DPS interpreted FEMA's review and approval of its State Homeland Security Strategies as adequate to satisfy the measures important to FEMA.

In July 2005, FEMA released guidance to the States and Urban Areas on how to align their Homeland Security Strategies with the National Preparedness Goal. The *Department of Homeland Security State and Urban Area Homeland Security Strategy: Guidance on Aligning Strategies with the National Preparedness Goal* requires States to include goals and measurable objectives in their strategies, and mandates that an objective should be—

- specific, detailed, particular, and focused—helping to identify what is to be achieved and accomplished;
- measurable—quantifiable, providing a standard for comparison, and identifying a specific achievable result;
- achievable—not beyond a state, region, jurisdiction, or locality's ability;
- results-oriented—identifies a specific outcome; and



- time-limited—a target date exists to identify when the objective will be achieved.

We evaluated the objectives in the State Homeland Security Strategies for FYs 2010–12 to meet the specific, measurable, achievable, results-oriented, and time-limited (SMART) criteria. The objectives that DPS developed were not always explicit, were qualitative instead of quantitative, tended to be task oriented, and did not include the time-limited requirement. Table 1 represents examples where objectives did not meet SMART criteria.

Table 1: Deficiencies in Vermont’s Homeland Security Strategies’ Objectives		
<u>Goal</u>	<u>Objective</u>	<u>Deficiency</u>
1. Establish interoperable communications throughout the State of Vermont and regionally with bordering states and the Province of Quebec, Canada.	1. Improve emergency communications in the State.	The objective is not: <ul style="list-style-type: none"> • Specific • Measurable • Results-oriented • Time-limited
2. Enhance preparedness planning within the Agriculture sector at a state and local level.	1. Engage the Agriculture Working Group.	The objective is not: <ul style="list-style-type: none"> • Specific • Measurable • Results-oriented • Time-limited
3. Enhance community preparedness and participation.	1. Prepare citizens for disasters.	The objective is not: <ul style="list-style-type: none"> • Specific • Measurable • Results-oriented • Time-limited

Source: DHS OIG analysis of the State Homeland Security Strategies (FYs 2010 through 2012).

Without objectives that are specific, measurable, achievable, results-oriented, and time-limited, it is difficult for the State to measure and report on improvements in preparedness and evaluate progress toward completing goals and objectives. In addition, the State is limited in its ability to measure how much an objective has been completed over a given timeframe, and monitoring the accomplishment of the objectives is directly affected.

Measure Progress and Improve Preparedness

The State of Vermont was not able to fully develop performance measures to assess its ability to respond to an emergency caused by natural disaster or terrorism. According to the DPS, the State’s preparedness posture is evaluated



based on the State Preparedness Report (SPR), After Action Reports, and risk assessments such as the Threat and Hazard Identification and Risk Assessment. Although the State's strategy objectives were for the most part achievable, they were not always specific, measurable, results-oriented and time-limited. FEMA continually changed the SPR format, which created challenges for the State of Vermont to measure its progress from year-to-year.

According to *Guidance on Aligning Strategies with the National Preparedness Goal*, July 2005, an objective sets a tangible and measurable target level of performance over time against which actual achievement can be compared. The goal may be expressed as a quantitative standard, value, or rate. Therefore, an objective should be SMART. In addition, the measurement tools need to be consistent in order to be measurable.

In April 2012, FEMA required State and local governments receiving FEMA preparedness grants to complete a Threat and Hazard Identification and Risk Assessment (THIRA) by December 31, 2012. The THIRA provides a comprehensive approach for identifying and assessing risks and associated impacts, using the core capabilities identified in the National Preparedness Goal. We did not review the THIRA process because it was not within the scope of our audit.

In addition to the THIRA, States and territories receiving FEMA preparedness grants are required to submit an SPR annually. FEMA stated that THIRA results and the SPR will provide a quantitative summary of preparedness. Without consistent standards and metrics against which to measure progress, it will be difficult for the State to determine the extent to which SHSP grant funds have enhanced its ability to prevent, prepare for, and protect against, and respond to manmade and natural disasters.

According to FEMA officials, the new requirements associated with the THIRA, SPR, and Investment Justification process will provide consistent and comprehensive measurement tools that include baselines for measuring progress toward enhancing their level of preparedness.

Obligate Grant Funds Timely

DPS did not obligate FYs 2010–12 SHSP funds within the required timeframe. The State did not obligate about 96 percent of the FY 2010 and 100 percent of the FY 2011 awarded SHSP grant funds within 45 days of receipt of funds to local government units, as required by FEMA's grant guidance. In addition, DPS received FY 2012 SHSP funds in August 2012. As of August 27, 2013, no pass through funds had been obligated to the local government units for FY 2012. DPS



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officials told us that they did not meet the grant requirements because of the lengthy obligation and approval process. This process involves various levels of review and approval before the DPS Commissioner signs the subgrantee agreement obligating the funds.

FEMA Homeland Security Grant Program Guidance requires SAA to obligate pass through grant funds within 45 days of FEMA’s award date. This includes the following requirements:

- There must be some action to establish a firm commitment on the part of the awarding entity.
- The action must be unconditional (i.e., no contingencies for availability of funds) on the part of the awarding entity.
- There must be documentary evidence of the commitment.
- The award terms must be communicated to the official grantee.

Our review of 193 SHSP pass through grants to subgrantees during FY 2010 showed 185 instances in which DPS did not obligate grant funds to the subgrantees timely. For example, 1 FY 2010 subgrant agreement between DPS and the City of South Burlington had not been executed as of August 19, 2013, which is more than 1,064 days since the September 20, 2010, FEMA award date. In addition, our review of eight SHSP pass through grants to subgrantees during FY 2011 showed eight instances in which DPS did not obligate grant funds to the subgrantees timely.

Table 2 reflects the instances in which the State did not obligate funds to subgrantees for 400 days or longer.

Subgrantee	FEMA/State Agreement Date	Obligation Date	Number of Days State Took To Obligate
FY 2010			
Colchester, Town of Colchester Technical Rescue	9/20/2010	4/26/2013	949
Burlington, City of Burlington Fire Department	9/20/2010	4/10/2013	933
	9/20/2010	4/3/2013	926
Stowe, Town of Stowe Emergency Services	9/20/2010	4/1/2013	924
Thetford Volunteer Fire Department, Inc.	9/20/2010	3/19/2013	911
FY 2011			
Shelburne, Town of Shelburne Police Department	9/27/2011	3/18/2013	538
Franklin County Sheriff’s Department	9/27/2011	2/19/2013	511
Hartford Emergency Communications Center	9/27/2011	11/7/2012	407
Lamoille County Sheriff’s Department	9/27/2011	11/7/2012	407
	9/27/2011	10/31/2012	400

Source: DHS OIG analysis of timeliness to obligate grant funds to subgrantees.



DPS indicated that the 45-day requirement to obligate pass through grant funds was unreasonable, especially because they did not have personnel and technological resources to meet this requirement.

Because of the excessive time lapse before the State obligated funds, the subgrantees may not have sufficient time to use grant funds to meet their approved needs. This could result in additional funds that need to be deobligated when the FYs 2010–12 FEMA grant agreements expire.

Property Management and Inventory Control Enforcement

Inventory management controls need to be improved to ensure proper internal controls exist to safeguard equipment and ensure compliance with Federal requirements. Specifically, local subgrantees did not always have an inventory control policy, maintain asset lists that included required information, and mark equipment as required.

Local Subgrantees Inventory Control Policies

Of the 10 subgrantees visited, 6 did not have an inventory control policy to include the requirement for property records; a physical inventory of property; reconciliation of the results with property records at least once every 2 years; and adequate safeguards to prevent loss, damage, or theft of property. In addition, one subgrantee (Berlin Volunteer Fire Department), which did not have an inventory policy, purchased three repeaters with SHSP funds. One of the repeaters was housed in a detached garage on the private property of a former Fire Chief. A Berlin Volunteer Fire Department official told us that an agreement had been in place for years, and still exists, allowing the Berlin Volunteer Fire Department's use of the property. This agreement could not be located at the time of our audit. This official also told us that the vendor (Burlington Communications) inventoried the equipment, performs annual maintenance of the equipment, and reports an inventory status on an annual basis. During the audit, this same official acknowledged this was the first time the subgrantee had seen the repeaters. This repeater services areas in Berlin as well as neighboring communities.

The subgrant agreements did not provide detailed requirements for property management and inventory controls as included in Code of Federal Regulations (CFR) 44 CFR 13.32(d). The agreements merely mentioned that the subgrantee will comply with Federal requirements imposed by the awarding agency, specifically including any applicable regulations such as 44 CFR Part 13.



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According to DPS, there are many sections of 44 CFR Part 13 with which a subgrantee needs to comply. DPS officials believed that focusing on one section, i.e., 13.32, diminishes the requirement to comply with all of Part 13.

Specifically, 44 CFR 13.32(d), *Management Requirements*, includes the following minimum requirements for grant recipients managing grant-funded equipment:

- Grant recipients must maintain property records that include a description of the property; a serial number or other identification number; the source of property; the name of the title holder; the acquisition date and cost of the property; the percentage of Federal participation in the cost of the property; the location, use, and condition of the property; and any ultimate disposition data, including the date of disposal and sale price of the property.
- Grant recipients must take a physical inventory of grant-funded property and reconcile the results with property records at least once every 2 years.
- Grant recipients must develop a control system to ensure adequate safeguards to prevent loss, damage, or theft of the property. Grant recipients also need to investigate any loss, damage, or theft.

Local Subgrantees' Asset Lists

Subgrantees did not maintain asset lists or other lists that included the required information. Of the 10 subgrantees visited, 2 did not provide us with an asset list. The asset lists of the remaining eight did not contain all required information such as the acquisition date, costs of the property, and use and condition of property. This condition existed because the State's subgrantee asset list template for reporting did not include all information as required by 44 CFR 13.32. In addition, the subgrant agreements merely mention the requirement for subgrantee compliance with Federal requirements imposed by the awarding agency and 44 CFR Part 13, but did not list the required inventory elements.

In addition to the inventory requirements in 44 CFR 13.32(d), according to the subgrant agreements:

- The subrecipient shall indicate the serial number of the equipment purchased and the location. DPS suggested the use of the Homeland Security Unit asset template for reporting.
- Agencies must maintain a Homeland Security Asset list, which could be combined with the agency's ongoing asset list.



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Table 3 shows examples of the subgrantee inventory compliance issues noted during the audit.

Table 3: State of Vermont HSGP Inventory Compliance Issues		
Subgrantee	Compliance Issue 44 CFR 13.32(d)(1)	Reported Value of Equipment Items Tested
Town of Barre (1 Subgrant Agreement)	Asset list did not contain use and condition of equipment.	\$14,962.00
Town of Berlin (1 Subgrant Agreement)	Asset list did not contain use and condition of equipment.	\$21,112.50
City of Burlington (2 Subgrant Agreements)	Asset list did not contain the costs of the property and use and condition of equipment.	\$77,119.70
Town of Hartford Police Department (1 Subgrant Agreement)	Asset list did not contain use and condition of equipment.	\$28,190.00
Town of Randolph Fire Departments (1 Subgrant Agreement)	Asset list did not contain use and condition of equipment.	\$54,565.00
Town of Shelburne Police Department (2 Subgrant Agreements)	Asset list did not contain the acquisition date, costs of the property, and use and condition of equipment.	\$76,973.00
Town of Springfield (2 Subgrant Agreements)	The inventory list did not show the correct serial number for a repeater. The asset list did not contain use and condition of equipment.	\$71,503.05
Town of Windsor Police Department (1 Subgrant Agreement)	No asset list provided.	\$29,025.26
Vermont Center for Geographic Information, Inc. (1 Subgrant Agreement)	No asset list provided.	\$9,500.00
Vermont Criminal Justice Training (1 Subgrant Agreement)	Asset list did not contain cost of property, and use and condition of equipment.	\$1,387.91
Total		\$384,338.42

Source: DHS OIG analysis of inventory compliance issues.

Local Subgrantees’ Equipment Marking

None of the 10 subgrantees visited always marked equipment to indicate that it was “Purchased with funds provided by the U.S. Department of Homeland Security.” For example, the Town of Shelburne Police Department and the City of Burlington Fire Department had portable radios that were not marked, because the subgrantee determined such marking would not be practicable due to potential exposure to moisture. However, another subgrantee (Town of Randolph Fire Department) did mark its portable radios, but not as required. This



condition existed because subgrantees did not fully understand the language included in the FY 2010 Subgrant agreement.

According to the subgrant agreement:

- Items purchased with Homeland Security funds must be identified as such.
- The subrecipient agrees that, when practicable, any equipment purchased with grant funding shall be prominently marked as follows: “Purchased with funds provided by the U.S. Department of Homeland Security.”

Without adherence to inventory and property management requirements, the State cannot ensure assets procured with grant funds are properly safeguarded, in good condition, and available when needed to prevent, prepare for, protect against, and respond to all hazard situations.

Document Compliance with Procurement Requirements

Local subgrantees did not always comply with Federal procurement requirements. Specifically, procurement records did not always show evidence that the subgrantees allowed vendor full and open competition, or documented the explanation why they considered only one vendor; and did not show cost or price analyses.

Of 10 subgrantees visited, 5 did not fully comply with Federal procurement requirements. The grant files for the purchases did not include evidence that the subgrantees allowed vendors full and open competition or documentation explaining the reason for selection of only one vendor. In addition, the files did not contain cost or price analyses conducted to support that costs were fair and reasonable. In two of the five instances, the Town of Randolph Fire Department and the Vermont Center for Geographical Information, Inc., did not document the sole source justification. In three of the five instances, the subgrantees (Berlin Volunteer Fire Department, Inc., the City of Burlington Fire Department, and Town of Shelburne Police Department) did not provide documentation to show issuance of a public announcement to obtain the quotes. In one of the three instances involving quotes (Berlin Volunteer Fire Department), we could not determine the rationale for the selected vendor that had a higher unit price over another quote for the items purchased.

This condition occurred because the subgrant agreements did not provide detailed requirements for procurement. According to DPS the subgrantees should determine whether their procurement policies meet the requirements of



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44 CFR 13.36, but DPS does not have the resources to research all outside agency policies to determine their compliance.

Title 44 CFR 13.36, *Procurement*, requires that subgrantees' procurement procedures conform to the following applicable Federal requirements:

- Subgrantees will conduct all procurement transactions in a manner providing full and open competition.
- Subgrantees must perform a cost or price analysis in connection with every procurement action.
- Subgrantees are required to maintain records detailing the method of procurement, contractor selection or rejection, and the basis for the contract price.

In subgrant agreements, the DPS requires competitive bids, and for all purchases over \$2,500, the subgrantees agree to provide solicitations of price quotations from at least three vendors or copies of the Request for Proposal and vendor lists as appropriate. Of the 13 subgrant agreements reviewed, 7 agreements included this specific requirement regarding competitive bids for purchases over \$2,500 using solicitations of price quotations, but these 7 subgrantees did not follow this process or a sole source procurement was involved. Only 1 of the 13 involved a State Agency which was required to follow the State procurement procedures. The five remaining subgrant agreements did not clearly state the competitive bids requirement. Those agreements required the subgrantee to certify that it had standard policies and procedures in place that govern the subgrantee's purchasing, contracting, and inventory control in accordance with Office of Management and Budget (OMB), Code of Federal Regulations, and other Federal requirements.

As a result, DPS cannot ensure that the amounts paid to vendors are justified, fair, and reasonable; or whether the contract or purchase order could have been awarded to an equally competent vendor at a lesser cost.

Monitoring of Subgrantee Activities

DPS' monitoring efforts did not ensure subgrantees complied with Federal requirements and achieved program performance goals for the FYs 2010 and 2011 SHSP grants.

A DPS official reported that approximately 104 programmatic desk-monitoring reviews had been conducted for FY 2010 and 12 for FY 2011, at the time the subgrantee requested reimbursement. Although totals reported were not validated, it was confirmed that grant files for 11 of 13 agreements included



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evidence of programmatic desk reviews. However, none of the 13 files showed any on-site monitoring. The absence of on-site monitoring can result in the types of inventory and procurement issues we identified.

Also, for the 10 subgrantees visited, Quarterly Status/Progress Reports were not included in the grant files for 4 subgrantees. Along with this, the files for 4 subgrantees did not contain a copy of the risk assessment/DPS Risk Management Survey report.

According to DPS officials, staff shortages have prevented DPS from conducting the desired number of on-site monitoring visits. On July 31, 2013, DPS told us that no on-site monitoring of FYs 2010 or 2011 SHSP subgrantees had occurred. DPS also reported that DEMHS personnel perform a comprehensive review of the subgrantee grant file to ensure that all documentation is complete and current and to note any file irregularities found. The review serves to evaluate progress implementation and timelines; determines the subgrantee's achievements and potential problems faced in implementing the project; and assesses the status of Quarterly Performance and Financial Progress Reports and the rate of expenditure of funds. However, these requirements were not clearly stated in its *Subrecipient Monitoring Guide*.

The CFR, OMB, FEMA, and the SAA have specific guidance on grantee monitoring requirements.

- Title 44 CFR 13.40, *Monitoring and reporting program performance: (a) Monitoring by grantees*. Grantees are responsible for managing the day-to-day operations of grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Grantee monitoring must cover each program, function, or activity.
- OMB Circular A-133, *Audits of States, Local Governments, and Non-profit Organizations*, and its *2013 Compliance Supplement, Part 3-M*: Grantees are responsible for monitoring subgrantee's use of Federal awards through reporting, site visits, regular contact, or other means. Grantee monitoring should provide reasonable assurance that the subgrantee administers Federal awards in compliance with laws and regulations, as well as the provisions of contracts or grant agreements.
- FEMA, *Homeland Security Grant Program Guidance and Application Kit*: Grant recipients are responsible for monitoring award activities, including subawards, to provide reasonable assurance that the Federal award is administered in compliance with requirements.



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The State of Vermont had guidance for monitoring the use of Federal grant funds awarded to subgrantees. DEMHS and the department's Grants Management Unit within the Administration Division coordinate to verify that the subgrantees (including State Agencies) are in compliance with all State and Federal requirements. DEMHS is responsible for programmatic monitoring, and the Administration Division is responsible for grants management including financial monitoring. The three methods of monitoring are telephone audits, desk or office audits, and on-site or field audits.

Although the state of Vermont has guidance for monitoring the use of Federal grant funds, our review showed no evidence that on-site monitoring had been conducted. As a result, the State cannot ensure subgrantees are administering FYs 2010 and 2011 SHSP grants funds in compliance with applicable Federal requirements and are achieving performance goals.

According to DEMHS, the staff is concluding its process to hire for open positions within the Homeland Security Unit. One of those positions will be tasked with on-site monitoring, and that individual will be responsible for checking progress and performance while on site. The DPS Auditor will continue to check the financial management systems for proper asset reporting and check the subgrantee processes for inventory management. In both instances, monitoring will be documented.

Recommendations

We recommend the Assistant Administrator, Grant Programs Directorate, Federal Emergency Management Agency:

Recommendation #1:

Develop and provide States with consistent and comprehensive measurement tools that include baselines for measuring and demonstrating progress toward enhancing their level of preparedness through the use of State Homeland Security Program grant funds.

Recommendation #2:

Evaluate the reasonableness of the requirement that State Administrative Agencies obligate pass through grant funds within 45 days of FEMA's award date. If the requirement is not reasonable, prepare a legislative proposal to revise the requirement.



Recommendation #3:

Require DPS to review and update its obligation and approval process to identify ways to shorten the process so subgrantees have sufficient time to procure and spend grant funds.

Recommendation #4:

Require DPS to ensure that subgrantees implement an inventory control policy and maintain property records that comply with 44 CFR § 13.32, as required.

Recommendation #5:

Require DPS to clarify the FY 2010 requirement to mark all equipment "Purchased with funds provided by the U.S. Department of Homeland Security." The State should determine which assets are deemed practicable to mark and ensure that the requirement is applied consistently.

Recommendation #6:

Require DPS to provide oversight of subgrantees' procurement practices to ensure competitive bidding for grant transactions.

Recommendation #7:

Require DPS to conduct on-site monitoring or other methods of monitoring programs, functions, and activities for State Homeland Security Program grants and clarify monitoring guidance.

Recommendation #8:

Require on-site monitors to document their reviews to ensure compliance with Federal inventory and procurement requirements and progress toward achieving performance goals.

Management Comments and OIG Analysis

FEMA's Response to Recommendation #1: FEMA concurred with this recommendation and has addressed the OIG recommendation for States to establish SMART goals and objectives. These goals will enable states and territories to measure improvements systematically in first responder capabilities and statewide preparedness by requiring states to use a set of tools including the THIRA, SPR, and Investment Justifications. Strategy updates are encouraged but



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not required as the THIRA, SPR, and Investment Justification methodology provide the goals and assessment of progress against those goals.

OIG Analysis: Although we did not review the THIRA process, we consider FEMA's actions responsive to the intent of this recommendation. This recommendation is now resolved and closed.

FEMA's Response to Recommendation #2: FEMA concurred with this recommendation and has evaluated the requirement that State Administrative Agencies obligate pass through grant funds within 45 days of the grant award date and believes that it is reasonable. FEMA has addressed this through requirements for new or improved policies and procedures for obligation of funds within the 45-day timeframe and through the provision of grants management technical assistance. In light of reduced periods of performance instituted in FY 2011 to expedite project completion, FEMA believes that proposing legislative changes to lengthen the obligation timeframe would be counterproductive to reducing unobligated balances, an issue that has received intense Congressional scrutiny. For these reasons, FEMA does not intend to submit legislative proposals to do so.

OIG Analysis: We consider FEMA's actions responsive to the intent of this recommendation; this recommendation is now resolved and closed.

FEMA's Response to Recommendation #3: FEMA concurred with this recommendation and will require DPS to review and update its obligation and approval process to identify ways to shorten the process so subgrantees have sufficient time to procure and spend grant funds.

OIG Analysis: We consider FEMA's proposed actions responsive to the intent of this recommendation. This recommendation will remain open and resolved pending completion of the corrective actions to review and update its obligation and approval process. Estimated completion date is June 30, 2014.

FEMA's Response to Recommendation #4: FEMA concurred with this recommendation and will require DPS to update its subgrantee agreements to include an inventory control policy and property record maintenance that comply with 44 CFR § 13.32.

OIG Analysis: We consider FEMA's proposed actions responsive to the intent of this recommendation. This recommendation will remain open and resolved pending completion of the corrective actions identified above. Estimated completion date is June 30, 2014.



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FEMA's Response to Recommendation #5: FEMA concurred with this recommendation and will require DPS to clarify the requirement to mark all equipment that was purchased with FY 2010 HSGP funding as "Purchased with funds provided by the U.S. Department of Homeland Security". The State should determine which assets are deemed practicable to mark and ensure that the requirement is applied consistently. Language regarding equipment marking is not included in the FY 2011 and FY 2012 HSGP Funding Opportunity Announcements and is not applicable.

OIG Analysis: We consider FEMA's proposed actions responsive to the intent of this recommendation. This recommendation will remain open and resolved pending completion of the corrective actions to clarify the requirement to mark all equipment purchased with FY 2010 HSGP funding. Estimated completion date is June 30, 2014.

FEMA's Response to Recommendation #6: FEMA concurred with this recommendation and will require DPS to update its subgrantee agreements to include provisions that require grant-funded procurements comply with 44 CFR 13.36, *Procurement*.

OIG Analysis: We consider FEMA's proposed actions responsive to the intent of this recommendation. This recommendation will remain open and resolved pending completion of the corrective actions to update its subgrantee agreements. Estimated completion date is June 30, 2014.

FEMA's Response to Recommendation #7: FEMA concurred with this recommendation and will require DPS to update its subgrantee monitoring policy to include a monitoring schedule that complies with 44 CFR 13.40 (a), *Monitoring and Reporting Program Performance*.

OIG Analysis: Since DPS is hiring for an open position tasked with on-site monitoring, and that individual will be responsible for checking progress and performance while on site, we consider FEMA's proposed actions responsive to the intent of this recommendation. This recommendation will remain open and resolved pending completion of the corrective actions to update its subgrantee monitoring policy. Estimated completion date is June 30, 2014.

FEMA's Response to Recommendation #8: FEMA concurred with this recommendation and will require DPS to update its subgrantee monitoring policy to include compliance with inventory and procurement requirements and progress toward achieving performance goals that complies with 44 CFR 13.40 (a), *Monitoring and Reporting Program Performance*. The monitoring plan will include requirements for the State to document its reviews to ensure



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compliance with Federal inventory and procurement requirements and progress toward achieving performance goals.

OIG Analysis: Since DPS is hiring for an open position tasked with on-site monitoring, and that individual will be responsible for checking progress and performance while on site, we consider FEMA's proposed actions responsive to the intent of this recommendation. This recommendation will remain open and resolved pending completion of the corrective actions identified above. Estimated completion date is June 30, 2014.



Appendix A Objectives, Scope, and Methodology

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. Public Law 110-53, *Implementing Recommendations of the 9/11 Commission Act of 2007*, requires DHS OIG to audit individual States' management of State Homeland Security Program (SHSP) and Urban Area Security Initiative grants. This report responds to the reporting requirement for the State of Vermont.

The audit objectives were to determine whether the State distributed, administered, and spent State Homeland Security Program grant funds strategically, effectively, and in compliance with laws, regulations, and guidance. We also addressed the extent to which funds awarded enhanced the ability of State grantees to prevent, prepare for, protect against, and respond to natural disasters, acts of terrorism, and other manmade disasters.

The entire Homeland Security Grant Program and its interrelated grant programs fund a range of preparedness activities, including planning, organization, equipment purchase, training, exercises, and management and administration costs. However, we reviewed only SHSP funding of equipment and programs for compliance. Appendix C provides additional information on these grant programs.

The scope of the audit included the following:

Vermont Homeland Security Grant Program Awards FYs 2010 Through 2012				
Program	FY 2010	FY 2011	FY 2012	Total
State Homeland Security Program	\$6,613,200	\$5,137,205	\$2,801,316	\$14,551,721
Urban Area Security Initiative	\$0	\$0	\$0	\$0
Metropolitan Medical Response System	\$0	\$0	\$0	\$0
Operation Stonegarden	\$324,204	\$330,254	\$315,106	\$969,564
Citizens Corps Program	\$108,684	\$86,748	\$0	\$195,432
Total HSGP	\$7,046,088	\$5,554,207	\$3,116,422	\$15,716,717

Source: Grant Programs Directorate, FEMA.



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To answer our audit objectives, we reviewed FYs 2010–12 documentation supporting management of grant funds, reviewed procurement and inventory documentation, inspected selected equipment purchased with grant funds, and interviewed State and local officials directly involved with Vermont’s management of SHSP. We also visited the SAA and 10 subgrantees that received SHSP funds.

We reviewed a judgmental sample of the grant obligations representing approximately 12 percent of the grant agreements for FY 2010 to determine whether the expenditures were supported and allowable under the grants. We did not select any grant obligations for the FY 2011 agreements because the amounts were so small compared with those for FY 2010. No funds had been obligated for FY 2012. We judgmentally selected specific equipment to observe at the local sites where it was located.

State Agency

- Vermont Criminal Justice Training Council

Local Jurisdictions and First Responders

- Berlin Volunteer Fire Department, Inc.
- City of Burlington Fire Department
- Town of Barre Fire Department
- Town of Hartford Police Department
- Town of Randolph Fire Department
- Town of Shelburne Police Department
- Town of Springfield Police Department
- Town of Windsor Police Department
- Vermont Center for Geographic Information, Inc.

We conducted this performance audit between April 2013 and August 2013, 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 B Management Comments to the Draft Report

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



FEMA

JAN 16 2014

MEMORANDUM FOR: Mark Bell
Acting Assistant Inspector General for Audits
Office of Inspector General (OIG)
Department of Homeland Security

FROM: *for* David J. Kaufman *Ther D C...*
Associate Administrator for
Policy, Program Analysis and International Affairs

SUBJECT: Federal Emergency Management Agency (FEMA) Response to
Draft Report: "Vermont's Management of State Homeland
Security Program Grants Awarded During Fiscal Years 2010
Through 2012" OIG Project No. 13-129-AUD-FEMA

Thank you for the opportunity to comment on OIG Draft Report, "Vermont's Management of State Homeland Security Program Grants Awarded During Fiscal Years 2010 Through 2012" OIG Project No. 13-129-AUD-FEMA. The findings in the report will be used to strengthen the effectiveness and efficiency of how we execute and measure our program. We recognize the need to continue to improve the process, including addressing the recommendations raised in this report. The following are our response to the eight (8) recommendations for implementation, of which, FEMA concurs with all eight (8) recommendations.

Recommendation #1: We recommend that the Assistant Administrator, Grant Programs Directorate, develop and provide States with consistent and comprehensive measurement tools that include baselines for measuring and demonstrating progress toward enhancing their level of preparedness through the use of State Homeland Security Program (SHSP) grant funds.

Response: Concur. The integrated preparedness system has its basis in the strategic plan and planning process. As part of this plan and process, OIG has recommended that FEMA help states, territories and urban areas establish measurable goals and objectives that will enable them to systematically measure improvements in first responder capabilities and statewide preparedness. FEMA has established and implemented a system to do exactly that, as described below.

Measuring Grant Effectiveness

As part of the National Preparedness System, FEMA has developed and is implementing performance assessments that measure progress toward achieving the National Preparedness Goal. FEMA's strategy is to base assessments on the principles that the Nation needs to

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understand existing risks, use those risks to determine required capabilities, assess current capability levels against those requirements, and track its progress in closing identified capability gaps.

On August 29, 2013, FEMA released a consistent methodology for determining risks in the Comprehensive Preparedness Guide 201: Threat and Hazard Identification and Risk Assessment (THIRA) Guide (CPG-201) Second Edition. CPG-201 details a four-step process jurisdictions can use to achieve desired outcomes and capability targets for each of the core capabilities. This approach allows a jurisdiction to establish its own capability targets based on the risks it faces.

On December 31, 2012, states, territories, and major urban areas receiving Homeland Security Grant Program (HSGP) funds were required to submit their THIRAs to FEMA. Once each jurisdiction has determined capability targets through the THIRA process, it estimates its current capability levels against those targets. Also in 2012, states and territories were required to submit State Preparedness Reports (SPRs) to FEMA. The THIRA and SPR processes are scalable to allow sub-jurisdictions, sub-grantees and subject matter experts to provide input to the state or territory. In conjunction, the THIRA results and the SPR identify capability needs and gaps. The THIRA and SPR results highlight gaps in capability and the progress of grantees in closing those gaps over time. FEMA reports the results of the capability assessments annually in the National Preparedness Report (NPR).

Sustaining, Building and Delivering Capabilities

Having estimating capability requirements, the next component of the National Preparedness System is to build and sustain capabilities. This step ties grant investments directly to needs and shortfalls. Grantees address documented capability requirements and gaps in their grant applications. Within the Investment Justifications (IJ) submitted in the grant application, grantees must specifically identify the core capability or capabilities, the priority of the core capability as well as the capability gaps noted in their SPR that investment intends to address. In addition, grantees must identify the specific outcome(s) of each investment. FEMA verifies completion of the investment/projects through its programmatic monitoring and the Biannual Strategy Implementation Report (BSIR). Since the period of performance for the HSGP is two years, a time limit is set for completion of the project once it is funded.

FEMA addressed the OIG recommendation for States to establish SMART goals and objectives that will enable states and territories to systematically measure improvements in first responder capabilities and statewide preparedness by requiring states to use a set of tools including the THIRA, SPR, and IJs. Strategy updates are encouraged but not required as the THIRA, SPR, and IJ methodology provide the goals and assessment of progress against those goals.

Based on this information, FEMA requests that this recommendation be resolved and closed.

Recommendation #2: We recommend that the Assistant Administrator, Grant Programs Directorate, evaluate the reasonableness of the requirement that State Administrative Agencies obligate pass through grant funds within 45 days of FEMA's award date. If the requirement is not reasonable, prepare a legislative proposal to revise the requirement.



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Response: Concur. FEMA has evaluated the requirement that State Administrative Agencies obligate pass through grant funds within 45 days of the grant award date and believes that it is reasonable. The OIG has made recommendations in this regard in a number of states. FEMA has addressed this through requirements for new or improved policies and procedures for obligation of funds within the 45-day timeframe and through the provision of grants management technical assistance. In light of reduced periods of performance instituted in FY 2011 to expedite project completion, FEMA believes that proposing legislative changes to lengthen the obligation timeframe would be counterproductive to reducing unobligated balances, an issue that has received intense Congressional scrutiny. For these reasons, FEMA does not intend to submit legislative proposals to do so.

Accordingly, FEMA requests that this recommendation be resolved and closed.

Recommendation #3: We recommend that the Assistant Administrator, Grant Programs Directorate, require Department of Public Safety (DPS) to review and update its obligation and approval process to identify ways to shorten the process so subgrantees have sufficient time to procure and spend grant funds.

Response: Concur. FEMA will require DPS within 90 days of the release of the final report to review and update its obligation and approval process to identify ways to shorten the process so sub-grantees have sufficient time to procure and spend grant funds.

FEMA requests that this recommendation be resolved and open pending completion of the corrective action plan.

Estimated Completion Date (ECD): June 30, 2014

Recommendation #4: We recommend that the Assistant Administrator, Grant Programs Directorate, require DPS to ensure that subgrantees implement an inventory control policy and maintain property records that comply with 44 CFR § 13.32, as required.

Response: Concur. FEMA will require DPS within 90 days of the release of the final report to update its subgrantee agreements to include an inventory control policy and property record maintenance that comply with 44 CFR § 13.32.

FEMA requests that this recommendation be resolved and open pending completion of the corrective action plan.

Estimated Completion Date (ECD): June 30, 2014

Recommendation #5: We recommend that the Assistant Administrator, Grant Programs Directorate, require DPS to clarify the FY 2010 requirement to mark all equipment "Purchased with funds provided by the U.S. Department of Homeland Security." The State should determine which assets are deemed practicable to mark and ensure that the requirement is applied consistently.



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Response: Concur. FEMA will require DPS to clarify the requirement to mark all equipment “Purchased with funds provided by the U.S. Department of Homeland Security” that was purchased with FY 2010 HSGP funding. The State should determine which assets are deemed practicable to mark and ensure that the requirement is applied consistently. Language regarding equipment marking is not included in the FY 2011 and FY 2012 HSGP Funding Opportunity Announcements and is not applicable.

FEMA requests that this recommendation be resolved and open pending completion of the corrective action plan.

Estimated Completion Date (ECD): June 30, 2014

Recommendation #6: We recommend that the Assistant Administrator, Grant Programs Directorate, require DPS to provide oversight of subgrantees’ procurement practices to ensure competitive bidding for grant transactions.

Response: Concur. FEMA will require DPS to update its sub-grantee agreements within 90 days of the release of the final report to include provisions that require grant-funded procurements comply with 44 CFR 13.36 Procurement.

FEMA requests that this recommendation be resolved and open pending completion of the corrective action plan.

Estimated Completion Date (ECD): June 30, 2014

Recommendation #7: We recommend that the Assistant Administrator, Grant Programs Directorate, require DPS to conduct on-site monitoring or other methods of monitoring programs, functions, and activities for State Homeland Security Program grants and clarify monitoring guidance.

Response: Concur. FEMA will require DPS to update its sub-grantee monitoring policy to include a monitoring schedule that complies with 44 CFR 13.40 (a) Monitoring and Reporting Program Performance within 90 days of the release of the final report.

FEMA requests that this recommendation be resolved and open pending completion of the corrective action plan.

Estimated Completion Date (ECD): June 30, 2014

Recommendation #8: We recommend that the Assistant Administrator, Grant Programs Directorate, require on-site monitors to document their reviews to ensure compliance with Federal inventory and procurement requirements and progress toward achieving performance goals.



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Response: Concur. FEMA will require DPS update its sub-grantee monitoring policy to include compliance with inventory and procurement requirements and progress toward achieving performance goals that complies with 44 CFR 13.40 (a) Monitoring and Reporting Program Performance. The monitoring plan will include requirements for the state to document its reviews to ensure compliance with Federal inventory and procurement requirements and progress toward achieving performance goals.

FEMA requests that this recommendation be resolved and open pending completion of the corrective action plan.

Estimated Completion Date (ECD): June 30, 2014

Again, we thank you for the work that you and your team did to inform us of measures we can take to enhance the program's overall effectiveness. We look forward to OIG's final report for "Vermont's Management of State Homeland Security Program Grants Awarded During Fiscal Years 2010 Through 2012". Please direct any questions regarding this response to Gary McKeon, FEMA's Chief Audit Liaison, at 202-646-1308.



Appendix C

Homeland Security Grant Program

The HSGP provides Federal funding to help State and local agencies enhance capabilities to prevent, deter, respond to, and recover from terrorist attacks, major disasters, and other emergencies. The HSGP 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 the following:

- **The 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.
- **The 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. Funding is expended based on the Urban Area Homeland Security Strategies.

In addition, the HSGP includes other interrelated grant programs with similar purposes. Depending on the fiscal year, these programs include the following:

- Operation Stonegarden,
- Metropolitan Medical Response System (through FY 2011), and
- Citizen Corps Program (through FY 2011).



Appendix D

Threat and Hazard Identification and Risk Assessment

The National Preparedness System establishes the process to define and achieve specific capability targets and meet the National Preparedness Goal. One of the six components of the National Preparedness System includes identifying and assessing risk. The Threat and Hazard Identification and Risk Assessment (THIRA) provides a comprehensive approach for identifying and assessing risks and associated impacts, using the core capabilities identified in the National Preparedness Goal and employing the following five-step process:

1. Identify threats and hazards;
2. Give threats and hazards context (assess vulnerability, how they affect the community);
3. Examine core capabilities using the threats and hazards (estimate consequences, impacts to the community);
4. Set capability targets; and
5. Apply the results (use results for planning and preparedness activities, identify means to deliver target level of capability).

THIRA submission is required of all 56 states and territories receiving Homeland Security Grant Program and Emergency Management Performance Grant funds and 31 eligible urban areas. The first THIRA submission was due December 31, 2012. Subsequent submissions will be an annual performance requirement for FEMA preparedness grant awards.

In addition to the THIRA, states and territories receiving FEMA preparedness grants are required to submit a State Preparedness Report annually. FEMA officials state that THIRA results and the State Preparedness Report will provide a quantitative summary of preparedness, document current capabilities and potential shortfalls, and set priorities for addressing shortfalls. FEMA officials also state that the State Preparedness Report results will be used by the states to identify funding requirements and set priorities for subgrantee project applications. The grant application (Investment Justification) must demonstrate how proposed projects address gaps and deficiencies in delivering one or more core capabilities outlined in the National Preparedness Goal, and according to FEMA officials, must address capability gaps reported in the State Preparedness Report.



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FEMA officials said that the FY 2013 Homeland Security Grant Program funding announcement will require applicants to map proposed investments to specific core capabilities and capability gaps identified in the State Preparedness Reports, linking investments to actions that build and sustain capabilities aligned with the National Preparedness Goal. We have not had the opportunity to audit this process or the outcomes for this State.



Appendix E

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Appendix F

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