

GOVERNOR'S OFFICE OF HOMELAND SECURITY
AND EMERGENCY PREPAREDNESS
PUBLIC ASSISTANCE PROGRAM
HURRICANES GUSTAV AND IKE
JANUARY 2010 - MARCH 2010



AGREED-UPON PROCEDURES REPORT
ISSUED AUGUST 11, 2010

**LEGISLATIVE AUDITOR
1600 NORTH THIRD STREET
POST OFFICE BOX 94397
BATON ROUGE, LOUISIANA 70804-9397**

LEGISLATIVE AUDIT ADVISORY COUNCIL

SENATOR EDWIN R. MURRAY, CHAIRMAN
REPRESENTATIVE NOBLE E. ELLINGTON, VICE CHAIRMAN

SENATOR NICHOLAS "NICK" GAUTREAUX
SENATOR WILLIE L. MOUNT
SENATOR BEN W. NEVERS, SR.
SENATOR JOHN R. SMITH
REPRESENTATIVE CAMERON HENRY
REPRESENTATIVE CHARLES E. "CHUCK" KLECKLEY
REPRESENTATIVE ANTHONY V. LIGI, JR.
REPRESENTATIVE CEDRIC RICHMOND

LEGISLATIVE AUDITOR
DARYL G. PURPERA, CPA, CFE

DIRECTOR OF RECOVERY ASSISTANCE
JOHN L. MOREHEAD, CPA

Under the provisions of state law, this report is a public document. A copy of this report has been submitted to the Governor, to the Attorney General, and to other public officials as required by state law. A copy of this report has been made available for public inspection at the Baton Rouge office of the Legislative Auditor.

This document is produced by the Legislative Auditor, State of Louisiana, Post Office Box 94397, Baton Rouge, Louisiana 70804-9397 in accordance with Louisiana Revised Statute 24:513. Six copies of this public document were produced at an approximate cost of \$17.82. This material was produced in accordance with the standards for state agencies established pursuant to R.S. 43:31. This report is available on the Legislative Auditor's Web site at www.la.la.gov. When contacting the office, you may refer to Agency ID No. 7430 or Report ID No. 52100003 for additional information.

In compliance with the Americans With Disabilities Act, if you need special assistance relative to this document, or any documents of the Legislative Auditor, please contact Wayne "Skip" Irwin, Administration Manager, at 225-339-3800.

	Page
Executive Summary	3
Independent Accountant's Report on the Application of Agreed-Upon Procedures	5
Management's Response	Appendix A

We performed agreed-upon procedures to assist the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) in evaluating the documentation submitted by sub-grantees for reimbursement under the Public Assistance program. For the period January 1, 2010, through March 31, 2010, we reviewed 350 initial expense reviews totaling \$35,211,453 and noted potential questioned costs of \$4,778,525. We also re-reviewed 90 reimbursement requests totaling \$17,566,775 that had been returned to GOHSEP disaster recovery specialists because of some deficiency in documentation (subsequent reviews) and noted potential questioned costs of \$605,033.

This page is intentionally blank.



LOUISIANA LEGISLATIVE AUDITOR
DARYL G. PURPERA, CPA, CFE

June 21, 2010

Independent Accountant's Report on the
Application of Agreed-Upon Procedures

MARK A. COOPER, DIRECTOR
GOVERNOR'S OFFICE OF HOMELAND
SECURITY AND EMERGENCY PREPAREDNESS
Baton Rouge, Louisiana

We performed the procedures enumerated below for the first quarter of 2010 (January 1, 2010, through March 31, 2010), which were requested and agreed to by management of the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), solely to assist you in fulfilling your responsibility for implementing the Public Assistance (PA) program. GOHSEP management is responsible for the day-to-day operations of PA. This agreed-upon procedures engagement was conducted in accordance with the attestation standards established by the American Institute of Certified Public Accountants and the applicable attestation standards contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. The sufficiency of these procedures is solely the responsibility of management of GOHSEP. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

This report is a summary of the findings that we present to GOHSEP management on a daily basis.

Background

GOHSEP's documentation review process begins with a sub-grantee submitting a reimbursement request and supporting documentation. A disaster recovery specialist reviews the request and gathers any additional documentation deemed necessary to fully support the request. The disaster recovery specialist documents the results of the review on an expense review form. The disaster recovery specialist then submits the expense review form and all supporting documentation to the Louisiana Legislative Auditor's document review team to be reviewed under our agreed-upon procedures engagement.

The document review team inspects the expense review form and supporting documentation to identify any potential questioned costs. Unsupported costs are considered potential questioned costs and are reported. The expense review form and supporting documentation are returned to the disaster recovery specialist for resolution when deficiencies are noted. This procedure allows GOHSEP the opportunity to correct deficiencies before final payment thus eliminating questioned costs.

Since it may take several months to resolve certain questioned amounts, we do not report whether deficiencies have been resolved in our quarterly reports. However, GOHSEP management requires the disaster recovery specialists to resolve all deficiencies noted by the document review team before payment with very limited exception. This process greatly reduces the risk that reimbursements will be paid that are not fully documented. Final determination of questioned costs will be made in the closeout review process.

Public Assistance

Disaster recovery specialists use expense reviews to document deficiencies in reimbursement claims submitted by sub-grantees. We inspected 440 expense reviews as prepared by the GOHSEP disaster recovery specialists totaling \$52,778,228 along with supporting documentation. The overall results of our inspection are as follows:

Review Type	Number of Reviews	Value	Questioned Amount
Initial	350	\$35,211,453	\$4,778,525
Subsequent*	90	17,566,775	605,033
Total	440	\$52,778,228	\$5,383,558

*Re-reviews of reimbursement requests that have been returned to GOHSEP disaster recovery specialists because of some deficiency in documentation identified by our review

For all large projects [as defined in 44 CFR 206.203(c)(1)], we inspected the expense reviews performed by the disaster recovery specialists and the supporting documentation to confirm that the reimbursement claims were in compliance with federal and state guidelines and were properly documented. We developed findings for the 440 expense reviews inspected during this period. Each finding was presented to management.

PROCEDURE: When the work undertaken by the sub-grantee was accomplished through the use of contractors, we inspected the expense reviews and supporting documentation and confirmed whether:

- (1) documentation provided in the sub-grantees’ reimbursement requests was for work contained in the scope of work for that project;
- (2) line items and/or project cost over-runs that were within the scope of the project worksheets were identified;

- (3) costs listed on the contract summaries were supported with invoices, receipts, lease agreements, and/or contracts; and
- (4) each contract was procured in accordance with federal and/or state laws.

FINDING:

As a result of our procedures, we identified 85 initial reviews and 16 subsequent reviews where the work was accomplished by a contractor. On those reviews, the disaster recovery specialists indicated total documented expenses of \$31,633,751.

We did not detect deficiencies in 77 of the 101 expense reviews. However, we noted deficiencies in 21 initial reviews containing documented expenses of \$9,402,836 and in three subsequent reviews containing documented expenses of \$3,153,811. When deficiencies were noted, the expense reviews and the supporting documentation were returned to the disaster recovery specialists for additional information or further clarification.

We placed the deficiencies from the 21 initial reviews and the three subsequent reviews into one of the following categories:

- Five deficiencies related to expenses that lacked documentation supporting the scope of work.
- Two deficiencies related to line items or project cost over-runs within the scope of work that were not identified.
- Seventeen deficiencies related to costs listed on contract summaries that lacked supporting documentation.
- Fifteen deficiencies related to files that lacked documentation to support procurement compliance with federal and/or state laws.

Since an expense review may have contained multiple deficiencies, there are more deficiencies than reviews.

Had we not detected these deficiencies, they could have resulted in questioned costs totaling \$3,189,858 (6.04% of the total amount reviewed or 10.08% of the documented expenses for this category).

PROCEDURE:

When the work undertaken by the sub-grantees was accomplished through the use of the sub-grantees' equipment, we inspected supporting documentation included with the expense reviews to determine whether:

- (1) documentation provided in the sub-grantees' reimbursement requests was for work contained in the scope of work for that project;

- (2) line items and/or project cost over-runs that were within the scope of the project worksheets were identified;
- (3) an operator was listed for each piece of equipment contained in the force account equipment summaries;
- (4) equipment hours claimed on the force account equipment summaries agreed with the employee hours claimed on the force account labor summaries; and
- (5) equipment rates used in calculating the reimbursement amount were in accordance with the FEMA equipment rate schedule or a locally adopted and approved equipment rate schedule.

FINDING:

As a result of our procedures, we identified 70 initial reviews and 22 subsequent reviews where the work was accomplished by using the sub-grantees' equipment. On those reviews, the disaster recovery specialists indicated total documented expenses of \$7,409,159.

We did not detect deficiencies in 80 of the 92 expense reviews. However, we noted deficiencies in 11 initial reviews containing documented expenses of \$1,562,482 and one subsequent review containing documented expenses of \$36,377. When deficiencies were noted, the expense reviews and the supporting documentation were returned to the disaster recovery specialists for additional information or further clarification.

We placed the deficiencies from the 11 initial reviews and one subsequent review into one of the following categories:

- One deficiency related to an operator not being listed for each piece of equipment.
- Seven deficiencies related to equipment hours listed on force account equipment summaries that did not agree with the employees' hours claimed on the force account labor summaries.
- Four deficiencies related to equipment rates that were not in accordance with FEMA rates or locally adopted and approved rates.

Had we not detected these deficiencies, they could have resulted in questioned costs totaling \$799,689 (1.52% of the total amount reviewed or 10.79% of the documented expenses for this category).

PROCEDURE:

When the work undertaken by the sub-grantees was accomplished through the use of the sub-grantees' employees, we inspected the expense reviews and supporting documentation to determine whether:

- (1) documentation provided in the sub-grantees' reimbursement requests was for work contained in the scope of work for that project worksheet;
- (2) line items and/or project cost over-runs that were within the scope of the project worksheets were identified;
- (3) a disaster-related job description for each employee was contained in the force account labor summaries;
- (4) employee hours listed on the force account labor summaries were in accordance with the sub-grantees' overtime policies and that only hours spent conducting work that was a direct result of the disaster were claimed for reimbursement; and
- (5) fringe benefit calculations prepared by the sub-grantees included only eligible elements and were mathematically accurate.

FINDING:

As a result of our procedures, we identified 98 initial reviews and 30 subsequent reviews where the work was accomplished using the sub-grantees' employees. On those reviews, the disaster recovery specialists indicated total documented expenses of \$7,589,155.

We did not detect deficiencies in 107 of the 128 expense reviews. However, we noted deficiencies in 18 initial reviews containing documented expenses of \$1,806,003 and three subsequent reviews containing documented expenses of \$214,942. When deficiencies were noted, the expense reviews and the supporting documentation were returned to the disaster recovery specialists for additional information or further clarification.

We placed the deficiencies from the 18 initial reviews and the three subsequent reviews into one of the following categories:

- Five deficiencies related to labor costs that lacked documentation supporting the scope of work.
- Three deficiencies related to costs listed on labor summaries that lacked supporting documentation.
- Two deficiencies related to disaster-related job descriptions for each employee that were not listed on the labor summaries.
- Eleven deficiencies related to employee hours listed on labor summaries that did not agree with the sub-grantees' overtime policies or hours claimed that were not for disaster-related work.

- Seven deficiencies related to fringe benefit calculations that contained ineligible items or mathematical inaccuracies.

Since an expense review may have contained multiple deficiencies, there are more deficiencies than reviews.

Had we not detected these deficiencies, they could have resulted in questioned costs totaling \$758,548 (1.44% of the total amount reviewed or 10.00% of the documented expenses for this category).

PROCEDURE: When the sub-grantees purchased or used materials from inventory to accomplish the work detailed in the scope of the project worksheets, we inspected the expense reviews and related documentation to determine whether:

- (1) documentation provided in the sub-grantees' reimbursement requests was for work contained in the scope of work for that project;
- (2) line items and/or project cost over-runs that were within the scope of the project worksheets were identified;
- (3) costs listed on the material summaries were supported with invoices, receipts, lease agreements, and/or contracts; and
- (4) materials were procured in accordance with federal and/or state laws.

FINDING: As a result of our procedures, we identified 67 initial reviews and 17 subsequent reviews where the sub-grantees used materials from inventory or purchased materials to accomplish the work. On those reviews, the disaster recovery specialists indicated total documented expenses of \$4,681,743.

We did not detect deficiencies in 76 of the 84 expense reviews. However, we noted deficiencies in eight initial reviews containing documented expenses of \$2,717,460. When deficiencies were noted, the expense reviews and the supporting documentation were returned to the disaster recovery specialists for additional information or further clarification.

We placed the deficiencies from the eight initial reviews into one of the following categories:

- Four deficiencies related to expenses that lacked documentation supporting the scope of work.
- Seven deficiencies related to costs listed on materials summaries that lacked supporting documentation.

- Three deficiencies related to files that lacked documentation to support procurement compliant with federal and/or state laws.

Since an expense review may have contained multiple deficiencies, there are more deficiencies than reviews.

Had we not detected these deficiencies, they could have resulted in questioned costs totaling \$128,470 (0.24% of the total amount reviewed or 2.74% of the documented expenses for this category).

PROCEDURE: When the work undertaken by the sub-grantees was accomplished through the use of rented equipment, we inspected the expense reviews and related documentation to determine whether:

- (1) documentation provided in the sub-grantees' reimbursement requests was for work contained in the scope of work for that project;
- (2) line items and/or project cost over-runs that were within the scope of the project worksheets were identified;
- (3) costs listed on the rented equipment summaries were supported with invoices, receipts, lease agreements, and/or contracts; and
- (4) equipment was procured in accordance with federal and/or state laws.

FINDING: As a result of our procedures, we identified 30 initial reviews and five subsequent reviews where rented equipment was used to accomplish the work on those reviews, disaster recovery specialists indicated total documented expenses of \$1,464,419.

We did not detect deficiencies in 30 of the 35 expense reviews. However, we noted deficiencies in four initial reviews containing documented expenses of \$671,297 and one subsequent review containing documented expenses of \$7,078. When deficiencies were noted, the expense reviews and the supporting documentation were returned to the disaster recovery specialists for additional information or further clarification.

We placed the deficiencies from three initial reviews and the subsequent review into one of the following categories:

- Two deficiencies related to expenses that lacked documentation supporting the scope of work.
- Two deficiencies related to costs listed on materials summaries that lacked supporting documentation.

- One deficiency related to a file that lacked documentation to support procurement compliant with federal and/or state laws.

Since an expense review may have contained multiple deficiencies, there are more deficiencies than reviews.

Had we not detected these deficiencies, they could have resulted in questioned costs totaling \$506,993 (0.96% of the total amount reviewed or 34.62% of the documented expenses for this category). The remaining deficiency related to effective writing/communication and would not have resulted in any questioned costs.

PROCEDURE: Confirm that the certification documents were dated on or after the creation of the project worksheets or that the sub-grantee and GOHSEP entered into a Memorandum of Understanding.

FINDING: We inspected the reimbursement requests included in 242 expense review form packages. We confirmed that all packages had certification documentation dated after the creation of the project worksheet or that the sub-grantee and GOHSEP had entered into a Memorandum of Understanding.

We were not engaged to and did not conduct an examination, the objective of which would be to express an opinion on GOHSEP's compliance with federal and state regulations, GOHSEP's internal control over compliance with federal and state regulations, or the fair presentation of GOHSEP's financial statements. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters may have come to our attention that would have been reported to you.

This report is intended solely for the information and use of GOHSEP management and is not intended to be and should not be used by anyone other than GOHSEP management. However, by provisions of state law, this report is a public document and has been distributed to the appropriate public officials.

Respectfully submitted,



Daryl G. Purpera, CPA, CFE
Legislative Auditor

JLS:JLM:dl

Management's Response



BOBBY JINDAL
GOVERNOR

State of Louisiana
Governor's Office of Homeland Security
and
Emergency Preparedness

MARK A. COOPER
DIRECTOR

July 6th, 2010

Daryl Purpera, CPA
Legislative Auditor
State of Louisiana
1600 North Third Street
Baton Rouge, Louisiana 70804-9397

**RE: Draft Public Assistance Division Quarterly Report
First Quarter 2010, Hurricanes Gustav and Ike**

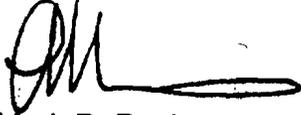
Dear Mr. Purpera:

We have received the draft report compiled by the Legislative Auditor's Recovery Assistance Division reviewing the State's Public Assistance (PA) program for Hurricanes Gustav and Ike for the first quarter of 2010 (January 1st, 2010 through March 31, 2010). We concur in the findings as identified in the report and note the continued improvement in the process.

As a matter of practice, we use the reports as a training tool for our Grants Management team. These reports assist us to identify opportunities to improve our process and highlight trends in need of our attention for further correction. Additionally, we continue to meet monthly with the LLA team and our management group to discuss problems and issues so that we may proactively address them and give consistent direction. Specifically, as related to document review and tracking, we have fine tuned our Expense Review Tool (ERT) and continue to look for opportunities to enhance ERT. In addition we are working on supplemental training for ERT. Writing and communication continues to be an issue. In addition to participating in the LLA writing and communication courses, we are developing some standard language which has been approved by the LLA staff to be used in expense review. We anticipate that this exercise will alleviate some of the written-communication issues.

Your LLA Team continues to assist us in the improvement of our processes and Continue to provide outstanding advice and counsel. Their continued analysis of our Public Assistance procedures will assist us in achieving our 100%-accuracy goal.

Sincerely,

A handwritten signature in black ink, appearing to be 'M DeBosier', with a long horizontal stroke extending to the right.

Mark DeBosier
Deputy Director - Disaster Recovery

MD:lb

cc: Mark A. Cooper, Director