

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



AGREED-UPON PROCEDURES REPORT
ISSUED FEBRUARY 2, 2011

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We performed agreed-upon procedures to assist the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) in evaluating the documentation, related to damages caused by hurricanes Gustav and Ike, submitted by sub-grantees for reimbursement under the Public Assistance program. For the period July 1, 2010, through September 30, 2010, we reviewed 497 initial expense reviews totaling \$50,146,764 and noted potential questioned costs of \$8,390,244. We also re-reviewed 182 reimbursement requests (subsequent reviews) totaling \$14,306,672 that had been returned to GOHSEP disaster recovery specialists because of some deficiency in documentation and noted potential questioned costs of \$445,377.

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LOUISIANA LEGISLATIVE AUDITOR
DARYL G. PURPERA, CPA, CFE

December 6, 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 third quarter of 2010 (July 1, 2010, through September 30, 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 for hurricanes Gustav and Ike. 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 GOHSEP management. 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 when sub-grantees submit reimbursement requests and supporting documentation. Disaster recovery specialists review the requests and gather any additional documentation deemed necessary to fully support them. The disaster recovery specialists document the results of their reviews on expense review forms and then submit the expense review forms 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 forms and supporting documentation to identify any potential questioned costs. Unsupported costs are considered potential questioned costs and are reported. The expense review forms and supporting documentation are returned to the disaster recovery specialists 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 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 679 expense reviews totaling \$64,453,436 as prepared by the GOHSEP disaster recovery specialists along with supporting documentation. The overall results of that inspection are as follows:

Review Type	Number of Reviews	Value	Questioned Amount
Initial	497	\$50,146,764	\$8,390,244
Subsequent*	182	14,306,672	445,377
Total	679	\$64,453,436	\$8,835,621

*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 as needed for the 679 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 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 202 initial reviews and 53 subsequent reviews where the work was accomplished by a contractor. On those reviews, the disaster recovery specialists indicated total documented expenses of \$39,811,588.

We did not detect deficiencies in 213 of the 255 expense reviews. However, we noted deficiencies in 35 initial reviews containing documented expenses of \$4,500,415 and in seven subsequent reviews containing documented expenses of \$1,681,921. 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 33 initial reviews and the seven subsequent reviews into one of the following categories:

- Eleven deficiencies related to expenses that lacked documentation supporting the scope of work.
- Seventeen deficiencies related to costs listed on contract summaries that lacked supporting documentation.
- Fourteen deficiencies related to files that lacked documentation supporting 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 \$1,224,292 (1.90% of the total amount reviewed or 3.08% of the documented expenses for this category). The deficiencies in the remaining two initial reviews related to effective writing/communication and would not have resulted in any questioned costs.

PROCEDURE:

When the work undertaken by the sub-grantees was accomplished through the use of the sub-grantees' equipment, we inspected supporting documentation included in 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 67 initial reviews and 38 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 \$6,994,296.

We did not detect deficiencies in 82 of the 105 expense reviews. However, we noted deficiencies in 19 initial reviews containing documented expenses of \$3,177,367 and four subsequent reviews containing documented expenses of \$195,330. 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 18 of the initial reviews and the four subsequent reviews into one of the following categories:

- One deficiency related to an operator not being listed for each piece of equipment.
- Ten 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.
- Fourteen deficiencies related to equipment rates that were not in accordance with FEMA rates or locally adopted/approved rates.

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 \$2,145,521 (3.3% of the total amount reviewed or 30.68% of the documented expenses for this category). The deficiency in the remaining initial review related to effective writing/communication and would not have resulted in any questioned costs.

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 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 listed on 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 97 initial reviews and 50 subsequent reviews where the work was accomplished using the sub-grantees' employees. On those reviews, the disaster recovery specialists indicated total documented expenses of \$13,374,780.

We did not detect deficiencies in 110 of the 147 expense reviews. However, we noted deficiencies in 31 initial reviews containing documented expenses of \$6,494,375 and six subsequent reviews containing documented expenses of \$654,360. 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 31 initial reviews and the six subsequent reviews into one of the following categories:

- Five deficiencies related to labor costs that lacked documentation supporting the scope of work.
- Four deficiencies related to costs listed on the labor summaries that lacked supporting documentation.
- Three deficiencies related to disaster-related job descriptions for each employee that were not listed on the labor summaries.

- Twenty-two 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.
- Four deficiencies related to fringe benefit calculations that contained ineligible items or mathematical inaccuracies.

Had we not detected these deficiencies, they could have resulted in questioned costs totaling \$5,022,587 (7.79% of the total amount reviewed or 37.55% 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: We identified 103 initial reviews and 31 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 \$3,223,334.

We did not detect deficiencies in 114 of the 134 expense reviews. However, we noted deficiencies in 17 initial reviews containing documented expenses of \$829,480 and in three subsequent reviews containing documented expenses of \$46,384. 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 17 initial reviews and the three subsequent reviews into one of the following categories:

- Seven deficiencies related to expenses that lacked documentation supporting the scope of work.

- Eleven deficiencies related to costs listed on material summaries that lacked supporting documentation.
- Eight deficiencies related to files that lacked documentation supporting 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 \$419,647 (0.65% of the total amount reviewed or 13.02% 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: We identified 28 initial reviews and 10 subsequent reviews where the sub-grantees used rented equipment to accomplish the work. On those reviews, the disaster recovery specialists indicated total documented expenses of \$1,049,438.

We did not detect deficiencies in 33 of the 38 expense reviews. However, we noted deficiencies in four initial reviews containing documented expenses of \$80,717 and in one subsequent review containing documented expenses of \$30,254. 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 of the initial reviews and the subsequent review into 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.

Had we not detected these deficiencies, they could have resulted in questioned costs totaling \$23,574 (0.04% of the total amount reviewed or 2.25% of the documented expenses for this category). The deficiency in the remaining initial review related to effective writing/communication and would not have resulted in any questioned costs.

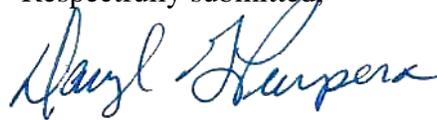
PROCEDURE: We confirmed that the reimbursement requests and the parish/local certification documents were dated on or after the creation of the project worksheets.

FINDING: We inspected the reimbursement requests included in 413 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 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 the Louisiana Legislature and is not intended to be and should not be used by anyone other than those parties. 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:JM:dl

3RD QTR10 PA GI

Management's Response



BOBBY JINDAL
GOVERNOR

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

MARK A. COOPER
DIRECTOR

December 20th, 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
Third Quarter 2010, Hurricanes Gustav and Ike**

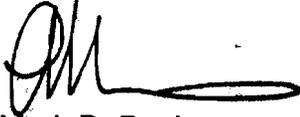
Dear Mr. Purpera:

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 third quarter of 2010 (July 1st, 2010 through September 30th, 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 'MD' followed by a long horizontal stroke.

Mark DeBosier
Deputy Director - Disaster Recovery

MD:lb

cc: Mark A. Cooper, Director