



# U.S. DEPARTMENT OF HOMELAND SECURITY **OFFICE OF INSPECTOR GENERAL**

OIG-24-34

June 25, 2024

**FINAL REPORT**

## **FEMA Region IV Has a Process to Identify Single Sites Damaged by Multiple Events**





# OFFICE OF INSPECTOR GENERAL


U.S. Department of Homeland Security

Washington, DC 20528 | [www.oig.dhs.gov](http://www.oig.dhs.gov)

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June 25, 2024

MEMORANDUM FOR: The Honorable Deanne Criswell  
Administrator  
Federal Emergency Management Agency

FROM: Joseph V. Cuffari, Ph.D. **JOSEPH V**  
Inspector General **CUFFARI**  Digitally signed by JOSEPH  
V CUFFARI  
Date: 2024.06.25 07:44:48  
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SUBJECT: *FEMA Region IV Has a Process to Identify Single Sites Damaged by  
Multiple Events*

Attached for your action is our final report, *FEMA Region IV Has a Process to Identify Single Sites Damaged by Multiple Events*. We incorporated the formal comments provided by your office. FEMA provided technical comments on the draft report, and we took FEMA's suggested changes into consideration. The report contains no recommendations.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to 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 contact me with any questions, or your staff may contact Kristen Bernard, Deputy Inspector General, Office of Audits, at (202) 981-6000.

Attachment



# DHS OIG HIGHLIGHTS

## *FEMA Region IV Has a Process to Identify Single Sites Damaged by Multiple Events*

June 25, 2024

### Why We Did This Audit

In FY 2022, the Commonwealth of Kentucky experienced damage from three federally declared weather-related events. Each disaster was approved to receive FEMA Public Assistance funds and managed from a single joint field office. We conducted this audit to determine the effectiveness of FEMA's process for evaluating single-site damages from multiple Kentucky weather-related events in FY 2022.

### What We Recommend

We did not make any recommendations in this report.

#### For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at: [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov).

### What We Found

The Federal Emergency Management Agency's (FEMA) Region IV has a process for identifying and evaluating single sites damaged by multiple disasters, which it followed in administering Public Assistance in fiscal year 2022 for three federally declared weather-related events in Kentucky. Specifically, Region IV uses a geographic information system tool (the tool) that incorporates historical information and allows FEMA to create and maintain a visual electronic record, or representation, of prior weather damage. This tool ensured damages were being claimed or attributed to the applicable declaration. The visual representation produced by the tool can be used throughout various phases of the Public Assistance grant program process, including preliminary damage assessment, site inspection, project worksheet (or project) formulation, and eligibility review.

During FY 2022, Region IV staff used the tool to supplement Grants Manager. However, other FEMA regions did not. Use of the tool allowed Region IV to fund projects in back-to-back declarations and conduct site inspections and project formulation according to policy. In addition, Consolidated Resource Center personnel could use the tool to assist with project formulation and conduct eligibility reviews.

Region IV's process reduces the risk of potentially duplicative claims for sites repeatedly damaged in multiple disaster events. Use of the tool offers a best practice for all FEMA regions.

### FEMA Response

FEMA concurred with our assessment of Region IV's process to evaluate single sites damaged by multiple events. Appendix B contains FEMA's response in its entirety.



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### Background

During fiscal year 2022, the Commonwealth of Kentucky (Kentucky) experienced damage from weather-related events, such as severe storms, straight-line winds, flooding, landslides, mudslides, and tornadoes. These events resulted in three Federal disaster declarations: FEMA-4630-DR (December 12, 2021), FEMA-4643-DR (February 27, 2022), and FEMA-4663-DR (July 29, 2022). Kentucky was approved to receive FEMA Public Assistance (PA) funds for each of these events. FEMA and the state managed all three disasters from a single joint field office (JFO).<sup>1</sup> FEMA's PA grant program gives supplemental funding to state, local, tribal, or territorial (SLTT) recipients and their subrecipients (counties, cities, and nonprofit organizations) to repair, restore, and replace damaged facilities, such as roads and other infrastructure.

The severity and magnitude of the damage resulting from the FY 2022 weather-related events prompted the authorization of special cost share agreements. Those agreements allowed FEMA to approve a 100 percent Federal cost share for certain reimbursable costs (instead of the usual 75 percent) for DR-4630 and DR-4663. The cost share adjustment applied to categories A (debris removal) and B (emergency work) for 30-day periods selected by the recipient in accordance with the applicable declaration.<sup>2</sup> Additionally, the *Consolidated Appropriations Act, 2022* directed that the Federal cost share for all eligible disaster-related expenses "shall be not less than 90 percent" for work related to DR-4630 and DR-4643.<sup>3</sup> DR-4663 was funded at the usual 75 percent Federal cost share.

According to FEMA's *Public Assistance Program and Policy Guide*, applicants requesting reimbursement for permanent repair or replacement must identify the damages to FEMA (by creating the Damage Inventory);<sup>4</sup> demonstrate that the site was maintained and in working order before the damaging event; and demonstrate that the damage is a direct result of the disaster. FEMA site inspectors, along with the applicant, visit sites listed on the Damage Inventory to physically inspect the sites and validate the damage. Afterward, site inspectors initiate project worksheets (PW), based on approved templates, with an itemized list of damages and detailed scope of work to determine costs necessary to restore the damaged location to its pre-disaster

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<sup>1</sup> A JFO is a temporary facility in proximity to the area affected by the incident that becomes the central location for coordination of response and recovery activities. Virtual JFOs may operate during select incidents and operate from a FEMA regional office.

<sup>2</sup> Initially, DR-4630 was amended to allow 100 percent Federal cost share for debris removal for the first 30 days of the declaration. Subsequently, DR-4630 and DR-4663 were amended to allow Kentucky 30 days of its choosing from the first 120 days of each declaration to apply 100 percent Federal funding to debris removal and emergency work.

<sup>3</sup> The incident period for DR-4643 was December 21, 2021, through January 2, 2022, making it eligible for the 90 percent Federal cost share adjustment as directed by the *Consolidated Appropriations Act, 2022*.

<sup>4</sup> The Damage Inventory includes the applicant's description of damage and location. Site inspectors collaborate with applicants to develop agreed-upon detailed descriptions of disaster-related damage.



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condition. Program staff at the Consolidated Resource Center (CRC)<sup>5</sup> perform cost and compliance reviews, and staff at the JFO determine the eligibility of projects and award PA grant funds on a project-by-project basis.

FEMA's Grants Management system is the system of record and is structured on a single platform with two portals for access: PA Grants Manager (Grants Manager) and Grants Portal. Using Grants Manager, FEMA helps SLTT governments and eligible non-profit organizations to formulate projects. FEMA identifies issues and submits recommended changes via Grants Manager. FEMA also uses Grants Manager to track incident-related data after an area receives a Federal disaster declaration. In parallel, recipients and applicants can register to monitor the project development process using Grants Portal. Applicants and FEMA staff record location description and geographic coordinates (latitude and longitude) for all damages claimed for reimbursement by the PA grant program in Grants Manager.

FEMA and its regional offices use a commercial, off-the-shelf geographic information system tool to supplement many of its programs. Although the tool is independent of the PA program, Region IV uniquely uses it to supplement Grants Manager by incorporating historical information queried from Grants Manager into the tool.<sup>6</sup> Thus, Region IV created and maintains an ongoing electronic record of damaged sites from past declarations. The visual representation produced by the tool can be used by Region IV staff throughout various phases of the PA grant program delivery process, including preliminary damage assessment, site inspection, PW (or project) formulation, and project eligibility review (see Appendix D).

As of June 14, 2023, FEMA obligated approximately \$144 million for the approved PWs related to the three weather-related declarations included in the scope of our audit. We conducted this audit to determine the effectiveness of FEMA's process for evaluating single-site damages from multiple Kentucky weather-related events in FY 2022.

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<sup>5</sup> CRCs are permanent FEMA offices where subject matter experts and specialized resources provide support to all FEMA operations.

<sup>6</sup> Geographic information systems are computer-based tools used to store, visualize, analyze, and interpret geographic data, which is also called geospatial data.



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### Results of Audit

#### Region IV Followed a Process for Identifying and Evaluating Single Sites Damaged by Multiple Events

##### Region IV Staff Used Its Geographic Information Tool to Supplement Grants Manager

Grants Manager allows FEMA staff to review projects from past declarations using location data. However, staff face limitations when viewing past projects in Grants Manager because the system only allows users to review one declaration at a time or on a site-by-site basis. The limitation of reviewing one declaration at a time could make the process of reviewing locations in consecutive events cumbersome for staff.

Region IV uses a geographic information system tool to supplement Grants Manager. The tool was developed by a CRC East employee who used a commercial, off-the-shelf software suite to catalog past and present damaged sites to consolidate the geographic locations from multiple declarations. Officials explained that although CRC East also services Regions I and III, only Region IV was introduced to the tool's use.

Region IV staff reported that the tool's database currently contains records for all disaster-damaged sites claimed by applicants in Region IV for approximately the last 10 years. JFO staff demonstrated how data is exported from Grants Manager into the tool, stating that the process is performed monthly.

The tool allows Region IV users to view data in "layers," meaning damage from multiple events can be viewed simultaneously, which allows users to easily identify locations that experienced repeated damage. During our site visits to the regional office and JFO, FEMA staff demonstrated the tool's capabilities for using overlays to create multiple data collections, such as flood zones, maps, and roadway classifications. For example, in the case of the three FY 2022 declarations, for any given county, we observed all damaged locations color coded by declaration; if sites were in a floodplain; and if impacted roadways were local, state, or Federal.

During our visit to the JFO, we observed Region IV staff creating maps using geospatial queries by county, declaration, preliminary damage assessments (PDA<sup>7</sup>) data, and categories of work. We also accompanied field personnel on five site inspections during which FEMA staff used the maps. JFO and Region IV personnel reported they can use this visual representation throughout various phases of the overall grant program process, including PDA, site inspection, PW

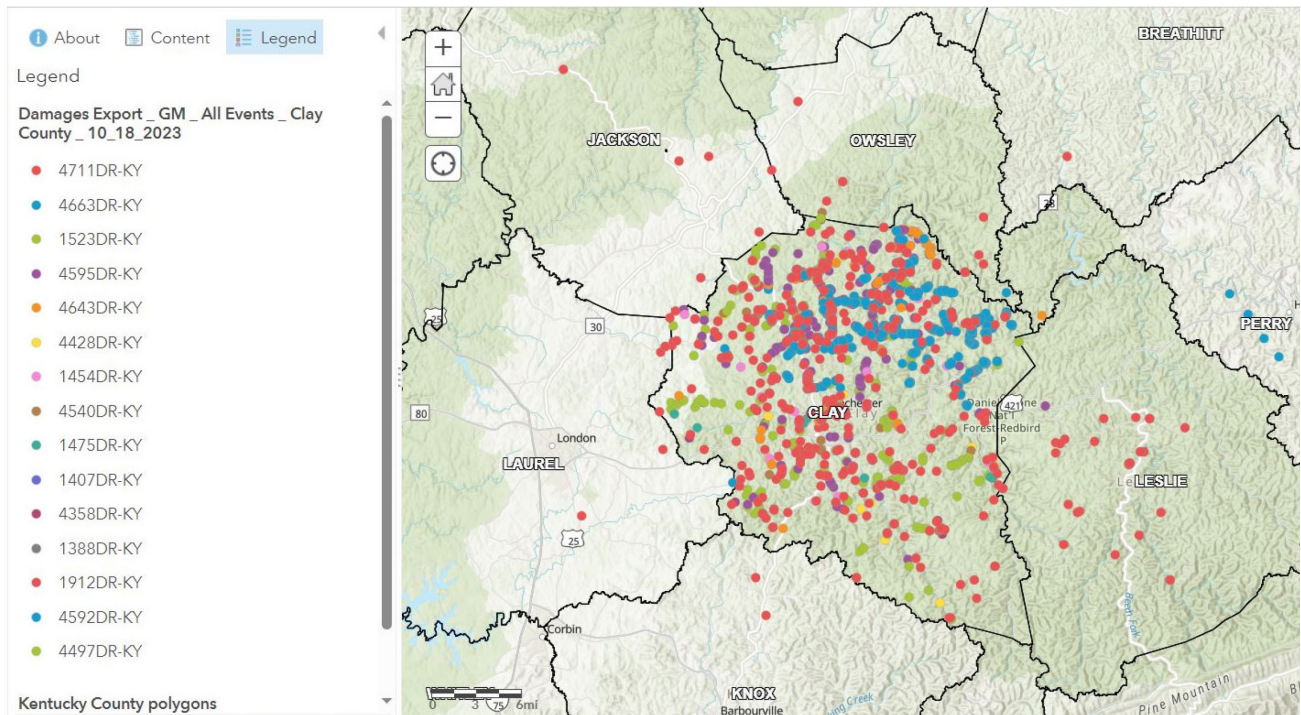
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<sup>7</sup> PDAs are conducted following the disaster incident to help determine if the occurrence warrants a Presidential declaration. For additional information, see Appendix D.



formulation, and eligibility review. Figure 1 is a screenshot from the tool showing all damages for Clay County, Kentucky, for 15 declarations.

**Figure 1. Geographic Information System Tool Screenshot Showing Current and Historical Damages in Clay County, Kentucky**



Source: FEMA Region IV

### FEMA<sup>8</sup> Properly Obligated Funds for Projects in Back-to-Back Declarations

We found that repetitive damages occurred spanning the three declarations within a period of 7.5 months.<sup>9</sup> FEMA regulations require that damages claimed by an eligible applicant be a direct result of a declared disaster event.<sup>10</sup> When sites have damages resulting from more than one event, it may be challenging for FEMA to assign the damages to the proper declaration and accurately award funds. For example, if a bridge is damaged by multiple flooding events in a short period of time, particularly if inspections or repairs were not made in the interim, applying the appropriate source of funding can be complicated. Further, when back-to-back declarations are funded at different cost shares, as was the case in Kentucky with DR-4630 (90 percent Federal cost share), DR-4643 (90 percent Federal cost share), and DR-4663 (75 percent Federal cost

<sup>8</sup> The scope of work is limited to Region IV; however, in cases of projects exceeding a Federal cost share of \$1 million, additional reviews and notifications are required at higher levels.

<sup>9</sup> Declaration dates: DR-4630 December 12, 2021; DR-4643 February 27, 2022; DR-4663 July 29, 2022.

<sup>10</sup> Title 44 Code of Federal Regulations § 206.223 (a)(1).



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share),<sup>11</sup> it is important to be able to identify the event that caused the damage to ensure that Federal funds are correctly applied.

We determined Region IV's process ensured damages were being claimed or attributed to the applicable declaration. By reviewing the Damage Inventories for applicants who submitted damage claims for more than one of the three FY 2022 events, we identified 27 sites that could potentially have duplicative claims. Upon review of the project data, we found no duplicated claims.

FEMA officials explained that they consider ways to package damages. In connection with some disasters, FEMA has rolled site damages from different declarations into a single funding source, but FEMA stated this approach has not been discussed for the three FY 2022 disasters under review. Similarly, FEMA sometimes applies the same approach on a project-by-project basis, assigning one disaster fund for repairs to a single location damaged by consecutive events. We did not encounter this project-by-project scenario in our review of damaged sites. FEMA officials said, and we confirmed, the declarations for any of the three FY 2022 Kentucky disasters in the scope of the audit had not been consolidated. We determined that the proper cost share was applied for projects related to each declaration.

### **Region IV Conducted Site Inspections and Project Formulation According to Policy**

We visited the JFO in Frankfort, Kentucky, and observed FEMA's processes for site inspection and entering project formulation into Grants Manager. Applicants provide the Damage Inventory to FEMA as required by regulation,<sup>12</sup> and FEMA then assigns work orders to site inspectors to conduct inspections. The Damage Inventory includes the applicant's description of damage and site coordinates. Site inspectors collaborate with applicants to develop agreed-upon detailed descriptions of disaster-related damage.

The FEMA field staff we interviewed confirmed it is incumbent on the applicant to provide as much detailed damage information to FEMA as possible. Site inspectors use that information to prepare a project packet<sup>13</sup> and enter all data into Grants Manager, which in turn is used to formulate the PW. FEMA may consolidate multiple sites into a single PW. See Appendix D for information on FEMA's project development cycle. We determined that Region IV conducted site inspections and project formulation, as required.

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<sup>11</sup> Also, as discussed above, DR-4630 was initially amended to allow 100 percent Federal cost share for debris removal for the first 30 days of the declaration. Subsequently, DR-4630 and DR-4663 were amended to allow Kentucky 30 days of its choosing from the first 120 days of each declaration to apply 100 percent Federal funding to debris removal and emergency work.

<sup>12</sup> Title 44 Code of Federal Regulations § 206.202 (d)(1)(ii).

<sup>13</sup> The packet we observed included photographs, maps created by the site inspector, copies of documentation supporting the applicant's claim, and Site Inspection Reports. Each project is unique and may include additional items.





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### Consolidated Resource Center Personnel Assisted with Project Formulation and Conducted Eligibility Reviews

FEMA pooled its resources into four CRCs, which are permanent offices, so multiple disaster operations can tap into trained experts when developing PA projects. FEMA officials explained that the CRC East services Regions I, III, and IV. The *Public Assistance Program and Policy Guide* outlines CRC responsibilities, which include project scoping, costing, validation, and compliance reviews. Once a PW is formulated and entered into Grants Manager, the PW passes through multiple reviews at the CRC, including environmental and historic, insurance, and/or hazard mitigation. When the PW has met eligibility criteria and other sources of funding, if available, are identified, the PW is approved.

For example, insurance reviews occur at the CRC. FEMA policy requires, as part of the insurance review, that an insurance specialist search current and prior disaster data to determine if a damaged location has been previously funded.<sup>14</sup> When performed in Grants Manager, the search can lead the specialist to a spreadsheet that contains information regarding past insurance requirements, if any, for damaged facilities potentially matching the one in question.<sup>15</sup> The specialist must also consult an applicant tracker in SharePoint to determine if any additional projects have been formulated for the applicant for the disaster in question, thus avoiding duplicative funding. Finally, for flooding events, the insurance specialist evaluates if the damaged location exists within a flood zone by consulting a website. We examined the documentation of insurance specialists' reviews in PWs in our scope. We determined that use of the tool would be beneficial during this phase of project formulation.

### Conclusion

All FEMA Regions could benefit by using the geographic information system tool to evaluate single-site damages. We sent a three-question survey to the remaining nine FEMA regional offices to learn whether they use geospatial information for their PA grant program delivery. Based on the survey responses, Region IV is the only FEMA region currently using a tool to assist with the overall grant program process to assign damages to the correct disaster fund and to avoid duplicative payments.

We did not make any recommendations in this report because, in addition to following program policy and guidance, Region IV followed policy and its process for identifying and evaluating

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<sup>14</sup> *Insurance Specialist Position Assist*, Public Assistance Program Delivery Branch, Recovery Directorate, Office of Response and Recovery, FEMA, Last Updated: 2020, pp. 7-8.

<sup>15</sup> Grants Manager does not contain historical data for all past disaster declarations. Records from some events still need to be migrated from FEMA's former system of record. However, because our audit focused on consecutive events occurring during FY 2022, Grants Manager was the system of record in use.



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single sites damaged by multiple events. Unlike Grants Manager, the tool used in Region IV allows simultaneous queries across multiple declarations, and additional feature layers may be added as requested by users.

Back-to-back disaster incidents are not unique to Kentucky. All of FEMA's regions could benefit from similar capabilities to enable visual overlays to depict information from multiple historical events with other feature layers. Regions that do not have experience with consecutive disasters resulting in repeated damage to individual sites would then have reference data on hand when confronted with back-to-back declarations. Although we are not making any recommendations in this report, FEMA should consider Region IV's use of a tool in conjunction with Grants Manager data as a potential best practice to effectively catalog previously damaged sites for present and future use, assign damages to the correct disaster fund, and avoid duplicative payments.

### **Management Comments and OIG Analysis**

In response to our draft report, FEMA Region IV agreed with the content of the audit and stated it will work with FEMA headquarters to discuss the possibility of extending the use of the geographic information system tool utilized in Kentucky to other regions. FEMA provided technical comments on the draft report, and we took FEMA's suggested changes into consideration. We included a copy of FEMA Region IV's Management Response in its entirety in Appendix B. Because there were no recommendations in the report, an action plan was not necessary.



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### Appendix A: Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

The objective of this audit was to determine the effectiveness of FEMA’s process for evaluating single-site damages from multiple Kentucky weather-related events in FY 2022. The audit primarily focused on all PA grant program funding across three presidentially declared disasters: FEMA-4630-DR, FEMA-4643-DR, and FEMA-4663-DR. Our scope encompassed \$143,719,583 dollars obligated as of June 14, 2023.

#### Federal Share Obligated for Kentucky FY 2022 Weather-Related Events

Declaration Number	Date of Declaration	Federal Share
FEMA-4630-DR	December 12, 2021	\$84,279,302
FEMA-4643-DR	February 27, 2022	\$13,806,028
FEMA-4663-DR	July 29, 2022	\$45,634,253
<b>TOTAL</b>		<b>\$143,719,583</b>

Source: DHS OIG analysis of Grants Manager data

We assessed internal controls related to FEMA’s management of PA grant funds related to single-site damage from multiple weather-related events. Because our review was limited to addressing our audit objective, it may not disclose all internal control weaknesses that may have existed at the time of the audit.

We reviewed policies and procedures within FEMA’s authority as specified within the *Robert T. Stafford Disaster Relief and Emergency Assistance Act*, as amended, and other applicable Federal laws. We assessed FEMA policies for consistency and compatibility with procedures; FEMA’s assessment of subrecipients’ capacity and capability to effectively implement the program; and the effectiveness of assessing damages at sites that were affected by multiple events.



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We analyzed all declarations for designated counties and FEMA's system of record for eligible applicants. As such, we identified 6 overlapping applicants between DR-4630 and DR-4643 and 11 overlapping applicants between DR-4643 and DR-4663. We identified no overlapping applicants between DR-4630 and DR-4663 or across the three declarations. Using itemized Damage Inventories of the overlapping applicants, we isolated 27 total sites incurring damage related to at least two events.

We conducted interviews with FEMA Region IV officials in the Atlanta, Georgia, regional office and at the JFO in Frankfort, Kentucky. At the Atlanta office, we gained an understanding of the following FEMA processes: PDA, damaged sites inventory (or Damage Inventory) and Site Inspection Report development, PW formulation, project funding, and geospatial record of previously claimed damaged locations.

To assess the validity and accuracy of data, we attended site inspections at five locations in Floyd County, Kentucky, observing FEMA officials work with an applicant representative to record damages as claimed by the applicant. We further observed FEMA's process for recording the applicant's claim into Grants Manager, the system of record. This process included entering site information and photographs, comparing maps of the damaged site against previously claimed damages within the general area, and uploading any applicant-supplied documentation. We were given a walkthrough of the process by which FEMA evaluates the applicant's claim and determines project eligibility. We retrieved all data directly from Grants Manager rather than relying on extracts provided by FEMA. We also observed that FEMA personnel export data from Grants Manager directly into Region IV's tool without modification. Therefore, we determined this data is sufficiently reliable for the purposes of our audit.

We conducted this performance audit between March and June 2023 pursuant to the *Inspector General Act of 1978*, 5 U.S.C. §§ 401-424, 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 on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

### **DHS OIG's Access to DHS Information**

During this audit, FEMA provided timely responses to our requests for information and did not delay or deny access to information we requested.



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**Appendix B:**  
**FEMA Comments on the Draft Report**

U. S. Department of Homeland Security  
Region 4  
3005 Chamblee Tucker Road  
Atlanta, GA 30341



**FEMA**

April 25, 2024

MEMORANDUM FOR: Joseph V. Cuffari  
Inspector General  
FROM: for Robert D. Samaan  
Regional Administrator

**ROBERT P ASHE** Digitally signed by  
ROBERT P ASHE  
Date: 2024.04.28  
09:07:42 -04'00'

SUBJECT: Management Response to Draft Report: “FEMA Region 4 Has a Process to Identify Single Sites Damaged by Multiple Events” (Project No. OIG-24-XX)

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

The Department is pleased to note OIG’s positive recognition that the Federal Emergency Management Agency (FEMA) Region 4 has a process for identifying and evaluating single sites damaged by multiple disasters, which it followed in administering public assistance in FY 2022 for three federally declared weather-related events in Kentucky. DHS remains committed to utilizing best practices to ensure that Region 4’s processes continue to reduce the risk of potentially duplicative claims for sites repeatedly damaged in multiple disaster events continues.

FEMA Region 4 will work with FEMA headquarters to discuss the possibility of extending the use of the geographic information system tool utilized in Kentucky for other regions.

The draft report contained no recommendations, with which the Department concurs. DHS previously submitted technical comments addressing several accuracies, contextual, and other issues under a separate cover for OIG’s consideration.

Again, thank you for the opportunity to review and comment on this draft report. Given that FEMA Region 4 agrees with the content of this audit, we would like to waive the official exit conference. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

[www.fema.gov](http://www.fema.gov)



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### Appendix C: Counties Affected in the FY 2022 Disaster Declarations

#### FEMA-4630-DR:

- Barron
- Breckinridge
- Bullitt
- Caldwell
- Christian
- Fulton
- Graves
- Grayson
- Hart
- Hickman
- Hopkins
- Logan
- Lyon
- Marion
- Marshall
- Meade
- Muhlenberg
- Ohio
- Shelby
- Spencer
- Taylor
- Todd
- Warren

#### FEMA-4643-DR

- Boyd
- Breathitt
- Carter
- Christian
- Clay
- Floyd
- Green
- Johnson
- Knott
- Lawrence
- Owsley
- Pike
- Taylor

#### FEMA-4663-DR

- Breathitt
- Casey
- Clay
- Cumberland
- Floyd
- Harlan
- Johnson
- Knott
- Lee
- Leslie
- Letcher
- Lincoln
- Magoffin
- Martin
- Owsley
- Perry
- Pike
- Powell
- Whitley
- Wolfe

Source: Auditor analysis of affected counties

Christian and Taylor counties, highlighted in blue, were impacted by FEMA-4630-DR and FEMA-4643-DR. Breathitt, Clay, Floyd, Johnson, Knott, Owsley, and Pike counties, highlighted in red, were impacted by FEMA-4643-DR and FEMA-4663-DR. No counties were impacted by all three disasters, and no counties had damage from both FEMA-4630-DR and FEMA-4663-DR. No dollar figures are assigned to the locations because not all sites had been developed into completed PWs at the time of our analysis.



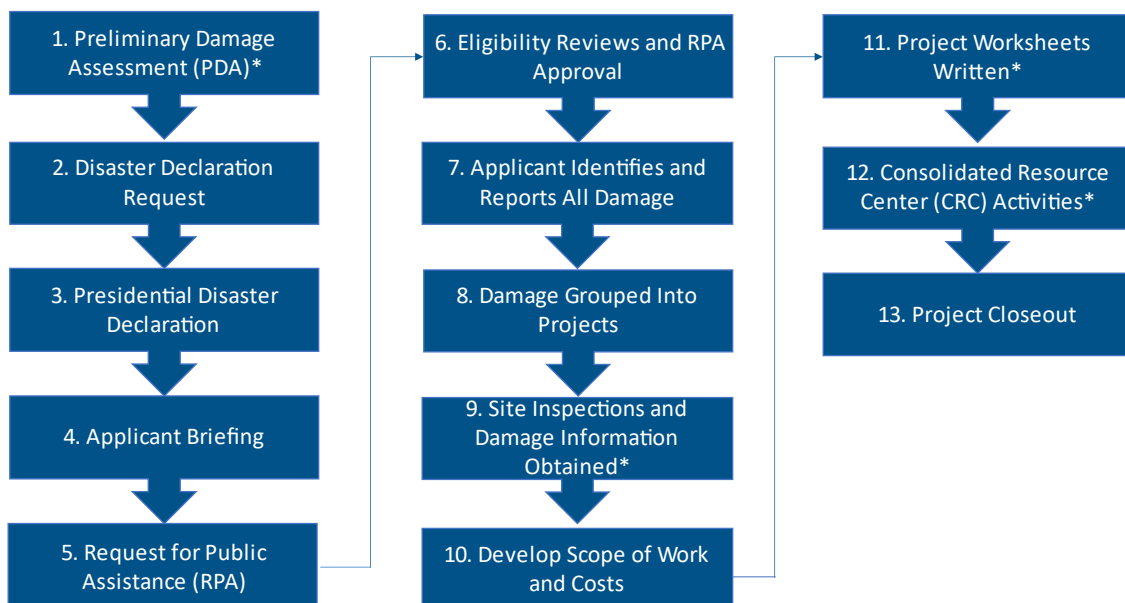
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### Appendix D: FEMA PA Grant Program Process

This appendix does not include all steps in the PA grant program delivery process. It includes only those that are applicable to the scope of our audit, specifically those that include some aspect of the PWs. The tool mentioned in steps 1, 9, 11, and 12 in the chart below is specific to Region IV.

#### FEMA PA Grant Program Process



\*Steps that produce and/or use location data

Source: DHS OIG consolidation of extracts from FEMA policy and interviews

#### 1. Preliminary Damage Assessment (PDA)

SLTT government requests a joint PDA with FEMA. Site inspectors' notes are scanned into FEMA's tool. Data from applications used by local authorities is also uploaded into the tool.

#### 2. Disaster Declaration Request

Governors request declarations from the President through FEMA. FEMA uses PDA information to evaluate the need for assistance under the PA program.



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### 3. Presidential Disaster Declaration

For FEMA to provide PA, the President must declare that an emergency or major disaster exists.

### 4. Applicant Briefing (as Soon as Possible after Declaration)

The recipient conducts high-level information briefings for all potential applicants regarding the PA program.

### 5. Request for Public Assistance (RPA) (within 30 Days of Declaration)

The SLTT completes and submits the application for Federal assistance.

### 6. Eligibility Reviews and RPA Approval

FEMA and the recipient review the RPA to determine whether the applicant is eligible for assistance.

### 7. Applicant Identifies and Reports All Damage (within 60 Days of Recovery Scoping Meeting)

The applicant is responsible for providing information and documentation required to substantiate the eligibility of a project. This information and documentation supports facilities, work, and cost eligibility based on the applicable laws, regulations, Executive Orders, and policies. At a minimum, FEMA requires the “who, what, when, where, why, and how much” for each item claimed.

### 8. Damage Grouped into Projects

The program delivery manager works with the applicant and the program delivery task force leader to identify sites and facilities that can be combined into one project.

### 9. Site Inspections and Damage Information Obtained

FEMA conducts inspections at sites with work to be completed. Site inspectors enter information from the Site Inspection Report into Grants Manager. FEMA personnel demonstrated that data is exported from Grants Manager and directly imported into the tool and overlaid onto map data.

### 10. Develop Scope of Work and Costs

The applicant describes the completed scope of work for each of the projects and provides supporting documentation. The program delivery manager works with the applicant to develop





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costs, and FEMA makes its eligibility determination and processes the project. (The applicant must submit documentation for the project within 90 days of the Recovery Scoping Meeting or within 90 days of the work completion date, whichever is later.)

### 11. Project Worksheets Written

The PW is the primary form used to document the project and includes the location, damage description and dimensions, scope of work, and cost estimate for each project. It is completed by the applicant. PA personnel explained that they build on the initial recipient assessment and use geographic information. The geographic data ensure that damage applies to the correct disaster, which reduces the risk of duplicate disaster claims.

### 12. Consolidated Resource Center Activities

PA staff receive project development and processing support from the CRC. CRC responsibilities include project scoping, costing, validation, and compliance reviews. PA personnel explained that CRC East uses Grants Management information for geographic plotting. Once a PW has been entered into Grants Manager, it is reviewed at the CRC and it is approved after eligibility is determined and all other funding sources, if any, are applied.

### 13. Project Closeout (within 180 Days of Work Completion)

Subrecipients inform recipients that projects are complete and the date the work was completed. Subrecipients notify the recipients immediately as they complete each large project, and when they have completed their last small project.



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### **Appendix E: Office of Audits Major Contributors to This Report**

The Office of Audits major contributors to this report are Anthony Colache, Director; Karen Gardner, Audit Manager (retired); Michael Staver, Audit Manager; Angela McNabb, Auditor-in-Charge; David Kinard, Auditor; Michael Watson, Auditor; Toni Jaffier, Auditor; and Kevin Dolloson, Communications Analyst.



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### **Appendix F: Report Distribution**

#### **Department of Homeland Security**

Secretary  
Deputy Secretary  
Chief of Staff  
Deputy Chiefs of Staff  
General Counsel  
Executive Secretary  
Director, GAO/OIG Liaison Office  
Under Secretary, Office of Strategy, Policy, and Plans  
Assistant Secretary for Office of Public Affairs  
Assistant Secretary for Office of Legislative Affairs  
DHS Component Liaison

#### **Office of Management and Budget**

Chief, Homeland Security Branch  
DHS OIG Budget Examiner

#### **Congress**

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