

An Agreed-Upon Procedures Report on the  
**GOVERNOR’S OFFICE OF HOMELAND SECURITY  
AND EMERGENCY PREPAREDNESS  
PUBLIC ASSISTANCE PROGRAM  
JANUARY - JUNE 2021**  
Issued October 6, 2021



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LOUISIANA LEGISLATIVE AUDITOR  
MICHAEL J. "MIKE" WAGUESPACK, CPA

August 12, 2021

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

**MR. JAMES WASKOM, DIRECTOR  
GOVERNOR'S OFFICE OF HOMELAND SECURITY  
AND EMERGENCY PREPAREDNESS**

Baton Rouge, Louisiana

We have performed the procedures enumerated below on the completeness and accuracy of documentation submitted by sub-grantees under the Public Assistance (PA) program during the period January 1, 2021, through June 30, 2021. The Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) management is responsible for the completeness and accuracy of documentation submitted by sub-grantees of the PA program.

GOHSEP management has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of the engagement, which is to perform specified procedures on the completeness and accuracy of the documentation identified above. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

**PUBLIC ASSISTANCE REIMBURSEMENT REQUEST REVIEWS**

For the period January 1, 2021, through June 30, 2021, we confirmed the completeness and accuracy of 1,939 expense reimbursements submitted by GOHSEP's disaster recovery specialists totaling \$457,622,294. As a result of applying our procedures, we noted exceptions, which exceeded \$500 per expense reimbursement review, totaling \$52,432,743 (11.46%) in 342 expense reimbursements. GOHSEP management has directed its staff to resolve the exceptions prior to final payment, thus eliminating questioned costs. The following tables present a breakdown of the exceptions by work type (Table 1) and finding type (Table 2).

<b>Table 1 Exceptions by Work Type</b>			
<b>Work Type</b>	<b>Number of Occurrences</b>	<b>Exception Amount</b>	<b>Exceptions as a Percent of Total Analyzed (\$457,622,294)</b>
Contract Work	208	\$44,677,301	9.76%
Force Account Equipment	19	1,151,567	0.25
Force Account Labor	32	3,169,522	0.69
Materials	80	3,417,476	0.75
Rented Equipment	3	16,877	<0.01
<b>Total</b>	<b>342</b>	<b>\$52,432,743</b>	<b>11.46%</b>

<b>Table 2 Exceptions by Finding Type</b>			
<b>Finding Type</b>	<b>Number of Occurrences</b>	<b>Exception Amount</b>	<b>Exceptions as a Percent of Total Analyzed (\$457,622,294)</b>
Out-of-Scope	24	\$964,938	0.21%
Lack of Support	193	39,180,010	8.56
Procurement not Documented	29	5,126,013	1.12
Ineligible Costs	115	6,056,968	1.33
Errors	33	1,104,814	0.24
<b>Total</b>	<b>394*</b>	<b>\$52,432,743</b>	<b>11.46%</b>

\*The number of occurrences by finding type is greater than the number of occurrences by work type because each work type may contain multiple findings.

Following are the procedures we applied and the resulting findings for the five finding types (*Out-of-Scope, Lack of Support, Procurement not Documented, Ineligible Costs, and Errors*) mentioned in Table 2 on the previous page.

**PROCEDURE:** For all reimbursement requests except those in the “Project Closeout” step of the process checklist in louisianapa.com, we confirmed that the work reflected in the reimbursement request was within the scope approved for the project and that the requested amount did not exceed the cost estimate.

**FINDING:** Of the 1,939 expense reimbursements we confirmed, 774 were in the “Project Closeout” step and were excluded from this procedure. An additional 1,141 expense reimbursements were within the scope approved for the project and did not exceed the cost estimate. However, we noted exceptions totaling \$964,938 (0.21%) in the other 24 expense reimbursements.

**PROCEDURE:** We confirmed that the requested amount was supported by invoices, receipts, lease agreements, contracts, labor policies, time records, equipment logs, inventory records, or other applicable documentation.

**FINDING:** Of the 1,939 expense reimbursements we confirmed, 1,746 were supported by invoices, receipts, lease agreements, contracts, labor policies, time records, equipment logs, inventory records, or other applicable documentation. However, we noted exceptions totaling \$39,180,010 (8.56%) in the other 193 expense reimbursements.

**PROCEDURE:** We confirmed that contracts and purchases totaling more than \$30,000 per vendor per calendar year comply with applicable federal and state procurement requirements. However, for contracts and purchases where cost reasonableness is established through an after-the-fact cost analysis and the cost to be analyzed is less than \$100,000, we did not review the cost analysis.

**FINDING:** Of the 1,939 expense reimbursements we confirmed, 1,910 contained purchases totaling more than \$30,000 per vendor per calendar year that complied with applicable federal and state procurement requirements. However, we noted exceptions totaling \$5,126,013 (1.12%) in the other 29 expense reimbursements.

**PROCEDURE:** We confirmed that the work reflected in the reimbursement request complied with applicable FEMA regulations and guidance.

**FINDING:** Of the 1,939 expense reimbursements we confirmed, 1,824 complied with applicable FEMA regulations and guidance. However, we noted exceptions totaling \$6,056,968 (1.33%) in the other 115 expense reimbursements.

**PROCEDURE:** We confirmed that the Cost Estimate Tool (CET) and the Expense Review Form (ERF) did not contain duplicate, omitted, and/or miscategorized expenses.

**FINDING:** Of the 1,939 expense reimbursements we confirmed, 1,906 included a CET or ERF that did not contain duplicate, omitted, and/or incorrectly categorized expenses. However, we noted exceptions totaling \$1,104,814 (0.24%) in the other 33 expense reimbursements.

#### **TOTAL EXCEPTIONS AND AMOUNT RESOLVED**

**PROCEDURE:** For the period April 1, 2008, through June 30, 2021, we accumulated total potential questioned costs and resolved amounts.

**FINDING:** During the period April 1, 2008, through June 30, 2021, we confirmed the completeness and accuracy of expense reimbursements totaling \$15,543,558,607. We noted exceptions totaling \$1,422,732,440 (9.15%). GOHSEP worked with the sub-grantees to resolve \$1,304,226,847 (91.67%) of the exceptions, of which \$37,418,744 was resolved this reporting period.

We were engaged by GOHSEP to perform this agreed-upon procedures engagement and conduct our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States of America. We were not engaged to, and did not conduct, an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the completeness and accuracy of documentation submitted by sub-grantees of the PA program during the period January 1, 2021, through June 30, 2021, or on GOHSEP's compliance with 2 CFR Part 200 and 44 CFR Parts 13 and 206. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of GOHSEP and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

The purpose of this report is solely to assist GOHSEP management in evaluating the completeness and accuracy of documentation submitted by sub-grantees of the PA program during the period January 1, 2021, through June 30, 2021.

Accordingly, this report is not suitable for any other purpose. By provision of state law, this report is a public document and has been distributed to the appropriate public officials.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Mike Waguespack", with a long horizontal flourish extending to the right.

Michael J. "Mike" Waguespack, CPA  
Legislative Auditor

MJW/aa

GOHSEP-PA JAN-JUNE2021



## BACKGROUND

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The Federal Emergency Management Agency Public Assistance (PA) Grant Program provides assistance to state and local governments and certain private nonprofit entities to respond to and recover from major disasters or emergencies declared by the President of the United States. Specifically, the PA program provides assistance for debris removal, emergency protective measures, and permanent restoration of infrastructure. The federal share of these expenses typically cannot be less than 75% of eligible costs.

The Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) is responsible for coordinating the state's efforts throughout the emergency management cycle to prepare for, prevent where possible, respond to, help recover from, and mitigate against to lessen the effects of man-made or natural disasters in Louisiana. GOHSEP is the grantee for the PA funds and has been designated as the state agency responsible for program administration.

Sub-grantees submit reimbursement requests and supporting documentation to GOHSEP for payment through the PA program. Our engagement with GOHSEP requires the Louisiana Legislative Auditor's (LLA) document review team to confirm the completeness and accuracy of documentation submitted by GOHSEP contractors and sub-grantees.

GOHSEP's review process begins when sub-grantees submit reimbursement requests and supporting documentation. GOHSEP 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 the reviews on expense review forms and then submit the forms and all supporting documentation (expense reimbursements) to the team leads. The team leads conduct a review and then submit the expense reimbursements to the LLA document review team to be reviewed under our agreed-upon procedures engagement.

The LLA document review team analyzes the expense reimbursements and supporting documentation to confirm the completeness and accuracy of documentation submitted by sub-grantees under the PA program. Unsupported costs are considered exceptions and are reported.

The LLA document review team also documents exceptions in findings of review that are presented to GOHSEP management. When exceptions are noted, the expense reimbursements and supporting documentation are returned to the GOHSEP disaster recovery specialists. GOHSEP management decides whether to correct the exceptions or fund the requests. If GOHSEP management decides to correct the exceptions, the disaster recovery specialists gather additional documentation to correct them. Then, LLA's document review team analyzes the additional documentation following the same agreed-upon procedures as the initial reviews. This process allows GOHSEP the opportunity to correct exceptions prior to final payment, thus eliminating questioned costs.



## Appendix A

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### Management's Response



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

JOHN BEL EDWARDS  
GOVERNOR



JAMES B. WASKOM  
DIRECTOR

**ADDP-2021-0826-008**

August 26, 2021

Mr. Michael J. "Mike" Waguespack, CPA  
Legislative Auditor  
Office of Legislative Auditor  
1600 North Third Street  
Post Office Box 94397  
Baton Rouge, LA 70804-9397

RE: Draft Public Assistance - Agreed Upon Procedures Engagement  
Public Assistance Program – January 1<sup>st</sup>, 2021 – June 30<sup>th</sup>, 2021

Dear Mr. Waguespack:

We have received the draft report compiled by the Legislative Auditor's Recovery Assistance Division reviewing the State's Public Assistance (PA) program for the first half of 2021 (January through June 2021). We have reviewed your report and concur with the exceptions identified in the report.

We would like to note that we share these reports with our management group to assist them in identifying training opportunities for our staff. Training and education are top priorities for GOHSEP, and these reports are instrumental in assisting us in ensuring that both internal and external stakeholders are receiving proper guidance.

It is also important to note that GOHSEP has the mechanisms in place to address many of the questioned costs found within your report. Out of scope work can be addressed by requesting a FEMA scope alignment and upon obligation resubmitting the invoices in question. Costs submitted which do not have all support documentation are addressed with the applicant to receive any missing documents. Procurement issues are also regularly addressed and corrected by working with the applicant to better document their procurement process and by analyzing the costs incurred to ensure those costs are reasonable.

We would also like to note that our review process necessitates that any exceptions identified within your report are required to be addressed before project closeout. GOHSEP has made considerable progress in addressing all historical questioned costs and have realized a high success rate using the information your staff provides to remedy any outstanding issues.

Your reports continue to assist us in the improvement of our processes and provide important feedback, which will assist us in achieving our 100% accuracy goal.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lynne Browning', with a stylized, flowing script.

Lynne Browning  
Assistant Deputy Director – Public Assistance

LB:am