

# **GOVERNOR'S OFFICE OF HOMELAND SECURITY AND EMERGENCY PREPAREDNESS**

## **HAZARD MITIGATION GRANT PROGRAM**

**RECOVERY ASSISTANCE SERVICES**

**Agreed-Upon Procedures Report  
for the period January-June 2024  
Issued September 11, 2024**

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

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

**FIRST ASSISTANT LEGISLATIVE AUDITOR**  
BETH Q. DAVIS, CPA

**DIRECTOR OF RECOVERY ASSISTANCE**  
VICTORIA HAYES, CPA

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August 23, 2024

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

**MR. JACQUES THIBODEAUX, DIRECTOR**  
**GOVERNOR'S OFFICE OF HOMELAND SECURITY**  
**AND EMERGENCY PREPAREDNESS**  
Baton Rouge, Louisiana

We have performed the procedures enumerated below on documentation submitted by sub-grantees and technical assistance contractors (Documentation) to the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) for reimbursement under the Hazard Mitigation Grant Program (HMGP) for the semi-annual period ending June 30, 2024. GOHSEP management is responsible for the Documentation.

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 Documentation. 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.

**OVERALL RESULTS**

For the period January 1, 2024, through June 30, 2024, we performed procedures on the Documentation for 387 reimbursement requests totaling \$29,186,112. As a result of applying our procedures, we noted exceptions, which exceed \$500 per reimbursement request, totaling \$3,928,311 (13.46%) in 64 reimbursement requests. The following table presents the overall results of our procedures.



Exceptions				
Finding Type	Number of Occurrences	Exception Amount*	Percent of Total Exceptions	Amount Resolved**
Out-of-Scope	12	\$373,876	9.52%	\$162,768
Lack of Support	35	2,668,311	67.92	15,596,132
Procurement Not Documented	13	752,330	19.15	80,664
Ineligible Costs	1	45,121	1.15	37,996
Errors	3	88,673	2.26	13,752
<b>Total</b>	<b>64</b>	<b>\$3,928,311</b>	<b>100%</b>	<b>\$15,891,312</b>

\*Does not include exceptions noted in prior periods.

\*\*Includes exceptions noted in prior periods but resolved in the current period.

The procedures and associated findings are as follows:

**PROCEDURE 1:** We confirmed that the work reflected in the reimbursement request is within the scope approved for the project and that the requested amount does not exceed the funding parameters.

**FINDING 1:** We identified 12 reimbursement requests where \$373,876 (9.52%) of the work was not within the approved scope of the project.

Through our subsequent application of this procedure on reimbursement requests from the current and prior reporting periods, we noted that the sub-grantees provided approved amended scopes of work to support \$162,768 of the exceptions noted for out-of-scope expenses.

**PROCEDURE 2:** We confirmed that the requested amount is supported by invoices, receipts, lease agreements, contracts, labor policies, time records, equipment logs, HUD settlement statements, appraisals, elevation certificates, duplication of benefits verifications, engineer plans, inspection photographs, or other applicable documentation.

**FINDING 2:** We identified 35 reimbursement requests where \$2,668,311 (67.92%) of expenses were not supported by sufficient documentation.

Through our subsequent application of this procedure on reimbursement requests from the current and prior reporting periods, we noted that GOHSEP either reduced the requested

amount or the sub-grantees provided sufficient documentation to support \$15,596,132 of the exceptions noted for lack of support.

**PROCEDURE 3:** We confirmed that contracts and purchases totaling more than \$10,000 per vendor per calendar year comply with applicable federal and state procurement requirements.

**FINDING 3:** We identified 13 reimbursement requests for contracts greater than \$10,000, where we could not confirm that applicable procurement guidelines had been followed for purchases totaling \$752,330 (19.15%).

Through our subsequent application of this procedure on reimbursement requests from the current and prior reporting periods, we noted that GOHSEP either reduced the requested amount or the sub-grantees provided additional documentation to support \$80,664 of the exceptions noted for unsupported procurement.

**PROCEDURE 4:** We confirmed that the work reflected in the reimbursement request complies with applicable FEMA regulations and guidance.

**FINDING 4:** We identified one reimbursement request where \$45,121 (1.15%) of expenses were not in compliance with applicable FEMA regulations and guidance.

Through our subsequent application of this procedure on reimbursement requests from the current and prior reporting periods, we noted that GOHSEP either reduced the requested amount or the sub-grantees provided additional documentation to support \$37,996 of the exceptions noted for ineligible expenses.

**PROCEDURE 5:** We confirmed that the expenses uploaded to [gohsepgrants.la.gov](http://gohsepgrants.la.gov) for each reimbursement request do not contain duplicate invoices, incorrect vendor information, and/or incorrect invoice amounts.

**FINDING 5:** We identified three reimbursement requests where \$88,673 (2.26%) of expenses were duplicated, included incorrect vendor information, and/or incorrect invoice amounts.

Through our subsequent application of this procedure on reimbursement requests from the current and prior reporting periods, we noted that GOHSEP either reduced the requested amount or the sub-grantees provided additional documentation to support \$13,752 of the exceptions noted for errors.

**PROCEDURE 6:** We accumulated the total potential questioned costs and resolved amounts noted during our analysis of reimbursement requests.

**FINDING 6:** During our analysis of reimbursement requests totaling \$1,598,867,495 for the period April 1, 2008, through June 30, 2024, we identified potential questioned costs totaling \$323,381,634 (20.23%), of which a total of \$239,522,386 (74.07%) was resolved.

We were engaged by GOHSEP management to perform this agreed-upon procedures engagement and conducted our engagement in accordance with Generally Accepted *Government Auditing Standards* and attestation standards established by the American Institute of Certified Public Accountants. 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 Documentation submitted by sub-grantees under the HMGP program. 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.

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 this specified party. By provision of state law, this report is a public document and has been distributed to the appropriate public officials.

Respectfully submitted,



Michael J. "Mike" Waguespack, CPA  
Legislative Auditor

MJW/aa

GOHSEP-HM JANUARY-JUNE 2024



## BACKGROUND

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The Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) is the state agency responsible for responding to, and helping the state recover from, all natural and man-made emergencies and reducing the loss of life and property through an all-hazards emergency management program of prevention, mitigation, preparedness, response, and recovery. One of the programs GOHSEP uses to accomplish its mission is the Hazard Mitigation Grant Program (HMGP). The HMGP assists local governments with funding cost-effective actions that reduce the risk of property damage while simultaneously reducing reliance on federal disaster funds.

Hazard mitigation projects are intended to strengthen facilities and communities, making them less vulnerable to future disaster impacts. Examples of typical mitigation activities include:

- *Elevating flood-prone structures* - physically raising an existing structure above the base flood elevation;
- *Acquiring flood-prone structures* - purchasing structures and converting the land to green space in perpetuity;
- *Localized drainage improvements* - reducing localized flooding by increasing drainage capacity;
- *Safe-room construction* - providing immediate, nearby life-safety protection against either tornado or hurricane winds; and
- *Wind retrofitting structures* - hardening the envelope of a structure to protect against high winds. The envelope is the shell of the structure (including the doors, roof covering, windows, and walls) that maintains a dry, heated, or cooled indoor environment.

Sub-grantees submit reimbursement requests and supporting documentation to GOHSEP for payment through the HMGP. Our engagement with GOHSEP requires the Louisiana Legislative Auditor's (LLA) document review team to perform procedures on the documentation submitted by sub-grantees and technical assistance contractors.

GOHSEP's documentation review process begins when sub-grantees and technical assistance contractors submit reimbursement requests and supporting documentation. The 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 their reviews on requests for advance or reimbursement and then submit the forms and all supporting documentation to the team leads. After the team leads review the requests for advance or reimbursement and all supporting documentation, they submit them to

the LLA document review team to be reviewed under our agreed-upon procedures engagement.

The LLA document review team performs procedures on the documentation submitted by sub-grantees and technical assistance contractors under the HMGP. Unsupported costs exceeding \$500 are considered exceptions and are reported. The LLA document review team communicates the results of their review to GOHSEP management via Findings of Review. When exceptions are noted, 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. Then, LLA's document review team performs the same agreed-upon procedures on the additional documentation. This process allows GOHSEP the opportunity to correct exceptions prior to final payment, thus eliminating questioned costs.

## **MANAGEMENT'S RESPONSE**

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

JEFF LANDRY  
GOVERNOR



JACQUES THIBODEAUX  
DIRECTOR

September 6, 2024

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: Management's Response - Agreed-Upon Procedures  
Hazard Mitigation Grant Program Report January 1, 2024 - June 30, 2024

Dear Mr. Waguespack:

The Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) has reviewed the final report prepared by the Louisiana Legislative Auditor's (LLA) Recovery Assistance Division regarding the State's Hazard Mitigation Grant Program (HMGP) for the period of January 1, 2024, through June 30, 2024. We value the insights presented in the report and take the identified exceptions seriously.

GOHSEP takes great pride in administering the State's Hazard Mitigation Grant Program (HMGP) and the dedication of our team in achieving impactful results. In the first half of 2024, our HMGP grants management staff successfully processed \$29,186,112 in mitigation reimbursement requests from eligible subrecipients. Although the exceptions noted in your report reflect a slight improvement from 14.38% in the previous reporting period to 13.46% in the current period, we remain committed to continuous improvement and managing the program with the utmost diligence and accountability.

Lack of supporting documentation was the most significant exception noted, both in terms of frequency and percentage. GOHSEP's grants management team consistently works with HMGP subrecipients to improve the documentation submitted with reimbursement requests. Providing training and education remains a top priority, as these reports are invaluable in helping us ensure that all stakeholders—both internal and external—receive clear, comprehensive guidance. Furthermore, ongoing collaboration among the State Applicant Liaisons (SALs), Legal, and Grants Management teams continues to play a critical role in addressing and reducing out-of-scope work, procurement issues, and documentation deficiencies.

Mr. Michael J. "Mike" Waguespack, CPA  
September 6, 2024

GOHSEP has established effective mechanisms to address many of the questioned costs identified in your report. Our HMGP reimbursement review process ensures that all exceptions must be fully resolved before the disbursement of funds or the closeout of projects. We continue to make significant progress in addressing these questioned costs, achieving higher success rates during this period, thanks in part to the valuable information provided by your team. The insights from your reports have been instrumental in guiding our efforts to educate subrecipients on the proper documentation required for reimbursement requests, while also improving the accuracy and efficiency of our review process.

We remain committed to the diligent administration of this grant program and appreciate your continued review, insights, and assistance as we refine our processes. Our ultimate goal is to achieve 100% accuracy in the administration of the HMGP, and your support is vital in helping us reach that objective.

Sincerely,

Sandra D. Gaspard Digitally signed by Sandra D. Gaspard  
DN: cn=Sandra D. Gaspard, o=GOHSEP, ou=Hazard  
Mitigation, email=Sandra.Dugas@la.gov, c=US  
Date: 2024.09.06 12:58:55 -05'00'

Sandra D. Gaspard  
Assistant Director  
Hazard Mitigation Assistance Division

SG:bb