

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

## **HAZARD MITIGATION GRANT PROGRAM**

**RECOVERY ASSISTANCE SERVICES**

**Agreed-Upon Procedures Report  
for the period July-December 2022  
Issued April 12, 2023**

**LOUISIANA LEGISLATIVE AUDITOR  
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March 21, 2023

Independent Accountant's Report

**MR. CASEY TINGLE, 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 December 31, 2022. GOHSEP management is responsible for the completeness and accuracy of 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 completeness and accuracy of 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.

**HAZARD MITIGATION REIMBURSEMENT REQUESTS REVIEWS**

For the period July 1, 2022, through December 31, 2022, we confirmed the completeness and accuracy of Documentation for 275 reimbursement requests submitted by GOHSEP totaling \$31,436,211. As a result of applying our procedures, we noted exceptions, which exceed \$500 per reimbursement request, totaling \$4,588,866 (14.60%) in 50 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	4	\$1,120,814	24.42%	\$850,190
Lack of Support	30	2,103,445	45.84	1,823,271
Procurement Not Documented	16	1,364,607	29.74	812,059
Ineligible Costs	0	0	0.00	0
Errors	0	0	0.00	0
<b>Total</b>	<b>50</b>	<b>\$4,588,866</b>	<b>100%</b>	<b>\$3,485,520</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 four reimbursement requests where \$1,120,814 (24.42%) of the work was not within the approved scope of the project.

Through our subsequent analysis of reimbursement requests from the current and prior reporting periods, we noted that the sub-grantees provided approved amended scopes of work to support \$850,190 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 30 reimbursement requests where \$2,103,445 (45.84%) worth of expenses were not supported by sufficient documentation.

Through our subsequent analyses of 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 \$1,823,271 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 16 reimbursement requests where we could not confirm that applicable procurement guidelines had been followed for purchases totaling \$1,364,607 (29.74%).

Through our subsequent analysis of 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 \$812,059 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:** No exceptions were found as a result of this procedure.

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

**FINDING 5:** No exceptions were found as a result of this procedure.

**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 \$1,526,501,147 for the period April 1, 2008, through December 31, 2022, we identified potential questioned costs totaling \$314,059,161 (20.57%) of which a total of \$216,308,016 (68.87%) was resolved.

We were engaged by GOHSEP to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the AICPA. 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 JULY-DEC22



## 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 confirm the completeness and accuracy of 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 analyzes the requests and supporting documentation to confirm the completeness and accuracy of 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 (FORs). 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 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.

## **MANAGEMENT'S RESPONSE**

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

JOHN BEL EDWARDS  
GOVERNOR



CASEY TINGLE  
DIRECTOR

April 6, 2023

Mr. Michael J. 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 July 1, 2022 - December 31, 2022

Dear Mr. Waguespack:

The Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) has received and reviewed the draft report compiled by the Louisiana Legislative Auditor's (LLA) Recovery Assistance Division reviewing the State's Hazard Mitigation Grant Program (HMGP) for the second half of 2022 (July 1, 2022 and December 31, 2022). We appreciate the insight provided in your report.

GOHSEP takes great pride in administering the State's HMGP and in the work accomplished by our team. In the second half of 2022, HMGP grants management staff processed \$31,436,211 in hazard mitigation reimbursement requests (RRF) from eligible subrecipients. The noted exceptions increased slightly from the previous reporting period of 10.17% to the current report's 14.60%. While the number of RRFs with noted exceptions was similar between the two reporting periods, 46 and 50 respectively, a couple of large dollar RRFs with noted exceptions contributed to the slight percentage increase from the previous reporting period. We noted the number of exceptions for finding type "Out-of-Scope" trended slightly downward this reporting period. The GOHSEP staff will continue to address all questioned costs.

Lack of supporting documentation was the largest of the noted exceptions in both the number of occurrences and percentage noted. The two reimbursement requests previously mentioned of high dollar value made up a significant portion of these finding types, "Lack of Support" and "Out-of-Scope." GOHSEP continues to make progress by providing increased technical assistance to HMGP subrecipients through outreach by the GOHSEP State Applicant Liaisons (SALs) and GOHSEP Legal staff. Training and education are top priorities for GOHSEP, and these reports are instrumental in assisting us to ensure that both internal and external stakeholders are receiving proper guidance.

Mr. Michael J. Waguespack, CPA

April 6, 2023

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GOHSEP has the mechanisms in place to address many of the questioned costs found within your report. The HMGP reimbursement review process requires that exceptions identified in your report are addressed before disbursement of funds or project closeout. GOHSEP continues to address all questioned costs and works collaboratively with your team to understand the noted exceptions. The valuable data provided in your reports helps guide us in our efforts to advise our subrecipients of the proper documentation required for reimbursement requests and to improve the accuracy and efficiency of our subsequent reviews. Our team remains vigilant in the administration of this grant program.

Thank you again for your review, insight, and assistance as we continue to refine our processes to ultimately achieve our goal of 100% accuracy in the administration of the HMGP.

Sincerely,



Sean Wyatt  
Assistant Deputy Director  
Hazard Mitigation Assistance Division

SW:bb