

**Management Alert —  
Observations of FEMA's  
Debris Monitoring Efforts  
for Hurricane Irma**





# DHS OIG HIGHLIGHTS

## Management Alert — Observations of FEMA's Debris Monitoring Efforts for Hurricane Irma

September 27, 2018

### Why We Did This Management Alert

Adequate monitoring is critical to the accuracy of debris removal operations and eligible associated costs. The objective of this alert is to proactively advise the Federal Emergency Management Agency (FEMA) of the risks for fraud, waste, abuse, and mismanagement of Federal resources surrounding debris removal operations. This alert emphasizes potential debris monitoring challenges and risks that FEMA needs to address during response and recovery efforts for any disaster.

### What We Recommend

We made three recommendations that, when implemented, will strengthen FEMA's debris monitoring operations.

#### 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)

## Debris Removal

FEMA's guidance for debris monitoring lacks sufficient information to ensure adequate oversight. In our 2011 report, *FEMA's Oversight and Management of Debris Removal Operations*, we identified deficiencies in FEMA's debris removal guidance. To resolve these deficiencies, we made 10 recommendations to, in part, strengthen FEMA's debris removal guidance and procedures. In response, FEMA released additional criteria pertaining to debris estimating and monitoring to enhance the overall effectiveness of the process.

However, in January 2016, FEMA superseded almost all Public Assistance guidance — including guidance for debris operations — when it issued the *Public Assistance Program and Policy Guide* (PAPPG). The PAPPG eliminates Federal and state monitoring responsibilities for debris operations, and relies solely on subrecipients to monitor debris removal operations. Additionally, although local officials said contractors perform required monitoring of debris removal efforts, FEMA, State, and subrecipients provided limited or no contractor oversight, and contractor employees lacked adequate training for monitoring.

FEMA is currently responding to Hurricane Irma — one of the most catastrophic disasters in recent United States history. FEMA's damage estimates for Florida and Georgia exceed \$4.2 billion, with debris removal operations constituting approximately 36 percent of the total Public Assistance cost. Such costs are expected to reach about \$1.5 billion in these two states. Without adequate guidance and oversight of debris removal by FEMA, State officials, and subrecipients, there is increased risk of fraud, waste, and abuse at great cost to taxpayers.

## FEMA's Response

FEMA concurred with the three recommendations and described corrective actions it is taking, or plans to take, to address them.

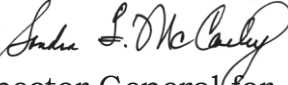


**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

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

September 27, 2018

MEMORANDUM FOR: Jeffrey Byard  
Associate Administrator  
Office of Response and Recovery  
Federal Emergency Management Agency

FROM: Sondra F. McCauley   
Acting Assistant Inspector General for Audits

SUBJECT: *Management Alert — Observations of FEMA's  
Debris Monitoring Efforts for Hurricane Irma*

For your action is our final management alert, *Observations of FEMA's Debris Monitoring Efforts for Hurricane Irma*. The report identifies actions the Federal Emergency Management Agency can take to enhance its Public Assistance Debris program's oversight and overall effectiveness. We incorporated the formal comments provided by your office.

The report contains three recommendations aimed at improving the program's overall effectiveness. Your office concurred with the three recommendations. Based on the information provided in your response to the draft report, we consider the three recommendations open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of the corrective actions. Please send your response or closure request to [OIGAuditsFollowup@oig.dhs.gov](mailto:OIGAuditsFollowup@oig.dhs.gov).

Consistent with our responsibility under the *Inspection General Act of 1978*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions at (202) 981-6000, or your staff may contact Patrick J. O'Malley, Acting Deputy Assistant Inspector General for Audits, at (856) 229-5105.



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**Background**

On September 10, 2017, Hurricane Irma made landfall in Florida as a Category 4 Hurricane and moved into Georgia as a tropical storm. Irma caused catastrophic flooding and widespread destruction along much of the Florida and Georgia coasts. In some locations, storm-related rainfall exceeded 15 inches, with top wind speeds exceeding 120 miles per hour. FEMA reported 75 individuals lost their lives because of this disaster.<sup>1</sup> In addition, FEMA estimated 30,982 residential structures suffered significant water damage.

The President approved a Major Disaster Declaration for Florida (DR-4337-FL) on September 10, 2017, and approved Georgia’s declaration (DR-4338-GA) on September 15, 2017. These declarations authorized FEMA to provide public assistance (direct and financial) to eligible subrecipients directly impacted by the disaster. As of May 2018, FEMA expected damage costs to reach \$4.2 billion. Of the \$4.2 billion, FEMA estimated debris removal costs for Florida (DR-4337) and Georgia (DR-4338) would reach approximately \$1.5 billion or 36 percent of the total damage. Figure 1 illustrates debris collected in Florida and Georgia.

**Figure 1. Disaster Staging Sites in Florida and Georgia**



Source: Department of Homeland Security Office of Inspector General (OIG)

Section 407 of the *Stafford Act* authorizes the FEMA Public Assistance (PA) program to provide assistance for debris removal (Category A).<sup>2</sup> When a disaster or emergency generates large amounts of debris, eligible recipients and

<sup>1</sup> As of November 14, 2017, FEMA reported 70 fatalities in Florida and 5 fatalities in Georgia resulting from Hurricane Irma.

<sup>2</sup> *Robert T. Stafford Disaster Relief and Emergency Assistance Act*, Pub. L. 93-288, as amended, 42 United States Code (U.S.C.) 5121, *et seq.*



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subrecipients may request PA grant funding to offset expenses incurred for debris removal operations.<sup>3</sup>

### Results of Review

FEMA's guidance for debris monitoring lacks sufficient information to ensure adequate oversight. In our 2011 report, *FEMA's Oversight and Management of Debris Removal Operations*, we identified deficiencies in FEMA's debris removal guidance. To resolve these deficiencies, we made 10 recommendations to, in part, strengthen FEMA's debris removal guidance and procedures. In response, FEMA released additional criteria pertaining to debris estimating and monitoring to enhance the overall effectiveness of the process.

However, in January 2016, FEMA superseded almost all Public Assistance guidance — including guidance for debris operations — when it issued the *Public Assistance Program and Policy Guide* (PAPPG). The PAPPG eliminates Federal and state monitoring responsibilities for debris operations, and relies solely on subrecipients to monitor debris removal operations. Additionally, although local officials said contractors perform required monitoring of debris removal efforts, FEMA, State, and subrecipients provided limited or no contractor oversight, and contractor employees lacked adequate training for monitoring.

FEMA is currently responding to Hurricane Irma — one of the most catastrophic disasters in recent United States history. FEMA's damage estimates for Florida and Georgia exceed \$4.2 billion, with debris removal operations constituting approximately 36 percent of the total Public Assistance cost. Such costs are expected to reach about \$1.5 billion in these two states. Without adequate guidance and oversight of debris removal by FEMA, State officials, and subrecipients, there is increased risk of fraud, waste, and abuse at great cost to taxpayers.

### **FEMA Did Not Ensure Adequate Debris Removal Monitoring**

FEMA did not ensure subrecipients provided adequate oversight of debris removal operations in Georgia or Florida. In Georgia, FEMA provided limited oversight in only 5 of the 42 counties conducting debris removal through a mission assignment with the U.S. Army Corps of Engineers (USACE). The majority of the municipalities in Florida we visited relied on contractors to

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<sup>3</sup> *Id.*; 44 Code of Federal Regulations (CFR) § 206.224. Recipients and subrecipients include state and local governments, Indian tribes or authorized tribal organizations and Alaskan Native villages, and certain private nonprofit organizations (44 CFR § 206.222).



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perform debris monitoring. We visited 12 debris management sites in Georgia and Florida combined, and observed the performance of the contracted monitors. Seven of those sites had no force account personnel engaged in active monitoring capacities.<sup>4</sup> We believe the lack of monitoring may have resulted from FEMA's elimination of debris monitor responsibilities from its PA guidance during its drafting of the PAPPG.

In a 2011 OIG report,<sup>5</sup> we identified deficiencies in FEMA's debris removal guidance. To resolve these deficiencies, we made 10 recommendations to, in part, strengthen FEMA's debris removal guidance and procedures. In response, FEMA released additional criteria pertaining to debris estimating and monitoring to enhance the overall effectiveness of the process. For example, FEMA's 2010 *Public Assistance Debris Monitoring Guide (FEMA 327)*, outlined clear roles for FEMA, the State, and subrecipients, and defined contractor monitoring responsibilities. The guidance indicated that FEMA debris monitors should ensure that subrecipients meet PA grant requirements and eligibility criteria in all areas of the debris operation. Operating under this guidance required FEMA to take an active role in validating truck and trailer capacity certifications, evaluating operational efficiency, and overseeing documentation requirements.

However, FEMA removed the detailed responsibilities when it subsequently released the PAPPG.<sup>6</sup> Going forward from PAPPG version 1.0, FEMA relies solely on the subrecipient to monitor the debris removal operations, and eliminates monitoring responsibilities from both FEMA and the State. Subrecipients now have a greater responsibility to identify issues or concerns during debris removal operations. FEMA's guidance encourages, but does not require, the subrecipient to use its own employees to monitor debris removal operations. The subrecipient may use force account resources (including temporary hires), contractors, or a combination of these options for debris monitoring. According to the PAPPG, FEMA provides training to force account monitors, but only upon request. The subrecipient may have little incentive to reach out to FEMA for guidance because subrecipients rely on debris monitoring contractors and FEMA has limited active debris monitoring in the field, decreasing its situational awareness. Additionally, once debris removal occurs, FEMA has limited recourse to question the validity and eligibility of costs incurred.

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<sup>4</sup> FEMA refers to a subrecipient's permanently-employed personnel as "force account labor" (44 CFR § 206.228).

<sup>5</sup> *FEMA's Oversight and Management of Debris Removal Operations*, OIG-11-40, February 2011.

<sup>6</sup> FEMA issued several additional revisions of the PAPPG. Versions 3.0 and 3.1 apply to incidents declared on or after August 23, 2017. This report used the guidance in PAPPG Version 3.0 issued January 2, 2018.



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The impact of FEMA's change from the 2010 guidance to the PAPPG version 3.0 resulted in:

- loss of specific guidance for FEMA, State, and subrecipients;
- no direct FEMA oversight of debris operations, including monitoring and hauling; and
- increased risk of overstated debris loads.

To ensure eligible subrecipients receive much-needed technical assistance, and to reduce the potential for fraud, waste, and abuse, FEMA must ensure state officials fully understand their grant management responsibilities and hold subrecipients accountable for adequately monitoring debris removal activities.

### **Risks Associated with Debris Removal Efforts**

Inadequate monitoring poses risks of overstated debris removal activity and questionable costs for reimbursement. Following Hurricane Irma, FEMA lacked oversight of the debris removal process in Florida. FEMA did have limited oversight in Georgia through an agreement with USACE. OIG observed overstated debris loads in Florida while both OIG and USACE observed overstated debris loads in Georgia.

In Florida and Georgia, subrecipients entered into contracts with haulers to remove debris and with debris monitoring contractors to oversee the haulers' work. Subrecipients pay haulers for the volume of debris collected in each truck measured in cubic yards. To calculate the amount of eligible cubic yards, debris monitoring contractors measure and certify the maximum amount each truck can haul. Based on that pre-established volume, the monitors estimate the percentage of debris each truck brings to the debris staging or dump site (commonly referred to as a "load call"). For instance, if a monitor determines a truck's total capacity is 10 cubic yards, and the truck is assessed as 75 percent full, then the "load call" for that truck is 7.5 cubic yards. To record the amount of estimated cubic yards actually dumped, monitors prepare a load call ticket. Subrecipients use these load call tickets to substantiate their claims for debris removal.

When haulers overstate debris loads or collect unauthorized debris, subrecipients can end up incurring and requesting reimbursement for unreasonable or ineligible costs. FEMA's current guidance provides little to no incentive for subrecipients to oversee the debris removal process as required by Federal regulations.<sup>7</sup> In fact, FEMA's Alternative Procedures Pilot Program for

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<sup>7</sup> 2 CFR § 200.318 (b) requires the applicant to assert a "high degree of oversight in order to



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Debris Removal incentivizes subrecipients to remove debris quickly by reducing subrecipients' financial exposure, but does not increase oversight responsibilities. The assistance FEMA provides through its PA program is subject to a Federal cost share.<sup>8</sup> Although the Federal share of assistance shall not be less than 75 percent of the eligible costs of debris removal, depending on the disaster severity, FEMA has the authority to increase the Federal share up to 100 percent.<sup>9</sup> Any remaining non-Federal cost share is split between the State and the subrecipient. In some instances, the State absorbs the entire non-Federal share. For example, in Georgia, the State Governor publicly declared that Georgia would cover the non-Federal share for six coastal counties. As a result, these six counties will obtain 100 percent reimbursement of their eligible debris removal costs. Given the subrecipients' limited to non-existent financial exposure for debris removal operations, the subrecipients have little incentive to engage in project oversight.

### **Minimal Debris Removal Oversight Observed in Florida**

OIG observed virtually no debris oversight in Florida. FEMA officials in Florida, at the Joint Field Office and local regional branch offices, indicated that they do not perform any kind of active debris monitoring in the field, such as verifying truck certifications or conducting random spot checks of load calls.<sup>10</sup> Additionally, State and most subrecipient officials also indicated that they do not provide direct (force account) contract monitoring at debris management sites. Instead, they rely solely on contracted debris monitoring companies.

Federal regulations require that when a subrecipient contracts with a monitoring company, the subrecipient must maintain oversight of the contractors to ensure they perform according to the conditions and specifications of the contract and any purchase orders. Subrecipients visited by OIG said they did not monitor the contractor's daily activities when relying on them to provide oversight; rather, the subrecipients' oversight was limited to reviewing load tickets submitted prior to payment

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obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.”

<sup>8</sup> 44 CFR § 206.203(b) Cost sharing. All projects approved under State disaster assistance grants will be subject to the cost sharing provisions established in the FEMA-State Agreement and the Stafford Act.

<sup>9</sup> 44 CFR § 206.47(d) Cost-share adjustments.

<sup>10</sup> A truck certification determines the volume of the truck and how it will be identified during the recovery operation, including the size of hauling bed in cubic yards, license plate number, truck identification number, and a short physical description of the truck. Recertification of a truck is usually required if the physical truck identification becomes damaged or the volume capacity becomes suspect during operations.





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of invoices. At two debris management sites, however, we observed county officials present who visited the sites occasionally to provide limited oversight.

At a debris management site in a Florida county, contracted monitors made what appeared to be overstated load calls. FEMA has specific eligibility criteria and documentation requirements for reimbursing large stump removal when the stump measures larger than 2 feet in diameter and extraction is required. Reimbursement may be based on (1) a price per item, (2) weight, or (3) volume using FEMA's Stump Conversion Table. For stumps smaller than 2 feet in diameter, or for stumps of any size that do not require extraction, FEMA may reimburse costs based on volume or weight because removal of these stumps does not require special equipment.

However, the debris monitoring sites we visited did not contain weight scales. In addition, the monitors present at those sites did not measure the stumps, as required. Instead, the monitors overstated debris loads based on the volume of truck capacity, as depicted in the following figures. We observed a monitor who provided haulers load calls of 90 and 95 percent volume of the certified truck capacity even though the trucks were not that full. Instead, the truck contained large stumps that did not take up 90 and 95 percent of the truck's available space.

Figure 2 depicts a load with large tree limbs and a stump. The truck driver convinced the monitor to estimate the load call at 95 percent full when more than half of the truck was empty.

**Figure 2. Disaster Debris Load Called at 95 Percent Full**



Source: DHS OIG



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Figure 3 depicts a load containing a large stump and tree branches. The monitor overstated the debris load at 50 percent of the truck’s capacity when more than 75 percent of the truck was empty. We requested copies of the truck certification; however, the subrecipient did not provide the information by the time we concluded our fieldwork in March 2018.

**Figure 3. Disaster Debris Load Called at 50 Percent Full**



Source: DHS OIG

Figure 4 illustrates a disaster debris hauler certified to carry up to 43 cubic yards. The monitor declared this load 50 percent full; however, the truck was significantly less than half full.

**Figure 4. Disaster Debris Load Called at 50 Percent Full**



Source: DHS OIG



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We notified the County, Florida and FEMA of our observations. County officials said they would review the information provided, but Florida and FEMA provided no comment. Prior to our issuing this alert, County officials said they reviewed the load tickets and removed all tickets associated with the monitors identified in our observations.

### **Discrepancies in Debris Removal Monitoring in Georgia**

In Georgia, the FEMA Federal Coordinating Officer (FCO) anticipated the need for expert advice in the area of debris removal operations. The FCO entered into a mission assignment with USACE to assist FEMA with specialized oversight of debris operations for Hurricane Irma subrecipients. FEMA officials indicated that they did not have a documented risk-based approach for FCOs to use when determining the level of oversight or involvement FEMA would provide for debris removal operations after a disaster. Presently, FCOs rely on their experience and information obtained immediately after a disaster to determine oversight needs.

USACE's primary role is to provide technical guidance and debris-monitoring specialists to ensure that subrecipients meet PA grant requirements and eligibility criteria.<sup>11</sup> According to FEMA's agreement with USACE, USACE was to provide oversight to the six counties in Georgia (of the 42 counties that reported the need for PA in Category A (debris) work) that suffered the heaviest damage. One of the six counties declined USACE assistance.

At one Georgia county that USACE visited, USACE conducted fieldwork to determine whether monitors were estimating loads accurately. To validate the debris load tickets, USACE measured debris and mulch piles and compared its measurements to total load tickets collected for selected weeks. As a result, USACE validated a 28,000 cubic yard overstatement in a single week of debris operation. At \$16.43 per cubic yard, this equates to \$460,040 in ineligible cost. Figure 5 illustrates what USACE personnel observed throughout the week they shadowed contracted monitors in that Georgia county.

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<sup>11</sup> Technical guidance includes instruction on how to measure debris loads, debris piles, and how to train debris monitors.



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**Figure 5. Image of Disaster Debris Hauler**



Monitor called this 75 Percent Full, USACE would have called 25-30% \*

Source: USACE

\*The information was redacted because it could be used to identify the subrecipient.

USACE notified FEMA of the discrepancies, and FEMA and County officials discussed the matter with the monitoring contractor. As a result, FEMA, USACE, and the county agreed to recalculate the value of collected debris as of the date of the meeting, and FEMA agreed to use USACE to provide additional training to monitors at the debris collection and staging locations. According to USACE personnel, all five counties they visited had monitors that the subrecipient hired. These monitors needed additional training to prevent overestimated load calls. County officials also told us that they were not monitoring the contractors' daily activities when relying on them to provide oversight; rather, the subrecipients' oversight was limited to reviewing load tickets submitted prior to payment. FEMA does not require subrecipients to document load calls with photographs or to measure debris piles for comparison. Had USACE not been present at the time of the debris collection, FEMA would have no way to determine whether load calls were overstated.

USACE provided the following images (figures 6 through 9) to FEMA, Georgia, and the subrecipient to support its findings. FEMA, the State, and the subrecipient all took actions to correct the overstated calls and immediately began retraining the debris management site monitors.



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**Figure 6. Image of a Disaster Debris Hauler**



[Redacted]

Monitor called this 80 Percent Full, USACE would have called 40%

Source: USACE

\*The information was redacted because it could be used to identify the subrecipient.

**Figure 7. Image of a Disaster Debris Hauler**



[Redacted]

Monitor called this 70 Percent Full, USACE would have called 50%

Source: USACE

\*The information was redacted because it could be used to identify the subrecipient.



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**Figure 8. Image of a Disaster Debris Hauler**



Source: USACE

\*The information was redacted because it could be used to identify the subrecipient.

**Figure 9. Image of a Disaster Debris Hauler**



Source: USACE

\*The information was redacted because it could be used to identify the subrecipient.



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### Conclusion

As of May 2018, debris removal costs in Florida and Georgia following Hurricane Irma were estimated to reach approximately \$1.5 billion. FEMA is responsible for the greater share of these costs, exposing it to increased fraud and waste where oversight of these activities was lacking. We do not believe the current FEMA guidance ensures adequate oversight of debris removal operations and associated costs eligible for reimbursement. Therefore, adequate guidance and oversight will be essential to ensure disposal operations are efficient for all future disasters.

In addition, it is critical that subrecipients have sufficient capabilities and expertise to manage and oversee their own debris-removal operations. If FEMA continues to place the majority of the debris disposal oversight responsibilities on subrecipients, it is critical that FEMA's guidance include clear and unambiguous rules and procedures.

### Recommendations

**Recommendation 1:** We recommend the FEMA Administrator develop and implement clear and unambiguous rules, guidance, and procedures for debris removal operations, debris operations oversight, and contractor oversight, including contractor monitoring. This guidance may include, but should not be limited to, checklists, job aids, eligibility requirements, contract requirements, and debris management planning.

**Recommendation 2:** We recommend the FEMA Administrator develop a documented risk-based approach that Federal Coordinating Officers can use to determine appropriate cost-effective field presence required for debris removal oversight.

**Recommendation 3:** We recommend the FEMA Administrator require applicants to identify a quality control method for verifying debris amounts collected and claimed for reimbursement. For example, verification methods may include, but are not limited to, digital photographs of each load to validate load tickets, digital photographs of trucks to verify truck certifications, and measurements of debris piles and mulch piles for comparison and verification against the photographs.

### Management Comments and OIG Analysis

FEMA officials concurred with our recommendations and are committed to ensuring responsible stewardship of taxpayer dollars, including publishing clear



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guidance. Nonetheless, FEMA's estimated completion date for implementing clear guidance is August 30, 2019. Given the importance of this information, we urge FEMA to expedite this timeline. We have included a copy of the FEMA management comments in their entirety in appendix A. We also received technical comments to the draft report and revised this report as appropriate.

**Recommendation 1. Concur.** FEMA's Recovery Directorate recognizes the importance of producing clear debris monitoring guidance so that applicants can properly implement and manage debris monitoring activities. FEMA will develop and publish updated Public Assistance debris monitoring guidance, which will address this recommendation.

Estimated Completion Date (ECD): August 30, 2019

**OIG Analysis:** FEMA's proposed actions are responsive to this recommendation. This recommendation is resolved and will remain open until FEMA provides updated Public Assistance debris operations guidance, including steps that applicants must take to properly implement and manage debris removal monitoring activities.

**Recommendation 2: Concur.** FEMA's Recovery Directorate will develop and publish updated Public Assistance debris removal monitoring guidance, which will include content that Federal Coordinating Officers can use to determine appropriate cost-effective field presence for debris removal oversight.

ECD: August 30, 2019

**OIG Analysis:** FEMA's proposed actions are responsive to this recommendation. This recommendation is resolved and will remain open until FEMA provides the updated Public Assistance debris removal monitoring guidance.

**Recommendation 3: Concur.** FEMA's Recovery Directorate will develop and publish updated Public Assistance debris removal monitoring guidance, which will include content requiring applicants to identify a quality control method for verifying debris amounts collected and claimed for reimbursement. FEMA will also update its Public Assistance Grants Manager information system to require applicants using the system to identify (at the beginning of debris removal operations) a quality control method for verifying debris amounts collected and claimed for reimbursement.

ECD: August 30, 2019

**OIG Analysis:** FEMA's proposed actions are responsive to this recommendation. This recommendation is resolved and will remain open until FEMA provides the





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updated guidance.

### **Objective, Scope, and Methodology**

The objective of this management alert was to proactively advise FEMA of the risks for fraud, waste, abuse, and mismanagement of Federal resources surrounding debris removal operations. We based the information in the alert on our observations and discussions with FEMA officials from October to November 2017, at the Joint Field Office in Orlando, Florida, and at the Area Field Office in Brunswick, Georgia; as well as debris estimates as of May 2018 in response to Hurricane Irma.

To accomplish our objective, we reviewed the mission assignment between FEMA and USACE for debris removal oversight in Georgia (4338-DR-GA). We compiled, summarized, and analyzed Federal law, policy, procedures, and guidance, including the following:

- The *Stafford Act*, 42 U.S.C. § 5121, *et seq.*;
- 2 CFR Part 200;
- 44 CFR Part 206;
- PAPPG – FP-104-009-2 / January 2018; and
- *Public Assistance Debris Management Guide FEMA 327* / October 2010.

During fieldwork, we visited debris management sites in Georgia and Florida to observe debris collection operations. We reviewed findings and recommendations from disaster assistance reports issued in fiscal years 2012 through 2017; identified types of frequently reported debris removal issues in grant reports; identified findings related to non-compliance with Federal procurement regulations; and performed other procedures we considered necessary to accomplish our objective. We also interviewed FEMA officials, USACE employees, and debris-monitoring staff at the staging areas visited.

We conducted this management alert pursuant to the *Inspector General Act of 1978*, as amended. The objective of our alert was not to audit FEMA, its grant recipients, or its subrecipients. Therefore, we did not conduct our review or prepare this alert in accordance with generally accepted government auditing standards.

The Office of Audits major contributors to this management alert are Yesi Starinsky, Director; Carlos Aviles, Manager; Lauren Bullis, Auditor; Patricia Epperly, Senior Program Analyst; Angelica Esquerdo, Program Analyst; Jason Jackson, Program Analyst; Carlos Lecaro, Auditor; Jessica Makowski, Program Analyst; Judy Martinez, EMOT Coordinator; Leonardo Molineros,



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Auditor; Nancy Pergolizzi, Auditor; John Schmidt, Program Analyst; Michael Scoffone, Auditor; Jacqueline Thompson, Program Analyst; James Townsend, Program Analyst; Elizabeth Kelleher, Independent Referencer; and Thomas Hamlin, Communications Analyst.



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**Appendix A**  
**FEMA's Comments to the Draft Alert**


U.S. Department of Homeland Security  
Washington, DC 20472



**FEMA**

August 30, 2018

MEMORANDUM FOR: Sondra F. McCauley  
Acting Assistant Inspector General for Audits  
Office of Inspector General

FROM: David Bibo   
Associate Administrator (Acting)  
Office of Policy & Program Analysis

SUBJECT: Management's Response to OIG Draft Report: "Management Alert -  
Observations of FEMA's Debris Monitoring Efforts for Hurricane  
Irma" (Project No. OIG-18-008-AUD-FEMA)

Thank you for the opportunity to review and comment on this Draft Report. The Federal Emergency Management Agency (FEMA) appreciates the work of the Department of Homeland Security (DHS) Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

FEMA appreciates OIG noting that the Agency continues to respond to a historic disaster season that saw three major hurricanes including Hurricane Irma. FEMA is committed to ensuring responsible stewardship of taxpayer dollars while taking steps to prevent instances of waste, fraud, and abuse. This includes working with local governments and other non-Federal entities that submit an application for Public Assistance (PA) funding under a recipient's federal PA award (hereafter: "Applicants"). Through FEMA's PA Program, FEMA provides supplemental federal disaster grant assistance for debris removal.

FEMA recognizes the importance of producing clear debris monitoring guidance so that Applicants can properly implement and manage debris monitoring activities. FEMA encourages Applicants to establish written procedures and guidance for managing debris operations in an expeditious, efficient, and environmentally sound manner. FEMA also provides Applicants with a job aid to assist them in developing a comprehensive Debris Management Plan.

The Draft Report contained three recommendations with which FEMA concurs. Attached please find our detailed response to each recommendation. Technical comments were provided under a separate cover.

Again, thank you for the opportunity to review and comment on this Draft Report. Please contact Gary McKeon, Director of FEMA's Audit Liaison Office (ALO), at 202-646-1308 with any questions or concerns. We look forward to working with you again in the future.

Attachment



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### Attachment: Management Response to Recommendations Contained in Draft Report for Project OIG-18-008-AUD-FEMA

**Recommendation 1:** We recommend that the FEMA Administrator develop and implement clear and unambiguous rules, guidance, and procedures for debris operations, debris operations oversight, and contractor oversight, including monitoring contractors. This guidance may include but should not be limited to, checklists, job aids, eligibility requirements, contract requirements, and debris management planning.

**Response:** Concur. FEMA's Recovery Directorate recognizes the importance of producing clear debris monitoring guidance so that Applicants can properly implement and manage debris monitoring activities. FEMA will develop and publish updated Public Assistance debris monitoring guidance which will address this recommendation.

Estimated Completion Date (ECD): August 30, 2019.

**Recommendation 2:** We recommend the FEMA Administrator develop a documented risk based approach Federal Coordinating Officers can use when determining appropriate cost-effective field presence for debris oversight.

**Response:** Concur. FEMA's Recovery Directorate will develop and publish updated Public Assistance debris monitoring guidance which will address this recommendation. This guidance will include content that Federal Coordinating Officers can use when determining appropriate cost-effective field presence for debris oversight.

ECD: August 30, 2019.

**Recommendation 3:** We recommend the FEMA Administrator require applicants to identify a quality control method for verifying debris amounts collected and claimed for reimbursement. For example, verification methods may include, but are not limited to, digital photographs of each load to validate load tickets, digital photograph of trucks to verify truck certifications, and debris pile and mulch pile measurements for comparison and verification.

**Response:** Concur. FEMA's Recovery Directorate will develop and publish updated Public Assistance debris monitoring guidance which will address this recommendation. This guidance will include content requiring Applicants to identify a quality control method for verifying debris amounts collected and claimed for reimbursement. FEMA's Recovery Directorate will also update its Public Assistance Grants Manager / Grants Portal information system to require Applicants (associated with disasters for which FEMA is utilizing its PA New Delivery Model) to identify (at the beginning of debris removal operations) a quality control method for verifying debris amounts collected and claimed for reimbursement.

ECD: August 30, 2019.



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**Appendix B**  
**Alert Distribution**

**Department of Homeland Security**

Secretary  
Deputy Secretary  
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Executive Secretary  
Director, GAO/OIG Liaison Office  
Assistant Secretary for Office of Policy  
Assistant Secretary for Office of Public Affairs  
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**Federal Emergency Management Agency**

Administrator  
Chief of Staff  
Chief Financial Officer  
Chief Counsel  
Director, Risk Management and Compliance  
Chief Procurement Officer  
Audit Liaison, FEMA (Job Code G-18-008-EMO-FEMA)  
Regional Administrator, FEMA Region VI  
Audit Liaison, FEMA Region VI

**Office of Management and Budget**

Chief, Homeland Security Branch  
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