

**Review of Box Elder  
County, Utah's  
Procurement Policies and  
Procedures for Disaster No.  
4311-DR-UT, Grant No.  
003-99003-00**





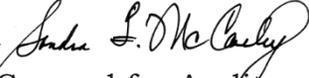
## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

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

November 7, 2019

MEMORANDUM FOR: Lee dePalo  
Regional Administrator, Region VIII  
Federal Emergency Management Agency

FROM: Sondra F. McCauley   
Assistant Inspector General for Audits

SUBJECT: *Review of Box Elder County, Utah's Procurement Policies and Procedures for Disaster No. 4311-DR-UT, Grant No. 003-99003-00*

For your information is our final report, *Review of Box Elder County, Utah's Procurement Policies and Procedures for Disaster No. 4311-DR-UT, Grant No. 003-99003-00*.

We conducted this review early in the Public Assistance process to identify areas in which the County may need additional technical assistance or monitoring to ensure compliance with Federal regulations and FEMA guidelines. Our objective was to determine whether Box Elder County's procurement policies and procedures are adequate to expend FEMA grant funds according to Federal procurement regulations. We conducted this review between July 2017 and August 2018, pursuant to the *Inspector General Act of 1978*, as amended.

At the time of our onsite work in July 2017, Box Elder County had not awarded any contracts under this grant. Therefore, we could not determine whether the County had complied with Federal procurement regulations. However, in reviewing Box Elder County's written procurement policies and procedures, we noted they did not include procedures to ensure opportunities for small and minority businesses, women's business enterprises, and labor surplus area firms to bid for federally funded work. In addition, Box Elder County's procurement policies did not require federally mandated provisions be incorporated in all contracts funded by Federal grants.

Although the Code of Federal Regulations (CFR)<sup>1</sup> does not require non-federal entities to include the abovementioned specific Federal requirements in their procurement policies and procedures, entities must nonetheless follow these requirements when issuing contracts using Federal funds. Unless Box Elder

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<sup>1</sup> 2 CFR 200.321(a) and 2 CFR 200.326.



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County includes these requirements in its written procurement policies and procedures, in the event of a future disaster, disadvantaged businesses, such as minority firms and women's business enterprises, may not receive sufficient opportunities to bid on federally funded work, and the risk of future contract disputes increases.

In response to our review, Box Elder County revised its procurement policies and procedures to include these Federal procurement requirements. Consequently, we are making no recommendations.

We thank FEMA staff and Box Elder County personnel for their cooperation with this review.

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.

The Office of Audits major contributors to this report are Paige Hamrick, Director (Ret); Brooke Bebow, Director; John Polledo, Audit Manager; David B. Fox, Audit Manager; Douglas Denson, Auditor-in-Charge (Ret); Evette Fontana, Auditor-in-Charge; Josh Welborn, Auditor in Charge; Lauren Moore, Auditor; Brandi Price, Program Analyst; LaTrina McCowin, Independent Reference Reviewer; and Kevin Dolloson, Communications Analyst.

Please call me with any questions, or your staff may contact Katherine Trimble, Deputy Assistant Inspector General for Audits at (202) 981-6000.



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