

**Department of Homeland
Security's FY 2020
Compliance with the
Payment Integrity
Information Act of 2019
and Executive Order
13520, Reducing Improper
Payments**





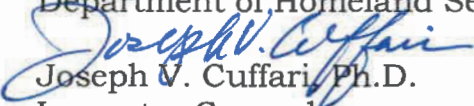
OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

May 7, 2021

MEMORANDUM FOR: Stacy Marcott
Acting Chief Financial Officer
Department of Homeland Security

FROM: 
Joseph V. Cuffari, Ph.D.
Inspector General

SUBJECT: *Department of Homeland Security's FY 2020
Compliance with the Payment Integrity Information Act
of 2019 and Executive Order 13520, Reducing Improper
Payments*

Attached for your information is our final report, *Department of Homeland Security's FY 2020 Compliance with the Payment Integrity Information Act of 2019 and Executive Order 13520, Reducing Improper Payments*. We incorporated the formal comments provided by your office.

The report contains two recommendations aimed at enhancing the Department's compliance with the *Payment Integrity Information Act of 2019*. Your office concurred with both recommendations. Based on information provided in your response to the draft report, we consider both 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 agreed-upon corrective actions. Please send your response or closure request to OIGAuditsFollowup@oig.dhs.gov.

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.

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

Attachment



DHS OIG HIGHLIGHTS

Department of Homeland Security's FY 2020 Compliance with the Payment Integrity Information Act of 2019 and Executive Order 13520, Reducing Improper Payments

May 7, 2021

Why We Did This Audit

Our objective was to determine whether DHS complied with PIIA and Executive Order 13520. Additionally, we evaluated the accuracy and completeness of DHS' improper payment reporting.

What We Recommend

We made two recommendations that DHS follow Office of Management and Budget requirements for agencies not compliant with PIIA and ensure the Federal Emergency Management Agency continues its remediation process to reduce improper payments.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

In fiscal year 2020, the Department of Homeland Security did not comply with the *Payment Integrity Information Act of 2019* (PIIA) because it did not meet one of the six PIIA requirements. Specifically, DHS did not achieve and report an improper payment rate of less than 10 percent for 2 of 12 programs published in the FY 2020 DHS Agency Financial Report.

We further determined DHS complied with Executive Order 13520, *Reducing Improper Payments*, by properly compiling and making available to the public its FY 2020 Quarterly High-Dollar Overpayment reports.

DHS Response

DHS concurred with both recommendations. DHS also indicated that it is committed to (i) becoming fully compliant with PIIA requirements and (ii) the responsible stewardship of taxpayer-provided resources; and ensuring proper controls are in place to eliminate fraud, waste, abuse, and mismanagement.



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Department of Homeland Security

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Abbreviations

AFR	Agency Financial Report
FEMA	Federal Emergency Management Agency
OMB	Office of Management and Budget
PIIA	<i>Payment Integrity Information Act of 2019</i>



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Background

The *Payment Integrity Information Act of 2019* (PIIA) (Public Law 116-117), issued March 2, 2020, repealed the *Improper Payments Information Act of 2002* (Public Law 107-300), the *Improper Payments Elimination and Recovery Act of 2010* (Public Law 114-204), and the *Improper Payments Elimination and Recovery Improvement Act of 2012* (Public Law 112-248). PIIA requires agency heads to review periodically all programs and activities administered and identify those that may be susceptible to significant improper payments. PIIA defines an improper payment as one that should not have been made or one that was made in an incorrect amount under statutory, contractual, administrative, or other legally applicable requirements. An improper payment includes any payment to an ineligible recipient, payment for an ineligible good or service, duplicate payment, payment for a good or service not received (except for such payments authorized by law), and payment that does not account for credit for applicable discounts. PIIA requires agency heads to report information on improper payments to the President and Congress annually through the annual financial statements.

PIIA requires agencies to identify and review all programs and activities that may be susceptible to significant improper payments based on guidance provided by the Office of Management and Budget (OMB). For programs or activities with estimated improper payments, each agency is required to prepare a report on actions it has taken, or plans to take, to recover improper payments and prevent future improper payments. Additionally, Inspectors General are required to review each agency's improper payment reporting and issue an annual report by May 15 of the following year.

OMB Circular A-123¹ requires agencies to conduct risk assessments of all programs once every 3 years and obtain a statistically valid estimate of the annual amount of improper payments for those programs the agency identified as susceptible to significant improper payments. In fiscal year 2020, the Department of Homeland Security conducted risk assessments for 38 of 153 programs with disbursements totaling \$41 billion of \$85 billion made in FY 2019 for all DHS programs. Based upon the risk assessments, DHS determined that 12 of the 38 programs were susceptible to significant improper payments and obtained a statistically valid estimate of the annual amount of

¹ Following the issuance of PIIA, OMB began updating agency and Office of Inspector General (OIG) guidance for implementation in its Circular A-123, Appendix C. However, this guidance will not be fully effective until FY 2021. Therefore, we conducted this review using a combination of requirements, including the existing version of OMB Circular A-123, Appendix C (M-18-20), OMB Payment Integrity Question and Answer Platform, and the Council of the Inspectors General on Integrity and Efficiency *Guidance for Payment Integrity Information Act Compliance Reviews* (August 2020).



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improper payments. Appendix C provides a chart outlining DHS' PIIA Component Risk Assessment Process.

Executive Order 13520, *Reducing Improper Payments* was issued November 20, 2009, in the interest of reducing payment errors and eliminating waste, fraud, and abuse in Federal programs. The Executive Order requires that at least once every quarter, the head of each agency submit to the agency's Inspector General and the Council of the Inspectors General on Integrity and Efficiency, and make available to the public, a report on any high-dollar improper payments identified by the agency.² A high-dollar overpayment is any overpayment in excess of 50 percent of the correct amount of the intended payment under the following circumstances:

- the total payment to an individual exceeds \$25,000 as a single payment or in cumulative payments for the quarter, or
- the total payment to an entity exceeds \$100,000 as a single payment or in cumulative payments for the quarter.

Based on the results of this year's review, we will close our prior-year recommendation that the DHS Chief Financial Officer ensure the Risk Management and Assurance Division properly follows the existing DHS *Improper Payments Reduction Guidebook*.

Results of Audit

DHS Did Not Comply with PIIA but Complied with Executive Order 13520

An agency must meet six specific requirements to comply with PIIA.³ If the agency does not meet one or more of these requirements, it is not compliant. In FY 2020, DHS did not comply with PIIA because it did not meet one of the six requirements. Specifically, DHS did not meet the requirement to achieve and report improper payment rates of less than 10 percent for 2 of 12 programs published in the FY 2020 DHS Agency Financial Report (AFR).

² OMB's revised Circular A-123, Appendix C (M-21-19), issued March 5, 2021, and effective for FY 2021, has re-defined requirements for the high-dollar overpayment report.

³ The six requirements are: (1) published an Agency Financial Report (AFR) for the most recent fiscal year and posted the AFR and accompanying materials on the agency website; (2) conducted a program-specific risk assessment for each program or activity susceptible to significant improper payments; (3) published improper payment estimates for all such programs and activities (if required); (4) published programmatic corrective action plans in the AFR (if required); (5) published and met reduction targets for each program susceptible to significant improper payments; and (6) reported an improper payment rate of less than 10 percent for each program and activity for which an estimate was published.



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Table 1 shows DHS components' compliance results with PIIA requirements. Programs for which certain requirements are not applicable are indicated as N/A.

Table 1. DHS PIIA Compliance Reporting Table, FY 2020

Component <i>Note 1</i>	Correctly published an AFR and OMB-Required Accompanying Materials	Conducted Risk Assessment	Published Improper Payment Estimate <i>Note 2</i>	Published Corrective Action Plans	Published and Is Meeting Reduction Targets <i>Note 3</i>	Reported Improper Payment Rate of Less than 10% <i>Note 4</i>
Countering Weapons of Mass Destruction	N/A	Yes	N/A	N/A	N/A	N/A
U.S. Customs and Border Protection	Yes	Yes	Yes	N/A	N/A	Yes
Cybersecurity and Infrastructure Security Agency	N/A	Yes	N/A	N/A	N/A	N/A
Federal Emergency Management Agency (FEMA)	Yes	Yes	Yes	Yes	Yes	No
Federal Law Enforcement Training Centers	N/A	Yes	N/A	N/A	N/A	N/A
U.S. Immigration and Customs Enforcement	Yes	Yes	Yes	N/A	N/A	Yes
Management Directorate	Yes	Yes	Yes	N/A	N/A	Yes
Office of Intelligence and Analysis	N/A	Yes	N/A	N/A	N/A	N/A



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Component <i>Note 1</i>	Correctly published an AFR and OMB-Required Accompanying Materials	Conducted Risk Assessment	Published Improper Payment Estimate <i>Note 2</i>	Published Corrective Action Plans	Published and Is Meeting Reduction Targets <i>Note 3</i>	Reported Improper Payment Rate of Less than 10% <i>Note 4</i>
Science and Technology Directorate	N/A	Yes	N/A	N/A	N/A	N/A
Transportation Security Administration	N/A	Yes	N/A	N/A	N/A	N/A
U.S. Citizenship and Immigration Services	N/A	Yes	N/A	N/A	N/A	N/A
United States Secret Service	N/A	Yes	N/A	N/A	N/A	N/A
United States Coast Guard	Yes	Yes	Yes	N/A	N/A	Yes

Source: OIG analysis of the FY 2020 DHS AFR and its accompanying support and component data

Notes:

- OIG was not included in our review.
- FEMA’s Flood Hazard Mapping and Risk Analysis Program, National Flood Insurance Program, and Public Assistance Program received OMB relief from reporting in FY 2020.
- FEMA Vendor Pay Program (the only program with a reduction target established in the prior year) met its reduction target. In FY 2020, DHS performed improper payments testing for several programs for the first time. OMB Memo M-18-20 does not expect the programs to publish a reduction target until a full baseline has been established and reported. If a program has a 24-month reporting cycle in which no changes occur, the program will most likely be considered to have established a baseline.
- DHS reported an improper payment rate of less than 10 percent for all programs tested except for FEMA’s Public Assistance Disaster Supplemental Funding and Urban Search and Rescue Disaster Supplemental Funding programs.

We further determined DHS complied with Executive Order 13520, *Reducing Improper Payments*, by properly compiling and making available to the public its FY 2020 Quarterly High-Dollar Overpayment reports.



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DHS Did Not Comply with PIIA

We reviewed DHS' FY 2020 AFR to determine whether DHS met the six PIIA requirements. We found that DHS did not achieve and report an improper payment rate of less than 10 percent for 2 of the 12 programs tested. The specific results of our review of DHS' compliance with PIIA requirements follow.

1. Did DHS publish an AFR for the most recent fiscal year and post that report and any accompanying materials required by OMB on the agency website?

Yes. DHS published its AFR and accompanying information on its website as required by OMB.

2. Did DHS conduct a program-specific risk assessment for each program or activity that may be susceptible to significant improper payments (if required)?

Yes. DHS conducted a program-specific risk assessment for each program or activity that may be susceptible to significant improper payments, when required.

3. Did DHS publish improper payment estimates for all programs and activities identified as susceptible to significant improper payments under its risk assessment (if required)?

Yes. DHS published improper payment estimates for all programs and activities identified as susceptible to significant improper payments under its risk assessment.

4. Did DHS publish programmatic corrective action plans in the AFR (if required)? (Note: OMB Circular A-136, Financial Reporting Requirements, issued on August 27, 2020, requires reporting of information not addressed in the circular on <https://paymentaccuracy.gov>.)

Yes. The AFR indicates that the corrective action plan for the FEMA Public Assistance Disaster Supplemental Funding program can be found at <https://paymentaccuracy.gov> and this plan is on the website.

5. Did DHS publish, and is it meeting, annual reduction targets (established in FY 2019) for each program in the accompanying materials to the annual financial statement and has it demonstrated improvements and developed a plan to meet reduction targets (if applicable)?



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Yes. DHS published and met the reduction target for the FEMA Vendor Pay Program, which is the only program for which DHS established a reduction target in FY 2019 and tested in FY 2020. DHS demonstrated improvements by meeting the reduction target.

6. Did DHS report an improper payment rate of less than 10 percent for each program and activity for which an improper payment estimate was obtained and published in the AFR?

No. DHS did not report improper payment rates of less than 10 percent for two FEMA programs. Table 2 shows the programs that contribute to PIIA noncompliance.

Table 2. Improper Payment Rates, FY 2020

Component	Program ⁴	Improper Payment Rate	Less than 10%
United States Coast Guard	Operating Expenses – Disaster Supplemental Funding	1.21%	Yes
U.S. Customs and Border Protection	Operations & Support – Disaster Supplemental Funding	5.45%	Yes
FEMA	Commercial Bills of Lading – Disaster Supplemental Funding	9.33%	Yes
	Disaster Case Management – Disaster Supplemental Funding	0.46%	Yes
	Disaster Relief Fund – Individuals and Household Program – Disaster Supplemental Funding	1.07%	Yes
	Payroll – Disaster Supplemental Funding	0.72%	Yes

⁴ DHS noted in its AFR that it received supplemental appropriations of more than \$50 billion for disaster relief following the 2017 hurricane season. As a result, DHS is reporting statistical testing results two years in arrears for the ten disaster supplemental funding programs due to the burden of testing and reporting.



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Component	Program ⁴	Improper Payment Rate	Less than 10%
	Public Assistance – Disaster Supplemental Funding	22.30%	No
	Travel – Disaster Supplemental Funding	2.25%	Yes
	Urban Search and Rescue – Disaster Supplemental Funding	18.56%	No
	Vendor Payments	1.17%	Yes
Immigration and Customs Enforcement	Operations and Support – Disaster Supplemental Funding	0.00%	Yes
Management Directorate	Federal Protective Service - Payroll	1.87%	Yes

Source: OIG analysis of the FY 2020 DHS AFR

In its FY 2020 AFR, DHS identified insufficient documentation as the primary cause of improper payments for two FEMA programs, Urban Search and Rescue and Public Assistance Disaster Supplemental Funding, both of which exceeded the 10 percent improper payment rate threshold. Improper payment rates above 10 percent could result in a significantly high risk for fraud, waste, and abuse. If DHS continues to be non-compliant with PIIA, it will need to meet additional OMB reporting requirements.

Other PIIA Results

Based on our data reliability review, we determined that DHS disbursement data was sufficiently reliable to support our conclusions. DHS’ Risk Management and Assurance Division adhered to the FY 2020 Improper Payments Reduction Guidebook and properly reviewed components’ risk assessments, program identification templates, and improper payment testing results, without exception. Based on our sampled review, risk assessment questionnaires provided relevant and complete responses to support their qualitative risk scores. Additionally, DHS properly calculated improper



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payment estimates and developed statistically valid samples and estimation plans.

DHS Complied with Executive Order 13520

We reviewed DHS' FY 2020 Quarterly High-Dollar Overpayment reports to determine whether DHS met the requirements of Executive Order 13520, *Reducing Improper Payments*. We found DHS complied with Executive Order 13520 by properly compiling and making available to the public its FY 2020 Quarterly High-Dollar Overpayment reports.

Recommendations

Recommendation 1: We recommend the Chief Financial Officer, Department of Homeland Security, ensure the DHS Risk Management and Assurance Division follows Office of Management and Budget requirements for agencies that are not compliant with the *Payment Integrity Information Act of 2019*, as stated in Appendix C of OMB Circular No. A-123.

Recommendation 2: We recommend the Chief Financial Officer, Department of Homeland Security, ensure FEMA continues its remediation process to obtain proper documentation and continue implementing corrective actions related to training, guidance updates, and policy changes to reduce future improper payments.

DHS Comments and OIG Analysis

DHS concurred with both recommendations. DHS also indicated that it is committed to (i) becoming fully compliant with PIIA requirements and (ii) the responsible stewardship of taxpayer-provided resources; and ensuring proper controls are in place to eliminate fraud, waste, abuse, and mismanagement.

We included a copy of DHS' management comments in their entirety in Appendix B. We consider both recommendations open and resolved. A summary of DHS' management responses and our analysis follow.

DHS Comments to Recommendation 1: Concur. In accordance with Appendix C of OMB Circular No. A-123, the DHS Office of the Chief Financial Officer (OCFO) Risk Management and Assurance Division will coordinate the submission of a plan within 90 days to the Senate Committee on Homeland Security and Governmental Affairs, the House Committee on Oversight and



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Government Reform, and OMB describing the actions that the agency will take to become compliant with the *Payment Integrity Information Act* of 2019. Estimated Completion Date: July 30, 2021.

OIG Analysis of DHS' Response: DHS' proposed actions are responsive to the recommendation. We consider the recommendation open and resolved until OIG has received the plan and it has been submitted to all applicable parties as required.

DHS Comments to Recommendation 2: Concur. For the FEMA Public Assistance program solely related to the Disaster Supplemental Funding received in response to the 2017 Harvey, Irma, and Maria hurricanes, the program worked to develop and execute corrective actions primarily associated with Puerto Rico and the U.S. Virgin Islands. For example, in addition to the corrective actions already completed, primarily for Puerto Rico, FEMA is in the process of implementing corrective actions for the U.S. Virgin Islands and overall program enhancements. Further, FEMA's Urban Search and Rescue program, which is solely related to the Disaster Supplemental Funding received in response to the 2017 Harvey, Irma, and Maria hurricanes, has been implementing incremental remediation activities since 2019. In order to provide enhanced oversight, the FEMA Chief Financial Officer assigned a remediation lead to track and ensure the resolution of identified deficiencies, and will provide incremental status of actions taken to reduce and eliminate improper payments to the DHS Risk Management and Assurance Division, in accordance with the DHS Improper Payments Reduction Guidebook. Estimated Completion Date: September 30, 2021.

OIG Analysis of DHS' Response: DHS' proposed actions are responsive to the recommendation. We consider the recommendation open and resolved until OIG has received documentation supporting the implementation of all remediation activities.



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Appendix A

Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law No. 107-296) by amendment to the *Inspector General Act of 1978*.

The audit objective was to determine whether DHS complied with PIIA and Executive Order 13520 in FY 2020. We also evaluated the accuracy and completeness of DHS' improper payment reporting.

To understand what is required of DHS under PIIA, and DHS policies and procedures to meet those requirements, we obtained and reviewed relevant authorities and guidance and interviewed officials in DHS' Office of the Chief Financial Officer.

We reviewed DHS' FY 2020 AFR and supporting documentation to determine whether DHS met the following PIIA requirements:

1. Published improper payments information with the annual financial statement of the agency for the most recent fiscal year; and posted on the website of the executive agency that statement and any accompanying materials required under OMB guidance.
2. Conducted a risk assessment for each program with annual outlays greater than \$10 million at least once in the last 3 years.
3. Published improper payments estimates for all programs and activities susceptible to significant improper payments in the accompanying materials to the annual financial statement.
4. Published programmatic corrective action plans for each program for which an estimate above the statutory threshold was published in the accompanying materials to the annual financial statement.
5. Published and met improper payments reduction targets (published in FY 2019) for programs assessed to be at risk for significant improper payments in the accompanying materials to the annual financial statement and considered whether a reduction target plan was applicable.



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6. Reported an improper payment rate of less than 10 percent for each program and activity for which an estimate was published in the accompanying materials to the annual financial statement.

We interviewed DHS Risk Management & Assurance Division personnel, and examined their documented reviews of Improper Payment Program Identification and Risk Assessment templates to determine whether they conducted those reviews in compliance with the DHS Improper Payment Reduction Guidebook.

We evaluated the accuracy of payment integrity information included in the DHS AFR and on paymentaccuracy.gov. We also performed a data reliability review and believe the data to be sufficiently reliable to support our audit conclusions.

We reviewed DHS' FY 2020 Quarterly High-Dollar Overpayment reports to determine whether DHS met the requirements of Executive Order 13520. Specifically, we determined whether DHS properly compiled and made available to the public DHS' FY 2020 Quarterly High-Dollar Overpayment reports.

We conducted this audit between November 2020 and March 2021, pursuant to the *Inspector General Act of 1978, as amended*, and according to generally accepted government auditing standards. Those standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.



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Appendix B
DHS Comments to the Draft Report

U.S. Department of Homeland Security
Washington, DC 20528



April 28, 2021

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.
Inspector General

FROM: Jim H. Crumacker, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

JIM H
CRUMPACKER
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CRUMPACKER
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SUBJECT: Management Response to Draft Report: “Department of Homeland Security’s FY 2020 Compliance with the Payment Integrity Information Act of 2019 and Executive Order 13520, Reducing Improper Payments” (Project No. 20-064-AUD-DHS)

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

The Department is pleased to note OIG’s recognition that DHS was compliant with five of the six key categories of the “Payment Integrity Information Act of 2019” (PIIA)¹ reviewed for fiscal year (FY) 2020:

- 1) Publishing an Annual Financial Report (AFR) for the fiscal year and posting that report and any accompanying materials on the agency website;
- 2) Conducting a program-specific risk assessment for each program that may be susceptible to significant improper payments;
- 3) Publishing improper payment estimates for all programs and activities identified as susceptible to significant improper payments;
- 4) Publishing programmatic corrective actions in the AFR²; and
- 5) Publishing and meeting annual reduction targets.

DHS is committed to:

¹ Utilizing continued implementation of Appendix C of Office of Management and Budget (OMB) Circular No. A-123, “Requirements for Payment Integrity Improvement,” dated June 26, 2018. Note that an updated version of Appendix C was released on March 5, 2021 and will apply for FY 2021 reporting.

² OMB Circular A-136, Financial Reporting Requirements, issued on August 27, 2020, required reporting of information not addressed in the circular on <https://paymentaccuracy.gov>



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- 1) Becoming fully compliant with PIIA requirements and continuing to work with the Federal Emergency Management Agency (FEMA) and others to reduce the estimated error rates through implementation of the established programmatic corrective actions, and
- 2) The responsible stewardship of taxpayer-provided resources and ensuring proper controls are in place to eliminate fraud, waste, abuse, and mismanagement.

The draft report contained two recommendations with which the Department concurs. Attached find our detailed response to each recommendation. DHS previously submitted technical comments under a separate cover for OIG's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Attachment



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Attachment: Management Response to Recommendations Contained in 20-064-AUD-DHS

OIG recommended that the DHS Chief Financial Officer:

Recommendation 1: Ensure the DHS Risk Management and Assurance Division follows Office of Management and Budget requirements for agencies that are not compliant with the *Payment Integrity Information Act of 2019*, as stated in Appendix C of OMB Circular No. A-123.

Response: Concur. In accordance with Appendix C of OMB Circular No. A-123, the DHS Office of the Chief Financial Officer (OCFO) Risk Management and Assurance Division will coordinate the submission of a plan within 90 days of the determination of non-compliance to the Senate Committee on Homeland Security and Governmental Affairs, the House Committee on Oversight and Government Reform, and the OMB, describing the actions that the agency will take to become compliant. Estimated Completion Date (ECD): July 30, 2021.

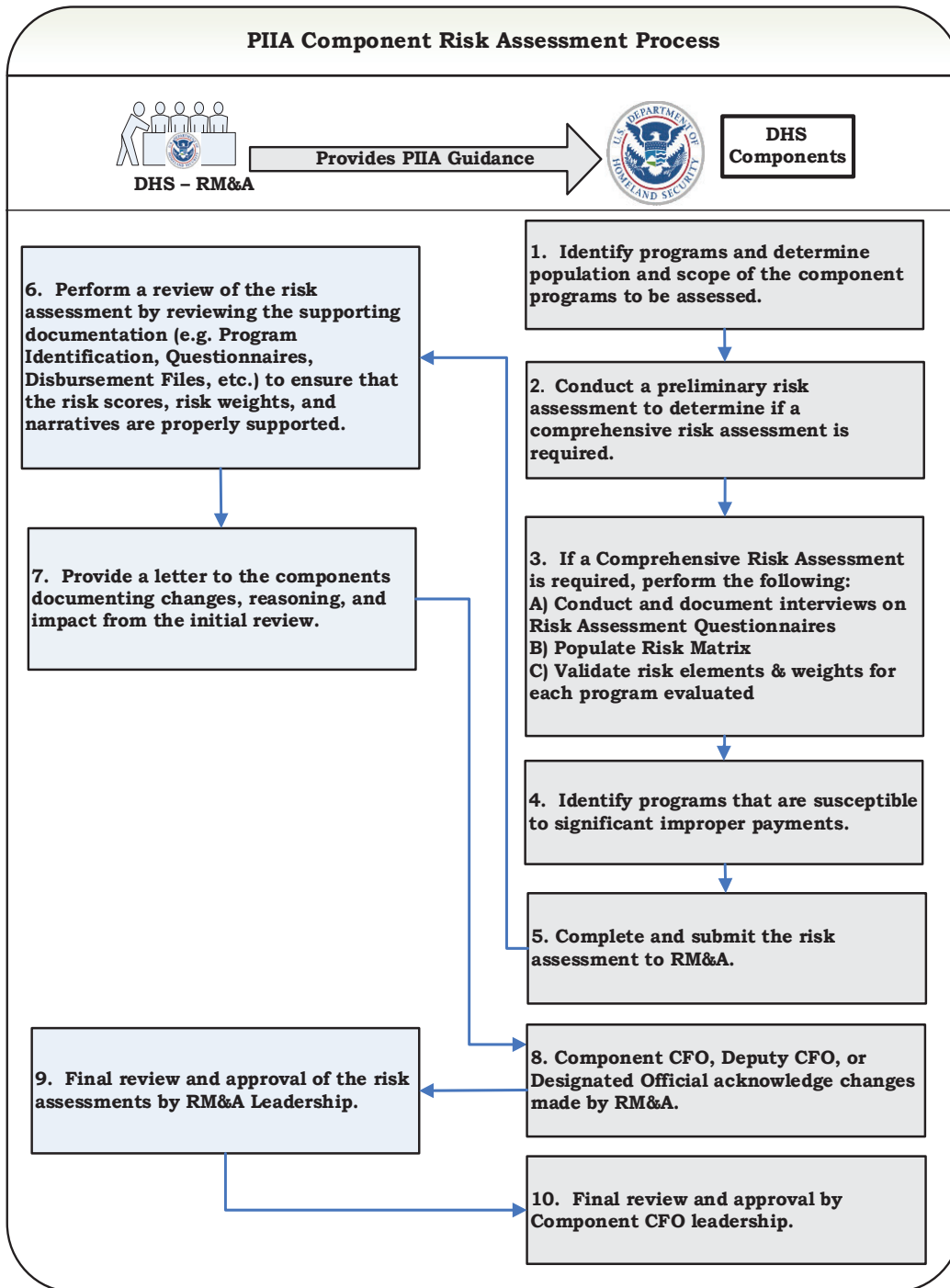
Recommendation 2: Ensure FEMA continues its remediation process to obtain proper documentation and continue implementing corrective actions related to training, guidance updates, and policy changes to reduce future improper payments.

Response: Concur. For the FEMA Public Assistance program solely related to the Disaster Supplemental Funding received in response to the 2017 Harvey, Irma, and Maria hurricanes, the program worked to develop and execute corrective actions primarily associated with Puerto Rico and the U.S. Virgin Islands. For example, in addition to the corrective actions that have already been completed, primarily for Puerto Rico, FEMA is in the process of implementing corrective actions for the U.S. Virgin Islands and overall program enhancements. Further, FEMA's Urban Search and Rescue program, which is solely related to the Disaster Supplemental Funding received in response to the 2017 Harvey, Irma, and Maria hurricanes, has been implementing incremental remediation activities since 2019. In order to provide enhanced oversight, the FEMA Chief Financial Officer assigned a remediation lead to track and ensure the resolution of identified deficiencies, and will provide incremental status of actions taken to reduce and eliminate improper payments to the DHS Risk Management and Assurance Division, in accordance with the DHS Improper Payments Reduction Guidebook. ECD: September 30, 2021.



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Appendix C
PIIA Component Risk Assessment Process



Source: OIG analysis of the *DHS Improper Payments Reduction Guidebook*



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Appendix D
Office of Audits Major Contributors to This Report

Sandra John, Audit Director
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Angela Fay, Auditor
Anthony Nicholson, Auditor
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Muhammad Islam, Statistician
Kevin Dolloson, Communications Analyst
Alphonso Hines, Independent Referencer



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Appendix E
Report Distribution

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Under Secretary, Office of Strategy, Policy, and Plans
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Assistant Secretary for Office of Legislative Affairs
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Office of Management and Budget

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Chief, Homeland Security Branch
DHS OIG Budget Examiner

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Senate Committee on Homeland Security and Governmental Affairs
House Committee on Oversight and Government Reform

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Department of Homeland Security
Office of Inspector General, Mail Stop 0305
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245 Murray Drive, SW
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