

**FEMA Has Not  
Prioritized Compliance  
with the Disaster  
Mitigation Act of 2000,  
Hindering Its Ability to  
Reduce Repetitive  
Damages to Roads and  
Bridges**





## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

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

July 6, 2021

MEMORANDUM FOR: The Honorable Deanne Criswell  
Administrator  
Federal Emergency Management Agency

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

JOSEPH V  
CUFFARI

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V CUFFARI  
Date: 2021.07.03 08:53:00  
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SUBJECT: *FEMA Has Not Prioritized Compliance with the Disaster Mitigation Act of 2000, Hindering Its Ability to Reduce Repetitive Damages to Roads and Bridges*

Attached for your action is our final report, *FEMA Has Not Prioritized Compliance with the Disaster Mitigation Act of 2000, Hindering Its Ability to Reduce Repetitive Damages to Road and Bridges*. We incorporated the formal comments provided by your component.

The report contains four recommendations aimed at enhancing the Federal Emergency Management Agency's (FEMA) program effectiveness related to repetitive damages to roads and bridges. FEMA concurred with all four recommendations. Based on the information you provided in your response to the draft report, we consider recommendations 1 and 4 open and unresolved. As prescribed by the Department of Homeland Security Directive 077-01, *Follow-Up and Resolutions for the Office of Inspector General Report Recommendations*, within 90 days of the date of this memorandum, please provide our office with a written response that includes your (1) agreement or disagreement, (2) corrective action plan, and (3) target completion date for each recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendations. Until your response is received and evaluated, the recommendations will be considered open and unresolved.

Recommendations 2 and 3 are considered open and resolved. Once your office has fully implemented recommendations 2 and 3, 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.



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Please send your response or closure request to  
[OIGAuditsFollowup@oig.dhs.gov](mailto:OIGAuditsFollowup@oig.dhs.gov).

Consistent with our responsibility under the *Inspector General Act of 1978, as amended*, 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 final report on our website for public dissemination.

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



# DHS OIG HIGHLIGHTS

## ***FEMA Has Not Prioritized Compliance with the Disaster Mitigation Act of 2000, Hindering Its Ability to Reduce Repetitive Damages to Roads and Bridges***

July 6, 2021

### **Why We Did This Audit**

The DMA 2000 repealed and replaced prior mitigation planning provisions with new requirements, primarily to authorize a program for pre-disaster mitigation, streamline administration of disaster relief, and control the Federal costs of disaster assistance. We conducted this audit to determine to what extent FEMA is complying with the DMA 2000 by implementing regulations and policies to identify and reduce repetitive damages to our Nation's roads and bridges.

### **What We Recommend**

FEMA should prioritize the DMA 2000 by addressing unresolved implementation issues and publishing a regulation as required.

#### **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)

### **What We Found**

The Federal Emergency Management Agency (FEMA) has not prioritized compliance with Section 205(b) of the *Disaster Mitigation Act of 2000* (DMA 2000). According to FEMA officials, the component has instead focused on other tasks necessary to carry out its mission. Therefore, FEMA has not published regulations and related policies, as required by the DMA 2000, to provide an incentive to reduce repetitive damages to facilities, including roads and bridges, through mitigation. Additionally, FEMA has overlooked and not resolved issues with two key aspects of program implementation — limitations in data collection and tracking and impediments to applicants' mitigation efforts.

From 2009 through 2018, FEMA obligated an estimated \$1.9 billion in assistance for repetitively damaged roads and bridges. Until FEMA prioritizes publication of regulations and policies and resolves data system limitations and impediments to applicants, it cannot take full advantage of mitigation opportunities to reduce repetitive damages to the Nation's roads and bridges and ensure effective long-term recovery.

### **FEMA Response**

FEMA concurred with all four recommendations. As a result of FEMA's responses, we consider two recommendations resolved and open and two unresolved. Appendix B contains FEMA's management response in its entirety.



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**Abbreviations**

CIR	Community Infrastructure Resilience Branch
DMA 2000	Disaster Mitigation Act of 2000
DRRA	<i>Disaster Recovery Reform Act of 2018</i>
EMMIE	Emergency Management Mission Integrated Environment
FEMA	Federal Emergency Management Agency
FIMA	Federal Insurance and Mitigation Administration
NEMIS	National Emergency Management Information System
NPRM	Notice of Proposed Rulemaking
PA	Public Assistance
PAPPG	<i>Public Assistance Program and Policy Guide</i>
U.S.C.	U.S. Code



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### Background

The *Disaster Mitigation Act of 2000*<sup>1</sup> (DMA 2000) requires the Federal Emergency Management Agency (FEMA) to publish regulations to reduce the Federal share of public assistance allocated to facilities<sup>2</sup> repetitively damaged by the same type of event in the preceding 10 years in the absence of appropriate mitigation measures. The Public Assistance (PA) Program, authorized by the *Robert T. Stafford Disaster Relief and Emergency Assistance Act* (Stafford Act), supports FEMA's efforts to award disaster-related grants to help state, local, territorial, and tribal governments, as well as certain private nonprofit organizations, respond to, recover from, and mitigate future disasters. The DMA 2000 amended portions of the Stafford Act by repealing and replacing prior mitigation planning provisions with a new set of requirements primarily designed to authorize a program for pre-disaster mitigation, streamline the administration of disaster relief, and control the Federal costs of disaster assistance.

Section 406 of the Stafford Act gives FEMA the authority to provide PA funding for cost-effective hazard mitigation measures for facilities damaged by a declared disaster.<sup>3</sup> According to FEMA, "hazard mitigation is any sustained action taken to reduce or eliminate long-term risk to people and property from natural hazards and their effects."<sup>4</sup> For example, in interviews with the Office of Inspector General (OIG), officials from Jackson Township, MO, stated they used mitigation funds to add wing walls<sup>5</sup> to two bridges in 2017. Both locations were repetitively damaged in disasters prior to mitigation, but neither bridge incurred damages in disasters that occurred after mitigation. Figures 1 and 2 show the Ashley Creek and Moore's Creek bridges with added wing walls.

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<sup>1</sup> Public Law 106-390, 42 U.S.C. § 5121, Subsection 205(b) of the DMA 2000 amended Section 406 of the *Robert T. Stafford Disaster Relief and Emergency Assistance Act* by adding a new paragraph (b)(2) (42 U.S.C. § 5172(b)(2)).

<sup>2</sup> Title 44 of the Code of Federal Regulations § 206.201(c) defines a facility as "any publicly or privately owned building, works, system, or equipment, built or manufactured, or an improved and maintained natural feature. Land used for agricultural purposes is not a facility."

<sup>3</sup> FEMA administers other programs to mitigate hazards, including Hazard Mitigation funding under Section 406 (Stafford Act), Hazard Mitigation Grant Program Section 404 (Stafford Act), Building Resilient Infrastructure and Communities (replaced Pre-Disaster Mitigation Assistance, Section 203, Stafford Act), and Flood Mitigation Assistance.

<sup>4</sup> FEMA *Public Assistance Program and Policy Guide*, April 2018, page 97.

<sup>5</sup> Wing walls, located at the ends of a bridge, retain the approach roadway embankment.



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**Figure 1.** Ashley Creek Bridge,  
Raymondville, MO  
*Source:* DHS OIG, October 2019



**Figure 2.** Moore's Creek Bridge,  
Raymondville, MO  
*Source:* DHS OIG, October 2019

According to FEMA's *Public Assistance Program and Policy Guide (PAPPG)*<sup>6</sup> disaster grants are classified by type: debris removal (Category A), emergency protective measures (Category B), and permanent work (Categories C through G), with category C grants covering roads and bridges. For category C grants, FEMA can fund not less than 75 percent of repair, restoration, reconstruction, or replacement as the Federal share.<sup>7</sup> The state and applicant are responsible for the remaining 25 percent or less non-Federal share. From 2009 to 2018, FEMA obligated \$4.5 billion in category C grants for more than 110,000 road and bridge projects.

According to the DMA 2000, if a facility has been repetitively damaged and the applicant has not taken appropriate hazard mitigation measures, FEMA can significantly reduce its Federal share of funding. The DMA 2000 directed FEMA to publish regulations to reduce the Federal share of assistance to not less than 25 percent to repair, restore, reconstruct, or replace any eligible public facility or private nonprofit facility, following an event associated with a major disaster, if the following criteria were met:

- the facility was damaged on more than one occasion in the preceding 10 years, by the same type of event; and
- the owner did not implement appropriate mitigation measures to address the hazard that caused the damages.<sup>8</sup>

<sup>6</sup> FEMA *Public Assistance Program and Policy Guide*, April 2018, page 19.

<sup>7</sup> 42 U.S.C. 5172, Subsection 205(b)(1).

<sup>8</sup> *Disaster Mitigation Act of 2000*, Section 205(b)(2)(A),(B).



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According to the PAPPG,<sup>9</sup> to be eligible for hazard mitigation funding, an applicant must provide required documents showing that the proposed mitigation measures will directly reduce the potential for future, similar type damage to the facility. FEMA then evaluates the proposed mitigation measures for approval based on cost-effectiveness, technical feasibility, and compliance with environmental and historical preservation laws, regulations, and executive orders. Figures 3 and 4 show damages to a road and bridge from federally declared disasters.



**Figure 3.** Damage caused by flash flooding on State Highway 23, Carlton County, MN  
*Source:* MPRnews.org, June 2018



**Figure 4.** Water rushes over 448<sup>th</sup> Avenue near Lake Norden, SD  
*Source:* The Watertown Public Opinion, April 2011

To identify and report damages caused by a disaster, FEMA uses a project worksheet (FEMA Form 90-91) as the basis for the subaward application. The project worksheet is the primary form used to document disaster grant details such as applicant's name, location, damage description and dimensions, scope of work, and cost estimate for each project. This data is maintained in the Emergency Management Mission Integrated Environment (EMMIE) web-based application.

We conducted this audit to determine to what extent FEMA is complying with the DMA 2000 by implementing regulations and related policies to identify and reduce repetitive damages to our Nation's roads and bridges.

<sup>9</sup> FEMA, *Public Assistance Program and Policy Guide*, April 2018, page 99.



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### Results of Audit

FEMA has not prioritized compliance with Section 205(b) of the DMA 2000. According to FEMA officials, the component has instead focused on other tasks necessary to carry out its mission. Therefore, FEMA has not published regulations and related policies as required by the DMA 2000 to provide an incentive to reduce repetitive damages to facilities, including roads and bridges, through mitigation. Additionally, FEMA has overlooked and not resolved issues with two key aspects of program implementation — limitations in data collection and tracking and impediments to applicants' mitigation efforts.

From 2009 through 2018, FEMA obligated an estimated \$1.9 billion in assistance for repetitively damaged roads and bridges. Until FEMA prioritizes publication of regulations and policies and resolves data system limitations and impediments to applicants, it cannot take full advantage of mitigation opportunities to reduce repetitive damages to the Nation's roads and bridges and ensure effective long-term recovery.

### **FEMA Has Not Prioritized Compliance with the Disaster Mitigation Act of 2000**

Due to a focus on the immediate needs of disaster operations and other high-profile initiatives, FEMA has not published implementing regulations and related policies as required by the DMA 2000. Although FEMA gave the public an opportunity to comment on a proposed regulation to implement Section 205(b)(2) of the DMA 2000, it did not use the stakeholder comments it received to move forward with implementing the regulation. FEMA also has not resolved issues with comprehensive and reliable data on repetitively damaged facilities, nor has it addressed impediments to applicants' use of PA funding for mitigation efforts. These shortcomings have hindered FEMA's efforts to reduce repetitive damages to roads and bridges. Rather than continuing efforts to implement Section 205(b) of the DMA 2000, from 2009 through 2018, FEMA obligated about \$1.9 billion in continued assistance for repetitive damages and continues to risk spending more on such assistance in the future.

### **Required Implementing Regulations Not Published**

The DMA 2000, Section 205(b)(2), requires FEMA to publish regulations to reduce the Federal share of public assistance for facilities repetitively damaged by the same type of event in the preceding 10 years if applicants have not implemented appropriate mitigation measures.



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In August 2009, 9 years later, FEMA started the process to comply with the DMA 2000 by publishing a Notice of Proposed Rulemaking (NPRM)<sup>10</sup> in the Federal Register and requesting comments by October 2009. The FEMA Public Assistance Division issued an NPRM to implement Subsection 205(b) of the DMA 2000. In the NPRM's Section II: *Discussion of the Proposed Rule*, FEMA officials identified a number of implementation issues that required action before it could formulate a final rule. FEMA needed to:

- compile information on repetitively damaged facilities, such as addresses, latitude and longitude, or standard location descriptions for damaged facilities;
- ensure the location of the facility was properly and consistently entered into EMMIE;
- reduce the cost share in EMMIE for repetitively damaged facilities;
- determine appropriate hazard mitigation for every facility, such as cost-effective mitigation options and appropriate mitigation measures, or address potential mitigation appeals;
- identify and track completion of the appropriate hazard mitigation;
- clarify certain terms, such as “same type of event” and “the hazard that caused the damage”;<sup>11</sup> and
- define whether, for systems like power lines, electrical lines, and roads, “facility” means the damaged section, the entire system, or a geographic area.

FEMA received stakeholder comments and identified issues that required action before proceeding with a final rule. However, FEMA did not take the necessary actions to resolve the issues or any additional measures to comply with Section 205(b) of the DMA 2000. According to FEMA officials, the component instead focused on the immediate needs of disaster operations and other high-profile initiatives necessary to carry out its mission.

FEMA officials said they took steps to address mitigation of repetitively damaged facilities by implementing Section 1235(b) of the *Disaster Recovery Reform Act of 2018* (DRRA).<sup>12</sup> This provision, however, did not repeal the requirements of Section 205(b)(2) of the DMA 2000. Section 1235(b) requires FEMA to fund repair, restoration, reconstruction, or replacement efforts in

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<sup>10</sup> *Disaster Assistance; Public Assistance Repetitive Damage*, 74 Federal Register 40,124 (August 11, 2009).

<sup>11</sup> For example, hurricanes and tornados are different types of events, but both cause the same hazard, wind damage.

<sup>12</sup> Public Law No. 115-254, Section 1235(b) (codified at 42 U.S.C. § 5172(e)(1)(A)). Section 1235(b) amended Section 406(e)(1)(A) of the Stafford Act.



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conformity with the “latest published editions of relevant consensus-based codes, specifications, and standards.” FEMA must also incorporate “the latest hazard-resistant design and establish minimum acceptable criteria for the design, construction, and maintenance.” According to FEMA, it implemented Section 1235(b) by requiring the FEMA-funded recovery projects to use the latest hazard-resistant design standards. However, in requiring such standards, FEMA did not address the implementation issues identified in the NPRM, neither did it address the longstanding requirement for publishing a regulation under Section 205(b)(2) of the DMA 2000. In addition, FEMA’s actions to implement the requirements of DRRRA occurred 18 years after the DMA 2000 was enacted, and they do not address the intent of Section 205(b) in the DMA 2000, which is to use mitigation to incentivize long-term recovery. The NPRM proposed that FEMA would not begin to count damaging events within a 10-year period for eligible damaged facilities until after a regulation becomes effective. Thus, even if a regulation was implemented today, because of FEMA’s delay, as long as 3 decades may pass from the enactment of DMA 2000 before FEMA can reduce the Federal cost share pursuant to Section 205(b).

#### **DMA 2000 Implementation Issues Not Addressed**

FEMA has not addressed limitations to its data collection and tracking. In particular, FEMA does not maintain a database to collect and track information on repetitive damages. Further, when inputting damage records into their database systems, FEMA staff depend on applicants’ incomplete knowledge to identify repetitive damages. The project worksheet process is not standardized to help ensure data on repetitively damaged roads and bridges is accurate and identifiable. Finally, applicants have not been properly trained on using FEMA’s new Grants Portal data system. FEMA also has not addressed applicants’ concerns about impediments to mitigation efforts. Specifically, applicants said they lacked awareness and familiarity about available mitigation options, had difficulty proving the benefits of a mitigation project would outweigh the cost, found addressing requirements in requests for mitigation and waiting for approval to be time-consuming, and could not pay their cost share for mitigation projects.

#### Limitations to Data Collection and Tracking

According to its 2009 NPRM, to effectively implement the DMA 2000, FEMA needs to collect and track information on repetitive damages (also called



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repetitive loss) through a database.<sup>13</sup> However, FEMA does not currently maintain a database that collects and tracks such information because, according to FEMA officials, FEMA is not required to do so by statute or regulation.

FEMA's reliance on applicants' information, which may be incomplete, also prevents effective collection and tracking of data on repetitive damages. FEMA relies on public assistance data retained in EMMIE for a historical record of damaged locations. Although FEMA staff are responsible for entering data into the database systems, they depend on information obtained from applicants about current and prior damages. During the grant application process, FEMA staff ask if the applicant has previously received public assistance for the facility in question. This approach is unreliable for identifying cases of repetitive damages because an accurate answer to this question depends on the applicant's familiarity with past disasters, including the specific locations of previous damages. Local officials we interviewed told us they do not track repetitive damages but instead rely on the potentially limited knowledge of current elected or appointed officials, or volunteers who serve for short periods of time and also may have very little to no experience or knowledge of prior damages. Because FEMA relies on applicants with little or no knowledge of prior disasters for information, it cannot be assured staff are entering reliable data on repetitive damages in EMMIE.

FEMA's project worksheet process is not standardized to help ensure FEMA staff capture accurate descriptions and locations of damages, which is necessary to effectively identify roads and bridges in need of long-term mitigation. In some instances, FEMA staff inconsistently recorded facility names, addresses, and latitude-longitude coordinates for damages. In other cases, FEMA consolidated multiple project locations into one project worksheet or recorded damage information differently for separate disasters, even though the damages occurred in the same location. For example, as Table 1 illustrates, in two federally declared disasters, FEMA consolidated multiple project damage locations into two project worksheets for the applicant, Township of Union, KS. Therefore, EMMIE captured only a single facility name, damage location, and latitude-longitude coordinates for each of the two project worksheets, even though the scope of work for each included multiple

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<sup>13</sup> According to FEMA's NPRM, Section G. *Identifying Repetitively Damaged Facilities*, to implement the proposed requirements, FEMA needs to collect repetitive damage (loss) information. FEMA would track the history of the provision of disaster assistance following presidentially declared major disasters by applicant and facility in its National Emergency Management Information System (NEMIS)/EMMIE in which all project worksheets are stored. FEMA would use the latitude and longitude documented on the project worksheet and entered into NEMIS/EMMIE for the damaged facility to track repetitively damaged facilities.



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site locations. The specific damage locations, required to track repetitive damages, were only obtainable through manual review of each project worksheet's scope of work.

**Table 1. Repetitive Damages to Roads in Township of Union, KS**  
2009 Kansas Severe Winter Storm (DR-1868)  
Applicant: Township of Union  
Project Worksheet #57

Facility Name	Damage Location	Latitude	Longitude	Scope of Work
Roads	2592 Concord Rd, Mahaska, KS 66955	39.95627	-97.31189	Site 1 - 24th Road
				Site 2 - 24th Road
				Site 3 - 24th Road
				Site 4 - Meridian Road
				Site 5 - 27th Road
				Site 6 - Meridian Road
				Site 7 - Arrowhead Road
				Site 8 - 28th Road
				Site 9 - 28th Road
				Site 10 - Concord Road
				Site 11 - Deer Road
				Site 12 - Eagle Road
				Site 13 - Eagle Road
				Site 14 - 28th Road
				Site 15 - 28th Road
				Site 16 - 27th Road
				Site 17 - 25th Road
				Site 18 - 25th Road

2015 Kansas Severe Storms, Tornadoes, Straight-line Winds, and Flooding  
(DR-4230)  
Applicant: Township of Union  
Project Worksheet #400

Facility Name	Damage Location	Latitude	Longitude	Scope of Work
Union (Township of)	2592 Concord Rd, Mahaska, KS 66955	39.93805	-97.31356	Site 1 - 24th Road
				Site 2 - 25th Road
				Site 3 - 26th Road
				Site 4 - 27th Road
				Site 5 - 28th Road
				Site 6 - Arrowhead Road
				Site 7 - Concord Road
				Site 8 - Deer Road
				Site 9 - Eagle Road
				Site 10 - Fox Road
				Site 11 - Meridian Road
				Site 12 - Stateline Road

Source: OIG analysis of FEMA's PA records



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FEMA is in the process of transferring its historical damage records from EMMIE, its legacy data system, to a new interactive system called Grants Manager. However, some applicants reported that they are not properly trained to use the new system. Grants Manager and its ancillary system, Grants Portal, have been in use since 2017. The new information system is intended to allow applicants to upload project documentation, such as photos of damages and insurance documents, through Grants Portal for FEMA staff review and assessment in Grants Manager. However, according to state and local officials, applicants did not have the training to correctly use FEMA's disaster data systems, which has resulted in inconsistent and sometimes inadequate data input. Some applicants stated they learned to use the system through trial and error. To address this issue, one state appointed an official to train and serve as the designated expert on Grants Portal. The state then instructed local applicants to contact this state official for assistance.

FEMA officials said the new system should alleviate concerns about inconsistent and inaccurate data in the new system because FEMA staff, as opposed to applicants, are now responsible for preparing and entering the details on damaged locations. However, we have concerns about FEMA's rationale because FEMA personnel who enter inconsistent location data in EMMIE will continue to enter the same location information in Grants Manager. Without a standard format to document location data, FEMA's transition to Grants Manager will not address the integrity of data or prevent inconsistencies.

#### Impediments to Applicants' Mitigation Efforts

Although FEMA regional staff and state officials encourage applicants to take advantage of PA program funds to implement mitigation efforts, they have no means to incentivize such participation because their authority is limited and program participation is voluntary. FEMA has promoted the availability of mitigation funding in various ways, including informational presentations at post-disaster meetings. However, in discussions with DHS OIG, applicants expressed concern about several impediments to mitigation efforts to reduce repetitive damages to roads and bridges. In general, our discussions revealed that applicants did not always have the knowledge and resources to consider using available mitigation funds. Applicants identified four main challenges:

- Applicants were not aware of or had limited familiarity with the mitigation options available.
- Applicants found it difficult to prove the benefits of a road or bridge mitigation project would outweigh the cost.



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- Addressing requirements in requests to FEMA for mitigation, as well as waiting for approval, was time-consuming.
- Most applicants were not able to pay their cost share for a mitigation project.

First, applicants who received FEMA PA funding had varying levels of knowledge about options to pursue mitigation efforts. Some applicants were well-informed about mitigation funding while others were unaware of its benefits and availability. For example, New York State Parks, Recreation and Historic Preservation officials said they were aware of mitigation funding and worked closely with the State of New York Department of Transportation to ensure mitigation was undertaken when possible. However, officials of a small rural township, Henderson, MN, stated they were having their first conversation with FEMA on mitigation efforts for a main road that had flooded nine times in 1 year and multiple times in the last 10 years. Because applicants were primarily responsible for initiating mitigation projects, those with greater knowledge were more successful in being approved for funding than those less familiar with the process.

Second, for FEMA to approve hazard mitigation funds, applicants must demonstrate that the benefits of a mitigation project will exceed the costs. The applicants we interviewed said clearing the benefit-cost threshold was difficult, if not impossible, especially in rural areas. For example, a Missouri State Emergency Management Agency official explained it was difficult to prove the benefit would outweigh the cost for a road or bridge mitigation project because there was not enough data to support such a decision. In rural areas, the road traffic volume is often too low to justify a favorable benefit-cost analysis for a mitigation project.

Third, according to FEMA regional staff and state officials, many applicants were discouraged from requesting mitigation because of the time and cost required to address environmental and historic preservation requirements. Applicants often have to make quick decisions in situations where damaged roads create public safety concerns. For example, officials from Jackson Township, MO, said they were “big fans” of using mitigation when possible because it solves reoccurring issues and saves time and money in the future. However, they added that requirements such as environmental and hydraulic studies complicated the process, as the cost of the required studies was often more than the cost to fix the damage. According to the Missouri State Emergency Management Agency, going through the approval process for disaster-specific mitigation is often too cumbersome when the priority is repairing roads so they can re-open as soon as possible.



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Finally, state and local officials cited the cost to applicants as their greatest concern, which, given the following examples, suggests FEMA should consider incentivizing long-term mitigation efforts. For example, in FEMA Region VIII, both FEMA officials and the South Dakota Office of Emergency Management identified cost share as the major barrier to applicants participating in mitigation efforts. According to other applicants OIG interviewed, it was challenging to raise funding to cover the non-Federal share required for mitigation assistance, especially for rural areas or small local governments that may not have adequate tax base or other resources. However, according to FEMA, every \$1 spent on mitigation saves \$6 on future disaster losses, suggesting a greater return on FEMA's investment for mitigation efforts.<sup>14</sup> FEMA has existing flexibilities to adjust the Federal cost share of mitigation activities and lessen the applicant cost share.<sup>15</sup> Reducing the non-Federal cost share could incentivize applicants to address repetitive damages and protect the Federal investment in public infrastructure.

### **Billions in Obligations for Repetitive Damages at Risk**

Our analysis of FEMA's PA records showed that, because FEMA did not prioritize and publish implementing regulations and policies according to Subsection 205(b) of the DMA 2000, it obligated about \$1.9 billion for repetitive damages to roads and bridges from 2009 through 2018. This amount represents the Federal share obligated for category C projects for three or more separate declared disasters during our scope period. For example, an applicant in Region VIII received \$4.6 million in Federal funds for repairs or replacement of roads and bridges for the same damages under seven different declared disasters between 2009 and 2017. See Table 2 for total funds obligated for repetitive damages across FEMA's 10 regions, from 2009 to 2018.

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<sup>14</sup> FEMA Fact Sheet, *Federal Insurance and Mitigation Administration*, June 2018; National Institute of Building Sciences, *Natural Hazard Mitigation Saves: 2018 Interim Report*, December 2018.

<sup>15</sup> Stafford Act, Section 203(h)(2) allows the President to contribute up to 90 percent of the total cost of a mitigation activity carried out in a small impoverished community. Stafford Act, Section 406(b)(3)(A) allows the President to provide incentives to a state or tribal government to invest in measures that increase readiness for, and resilience from, a major disaster by recognizing such investments through a sliding scale that increases the minimum Federal share to 85 percent. FEMA's *Hazard Mitigation Assistance Cost Share Guide*, May 2016, Section Four, *HMGP Global Match*, states the non-Federal share does not need to be 25 percent for each individual project, rather the share for all of the applicant's submitted projects combined for the overall disaster. Global Match allows the applicant to utilize any cost share match that exceeds the minimum requirement to alleviate the financial burden on projects, giving flexibility for the application of various cost-share methods.



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**Table 2. Total Funds Obligated for Repetitive Damages, 2009–2018**

<b>FEMA Region</b>	<b>Incident Types</b>	<b>State/Territory</b>	<b>Federal Share Obligated for Repetitive Damages<sup>16</sup></b>
<b>Region 1</b>	Coastal Storms, Flood, Hurricane, Severe Ice Storm, Severe Storm(s)	Connecticut, Massachusetts, Maine, New Hampshire, Rhode Island, Vermont	\$ 70,511,583
<b>Region 2</b>	Hurricane, Flood, Severe Storm(s)	New Jersey, New York, Puerto Rico	345,786,165
<b>Region 3</b>	Flood, Hurricane, Severe Storm(s)	Maryland, Pennsylvania, Virginia, West Virginia	194,432,657
<b>Region 4</b>	Flood, Hurricane, Severe Ice Storm, Severe Storm(s)	Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee	475,497,005
<b>Region 5</b>	Flood, Severe Storm(s)	Illinois, Indiana, Minnesota, Ohio, Wisconsin	47,676,193
<b>Region 6</b>	Coastal Storm, Flood, Hurricane, Severe Ice Storm, Severe Storm(s)	Arkansas, Louisiana, New Mexico, Oklahoma, Texas	326,156,065
<b>Region 7</b>	Flood, Severe Storm(s)	Iowa, Kansas, Missouri, Nebraska	203,691,082
<b>Region 8</b>	Flood, Severe Storm(s)	Montana, North Dakota, South Dakota, Wyoming	169,619,966
<b>Region 9</b>	Flood, Hurricane, Severe Storm(s)	California, Hawaii	48,102,790
<b>Region 10</b>	Coastal Storm, Flood, Severe Storm(s)	Alaska, Idaho, Oregon, Washington	47,759,616
<b>Total</b>			<b>\$1,929,233,122</b>

Source: OIG analysis of FEMA PA records

### Conclusion

The DMA 2000 amended the Stafford Act by repealing and replacing prior mitigation planning provisions with a new set of requirements, primarily to authorize a program for pre-disaster mitigation, streamline the administration of disaster relief, and control the Federal costs of disaster assistance. Although FEMA asserts it made advances to address mitigation efforts by implementing

<sup>16</sup> Federal Share Obligated for Repetitive Damages represents FEMA funds obligated for Category C: Roads and Bridges projects belonging to applicants who received Category C funding for three or more separate declared disasters from 2009 through 2018.



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Section 1235(b) of the DRRRA, our audit showed these actions do not meet the intent of the DMA 2000 and that FEMA needs to take further actions. In particular, FEMA should implement regulations and related policies to comply with the DMA 2000, as well as to incentivize long-term recovery through mitigation and reduce future repetitive damages to roads and bridges. Without such regulations and policies, FEMA will have limited authority to require applicants to undertake mitigation efforts to prevent or reduce repetitive damages, which will likely increase the Federal costs of disaster assistance. Until FEMA prioritizes and resolves the issues and limitations that hinder compliance with the DMA 2000, it cannot take full advantage of mitigation opportunities to reduce repetitive damages and ensure effective long-term recovery.

### Recommendations

**Recommendation 1:** We recommend the Federal Emergency Management Agency Administrator address unresolved implementation issues, publish proposed regulations for notice and comment within 1 year, and issue final regulations within 3 years of issuance of this report for implementation of the *Disaster Mitigation Act of 2000*, 42 U.S.C. § 5172(b)(2).

**Recommendation 2:** We recommend the Federal Emergency Management Agency Administrator establish a process to standardize data entry in FEMA's database systems to promote consistency and accuracy to better identify repetitive damages.

**Recommendation 3:** We recommend the Federal Emergency Management Agency Administrator work with states to develop a plan to properly train applicants on the use of FEMA's disaster-related data systems.

**Recommendation 4:** We recommend the Federal Emergency Management Agency Administrator review and resolve hazard mitigation challenges, such as:

- ensuring education and training of states and applicants on mitigation programs and availability of funding at the state and applicant levels;
- revising criteria and instructions for completing benefit-cost analyses to clarify and streamline the process and assist applicants with meeting the required benefit-cost threshold;
- streamlining the processes from application submission to approval to decrease applicants' wait time for mitigation; and
- considering existing flexibilities to adjust the cost share for applicants experiencing financial hardships.



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### Management Comments and OIG Analysis

FEMA provided its written response to this report on May 7, 2021, and concurred with all four recommendations. We included a copy of FEMA's management comments in their entirety in Appendix B. Based on FEMA's response, the proposed actions or actions taken were sufficient to resolve recommendations 2 and 3, but these remain open pending receipt of evidence showing actions taken. However, FEMA's actions were not sufficient to resolve recommendations 1 and 4. Therefore, we consider recommendations 1 and 4 unresolved.

#### **Recommendation 1**

**FEMA Response:** FEMA concurred with the recommendation. FEMA stated that since its prior rulemaking effort in 2009, it has addressed issues pertaining to the implementation of Section 205(b) of the DMA 2000. Most significantly, its FAC-TRAX information management system (often referred to as PA Grants Manager and PA Grants Portal) now provides functionality improving FEMA's ability to properly and consistently collect information, which allows it to identify and track repetitive damages more easily. Although FEMA will again undertake efforts to promulgate regulations, officials stated that OIG's proposed timeframes are not feasible or not entirely within its span of control, noting that the rulemaking process is lengthy and timeframes variable. FEMA's Recovery Directorate will prepare a request for new rulemaking and assign a team to implement the program's approved approach. However, according to FEMA, drafting, clearing, and publishing an NPRM typically takes up to 3 years, and adjudicating comments and determining how to move forward can take an additional 3 years.

**OIG Analysis:** Although FEMA concurred with the recommendation, we find FEMA's actions inadequate to resolve the recommendation. As we stated earlier, "even if a regulation was implemented today, because of FEMA's delay, as long as 3 decades may pass from the enactment of the DMA 2000 before FEMA can reduce the Federal cost share pursuant to Section 205(b)." If we were to accept this proposed solution with the additional timelines cited by FEMA, the date at which FEMA could reduce the Federal cost share pursuant to Section 205(b) could be as long as nearly 4 decades from enactment of the DMA 2000. We find this unacceptable. Therefore, we consider this recommendation unresolved.



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### **Recommendation 2**

**FEMA Response:** FEMA concurred with the recommendation. FEMA officials stated that in 2017, they began using the FAC-TRAX information management system, which allows FEMA to collect and track detailed and easily searchable project information, including facility types and locations, not previously available in EMMIE. In 2021, FEMA PA created a mapping function in PA Grants Manager, allowing it to identify damaged locations more clearly. As of April 2021, PA Grants Manager includes more locations with drop down menus to improve consistency of nomenclature and data entry.

**OIG Analysis:** FEMA's actions satisfy the intent of the recommendation. We consider the recommendation resolved and open, pending receipt of evidence showing database improvements, specifically those relative to its mapping function.

### **Recommendation 3**

**FEMA Response:** FEMA concurred with the recommendation. FEMA noted several efforts it has made to enhance applicant training on the use of its data systems. These include one-on-one video sharing sessions, on-demand videos, a YouTube channel, and a training catalog, among others.

**OIG Analysis:** FEMA's actions satisfy the intent of the recommendation. We consider the recommendation resolved and open, pending receipt of evidence showing the steps FEMA has taken.

### **Recommendation 4**

**FEMA Response:** FEMA concurred with the recommendation. FEMA stated the Federal Insurance and Mitigation Administration (FIMA) Community Infrastructure Resilience Branch (CIR) of the Hazard Mitigation Assistance Division has developed basic educational materials and is spreading this information. FIMA CIR, in November 2019, published "mitigate Disaster Damage with FEMA Public Assistance" on the FEMA website. In 2020, FIMA CIR worked with FIMA's External Stakeholder Working Group to identify knowledge and awareness gaps of PA mitigation requirements and assessed the websites of all 50 states and the District of Columbia. Forty-nine websites required updates to reflect current guidance. FIMA CIR, in conjunction with FEMA Regions, is working to communicate website improvements to relevant states and expects this communication to be complete by June 30, 2021.

**OIG Analysis:** Although FEMA's response addresses the first element of our recommendation — education and training of states and applicants on mitigation programs and availability of funding — it does not address the remaining three elements, relating to benefit-cost analyses, streamlining the



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application process, and flexibilities to adjust cost share for applicants experiencing financial hardships. We consider the recommendation unresolved.



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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 107-296) by amendment to the *Inspector General Act of 1978*.

We conducted this audit to determine to what extent FEMA is complying with the DMA 2000 by implementing regulations and policies to identify and reduce repetitive damages to our Nation's roads and bridges.

To achieve our objective we gained an understanding of FEMA's role in identifying and reducing repetitive damages to roads and bridges, by obtaining and reviewing relevant policies and procedures, including:

- *Disaster Mitigation Act of 2000*
- *Disaster Recovery Reform Act of 2018*
- *FEMA Hazard Mitigation Assistance Guidance*
- *Disaster Assistance; Public Assistance Repetitive Damage*, 74 Federal Register 40,124 (August 11, 2009)

We also interviewed officials from FEMA's Public Assistance Administration, FIMA, Office of Counsel, and regional offices, and state emergency management agencies, as well as applicants, to gauge the extent of participation and knowledge of the DMA 2000 and FEMA's PA Hazard Mitigation Program.

Because we determined EMMIE contained unreliable data to identify repetitive damage locations, we performed manual steps to identify nationwide locations with repetitive damages. Using FEMA's Enterprise Data Warehouse, which contains EMMIE data, we selected a universe of PA project worksheets for disasters declared from 2009 through 2018. We filtered those worksheets to capture disasters that met the following three criteria:

- Category C: Roads and Bridges as a category of work
- Repetitive damage to a road or bridge from disasters, such as floods, hurricanes, and severe storms
- FEMA applicant with project worksheets for three or more disasters declared from 2009 through 2018

Subsequently, we sorted the remaining project worksheets based on geographic characteristics by FEMA region, state, and county. The output contained a list of FEMA regions, states, and applicants that received PA funds to restore roads



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and bridges damaged by three or more separately declared disasters from 2009 through 2018. Our Chief Data Officer confirmed that this approach yielded the highest level of certainty we could achieve without a dedicated data system to identify the locations of repetitive damages.

As part of our interview process, we judgmentally selected a sample of two applicants from each of the five states with the highest frequency of funding granted to repair repetitively damaged roads and bridges. If the applicants' geographic distances from FEMA region and state agencies were too far, we elected to meet with applicants based on their funding frequency and closer proximities to reduce travel time. The intent of the interviews was to determine applicants' awareness of mitigation funding and public safety, and understand repetitive damage challenges. During applicant interviews, we confirmed their experiences with repetitive damages to validate that our approach of selecting applicants was appropriate to identify applicants with repetitive damages. Table 3 shows our sample of applicants receiving funding valued at \$324 million for repetitive damages in FEMA's regions and states.

**Table 3. Sample of Applicants Receiving Funding for Repetitive Damages**

<b>State/FEMA Region<sup>17</sup></b>	<b>Repetitive Applicants</b>	<b>Federal Share Obligated to Repetitive Applicants</b>
South Dakota / Region 8	251	\$ 23,111,863
Minnesota / Region 5	224	26,346,262
Missouri / Region 7	181	108,780,379
New York / Region 2	137	143,391,944
Kansas / Region 7	131	22,570,000
<b>TOTAL</b>	<b>924</b>	<b>\$324,200,448</b>

Source: OIG analysis of FEMA PA records

We conducted this performance audit between October 2019 and March 2020 pursuant to the *Inspector General Act of 1978, as amended*, and according to generally accepted government auditing standards. Those standards require that 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

<sup>17</sup> We are defining repetitive applicants as applicants who received Category C Public Assistance funding for three or more declared disasters between 2009 and 2018.



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**Appendix B**  
**FEMA Comments to the Draft Report**

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



**FEMA**

May 7, 2021

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

**FROM:** Cynthia Spishak  
Associate Administrator  
Office of Policy and Program Analysis

**SUBJECT:** Management Response to Draft Report: "FEMA Has Not Prioritized Compliance with the Disaster Mitigation Act of 2000, Hindering Its Ability to Reduce Repetitive Damages to Roads and Bridges"  
(Project No. 19-007-AUD-FEMA)

CYNTHIA SPISHAK  
Digitally signed by CYNTHIA SPISHAK  
Date: 2021.05.07 12:47:46 -0400

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

FEMA is pleased with the OIG's Final Report pertaining to FEMA's positive actions to encourage mitigation activities that reduce repetitive damages to facilities that receive Public Assistance (PA) funding. This includes implementing Section 1235(b) of the Disaster Recovery Reform Act of 2018 (DRRA), which amended Section 406(e) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) to require FEMA to fund repair, restoration, reconstruction, or replacement efforts in conformity with the "latest published editions of relevant consensus-based codes, specifications, and standards that incorporate the latest hazard-resistant designs and establish minimum acceptable criteria for the design, construction and maintenance of residential structures and facilities that may be eligible for assistance under [the Stafford] Act..."<sup>1</sup> In November 2019, FEMA published its policy requiring the FEMA-funded recovery projects to use the latest hazard-resistant design standards.<sup>2</sup>

<sup>1</sup> Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, and Related Authorities. [https://www.fema.gov/sites/default/files/2020-03/stafford-act\\_2019.pdf](https://www.fema.gov/sites/default/files/2020-03/stafford-act_2019.pdf)

<sup>2</sup> FEMA Recovery Interim Policy FP-104-009-11 (Version 2) entitled "Consensus-Based Codes, Specifications and standards for Public Assistance". <https://www.fema.gov/assistance/public/policy-guidance-fact-sheets/section-1235b-consensus-based-codes-and-standards#:~:text=As%20amended%20by%20Section%201235,that%20incorporate%20the%20latest%20hazard>



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FEMA has also improved its ability to collect and manage information pertaining to PA mitigation efforts and repetitively damaged facilities. FEMA began using the FEMA Applicant Case Tracker (FAC-TRAX) information management system in 2017, which improved the consistency and accuracy of project-related data. Standardized data fields allow FEMA to track repetitively damaged facilities more easily. FEMA is transferring its historical damage records from the Emergency Management Mission Integrated Environment (EMMIE) to FAC-TRAX, which will also improve these capabilities. FEMA provides applicants with a range of opportunities to receive training on the use of this system.

Further, FEMA has taken action to encourage and promote applicants' use of mitigation in various ways, and FEMA works with applicants to identify cost-effective mitigation activities. Within FEMA's PA Program and Policy Guide (PAPPG), FEMA provides a list of mitigation measures that have been pre-determined to be cost effective if the costs of the measures do not exceed 100 percent of eligible repair costs.<sup>3</sup>

In the furtherance of FEMA's mission to provide assistance before, during, and after disasters, FEMA remains committed to fulfilling its responsibility to be a good steward of taxpayer funds and supporting hazard mitigation that will reduce future damages. From January 1, 2000 through March 31, 2021, FEMA obligated \$67.7 billion in PA Program permanent work funding (Category C-G), of which an estimated 9.2 percent was provided for mitigation activities. Of the \$67.7 billion obligation figure, 16.3 percent was provided for roads and bridges.

The draft report contains four recommendations for FEMA with which FEMA concurs. Attached, find our detailed response to each recommendation. FEMA previously submitted technical comments addressing several accuracy, contextual, and other issues 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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<sup>3</sup> Please see Appendix J of FEMA's "Public Assistance Program and Policy Guide." Version 4 (June 1, 2020). [Public Assistance Program and Policy Guide Version 4 \(fema.gov\)](#)



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### Attachment: Management Response to Recommendations Contained in 19-007-AUD-FEMA Draft Report

OIG recommended that the FEMA Administrator:

**Recommendation 1:** Address unresolved implementation issues, publish proposed regulations for notice and comment within 1 year, and issue final regulations within 3 years of issuance of this report for implementation of the Disaster Mitigation Act of 2000, 42 U.S.C. § 5172(b)(2).

**Response:** Concur. Section 205(b) of the Disaster Mitigation Act of 2000 (DMA 2000) directed FEMA to promulgate regulations to implement a reduced Federal share for repetitively damaged facilities under certain circumstances. Since its prior rulemaking effort in 2009, FEMA has addressed issues pertaining to the implementation of Section 205(b) of the DMA 2000. Most significantly, FEMA's FAC-TRAX information management system now provides functionality that improves FEMA's ability to properly and consistently collect information that allows FEMA to identify and track repetitive damages more easily.

FEMA will again undertake efforts to promulgate regulations directed by Section 205(b) of the DMA 2000. However, the proposed timeframes that the OIG included within the text of Recommendation 1 ("publish proposed regulations for notice and comment within 1 year, and issue final regulations within 3 years of issuance of [the issuance of the OIG's Final Report]") are not feasible or are not entirely within FEMA's span of control. The rulemaking process is lengthy, and timeframes are variable.

In this case, the Recovery Directorate will prepare a request for new rulemaking for internal agency concurrence. Once the request for new rulemaking is approved, FEMA will assign a rulemaking team to implement the program's proposed approach. FEMA will then draft, clear, and publish a Notice of Proposed Rulemaking (NPRM), which involves review by the Department of Homeland Security (DHS) Office of General Counsel (OGC) and may require review by the Office of Management and Budget (OMB), depending on whether the rule is determined significant. The timeframe for this step would vary depending on the scope of the rulemaking and availability of data to support the rulemaking but typically takes up to 3 years. FEMA would then adjudicate the comments received on the NPRM, determine how to move forward in light of the comments, and draft, clear, and publish a final rule which would involve review by DHS OGC and may involve review by OMB, depending on whether the rule is determined significant. The timeframe for this step would vary depending on the scope of the rulemaking and availability of data to support the rulemaking but typically takes an additional 3 years.



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Based on the actions that FEMA has taken to address implementation issues and the lengthy and uncertain rulemaking process, FEMA requests that the OIG consider this recommendation to be resolved and closed.

**Recommendation 2:** Establish a process to standardize data entry in its database systems to promote consistency and accuracy to better identify repetitive damages.

**Response:** Concur. In 2017 FEMA began using the FAC-TRAX (often referred to as PA Grants Manager and PA Grants Portal) information management system for the PA Program. This system allows FEMA to collect and track detailed and easily searchable project information (including facility types and locations). This functionality was not previously available within FEMA's EMMIE system. Using the FAC-TRAX system, FEMA can track, sort, and export information related to repetitive damages to a higher degree than ever before.

In 2021, FEMA PA created a mapping functionality in PA Grants Manager to help identify the location of damage more clearly. As of April 23, 2021, PA Grants Manager includes more locations with drop down menus in lieu of fillable fields to improve the consistency of nomenclature and data entry.

Accordingly, FEMA requests that the OIG consider this recommendation to be resolved and closed.

**Recommendation 3:** Work with states to develop a plan and properly train applicants on the use of FEMA's disaster related data systems.

**Response:** Concur. In October of 2017, FEMA's FAC-TRAX information management system went live as the new information management system for all PA Program grant information. FAC-TRAX is comprised of two applications: PA Grants Manager (for FEMA staff) and PA Grants Portal (for state, local officials, and applicants). Applicant staff use PA Grants Portal to write their projects and track their PA eligible disaster related costs. FEMA has implemented a multi-pronged plan to train applicants on the use of FEMA's disaster related data systems, even before FAC-TRAX went live for all disasters. Efforts include:

- In October 2016, the Grants Manager Hotline opened for calls and emails. The Grants Manager Hotline is a technical support phone and email line which responds live to all end user questions about data system use. As of March 31, 2021, the PA hotline has answered 39,785 phone calls and 22,144 emails.
- Since October 2016, declaration-specific embedded trainers have been deployed to provide classroom trainings and one-on-one assistance to aid all stakeholders (including state, local, tribal, and territorial governments (SLTTs)) in a number of ways, including the proper use of PA Grants Portal.



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- On February 28, 2019, FEMA released 10 Independent Study Courses that discuss how to use PA Grants Portal in every step of the PA grant process.
- Since March 2020, the PA Division has released on-demand trainings in the form of videos and slides posted on the PA Grants Manager and PA Grants Portal to address common issues that applicants are experiencing with FEMA's PA grant writing process/data management system.
- The PA Division delivers PA Grants Portal training via one-to-one video sharing sessions and on-demand videos (as well as via in-person training sessions prior to the onset of the COVID-19 pandemic) to applicant staff upon request.
- As of March 2020, the PA Division conducts weekly webinars for applicant and recipient staff on the use of PA Grants Portal for PA projects.
- In March 2020, FEMA executed the "COVID-19 Regional Training Plan" that established FEMA regional points-of-contact to train and assist applicant and recipient staff with FEMA's PA Grants Portal.
- On March 20, 2020, the PA Division began uploading training videos on the PA Grants Manager YouTube channel, which was created in October of 2016. As of April 14, 2021, the YouTube channel currently houses 40 videos that give a walkthrough and explain functionality of Grants Manager and Grants Portal to end users. As of April 14, 2021, the Grants Manager YouTube channel has 139,300 views amounting to over 12,500 total viewing hours.
- In August 2020, the PA Division established an SLTT team specifically to coordinate trainings for applicant staff on the topics of the PA Program and the PA Grants Portal.
- On April 1, 2021, the PA Division created and shared with all Grants Manager and Grants Portal users a training catalog that captures all the training material that has been created, as well as where it is available.

Due to the numerous actions already completed by FEMA to train applicant staff on the use of FEMA's data systems, FEMA requests that the OIG consider this recommendation to be resolved and closed.

**Recommendation 4:** Review and resolve hazard mitigation challenges, such as:

- ensuring education and training of states and applicants on mitigation programs and availability of funding at the state and applicant levels;
- revising criteria and instructions for completing benefit-cost analyses to clarify and streamline the process and assist applicants in meeting the required benefit-cost threshold;
- streamlining the processes from application submission to approval to decrease applicants' wait time for mitigation; and
- considering existing flexibilities to adjust the cost share for applicants experiencing financial hardships.



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**Response:** Concur. FEMA Federal Insurance and Mitigation Administration (FIMA) Community Infrastructure Resilience (CIR) Branch of the Hazard Mitigation Assistance (HMA) Division has developed basic educational materials and is making efforts to spread the information. In November 2019, the CIR Branch published version 1.1 of a brochure entitled "[Mitigate Disaster Damage with FEMA Public Assistance](https://www.fema.gov/sites/default/files/2020-06/fema-pa406-mitigation-brochure.pdf)" on the FEMA website.<sup>4</sup> This document provides examples of approved mitigation, identifies requirements in simple language and by illustration, and identifies the process steps.

In 2020, FIMA's CIR Branch worked with FIMA Hazard Mitigation Assistance's External Stakeholder Working Group (ESWG) to identify gaps in knowledge and awareness of current PA mitigation requirements by conducting an assessment of all 50 state and the District of Columbia's websites. Of the 51 websites, 49 were found to require some degree of update to reflect current guidance. FIMA's CIR Branch developed model language for websites, including images and links, and is currently working with the ESGW to encourage states to update the information on their websites and provide relevant communication materials. FIMA's CIR Branch is working with FEMA Regions to communicate this to the relevant states. FIMA's CIR Branch expects to complete communication of state website gaps to the FEMA Regions for follow up by June 30, 2021.

**Estimated Completion Date:** June 30, 2021.

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<sup>4</sup> FEMA's "Mitigate Disaster Damage with FEMA Public Assistance." Version 1.1 (November 2019). <https://www.fema.gov/sites/default/files/2020-06/fema-pa406-mitigation-brochure.pdf>



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**Appendix C**  
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