

**FEMA Should Disallow \$1.2  
Million of \$6.0 Million in Public  
Assistance Program Grant  
Funds Awarded to the City of  
San Diego, California**





# DHS OIG HIGHLIGHTS

## ***FEMA Should Disallow \$1.2 Million of \$6.0 Million in Public Assistance Program Grant Funds Awarded to the City of San Diego, California***

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January 25, 2016

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

We audited \$4 million of the \$6 million of Federal Emergency Management Agency (FEMA) Public Assistance grant funds awarded to the City of San Diego, California (City), for damages resulting from heavy rainfall and flooding that occurred on December 17, 2010, through January 4, 2011.

### **What We Recommend**

FEMA should disallow \$1,163,225 in ineligible costs and direct California to provide greater guidance to the City related to landfill costs incurred under the FEMA grant.

#### **For Further Information:**

Contact our Office of Public Affairs at (202) 254-4100, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)

### **What We Found**

The City generally accounted for FEMA funds adequately, but did not always expend the funds according to Federal regulations and FEMA guidelines. We determined that of the \$3,991,282 we audited, \$1,163,225 (or 29 percent) was ineligible, including—

- \$654,348 in excessive landfill costs;
- \$393,704 in fees unrelated to the disaster;
- \$112,279 in costs related to preexisting damages; and
- \$2,894 in excessive equipment costs.

These findings occurred, in part, because California did not provide sufficient guidance to the City on FEMA Public Assistance rules governing landfill costs.

### **FEMA Response**

FEMA officials told us that they would provide comments after we issue the final report. FEMA's written response is due within 90 days.



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Department of Homeland Security

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

January 25, 2016

MEMORANDUM FOR: Robert Fenton  
Regional Administrator, Region IX  
Federal Emergency Management Agency

FROM:   
John V. Kelly  
Assistant Inspector General  
Office of Emergency Management Oversight

SUBJECT: *FEMA Should Disallow \$1.2 Million of \$6.0 Million in  
Public Assistance Program Grant Funds Awarded to the  
City of San Diego, California*  
Audit Report Number OIG-16-23-D

We audited Federal Emergency Management Agency (FEMA) Public Assistance grant funds awarded to the City of San Diego, California (City). The California Governor's Office of Emergency Services (California), a FEMA grantee, awarded the City \$5,986,508 for damages from heavy rainfall and flooding from December 17, 2010, through January 4, 2011. The award provided 75 percent FEMA funding for 7 large projects and 30 small projects. We audited three large projects and one small project, totaling \$3,991,282, or 67 percent of the total award (see appendix A), all of which the City has completed.

### **Background**

The City of San Diego, California, experienced flooding, debris, and mud flows resulting from severe winter storms that occurred from December 17, 2010, through January 4, 2011. The City manages normal rainwater flows through a network of storm drains and channels that it regularly maintains and cleans to minimize the accumulation of debris, which can cause flooding. However, the severity of the storms created excessive debris in three of the City's channels (Chollas Creek, Smuggler's Gulch, and Pilot) and caused blockages, overflows, and flooding onto adjacent roadways and private properties. Consequently, City personnel used City-owned trucks and leased equipment to remove the silt, refuse, and vegetative debris from the channels and haul it to the City-leased and operated Miramar Landfill (Landfill).<sup>1</sup>

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<sup>1</sup> The City operates the Landfill under the *50-year Miramar Ground Lease Agreement* (August 17, 1995, to August 16, 2045) with the U.S. Department of the Navy. This Agreement authorizes the City to use about 1,400-acres of the Miramar Naval Air Station for landfill purposes. The City, in exchange, agreed to provide a lump sum payment at lease execution; free refuse disposal for Navy facilities; and payments to the Navy equal to 2 percent of the annual gross revenues from the sale of energy generated, not to exceed \$1.5 million.



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### Results of Audit

The City generally accounted for FEMA funds adequately, but did not always expend the funds according to Federal regulations and FEMA guidelines.<sup>2</sup> We determined that of the \$3,991,282 we audited, \$1,163,225 (or 29 percent) was ineligible, including—

- \$654,348 in excessive landfill costs (table 1) (finding A);
- \$393,704 in fees unrelated to the disaster (table 2) (finding B);
- \$112,279 in costs related to preexisting damages (finding C); and
- \$2,894 in excessive equipment costs (finding D).

These findings occurred, in part, because California did not provide sufficient guidance to the City on FEMA Public Assistance rules governing landfill costs (finding E).

#### **Finding A: Excessive Landfill Costs**

The City improperly claimed and received \$654,348 from FEMA in ineligible landfill costs for Projects 1094 (\$593,258) and 1129 (\$61,090) because it misclassified the debris as a type for which the City's landfill charges a higher rate.

FEMA authorized the City to remove and dispose of disaster-related debris (e.g., sediment, vegetation) from the Chollas Creek and Tijuana River storm drain channels under Projects 1094 and 1129. According to the Landfill's schedule, the City should have classified this type of disaster debris as General Refuse Waste, with a corresponding disposal rate of \$21 per ton. However, we identified 1,685 instances where the City's automated Landfill billing process incorrectly classified debris loads as Construction and Demolition Waste, with a higher disposal rate of \$58 per ton—or \$37 more per ton than appropriate—resulting in \$654,348 in ineligible landfill costs for Projects 1094 (\$593,258) and 1129 (\$61,090).

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<sup>2</sup> Although the City *generally* accounted for FEMA funds adequately, we identified (relatively minor) deficiencies where cost adjustments posted on the City's internal accounting systems were not communicated to staff processing FEMA's claimed costs. We discussed these deficiencies with the City officials (who agreed), which resulted in the City's accounting staff initiating actions to determine the appropriate corrective actions to take.



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**Table 1. Excessive Landfill Costs**

| <b>Project Number</b> | <b>Eligible Debris Loads Properly Charged at \$21/ton</b> | <b>Misclassified (Ineligible) Debris Loads Mistakenly Charged at \$58/ton</b> | <b>Tons Overcharged by \$37/ton</b> | <b>Questioned Costs: Number of Tons x \$37 Overcharge per Ton<sup>3</sup></b> |
|-----------------------|---|---|-------------------------------------|---|
| 1094                  | 50  | 1,556   | 16,037                              | \$593,258   |
| 1129                  | 1,938   | 129   | 1,650                               | 61,090  |
| <b>Totals</b>         | <b>1,988</b>  | <b>1,685</b>  | <b>17,687</b>                       | <b>\$654,348</b>  |

Source: City documentation and Office of Inspector General (OIG) analyses

The City applies a decal on the window of each dump truck when it places the truck into service. The decal typically corresponds to the type of debris material the dump trucks deliver. However, the disaster necessitated that the City use trucks from various divisions that did not always have the decal that corresponded to the type of debris the truck was hauling. These misclassifications occurred primarily because of two reasons:

1. The City did not modify the default settings in its accounting systems for trucks assigned to the disaster project. Therefore, based on the assigned decal designation, the Landfill's automated billing system inaccurately generated charges as Construction and Demolition Waste (\$58/ton) when it should have generated charges as General Refuse Waste, at a much lower rate (\$21/ton).
2. City personnel did not verify that the landfill rate charges reflected the disaster debris material delivered. The Landfill-generated data schedule reflects the delivered debris tonnage and the total charge; the form does not identify the unit price for the debris. The City's FEMA claimed cost database lacked an analysis for unit cost (total debris charges divided by the debris tonnage). That database modification would automatically identify any mischarges (in this case, for example, anything over \$21/ton).

We also determined that the City's General Refuse Waste category is the only category that captures the Landfill's fixed and variable operating costs: the only landfill costs eligible for FEMA Public Assistance funding. To extend the life of the Landfill, the City adopted (in 2008) a higher rate for Construction and Demolition Waste: 2.75 times the General Refuse Waste rate, or \$58 per ton. This higher rate encouraged the diversion of recyclable materials from the landfill to lower-cost, City-certified recycling centers. Therefore, no matter the type of debris (and because the City consistently buried the debris at the

<sup>3</sup> Slight variance exists in these totals because of the City's method of rounding to whole dollar amounts on each transaction.



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landfill), it would only be eligible for costs associated with the Landfill's fixed and variable operating costs captured in the \$21/ton General Refuse Waste rate. All other (higher) rates—such as the \$58/ton Construction and Demolition Waste rate—would be ineligible for FEMA funding because charges greater than \$21/ton did not capture costs, but rather provided a disincentive for not recycling.

Federal regulations and FEMA guidelines require that costs under a Federal grant must be—

- necessary, reasonable, and consistent with policies, regulations, and procedures that apply uniformly to both Federal awards and other activities of the subgrantee (2 CFR Part 225, Appendix A, Sections C.1.a and e (2010), and 44 § CFR 13.22 (2010)); and
- restricted to the amount required to cover the fixed (equipment, construction, and permits) and variable (labor, supplies, maintenance, and utilities) costs of the landfill (Public Assistance *Debris Management Guide*, FEMA 325, July 2007, p. 31 (FEMA 325)).

FEMA guidelines acknowledge that local authorities “may incorporate special taxes or fees into the landfill tipping fee to fund government services or public infrastructure” but such costs “are not eligible for Public Assistance grant funding” (FEMA 325, p. 31).

Because the City's disaster-related debris consisted of General Refuse Waste and not Construction and Demolition Waste—and because Federal rules restrict the City's claim to actual costs—the City improperly claimed to FEMA \$37 in excessive costs on 1,685 loads, or \$654,348, for Projects 1094 (\$593,258) and 1129 (\$61,090).

City and California officials agreed with our finding. City officials told us that they have already taken steps to prevent these issues in the future. FEMA officials told us that they would provide us comments after the issuance of this report.

### **Finding B: Landfill Fees Unrelated to the Disaster**

The City improperly claimed and received \$393,704 from FEMA for ineligible recycling fees for Projects 1094 (\$165,495) and 1129 (\$228,209) because the Landfill did not recycle any disaster-related debris associated with these projects. Instead, it buried the debris because the debris material did not qualify for recycling.



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As noted above, FEMA authorized the City to remove and dispose of disaster-related debris (e.g., sediment, vegetation) from the Chollas Creek and Tijuana River storm drain channels under Projects 1094 and 1129. In addition to the Landfill disposal charges discussed in Finding A, the Landfill levies a \$10 per ton recycling fee on behalf of the City on all materials disposed—regardless of whether the City buries or recycles the debris—in accordance with the *State of California Integrated Waste Management Act of 1989* (AB 939). These fees finance recycling programs and provide education and technical assistance in schools and the community. However, the recycling fee is unrelated to the disaster—and to the operation of the Landfill—and thus \$393,704 related to Projects 1094 (\$165,495) and 1129 (\$228,209) is ineligible for FEMA’s Public Assistance grant funding.

| <b>Project Number</b> | <b>Total Debris Tonnage<sup>4</sup></b> | <b>Questioned Costs: Number of Tons x \$10 Ineligible Recycling Fee per Ton<sup>5,6</sup></b> |
|-----------------------|---|---|
| 1094                  | 16,537                                  | \$165,495   |
| 1129                  | 22,837                                  | 228,209   |
| <b>Totals</b>         | <b>39,374</b>                           | <b>\$393,704</b>  |

Source: City documentation and OIG analyses

Specifically, the recycling fees are not eligible for FEMA’s Public Assistance grant funding because those fees—

- did not reduce or eliminate any immediate threats to life and property resulting from the major disaster (*Robert T. Stafford Disaster Relief and Emergency Assistance Act*, Section 403, as amended, Pub. L. 93-288, (a)(3)(A) and (a)(3)(I) (June 2007)); and
- did not directly fund the fixed and variable costs of the Landfill’s operation, but instead constitute “special taxes or fees,” which funded governmental services or public infrastructure (FEMA 325, p. 31).

Therefore, the recycling fees that the City claimed under the FEMA grant are ineligible because of the following conditions:

<sup>4</sup> City officials made minor errors in recording the tonnage, such as recording one entry as 1,019 tons rather than 10.19 tons. We have corrected these errors within this table to ensure the accuracy of the costs we question.

<sup>5</sup> Project 1094 includes \$270 in ineligible Refuse Collector Business Taxes (a tax for disposing non-City waste). This nominal amount is included in the Recycling Fees we question.

<sup>6</sup> Slight variance exists in these totals because of the City’s method of rounding to whole dollar amounts on each transaction.



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- Fees did not fund work to reduce or eliminate any immediate threats to life and property resulting from the disaster event.
- City disposed of all disaster related debris through burial at a landfill without recycling *any* of its disaster debris (to which the City concurs).
- Recycling fees funded ongoing or future *non-disaster-related* City programs.
- Landfill tipping fees funded the operation of the Landfill; therefore, the recycling fees constituted what FEMA classifies as special taxes and fees that are ineligible for reimbursement under the grant.

City officials did not agree with this finding, saying that the recycling fees represent direct costs. California officials also did not agree with this finding; they said that the recycling fees are part of the disposal fee structure that is required pursuant to the aforementioned *State of California Assembly Bill 939*. However, our position remains unchanged. In an attempt to further explain our position to the City and California, we provided them with detailed information that explains FEMA's rules for reimbursing disaster debris disposal costs.<sup>7</sup> These rules specify that FEMA only reimburses actual recycling costs when an established recycling program exists and the disaster debris consists of materials disposed of through the recycling process. FEMA officials told us that they would provide us comments after the issuance of this report.

### **Finding C: Costs Unrelated to the Disaster (Preexisting Damage)**

The City improperly claimed and received from FEMA \$112,279 for Project 497 for damages that existed before the disaster, and thus did not relate to the disaster.

FEMA and City officials identified \$160,374 in costs related to pre-disaster damages that they agreed to remove from the City's final claim. However, we identified *additional* ineligible costs that the City and FEMA overlooked. We shared our concerns with the City's engineers, who subsequently worked with us to quantify those additional costs that related to pre-disaster damages for this Project. Our joint efforts determined that the City's actual pre-disaster damages were \$272,653—or \$112,279 *more* than FEMA and the City's determination. These additional ineligible costs are—

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<sup>7</sup> The information we provided to City and California officials included multiple references to the *California Department of Resources Recycling and Recovery – Integrated Waste Management Disaster Plan* (issued by a California agency), which specifies that it is FEMA's policy to only provide reimbursements for *actual costs* (either landfill or recycling, whichever is least costly). When considering that only actual disposal-related costs are eligible, it is apparent that the City's recycling fees—which were unrelated to the disaster—are ineligible for reimbursement under the FEMA grant.



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- \$48,000 for 60 linear feet of 42-inch reinforced concrete pipe the City used to replace corrugated metal pipe damaged before the disaster;
- \$47,151 to clean and grub a slope damaged before the disaster;
- \$15,352 in project engineering costs that relate to the City's pre-disaster damages; and
- \$1,776 for contractor field orders.

Federal rules stipulate that, for costs to be eligible under the Federal grant, the work must be the direct result of the declared disaster; pre-disaster damages are not eligible (44 CFR § 206.223 (a)(1); and FEMA Public Assistance Guide, FEMA 322, October 2007, p. 29 (FEMA 322)). Because the four items of work related to preexisting damages, FEMA overfunded the City \$112,279 for that work.

The City's engineers agreed that the City understated its preexisting damage costs by \$112,279. California officials also agreed with this finding. FEMA officials told us that they would provide us comments after the issuance of this report.

### **Finding D: Excessive Equipment Costs**

California improperly increased rates that the City used for claiming equipment costs, resulting in \$2,894 in excessive and ineligible equipment costs for Project 1094. The City claimed \$44,134 for equipment costs from January 4, to April 20, 2011, using its own equipment rates, which were lower than the rates set forth in FEMA's Schedule of Equipment Rates (FEMA's rates). However, California increased this amount by \$2,894, to \$47,028, with the notation "FEMA Rates," and no further explanation. FEMA approved these costs.

Federal regulations (44 CFR 206.228 (a)(1)(ii)) allow use of local (City) equipment rates if they are lower than FEMA's rates. However, even if the local rates are lower than FEMA's rates, FEMA's regulations allow for reimbursement at the higher FEMA rates if the grant applicant certifies that the local rates do not reflect actual costs. Under such circumstances, the applicant must provide documentation if requested. However, California increased the City's claimed costs by using FEMA's rates without documenting or explaining why or whether FEMA's rates were more appropriate than the City's lower rates.

City officials had no comment. California officials disagreed with this finding. They told us that they compared the force account equipment cost worksheets that the City provided with FEMA's Schedule of Equipment Rates and concluded that the City's claimed equipment rates are substantially lower than published FEMA Equipment Rates. We maintain our position; even if the City's



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equipment rates are lower, the City and California did not document that the actual costs it incurred were higher than its claimed rate costs. In fact, the City was not even aware that California increased its claimed equipment costs. We encourage California to revisit Federal regulations governing the eligibility of costs claimed for equipment that do not reflect the actual costs incurred. FEMA officials told us that they would provide us comments after the issuance of this report.

### **Finding E: Grant Management**

California should improve its guidance to the City on the rules governing FEMA's Public Assistance Program. Our audit results demonstrated that City officials did not have an adequate understanding of the eligibility, applicability, and reasonableness of disaster-related landfill costs it incurred under the FEMA grant. City officials did not—

- implement an adequate accounting process that accurately captured and verified the eligibility of landfill costs incurred (finding A);
- reduce its claim by the amount of ineligible special taxes and fees the landfill levied (finding B); and
- exclude costs for pre-disaster damages unrelated to the disaster (finding C).

Federal regulations require California as a grantee to—

- ensure that subgrantees are aware of requirements imposed on them by Federal statutes and regulations (44 CFR § 13.37(a)(2)); and
- manage the day-to-day operations of subgrant activity and monitor subgrant activity to assure compliance with applicable Federal requirements (44 CFR § 13.40(a)).

Therefore, California officials should ensure that they consistently provide relevant, timely, and accurate guidance to the City.

City officials disagreed with this finding. They told us that California officials consistently provided them comprehensive and exhaustive guidance related to FEMA's Public Assistance Program, and always demonstrated great responsiveness and support to the City's inquiries, questions, and requests for assistance. City officials said that the findings in this report generally occurred because of staffing challenges immediately following the disaster; and that consequently (since 2012) they have committed an additional full-time, supervisory level position to support the City's FEMA-related work to fully incorporate FEMA and California requirements into the City's practices.



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California officials also disagreed with this finding. They told us that (as a matter of practice) they provide extensive training, reference materials, and technical support to their subgrantees for every major disaster. They said that their Disaster Debris Management Specialist attended the City's applicant briefing and provided comprehensive debris management training and materials to City officials. Lastly, they told us that it is a well-established practice for California to provide regulatory and best practice guidance to its subgrantees through project completion. To support its assertions, California provided us the same documents it provided the City, including fact sheets, training materials, and debris management information.

FEMA officials told us that they would provide comments after the issuance of this report.

We considered California officials' comments and reviewed the documentation they provided, along with other records that we collected during the course of this audit. After careful consideration, we maintain our position. California provided the City with general guidance, but not specific guidance relevant to the conditions we identified. Further, California monitored, validated, and approved \$1,048,052 in landfill-related costs that we determined were not eligible. Therefore, regardless of the amount or quality of advice that California provided, it did not assure compliance with applicable Federal requirements as 44 CFR § 13.40(a) requires.

### Recommendations

We recommend that the Regional Administrator, FEMA Region IX:

**Recommendation 1:** Disallow as ineligible \$654,348 (Federal share \$490,761) in excessive landfill costs for Projects 1094 and 1129 (finding A).

**Recommendation 2:** Disallow \$393,704 (Federal share \$295,278) in ineligible landfill fees for Projects 1094 and 1129 (finding B).

**Recommendation 3:** Disallow \$112,279 (Federal share \$84,209) for Project 497 for ineligible costs related to preexisting damage (finding C).

**Recommendation 4:** Disallow as ineligible \$2,894 (Federal share \$2,171) in excessive equipment costs for Project 1094 (finding D).

**Recommendation 5:** Direct California to provide guidance to the City and monitor its performance to ensure the City complies with Federal regulations and FEMA guidelines for future disaster grants (finding E).



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**Discussion with Management and Audit Follow-up**

We discussed the results of this audit with City officials during our audit and briefed FEMA on our audit findings on June 24, 2015. We also provided a draft report to FEMA, California, and City officials in advance of the exit conferences, which occurred with FEMA on July 23, 2015, and with the City and California on July 30, 2015. We included these officials' comments, as applicable, in the body of this report.

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 the contact information of responsible parties and any other supporting documentation necessary to inform us about the status of the recommendations. Please email a signed pdf copy of all responses and closeout request to Humberto Melara, Director, Western Regional Office, Office of Emergency Management Oversight, at [Humberto.Melara@oig.dhs.gov](mailto:Humberto.Melara@oig.dhs.gov). Until we receive and evaluate your response, we will consider the recommendations open and unresolved.

The Office of Emergency Management Oversight major contributors to this report are Humberto Melara, Director; Devin Polster, Audit Manager; Curtis Johnson, Senior Auditor; and Montul Long, Auditor.

Please call me with any questions at (202) 254-4100, or your staff may contact Humberto Melara, Director, Western Regional Office, at (510) 637-1463.



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**Appendix A**

**Objective, Scope, and Methodology**

We audited FEMA Public Assistance grant funds awarded to the City, Public Assistance Identification Number 073-66000-00. Our audit objective was to determine whether the City accounted for and expended FEMA grant funds according to Federal regulations and FEMA guidelines for FEMA Disaster Number FEMA-1952-DR-CA. California, a FEMA grantee, awarded the City \$5,986,508 for damages resulting from heavy rainfall and flooding from December 17, 2010, through January 4, 2011. The award provided 75 percent FEMA funding for 7 large projects and 30 small projects.<sup>8</sup>

We audited \$3,991,282 or 67 percent of the total award, including three large projects totaling \$3,928,218 and one small project totaling \$63,064 (see table 3). The audit covered the period from December 17, 2010, to April 30, 2015. FEMA closed the grant on April 17, 2015.

| <b>Table 3. Projects Audited and Costs Questioned</b> |                       |                                    |                  |                  |                |                    |
|---|-----------------------|------------------------------------|------------------|------------------|----------------|--------------------|
| <b>Project / Category of Work*</b>                    | <b>Project Amount</b> | <b>Costs Questioned by Finding</b> |                  |                  |                |                    |
|   |                       | <b>A</b>                           | <b>B</b>         | <b>C</b>         | <b>D</b>       | <b>Total</b>       |
| 497/F   | \$1,050,925           |                                    |                  | \$112,279        |                | \$112,279          |
| 1094/A  | 1,395,968             | \$593,258                          | \$165,495        |                  | \$2,894        | 761,647            |
| 1129/A  | 1,481,325             | 61,090                             | 228,209          |                  |                | 289,299            |
| 1155/G♦   | 63,064                |                                    |                  |                  |                |                    |
| <b>Total</b>  | <b>\$3,991,282</b>    | <b>\$654,348</b>                   | <b>\$393,704</b> | <b>\$112,279</b> | <b>\$2,894</b> | <b>\$1,163,225</b> |

*Source:* City documentation and OIG analyses

\*FEMA identifies type of work by category: A for debris removal, B for emergency protective measures, and C–G for permanent work.

♦ Small project

To accomplish our objectives, we interviewed FEMA, California, and City officials; gained an understanding of the City’s method of accounting for disaster-related costs and its procurement policies and procedures; judgmentally selected and reviewed (generally based on dollar amounts) project costs and procurement transactions for the projects in our audit scope; reviewed applicable Federal regulations and FEMA guidelines; and performed other procedures considered necessary to accomplish our audit objective. As part of our standard auditing procedures, we also notified the Recovery

<sup>8</sup> Federal regulations in effect at the time of the disaster set the large project threshold at \$63,900.



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**Appendix A (continued)**

Accountability and Transparency Board of all contracts the City awarded under the grant that we reviewed to determine whether the contractors were debarred or whether there were any indications of other issues related to those contractors that would indicate fraud, waste, or abuse. We did not perform a detailed assessment of the City's internal controls applicable to its grant activities because it was not necessary to accomplish our audit objective.

We conducted this performance audit between December 2014 and July 2015, 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objective. We conducted this audit by applying the statutes, regulations, and FEMA policies and guidelines in effect at the time of the disaster.



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**Appendix B**

**Potential Monetary Benefits**

| <b>Table 4: Summary of Potential Monetary Benefits</b> |                    |                      |
|--|--------------------|----------------------|
| <b>Type of Potential Monetary Benefit</b>              | <b>Total</b>       | <b>Federal Share</b> |
| Questioned Costs – Ineligible                          | \$1,163,225        | \$872,419            |
| Questioned Costs – Unsupported                         | 0                  | 0                    |
| Funds Put to Better Use                                | 0                  | 0                    |
| <b>Totals</b>  | <b>\$1,163,225</b> | <b>\$872,419</b>     |

Source: OIG analyses of findings in this report



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**Appendix C**

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**Appendix C (continued)**

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