

Consolidated Results of SBA's Initial Disaster Assistance Response to Hurricanes Harvey, Irma, and Maria

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EXECUTIVE SUMMARY

CONSOLIDATED RESULTS OF SBA'S INITIAL DISASTER ASSISTANCE RESPONSE

Report No. 21-05

December 22, 2020

What OIG Reviewed

In 2017, after hurricanes Harvey, Irma, and Maria resulted in catastrophic damage, the Office of Inspector General conducted three inspections to assess SBA's initial disaster assistance response. We reviewed SBA's staffing adequacy, loan application volume, and timeliness of disaster loan approvals in response to the damages caused by hurricanes Harvey, Irma, and Maria.

The objective of this review is to summarize the results of those inspection reports. To accomplish our objective, we compiled the results to identify successes, issues, risks, and contributing factors. We also interviewed officials from SBA's Office of Disaster Assistance to identify any planned or initiated corrective actions.

What OIG Found

The unprecedented damage, application volume, and magnitude of hurricanes Harvey, Irma, and Maria presented challenges for SBA. However, within 9 days of Hurricane Harvey, the agency established both disaster and recovery centers. While still helping victims of Hurricane Harvey, SBA established its presence for Hurricane Irma within 20 days. Then, while still assisting hurricane Harvey and Irma disaster survivors, SBA was able to staff disaster recovery and business recovery centers within 13 days in Puerto Rico and 33 days in the U.S. Virgin Islands to help victims of Hurricane Maria.

We found SBA quickly increased its staffing levels from 758 on August 4, 2017, to 2,579 by September 30, 2017. The agency effectively staffed and opened loan processing centers in each of the affected communities and exceeded its loan application processing goals for accepted applications for all three hurricanes.

However, SBA's response was not without difficulty. We found there was a 24 percent backlog of loan applications. SBA also did not meet its goals for answering calls and responding to email messages and some survivors were on hold 45

minutes or more waiting to discuss their applications.

Some of the factors that contributed to these issues included:

- SBA used manual processes for onboarding and new hire placement;
- SBA omitted or shortened training for its volunteer staff and new hires; and
- SBA also did not effectively anticipate the need for Spanish translation services.

Actions Taken by SBA

SBA planned or initiated actions to address the challenges faced. To reduce the backlog and increase staffing, the agency began using USA Staffing to automate recruitment, hiring, and onboarding processes.

The agency also set new program-specific training requirements for temporary disaster employees and volunteers and awarded a new blanket-purchase agreement to three different vendors for translation services. SBA's corrective actions, when implemented, should enhance its initial response to future large-scale disasters.



Office of Inspector General U.S. Small Business Administration

DATE: December 22, 2020

TO: Jovita Carranza
Administrator

FROM: Hannibal "Mike" Ware 
Inspector General

SUBJECT: Consolidated Results of SBA's Initial Disaster Assistance Response to Hurricanes Harvey, Irma, and Maria

This report presents the consolidated inspection results of SBA's initial disaster assistance response to hurricanes Harvey, Irma, and Maria. We considered management's comments on the discussion draft of this report when preparing the final report.

We appreciate the courtesies and cooperation extended to us during this inspection. If you have any questions please contact me or Andrea Deadwyler, Assistant Inspector General for Audits at (202) 205-6586.

cc: William Manger, Chief of Staff and Associate Administrator, Office of Capital Access
Christopher Gray, Deputy Chief of Staff
James Rivera, Associate Administrator, Office of Disaster Assistance
Alejandro Contreras, Director, Preparedness, Communication and Coordination, Office of Disaster Assistance
Brittany Biles, General Counsel
Michael Simmons, Attorney Advisor, Office General Counsel
Martin Conrey, Attorney Advisor, Office General Counsel
Rafaela Monchek, Director, Office of Continuous Operations and Risk Management
Tonia Butler, Director, Office of Internal Controls
Tami Perriello, Chief Financial Officer

Table of Contents

Introduction.....	1
A Trio of Hurricanes	1
Table 1. Hurricanes Harvey, Irma, and Maria Loan Application Volume – September 30, 2017, through March 30, 2018	2
Overview of Office of Disaster Assistance	2
Disaster Loan Processing Overview.....	2
Figure 1. SBA’s Disaster Loan Process	3
Prior Work.....	4
Results.....	4
Initial Disaster Assistance Response Successes.....	6
Staffing Adequacy	6
Table 2. Staffing Levels – Hurricanes Harvey, Irma, and Maria.....	6
Disaster Recovery Centers and Business Recovery Centers.....	6
Loan Application Processing Timeliness	7
Hurricane Harvey	7
Hurricane Irma	7
Hurricane Maria	7
Opportunities to Improve Initial Disaster Assistance Response	8
Application Backlog.....	8
Table 5. Applications Processed and Approved for Hurricane Harvey	8
Unanswered Calls and Emails.....	8
Table 3. Customer Service Center Staffing, Call Volume, and Unanswered Call Rate.....	9
Table 4. Customer Service Center Staffing, Email Volume, and Percent Emails Unanswered.....	9
Translation Services	10
Contributing Factors	10
Corrective Actions Taken By SBA	10
Appendix I: Objective, Scope, and Methodology.....	11
Use of Computer Processed Data	11

Introduction

The Small Business Administration (SBA) plays a major role in disaster relief efforts after hurricanes, floods, earthquakes, and other disasters that occur in the United States and its territories. SBA's Office of Disaster Assistance provides low-interest disaster loans to individuals and businesses affected by disasters.

SBA offers loans to businesses of all sizes; private and nonprofit organizations; homeowners; and renters to repair or replace real estate, personal property, machinery and equipment, inventory, and business assets that have been damaged or destroyed in a declared disaster. SBA also provides necessary working capital loans to eligible small businesses and most private nonprofit organizations to help overcome economic injury resulting from a declared disaster.

A Trio of Hurricanes

In less than 30 days between August 25 and September 20, 2017, three hurricanes--Harvey, Irma, and Maria--struck the United States and its territories, spurring unprecedented demand for federal disaster assistance. The combined estimated cost was \$265 billion.¹

Hurricane Harvey, a category 4 hurricane, made landfall on August 25, 2017. Hurricane Harvey devastated much of southeastern Texas and affected residents of Louisiana, Mississippi, Tennessee, and Kentucky, about 13 million people. Harvey was one of the most destructive storms in U.S. history, causing an estimated \$125 billion in damages—the second highest in U.S. history after Hurricane Katrina.

Hurricane Irma, a category 5 hurricane, made landfall on September 6, 2017, in the U.S. Virgin Islands. Hurricane Irma also affected residents in Florida, Georgia, and South Carolina a few days later (September 10-11, 2017). Irma caused approximately \$50 billion in property damage.

Hurricane Maria, a category 5 hurricane, struck the U.S. Virgin Islands on September 20, 2017, causing extreme damage. Hours later, it struck Puerto Rico as a category 4 hurricane, with maximum winds of 155 miles per hour. Hurricane Maria was so powerful it completely knocked out Puerto Rico's electrical grid, disabling weather stations, radar, and cell towers across the island. Maria caused nearly \$90 billion in damages.

According to the Federal Emergency Management Agency (FEMA), hurricanes Harvey, Irma and Maria were three of the top five costliest hurricanes on record. An estimated 26 million Americans were affected. SBA's application volume and loan amounts far exceeded SBA's normal loan processing activity, which was an average of 52,000 loan applications per fiscal year. By March 30, 2018, when we completed our initial inspection report, SBA had processed 312,874 disaster loan applications and approved 122,308 loans, totaling nearly \$6.5 billion (see Table 1). By September 20, 2018, processed application volume had increased to about 340,000 applications, of which about 141,000 were approved, totaling nearly \$7.2 billion.

¹ National Oceanic and Atmospheric Administration.

Table 1. Hurricanes Harvey, Irma, and Maria Loan Application Volume – September 30, 2017, through March 30, 2018

As of Date	Combined Total Apps Processed	Combined Total Apps Approved	Combined Dollar Value of Loans Approved (\$)
09/30/2017	47,303	7,968	\$ 669,140,200
10/30/2017	115,422	27,665	2,018,355,400
11/30/2017	188,900	57,933	3,572,288,700
12/30/2017	242,528	80,868	4,675,535,700
01/30/2018	279,861	99,830	5,526,295,400
02/28/2018	298,114	113,425	6,125,840,500
03/30/2018	312,874	122,308	6,491,243,000

Source: Disaster Credit Management System Disaster Activity Reports

Overview of Office of Disaster Assistance

The Office of Disaster Assistance includes the following primary functional groups that assist disaster survivors. Business recovery centers are set up by SBA after declared disasters. Disaster recovery centers are set up by FEMA and jointly staffed by SBA. There are two field operations centers: one in Sacramento, California, that services all disaster locations west of the Mississippi River and one in Atlanta, Georgia, which services the geographic area east of the Mississippi (Minnesota is assigned to the Atlanta, Georgia, field operation center). The field operations centers are responsible for assigning staff to the business and disaster recovery centers.

Generally, disaster survivors seeking federal assistance must register with FEMA. Once registered, they may be referred to SBA and encouraged to apply for a disaster loan online or in person at a local business recovery center or disaster recovery center in the disaster-affected area.

Disaster Loan Processing Overview

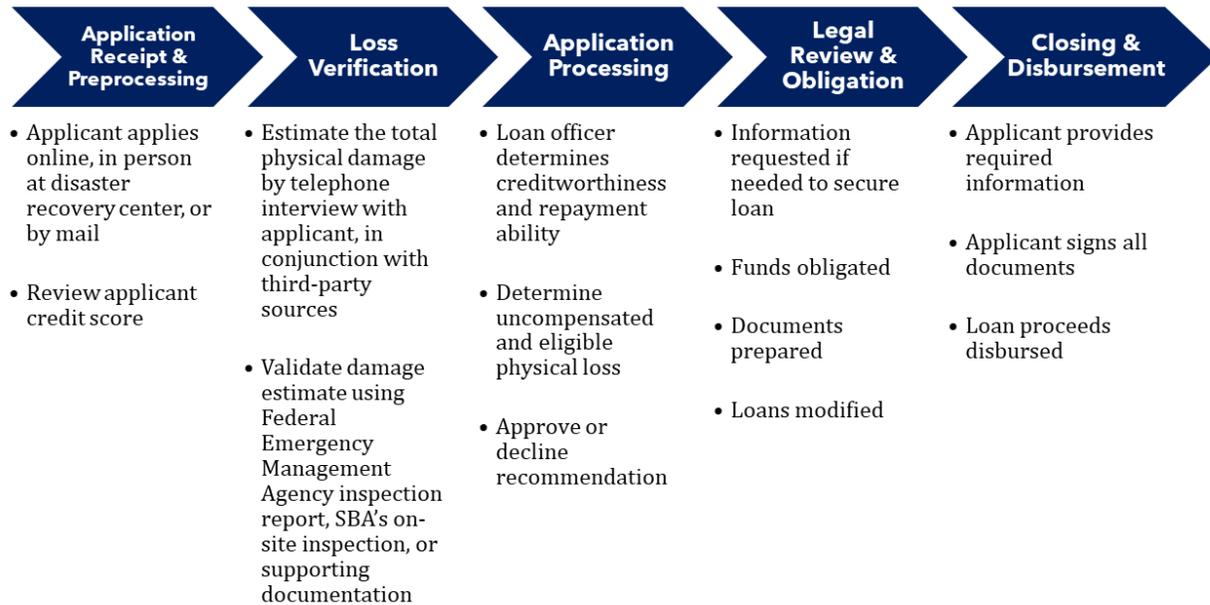
Disaster loan applications are routinely processed in Fort Worth, Texas, at the processing and disbursement center where eligible applicants are evaluated for creditworthiness and repayment ability. Before a disaster loan can be approved, SBA must verify the loss the applicant sustained as a result of the disaster.

Employees assigned to the damage verification center who perform these tasks are in Herndon, Virginia; Atlanta, Georgia; Fort Worth, Texas; and Sacramento, California. Effective January 31, 2017, the Associate Administrator for the Office of Disaster Assistance implemented desktop loss verification for all home loan applicants and for business loan applicants applying for residential structure (residential rental property owners) loans up to \$25,000. In loss verification, SBA evaluates the cause and extent of property damage and provides the processing and disbursement center with the information necessary to determine eligibility for disaster loan funds.

Damage assessments are completed in two parts: an initial desktop loss verification and a post-desktop review. The initial desktop loss verification is used to estimate the cost of repairs. Information is gathered and evaluated through telephone interviews with applicants in conjunction with third-party information, such as tax assessors' websites, Google Earth, and Zillow. Following the initial desktop loss verification, SBA requires a post-desktop review to validate the total damage estimates from the initial desktop loss verification.

Once the application meets all the requirements, the processing and disbursement center accepts the application for processing. Those that qualify are approved, and loan closing documents are prepared. When the disbursement center receives the borrower’s signed closing documents, the borrower receives the loan money (see Figure 1).

Figure 1. SBA’s Disaster Loan Process



Source: OIG analysis

SBA staff can deny loan applications on the spot based on income tests and family size. This allows SBA to immediately refer disaster survivors back to FEMA for possible grant assistance if they did not qualify for an SBA loan.

Prior Work

Inspection of SBA's Initial Disaster Assistance Response to Hurricane Maria (SBA OIG 18-19, July 19, 2018). We found SBA staffed two business recovery and five disaster recovery centers in the U.S. Virgin Islands within 33 days after Maria made landfall while still assisting Hurricane Irma disaster survivors. In Puerto Rico, SBA established three business recovery centers in 13-36 days and staffed two disaster recovery centers established by FEMA 30 days after Maria made landfall. As of March 30, 2018, SBA had staffed a total of 15 recovery centers in the U.S. Virgin Islands and 154 in Puerto Rico. Although SBA hired staff, it did not fully anticipate the need for Spanish interpretation services in Puerto Rico. SBA needed additional Spanish translation services to assist the staff in meeting the needs of disaster survivors. As a result, some survivors had estimated wait times of more than 45 minutes or dropped calls.

Inspection of SBA's Initial Disaster Assistance Response to Hurricane Irma (SBA OIG 18-16, April 26, 2018). We found SBA established a meaningful presence in the immediate aftermath of Hurricane Irma. Within 20 days after Hurricane Irma was declared a disaster, SBA provided 127 staff for recovery centers. By the end of December 2017, SBA had increased its staff to 4,703 and operated 134 centers. SBA management said although SBA was able to provide staffing to assist Hurricane Irma survivors, the Schedule A hiring process made it difficult to rapidly hire employees. Despite the unprecedented volume of disaster loan applications and hiring challenges, SBA met its 45-day processing goal for the applications. We found that SBA management could better assess their personnel needs if they fully used available management staffing tools.

Inspection of SBA's Initial Disaster Assistance Response to Hurricane Harvey (SBA OIG 18-10, January 19, 2018). We found SBA's initial response to Hurricane Harvey was expeditious. By the end of October 2017, the Office of Disaster Assistance had more than quadrupled its staff to 4,310 and operated 84 recovery centers. As of November 2, 2017, the office had served 60,694 Hurricane Harvey disaster survivors. Despite the quick response, SBA was unable to meet its goals for answering calls and responding to email messages and had a backlog of 21,571 loan applications waiting to be processed.

Objective

Our objective was to consolidate the results of our inspections of SBA's initial disaster assistance response to hurricanes Harvey, Irma, and Maria, including loan application volume, staffing adequacy, and timeliness of disaster loan approvals.

Results

Despite the unprecedented damage, application volume, and magnitude of hurricanes Harvey, Irma and Maria, SBA established disaster recovery and business recovery centers within 9 days after Hurricane Harvey made landfall. However, two more hurricanes followed quickly and while still assisting victims of Hurricane Harvey, SBA had to mobilize to help more disaster victims. SBA established a presence for Hurricane Irma victims within 20 days.

When Maria made landfall, the agency was still assisting hurricane Irma disaster survivors in Puerto Rico and the U.S. Virgin Islands. The agency established recovery centers within 13 days in Puerto Rico and staffed centers in the U.S. Virgin Islands within 33 days.

SBA also quickly increased staffing levels to process loan applications. SBA exceeded its loan processing goals for hurricanes Harvey, Irma, and Maria. However, we identified opportunities for improvement that if addressed could enhance SBA's future response to large-scale disasters.

Initial Disaster Assistance Response Successes

SBA quickly increased staffing levels for disaster and business recovery centers in each of the affected communities. SBA also exceeded loan processing goals for accepted applications.

Staffing Adequacy

The Small Business Act directs the SBA Administrator to ensure the number of full-time equivalent employees in the Office of Disaster Assistance is not less than 800 permanent employees and not less than 1,000 reserve employees.

On August 4, 2017, the office's staffing was 758. By September 30, 2017, program officials had increased staffing levels to 2,579 in response to all disasters, including hurricanes Harvey, Irma, and Maria. The agency continued to increase the number of employees in anticipation of huge spike in application volumes. Staff numbers peaked at 5,094 on December 13, 2017 and settled to 3,395 by March 31, 2018 (see Table 2).

Table 2. Staffing Levels – Hurricanes Harvey, Irma, and Maria

Functional Center ^a	8/4/17	9/15/17	9/30/17	10/30/17	11/30/17	12/30/17	1/31/18	2/28/18	3/31/18
PDC	466	896	1,368	2,374	2,599	2,669	2,805	2,534	2,160
DVC	91	304	435	698	838	834	497	423	390
CSC	56	103	210	321	290	279	267	238	191
FOC West	77	203	379	509	425	368	314	206	124
FOC East	68	154	187	408	537	553	541	521	530
Total Staff	758	1,660	2,579	4,310	4,689	4,703	4,424	3,922	3,395

Source: SBA Office of Disaster Personnel.

^a PDC stands for processing and disbursement center. CSC stands for customer service center. DVC stands for damage verification center. FOC stands for field operations center.

Disaster Recovery Centers and Business Recovery Centers

Within 9 days after Hurricane Harvey was declared a disaster, SBA provided 33 staff in the two disaster recovery centers opened by FEMA and opened a business recovery center. For Hurricane Irma, SBA placed 127 staff in 27 recovery centers within 20 days after being declared a disaster.

While still assisting disaster survivors from Hurricane Irma in the U.S. Virgin Islands and Puerto Rico, SBA staffed two additional business recovery centers and five disaster recovery centers to help Hurricane Maria survivors within 33 days after Maria made landfall in the Virgin Islands. SBA also opened three business recovery centers. The first was set up within 13 and the third was set up within 26 days after Maria made landfall in Puerto Rico. SBA also staffed two disaster recovery centers established by FEMA within 30 days. By March 30, 2018, SBA had staffed a total of 15 recovery centers in the U.S. Virgin Islands and 154 in Puerto Rico.

SBA staff at disaster recovery centers helped survivors onsite and set the locations and operating schedules for business recovery centers. SBA staff can deny loan applications on the spot based on income tests and family size. This allows SBA to immediately refer disaster survivors back to FEMA for possible grant assistance if they did not qualify for an SBA loan.

Loan Application Processing Timeliness

We analyzed SBA's processing times for disaster loan applications with a loan approval, denial, or withdrawal for each hurricane. SBA sets tiered goals to process loan applications based on volume. Accordingly, the processing loan application goal for Hurricane Harvey was 28 days and 45 days for Hurricanes Irma and Maria.

Despite the unprecedented volume of loan applications, SBA exceeded its processing goals for completed applications for all three hurricanes. The timeframes do not include applications in backlog, applications received but awaiting preprocessing, or incomplete applications.

Hurricane Harvey

On October 30, 2017, SBA had processed 67,232 of the 88,803 disaster loan applications it received for Hurricane Harvey, leaving a 24 percent backlog. SBA does not start counting processing time on disaster loan applications until it receives a complete loan package. The average processing time for approved loans was 17 days if automatic declines and pre-loss verification declines were not included. Automatic declines are computer-generated declines of applications because of poor applicant credit histories that stop the application in preprocess instead of moving the application forward for full processing. When we included computer-generated declines, the overall average processing time dropped to 11 days.

Hurricane Irma

SBA received 110,464 disaster loan applications and processed 105,257, or 95 percent. The average processing time for loans that were approved, denied, or withdrawn was approximately 21 days when the automatic declines and pre-loss verification declines were not included. When these computer-generated declines were included, the overall average processing time dropped to 15 days.

Hurricane Maria

SBA received 90,477 disaster loan applications and processed 86,598, or 96 percent, leaving 3,879, or 4 percent, remaining to be processed March 30, 2018. The average processing time for loans approved, denied, or withdrawn was approximately 30 days when the automatic declines and pre-loss verification declines were not included. When these computer-generated declines were included, the overall average processing time dropped to approximately 27 days.

Opportunities to Improve Initial Disaster Assistance Response

We identified opportunities for SBA to improve its initial disaster assistance response. If SBA addresses these issues, it could improve the agency’s response to future large-scale disasters. For example, SBA had a significant backlog of loan applications, did not always respond to phone calls and emails promptly, and did not fully anticipate the unprecedented need for Spanish language interpretation services in Puerto Rico.

Application Backlog

In an average year of disaster activity, SBA processes 52,000 loan applications. However, in the 2-month period after Hurricane Harvey made landfall, SBA received 88,803 disaster loan applications. By October 30, 2017, SBA had processed 67,232 of the 88,803 disaster loan applications it received after Hurricane Harvey, leaving a 24 percent backlog. The 67,232 applications processed during September and October 2017, exceeded SBA’s annual average for the previous 10 years. The approved loans totaled approximately \$1.7 billion (see Table 5).

Table 5. Applications Processed and Approved for Hurricane Harvey

Date	Applications Received	Applications Processed	Applications Approved	Dollar Value of Loans Approved (\$ millions)
9/15/2017	25,978	16,061	2,371	204
9/30/2017	55,186	35,464	7,787	661
10/30/2017	88,803	67,232	20,595	1.7

Source: Disaster Credit Management System - Disaster Activity Report by Disaster Number.

The backlog resulted from the high volume of loan applications received after the three hurricane disasters. We noted that the loan application backlog decreased steadily, and by November 30, 2017, the number of Hurricane Harvey loans waiting to be processed was down to 7,066.

Unanswered Calls and Emails

From September 2, 2017, to October 28, 2017, the customer service center increased the number of people available to answer phone calls from 17 to 146. The call volume from weeks two and three included calls related to hurricanes Harvey and Irma, in addition to those related to previous disasters. Beginning in week four, the call volume included hurricanes Harvey, Irma, Maria, and other disasters. The volume of unanswered calls peaked during week five, at 16,737.

Despite continuously increasing the number of available agents in the weeks after the hurricanes, a significant percentage of calls went unanswered (see Table 3). The percentage of unanswered calls ranged from 14 percent to 37 percent. The Office of Disaster Assistance’s strategic goal for fiscal year (FY) 2017 was to handle 90 percent of incoming calls.

We noted that the telephone system in the customer service center did not inform callers of the approximate wait time or how many callers were ahead in line waiting. The phone system also did not have an option of leaving a phone number to have the call returned when an agent was available.

Table 3. Customer Service Center Staffing, Call Volume, and Unanswered Call Rate

Week Number	Week Ending Date	Average Number Available Agents ^a	Calls Received	Calls Answered	Calls Unanswered	Percent Calls Unanswered
1	9/2/2017	17	11,051	9,353	1,698	15.34
2	9/9/2017	62	30,185	24,498	5,687	18.84
3	9/16/2017	64	30,265	25,726	4,539	15.00
4	9/23/2017	62	42,789	26,942	15,847	37.04
5	9/30/2017	84	50,850	34,113	16,737	32.91
6	10/7/2017	112	49,864	42,907	6,957	13.95
7	10/14/2017	111	56,111	43,342	12,769	22.76
8	10/21/2017	128	65,160	48,579	16,581	25.45
9	10/28/2017	146	64,105	51,339	12,766	19.91

Source: Buffalo Customer Service Center Daily Activity Summary

^a Indicates only those customer service employees available to answer calls. We have rounded up to the nearest whole number to identify the average number of agents assigned during the week.

The customer service center also experienced challenges responding to the high volume of email. The number of emails received ranged from a few more than 1,000 to more than 5,100. The number of emails left unanswered ranged from 820 to 4,536. The weekly percentage of unanswered emails ranged from 21 percent to 97 percent.

The customer service center continued to add staff to eliminate the email backlog and by October 28, the number of unanswered emails had been reduced some 33 percent down to a little more than 1,500 emails. The Office of Disaster Assistance’s strategic goal for FY 2017 was to respond to 90 percent of inquiries to the Disaster Assistance Customer Service Mailbox within 2 business days (see Table 4).

Table 4. Customer Service Center Staffing, Email Volume, and Percent Emails Unanswered

Week Number	Date Week Ended	Average Number Agents Assigned ^a	Emails Received	Emails Answered	Backlog of Unanswered Emails	Emails Received but Not Answered (% Weekly)
1	9/2/2017	1	1,006	205	820	81.51
2	9/9/2017	4	2,341	2,234	1,339	57.20
3	9/16/2017	8	3,099	3,795	643	20.75
4	9/23/2017	5	4,494	2,782	2,355	52.40
5	9/30/2017	5	5,121	3,869	3,611	70.51
6	10/7/2017	7	4,666	3,741	4,536	97.21
7	10/14/2017	10	4,506	6,053	3,045	67.58
8	10/21/2017	22	4,710	5,472	2,766	58.73
9	10/28/2017	22	4,555	5,807	1,514	33.24

Source: Buffalo Customer Service Center Daily Activity Summary

^a Each day of the week, a different number of agents were assigned to work. We have rounded up to the nearest whole number to identify the average number of agents assigned during the week.

SBA did not have processes and procedures to ensure temporary employees for the customer service center were adequately trained and had the program expertise and skills needed to respond to the myriad of questions about the disaster loan program or applicant’s application.

Translation Services

Hurricane Maria's landfall in Puerto Rico created an unprecedented demand for Spanish translation services. SBA needed a significant number of Spanish translators to assist staff in communicating with disaster survivors about disaster loan applications.

SBA regularly used language translation services to assist non-English-speaking disaster survivors and had a contract with one translation company for several years before the hurricanes. But SBA awarded a new contract for this service on September 5, 2017, just days after Hurricane Harvey. The new translation service contractor could not handle the high call volume.

Disaster survivors who called for help with their loan application or other assistance often had 45-minute or more wait times or dropped calls because SBA had not planned for or fully anticipated the extent of the need for Spanish translators in Puerto Rico.

During the 4 years before the 2017 hurricane season, the SBA disaster assistance program spent \$10,000 per year for translation services. The agency's translation costs increased to approximately \$3.6 million for Hurricanes Harvey, Irma, and Maria combined (October 1, 2017, through March 31, 2018).

Contributing Factors

SBA used manual onboarding processes, which negated the benefits of federal quick hiring flexibilities of management tools such as Schedule A and led to temporary staffing shortages that contributed to backlogs of calls and emails. For example, when Hurricane Irma was declared a disaster, the Office of Disaster Assistance had 1,660 employees. Hurricane Irma was the second of three major hurricanes, and SBA already had begun increasing staffing levels to process disaster loan applications, adding 27 employees to help hurricane survivors. However, because SBA used manual onboarding processes, new hires were not quickly placed.

In addition, SBA did not always ensure interagency volunteers and temporary employees were fully trained to do the jobs assigned. Training was shortened or omitted in the rush to bring in new employees.

Lastly, SBA did not fully anticipate the extent of the need for Spanish translators in Puerto Rico.

Corrective Actions Taken By SBA

SBA initiated or planned actions to address the challenges the agency faced in responding to hurricanes Harvey, Irma and Maria. SBA's corrective actions should enhance its initial response to future large-scale disasters.

SBA began using USA Staffing to automate its recruitment, hiring, and onboarding of new staff, implemented new program specific training requirements for temporary employees hired during large-scale disasters, and took steps to increase the availability of more experienced staff to support new hires.

To address the problem of language translation identified during the response to Hurricane Maria, SBA awarded a blanket purchase agreement to three vendors for translation services to increase the number of translators available and reduce associated wait times.

Appendix I: Objective, Scope, and Methodology

We initiated and completed reviews to assess SBA's initial disaster assistance response, including staffing adequacy, loan application volume, and timeliness of disaster loan approvals because of the scale of the disasters and the number of business and individuals affected by hurricanes Harvey, Irma, and Maria. This review consolidates the results of those reports.

To answer our objective, we reviewed the results from our inspections to identify successes, challenges, and risks. We also interviewed officials from the Office of Disaster Assistance and identified planned or implemented corrective actions to address the challenges. In addition, we reviewed laws and regulations and standard operating procedures, including SOP 50 30 8 as well as training guidance on the loan making process.

We conducted this inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's quality standards for inspection and evaluation. These standards require that we plan and perform the inspection to obtain sufficient, appropriate evidence to provide a reasonable basis for our conclusions and observations based on our inspection objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our inspection objectives.

Use of Computer Processed Data

We reviewed computer-generated disaster activity reports from the Disaster Credit Management System to quantify loan application volume and analyzed data extracts from the system to determine loan application processing times. We assessed the reliability of the data through limited testing. We relied on our previous audit work. We believe the data is sufficiently reliable to support the report conclusions.