

## **Memorandum for the Record: GSA OIG Biweekly Reporting on Hurricane Oversight**

GSA's role in assisting FEMA is unique in that under Emergency Support Function 7 (ESF-7) under the National Response Plan, GSA acts as procurement agent for FEMA. Under this situation, FEMA issues GSA a procurement request and a GSA contracting officer conducts the procurement through the award, including obligating FEMA funds. FEMA is responsible for receiving the product or service and vendors bill FEMA directly. GSA enters the procurement data into the Federal Procurement System Database (FPDS); however, the data is not entered into GSA's contract or financial systems as the transactions are processed, monitored, and paid by FEMA using its information systems. The GSA OIG biweekly report is based on the information in FPDS, since it is the only centralized database for the ESF-7 procurements and it provides all data fields requested by the DHS OIG.

The GSA OIG is performing a programmatic review that looks at GSA's support for FEMA in its entirety, including GSA's procurements for FEMA under ESF-7, charges against mission assignments, as well as management controls and processes internal to GSA. To date, we have made site visits to GSA regional offices supporting FEMA and held discussions with other GSA organizations involved with FEMA support to gain an understanding of the policies and processes.

The GSA OIG review of GSA's procurements for FEMA under ESF-7 includes examining the procurements for price reasonableness, the level of competition used for the award, and management controls related to the procurement award. To date, we have selected approximately 104 contracts over \$500,000 awarded by GSA under ESF-7. These contracts were identified primarily from procurement "logs" that are used by contracting personnel to track ESF-7 procurement. However, data on the competitive status for the procurements under review is not readily available, as the logs do not identify the level of competition. In addition, although the level of competition is identified in FPDS, only 78 of the 104 could be found in that database. As such, we will not report on the competitive status until it can be determined with more certainty.

In addition, the GSA OIG review will examine mission assignments that FEMA has issued to GSA under ESF-7 and the costs GSA has charged in carrying out the mission assignments. Mission assignments are used to assign tasks to agencies and provide a method for reimbursement for the costs of the tasks. GSA is using mission assignments primarily for the reimbursement of employee time and travel costs. In addition, GSA has sub-tasked additional ESF-7 mission assignments to other agencies in their entirety as instructed by FEMA and does not bill for those costs.

Under the procurement flexibilities allowed for contracting in response to the Hurricane Katrina, GSA raised the procurement ceiling for charge cards to \$15,000 and only for a limited number of cardholders. Generally, GSA does not utilize purchase cards to make procurements in support of FEMA. The data reported is based on the FPDS database.