Department of Homeland Security Office of Inspector General

State of Kansas' Management of State Homeland Security Program Grants Awarded During Fiscal Years 2008 Through 2010



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

SEP 14 2012

MEMORANDUM FOR: Elizabeth M. Harman

Assistant Administrator

Grant Programs Directorate

Grant Programs Directorate

Federal Emergency Management Agency

FROM: Anne L. Richards and Wichards

Assistant Inspector General for Audits

SUBJECT: State of Kansas' Management of State Homeland Security

Program Grants Awarded During Fiscal Years 2008

Through 2010

Attached for your action is our final report, *State of Kansas' Management of State Homeland Security Program Grants Awarded During Fiscal Years 2008 Through 2010.* We incorporated the formal comments from the Director of Office of Policy and Program Analysis in the report.

The report contains three recommendations aimed at improving the State of Kansas' Homeland Security Grant Program. Your office concurred with all three recommendations. As prescribed by the Department of Homeland Security Directive 077-1, 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 each recommendation. Until your response is received and evaluated, all three recommendations will be considered open and unresolved.

Consistent with our responsibility under the *Inspector General Act*, we are providing copies of our report to appropriate congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact John E. McCoy II, Deputy Assistant Inspector General for Audits, at (202) 254-4100.

Attachment

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Abbreviations

DHS Department of Homeland Security
FEMA Federal Emergency Management Agency
FY fiscal year
OIG Office of Inspector General

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Executive Summary

Public Law 110-53, *Implementing Recommendations of the 9/11 Commission Act of 2007*, as amended, requires the Department of Homeland Security (DHS) Office of Inspector General (OIG) to audit individual States' management of State Homeland Security Program and Urban Areas Security Initiative grants. This report responds to the reporting requirement for the State of Kansas.

The objectives of the audit were to determine whether the State of Kansas spent State Homeland Security Program funding effectively and efficiently and in accordance with Federal, State, and agency statutes, regulations, and guidance. We also assessed the extent to which the grant funding enhanced the State's ability to prevent, prepare for, protect against, and respond to natural disasters, acts of terrorism, and other manmade disasters. From fiscal year 2008 through fiscal year 2010, the State of Kansas was awarded \$21.4 million in State Homeland Security Program funding.

Generally, the State of Kansas did an effective job of working with its regional and local partners to develop a Homeland Security Strategic Plan that allocated grant funding based on national and State priorities. However, we identified instances in which the expenditure of State Homeland Security Program funds did not comply with Federal procurement, monitoring, and performance requirements. As a result, we questioned \$197,532 of unsupported management and administrative costs. We also determined that the State of Kansas did not have measurable outcomes established to allow it to fully evaluate the effects of grant funding on its emergency preparedness capabilities.

The report contains three recommendations to the Federal Emergency Management Agency (FEMA) that, when fully implemented, should improve program transparency, accountability, and performance. FEMA officials concurred with all three recommendations. Written comments to the draft report are incorporated as appropriate and are included in appendix B.



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Background

DHS, through FEMA, provides Federal funding to States to enhance their ability to prevent, deter, respond to, and recover from terrorist attacks, major disasters, and other emergencies. Funds are distributed to individual States through FEMA's Homeland Security Grant Program, which includes the State Homeland Security Program. The State of Kansas designated the Kansas Highway Patrol as the State Administrative Agency for the Homeland Security Grant Program. From fiscal year (FY) 2008 through FY 2010, FEMA awarded \$21.4 million in State Homeland Security Program funding to the State of Kansas. As of the start of our audit fieldwork, in July 2011, \$11.2 million (52 percent) remained unspent. Appendix C contains additional details about the Homeland Security Grant Program.

The Kansas Highway Patrol awarded Homeland Security Grant Program funds to subgrantees, including State agencies, homeland security regions within the State, and a fiscal agent.¹ All the State agencies and one of the seven homeland security regions we reviewed used their own policies, procedures, and internal controls to ensure compliance with Homeland Security Grant Program award requirements. The remaining six homeland security regions relied on the services of a fiscal agent selected by the Kansas Highway Patrol to ensure compliance with fiscal grant award procurement requirements.

Once the fiscal agent entered into the subgrant agreement with the Kansas Highway Patrol, the fiscal agent assumed responsibility for all Homeland Security Grant Program funds awarded to its six regions. This included the responsibility for procuring, disbursing, accounting for, and reporting grant funds in accordance with all Federal and State Homeland Security Grant Program fiscal requirements. The fiscal agent was responsible for the procurement of the grant's assets; the regions received, maintained, and used the assets.

The homeland security regions are composed of staff from local agencies within the region, but they do not have any authority to receive or expend funds. Kansas homeland security regions create an annual grant budget detailing the best use of State Homeland Security Program grant funds for the region. The Kansas Highway Patrol and FEMA must approve the budget. Once the budget is approved, the fiscal agent can begin procuring the approved equipment and services for the region. The fiscal agent verifies that the regions received the equipment or services and then requests grant funds from the Kansas Highway Patrol to pay the invoices.

This audit is required by Public Law 110-53, *Implementing Recommendations of the 9/11 Commission Act of 2007*, as amended. The audit covers \$21.4 million in State Homeland

¹ A fiscal agent is a government or nonprofit entity responsible for meeting all Homeland Security Grant Program fiscal and reporting requirements.



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Security Program funds awarded to the State over the course of FYs 2008, 2009, and 2010. See appendix A for additional details on the purpose, scope, and methodology for this audit.

Results of Audit

Generally, the State of Kansas worked effectively with its regional and local partners to develop a Homeland Security Strategic Plan, and allocated and spent grant funding based on national and State priorities. However, we identified instances in which the expenditure of State Homeland Security Program funds did not comply with Federal procurement, monitoring, and performance requirements. As a result, we questioned \$197,532 of unsupported management and administrative costs. We also determined that the absence of measurable outcomes made it difficult for OIG or FEMA to evaluate the effects of State Homeland Security Program expenditures on the State's preparedness capabilities.

Monitoring of Grant Management and Administrative Costs

The State of Kansas did not properly identify and validate management and administrative costs in accordance with Federal and State requirements. Specifically, the fiscal agent representing six of the seven homeland security regions could not provide supporting documentation for any of the management and administrative costs totaling \$197,532 submitted to and reimbursed by the State from FY 2008 through October 2011. The Kansas Highway Patrol did not detect the need for supporting documentation because it decided to reimburse the fiscal agent for the maximum allowable amount of management and administrative costs without requiring support for these costs. Kansas Highway Patrol and fiscal agent officials said that they believed the fiscal agent was entitled to the maximum allowable percentage of management and administrative costs under the grant. The Kansas Highway Patrol processes, reviews, and approves all grantee and subgrantee requests for reimbursement of management and administrative costs associated with the Homeland Security Grant Program. Management costs are indirect costs, administrative expenses, and any other expenses that a grantee or subgrantee reasonably incurs in administering and managing a Federal grant. Administrative costs are any direct costs incurred by the grantee or subgrantee that can be separately identified and assigned to a specific project, including staff time to conduct project inspections and prepare and submit a project worksheet. The maximum allowable percentage of management and administrative costs for the Homeland Security Grant Program was set at 3 percent for grants awarded from FY 2008 through FY 2009, and was increased to 5 percent for grants awarded during FY 2010.

Federal and State regulations require that source documentation support all grantee and subgrantee requests for reimbursement of management and administrative



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costs. Examples of source documentation include receipts, employee timesheets and attendance records, supervisors' letters of certification, canceled checks, and bank statements. Similar source documentation requirements are included in subgrantee contracts between the Kansas Highway Patrol (grantee), the fiscal agent (subgrantee), and six of the homeland security regional councils.

Fiscal agent officials believed that the fiscal agent's status as a local unit of government entitled it to reimbursement of all management and administrative costs and exempted it from having support for those costs. They cited the Kansas Highway Patrol's approval of all prior requests for the maximum allowable cost reimbursement without supporting source documentation. The fiscal agent was unable to provide supporting documentation for its management and administrative costs.

The Kansas Highway Patrol processed numerous fiscal agent requests for reimbursement over a 3-year period without a single request for source documentation. Kansas Highway Patrol officials said that the fiscal agent's status as a subgrantee required it to maintain adequate source documentation for all management and administrative costs and to submit such documentation to the State upon request.

The Kansas Highway Patrol acknowledged that it did not have the requisite policies, procedures, and internal controls to ensure that it accounted for all management and administrative costs associated with the Homeland Security Grant Program as required by Federal and State agency standards. State officials proposed a corrective action plan to ensure future fiscal agent compliance with all management and administrative cost requirements.

Assessing the Effects of Grant Funding on Preparedness

The State Administrative Agency (Kansas Highway Patrol) did not include goals and objectives with specific and measurable outcomes in its strategic plan. Without measurable outcomes, the State could not evaluate the effect of grant expenditures on meeting its preparedness capability goals.

Code of Federal Regulations Title 44 §13.40(a), Monitoring and reporting program performance, requires that grantees monitor grant- and subgrant-supported activities to ensure that performance goals are being achieved. *Department of Homeland Security State and Urban Areas Homeland Security Strategy Guidance on Aligning Strategies with the National Preparedness Goal*, dated July 22, 2005, states that an objective sets a tangible and measurable target level of performance over time against which actual achievement can be compared, including a goal expressed as a quantitative standard, value, or rate. Therefore, objectives should be—



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- Specific, detailed, particular, and focused—help to identify what is to be achieved and accomplished;
- Measurable—quantifiable, providing a standard for comparison, and identifying a specific achievable result;
- Achievable—not beyond a State, region, jurisdiction, or locality's ability;
- Results-oriented—identify a specific outcome; and
- Time-limited—identify a target date for the objective to be achieved.

In 2010, during a review of the State's strategic plan, FEMA identified areas for improvement to ensure that Kansas' strategic goals and objectives could be better measured, including specific target dates for all goals and objectives, as well as specific desired outcomes. For example, FEMA recommended more specific desired outcomes for objectives and steps related to implementation of the National Incident Management System/National Response Framework; and Chemical, Biological, Radiological/Nuclear, and Explosive capabilities. According to State officials, steps had been and were being taken to address these areas for improvement. Table 1 shows some goals and associated objectives included in the State's 2008–2010 Homeland Security Strategies that FEMA identified as needing improvement.

Table 1. Kansas Homeland Security Strategic Goals and Objectives
That *Do Not* Include Specific and Measurable Outcomes (FYs 2005–2014)

	Kansas Strate	egy FYs 2005–2009		
GOALS	OBJECTIVES			
Goal 17. (Respond/Recover) To support the expansion and sustainment of Metropolitan Medical Response System planning and organizations for communities in the 15 State bioterrorism regions.		<u>17.1</u> Use the Metropolitan Medical Response System Advisory Council to prepare a statewide strategy for the expansion and sustainment of Metropolitan Medical Response System in Kansas (December 2006).		
<u>Goal 18</u> . (Respond/Recove statewide emergency mana ensures Kansas is prepared disaster.	agement system that	18.1. Enhance the ability to mitigate, respond to, and recover from all hazards effectively through use of National Incident Management System and evolving technology (December 2006).		
	Kansas Strate	egy FYs 2010–2014		
GOAL	S	OBJECTIVES		
Goal 1. Improve the ability to share intelligence and information on all hazards facing the citizens.		1.1 Build and sustain a State Fusion Center capabili (December 2009).		
Goal: 2. (Prevent, Protect, Respond, Recover) Enhance the State's ability to communicate and share information.		2.1 Enhance and maintain a secure network of redundant statewide interoperable voice communication systems within 5 years of securing funding.		



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The Post-Katrina Emergency Management Reform Act of 2006, as amended, requires any State receiving Federal preparedness assistance to submit a State Preparedness Report to FEMA. Kansas' 2008 State Preparedness Report identified the State's progress toward achieving target capabilities; however, it did not provide specific desired outcomes measurable against the goals and objectives of its strategic plan.

A recent Government Accountability Office report indicated that FEMA, in response to Public Law 111-271, Redundancy Elimination and Enhanced Performance for Preparedness Grants Act, was planning to generate measurable national preparedness capability requirements and evaluation criteria (e.g., speed, effectiveness, and efficiency). These requirements and criteria would provide a comprehensive framework to guide investments and assess readiness.

We determined that the State of Kansas did an effective job of working with its regional and local partners to develop a Homeland Security Strategic Plan that allocated grant funding based on national and State priorities. However, without specific, measurable outcomes in its strategic plan, the State of Kansas did not have a sufficient basis to evaluate the effect of grant expenditures on its preparedness and response capabilities.

Recommendations

We recommend that the Assistant Administrator, Grant Programs Directorate, require the Superintendent of the Kansas Highway Patrol to:

Recommendation #1: Conduct a review of all management and administrative costs associated with the Homeland Security Grant Program incurred from FY 2008 through FY 2011 to determine allowable costs and to seek recovery of any unsupported amounts.

Recommendation #2: Develop and implement policies, processes, and internal controls to ensure a full and proper accounting of management and administrative costs associated with the Homeland Security Grant Program.

Recommendation #3: Develop strategic goals, objectives, and outcomes that are specific, measurable, achievable, results oriented, and time limited.

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² Opportunities to Reduce Potential Duplication in Government Programs, Save Tax Dollars, and Enhance Revenue (GAO-11-318SP), March 1, 2011.



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Management Comments and OIG Analysis

Previously we had reported on the fiscal agent's bidding procedures regarding acquisitions that were less than \$100,000. The fiscal agent followed procurement procedures that were inconsistent with Kansas Highway Patrol procurement procedures. We removed this finding based upon additional information provided by the Kansas Highway Patrol, FEMA, and our legal counsel. As result, recommendations 1 and 2 in management's comments were removed from our final report. Recommendations 1, 2, and 3 correlate to recommendations 3, 4, and 5 in management's comments.

Although the finding was removed from the final report, the Kansas Highway Patrol developed and implemented a corrective action plan to bring the fiscal agent's procurement procedures into alignment with those of other State agencies and entities receiving State Homeland Security Grant Program funding. The Kansas Highway Patrol also revised its Homeland Security Grant Program Policy Manual to reflect the recommendations and lessons learned from the OIG audit and FEMA monitoring activity.

FEMA and the Kansas Highway Patrol concurred with recommendation 1. FEMA stated that it will require the Kansas Highway Patrol to conduct a review of all management and administrative costs incurred under the Homeland Security Grant Program for FY 2008 through FY 2011 to determine allowable costs, along with the proper source documentation for these costs. FEMA agreed to work with the State of Kansas to reallocate or seek recovery of expenditures that are unsupported by proper source documentation. The Kansas Highway Patrol agreed to conduct a review of all management and administrative costs associated with the Homeland Security Grant Program incurred from FY 2008 through FY 2011.

FEMA and the Kansas Highway Patrol concurred with recommendation 2. FEMA stated that it will require the Kansas Highway Patrol to submit written policies and procedures that focus on improving and implementing internal controls to ensure proper accounting (including proper source documentation) of management and administrative costs associated with the Homeland Security Grant Program.

The Kansas Highway Patrol acknowledged that management and administrative costs associated with the fiscal agent were not requested, received, identified, or validated. The Kansas Highway Patrol developed a corrective action plan (dated November 29, 2011) that addressed this issue and outlined procedures to ensure that proper documentation is received and validated. In addition, the Kansas Highway Patrol stated that its Homeland Security Grant Program Policy Manual was revised in January 2012 to reflect recommendations and lessons learned from the OIG audit and FEMA monitoring activity.



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FEMA concurred with recommendation 3. FEMA stated that it will request the Kansas Highway Patrol to make improvements and revisions to the State strategy as needed. FEMA did not request that the new strategy be submitted at this time. However, FEMA emphasized that when strategy updates are made in the future, specific attention must be paid to ensuring that goals and objectives are more specific, achievable, results oriented, and time limited.

The Kansas Highway Patrol stated that in early 2012, FEMA accepted Kansas' 2011 strategy update. However, because of language reported in previous OIG audits of other States' Homeland Security Grant Programs, FEMA recommended that the Kansas Highway Patrol revisit its goals and objectives for more measureable and expected outcomes. The Kansas Highway Patrol stated that while it had satisfactorily addressed its areas of improvement, its partners were updating and had completed four of the six goals to ensure that goals and objectives meet FEMA's expectation of measuring preparedness. The Kansas Highway Patrol stated that it continues to work on its final two goals with local and State subject matter experts. In addition, Kansas partners are expected to rewrite the strategy in the summer of 2013, developing strategic goals, objectives, and outcomes that are specific, measureable, achievable, results oriented, and time limited.

The responses of FEMA and the Kansas Highway Patrol include positive steps for implementing recommendations 1 through 3. If fully implemented, the actions identified in the responses should address the conditions identified during the audit. The recommendations are considered unresolved and open, pending final implementation of the proposed corrective actions.



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Appendix A Objectives, Scope, and Methodology

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the Department.

The objectives of this audit were to determine whether the State of Kansas spent State Homeland Security Program funding effectively and efficiently and in compliance with Federal laws and regulations, as well as DHS guidelines governing the use of such funding. In addition, we assessed the extent to which grant funds enhanced the ability of State grantees to prevent, prepare for, protect against, and respond to natural disasters, acts of terrorism, and other manmade disasters.

The scope of this audit included the plans developed by the State to improve preparedness and responses to all hazards, the goals set within those plans, the measurement of progress toward the goals, and the assessments of performance improvement. Furthermore, the scope included assessment of these activities within the context of risk to determine whether the State's plans improved strategic performance in the areas of highest risk, rather than merely improving performance in a broader sense.

The Homeland Security Grant Program, which includes five interrelated grant programs, funds a range of preparedness activities such as planning, organization, equipment purchases, training, exercises, and management and administration. Because of the interrelationship of these grant programs, all must be considered when evaluating the planning cycle and the effectiveness of the overall grant program. However, only State Homeland Security Program grants, and equipment and programs supported by these grants, were reviewed for compliance.

The audit methodology included interviews with FEMA representatives as well as work in the State, and with the following fiscal agent, regions, and State agencies that were awarded grants from FY 2008 through FY 2010.

Fiscal Agent

North Central Regional Planning Commission



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Regions

- Northeast
- South Central
- Northwest
- Kansas City Metro

State Agencies

- Kansas Department of Agriculture
- Kansas Department of Emergency Management

At each location, we interviewed responsible officials, reviewed documentation supporting State and subgrantee management of grant funds, and physically inspected selected equipment procured with grant funds.

The scope of the audit included only State Homeland Security Program funds out of the entire Homeland Security Grant Program awards (see table 2).

Table 2. State of Kansas Homeland Security Grant Program Awards						
Funded Activity	FY 2008	FY 2009	FY 2010	Total		
State Homeland Security Program	\$7,530,000	\$7,280,500	\$6,613,200	\$21,423,700		
Urban Areas Security Initiative	N/A	N/A	N/A	N/A		
Total	\$7,530,000	\$7,280,500	\$6,613,200	\$21,423,700		
Operation Stonegarden	N/A	N/A	0	0		
Citizen Corps Program	\$189,278	\$188,614	\$161,632	\$539,524		
Metropolitan Medical Response System Program	\$642,442	\$642,442	\$634,838	\$1,919,722		
Grand Total	\$8,361,720	\$8,111,556	\$7,409,670	\$23,882,946		

Source: FEMA.

We conducted this performance audit between June and October 2011 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.

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Appendix B Management Comments to the Draft Report

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



JUN 1 9 2012

MEMORANDUM FOR:

Anne L. Richards

Assistant Inspector General for Audits

Office of Inspector General

FROM:

HOL I

David J. Kaufman Kathers Fox

Director

FEMA Office of Policy and Program Analysis

SUBJECT:

Comments to OIG Draft Report, The State of Kansas's Management of State Homeland Security Program Grants Awarded During Fiscal

Years 2008 through 2010

The Federal Emergency Management Agency (FEMA) appreciates the opportunity to review and respond to the Department of Homeland Security (DHS) Office of Inspector General (OIG) Draft Report, The State of Kansas's Management of State Homeland Security Program Grants Awarded During Fiscal Years 2008 through 2010. As noted in our responses to your recommendations, below, FEMA is continuing to work to resolve the issues identified in the audit.

1. Compliance with Federal and State Procurement Requirements

The OIG recommends that the Assistant Administrator, Grant Programs Directorate, require the Superintendent of the Kansas Highway Patrol (KHP) to:

Recommendation #1: Develop and implement policies, procedures, internal controls, and reporting requirements to ensure that all expenditures of Homeland Security Grant Program (HSGP) funding comply with federal and state procurement and financial management requirements.

FEMA Response: FEMA concurs with this recommendation. FEMA will require the KHP to submit within 90 days of receipt of our letter written policies and procedures which focus on improving and implementing internal controls and reporting requirements in order to ensure all expenditures under the HSGP program adhere to federal and state procurement and financial management requirements.

FEMA believes this satisfies the intent of the recommendation and requests that this recommendation be considered resolved and closed.



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Recommendation #2: Conduct a cost and price analysis of all HSGP procurements of assets valued at more than \$2,000 made by the fiscal agent between FY 2008 and FY 2011 to identify procurements with excessive costs and to seek recovery of the excessive costs from the State of Kansas.

FEMA Response: FEMA does not concur with the recommendation. Per the terms and conditions of the subgrant award between the KHP and all their subgrantees, the subrecipient agrees to expend grant funds solely and exclusively in compliance with the KHP HSGP Policy Manual -- not the State of Kansas Procurement Manual, as stated on page 4 of the OIG Draft Report. The State of Kansas Procurement Manual is a policy document used to serve as a reference guide to state agencies and personnel. It is not a law or a regulation. The KHP HSGP Policy Manual states that "Regional Council subrecipient equipment purchases must follow the bidding procedures of the fiscal agent's county and such procedures must meet or exceed the federal requirement for bids." The fiscal agent in question drafted their procurement policy in accordance with 44 CFR 13.36 (d) (1) which sets the threshold for simplified acquisition at \$100,000. FEMA will review the questioned costs with the Kansas Highway Patrol to insure all procurements were made in accordance with 44 CFR 13.36.

FEMA believes this satisfies the intent of the recommendation and requests that this recommendation be resolved and closed.

2. Monitoring of Grant Management and Administrative Costs

The OIG recommends that the Assistant Administrator, Grant Programs Directorate, require the Superintendent of the Kansas Highway Patrol to:

Recommendation #3: Conduct a review of all management and administrative costs associated with the HSGP incurred from FY 2008 through FY 2011 to determine allowable costs and to seek recovery of any unsupported amounts.

FEMA Response: FEMA concurs with the recommendation. FEMA will require the KHP to conduct within 90 days of receipt of our letter, a review of all management and administration costs incurred under the HSGP grant program for fiscal years FY 08 through FY 11 to determine allowable costs along with the proper source documentation for these cost. FEMA will work with the state to reallocate or seek recovery of expenditures which are unsupported by proper source documentation.

FEMA believes this satisfies the intent of the recommendation and requests that this recommendation remain resolved and open.

Recommendation #4: Develop and implement policies, processes, and internal controls to ensure a full and proper accounting of management and administrative costs associated with the Homeland Security Grant Program.

FEMA Response: FEMA concurs with the recommendation. FEMA will require the KHP to submit within 90 days of receipt of our letter written policies and procedures which focus on improving and implementing internal controls which ensure proper accounting (including proper



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source documentation) of management and administration costs associated with the HSGP grant program.

FEMA believes this satisfies the intent of the recommendation and requests that this recommendation remain resolved and open.

3. Assessing the Effects of Grant Funding on Preparedness

The OIG recommends that the Assistant Administrator, Grant Programs Directorate, require the Superintendent of the KHP to:

Recommendation #5: Develop strategic goals, objectives, and outcomes that are specific, measurable, achievable, results-oriented, and time-limited.

FEMA Response: FEMA concurs with the recommendation. FEMA will request that the KHP continue to make improvements and revisions to the state strategy as needed. FEMA is not requesting that a new strategy be submitted at this time. However, we would like to emphasize that when strategy updates are made in the future, special attention and consideration must be given to ensuring that goals and objectives are more specific, measurable, achievable, results-oriented, and time-limited. FEMA believes this satisfies the intent of the recommendation and requests that this recommendation remain resolved and open.

Again, we thank you for the opportunity to review and comment on the recommendations concerning your draft report. Please do not hesitate to contact our Audit Liaison Office point of contact, Gina Norton at 202-646-4287, with any questions or concerns regarding our response.

Appendix C Description of Homeland Security Grant Program

The Homeland Security Grant Program provides Federal funding to help State and local agencies enhance their capabilities to prevent, deter, respond to, and recover from terrorist attacks, major disasters, and other emergencies. The Homeland Security Grant Program encompasses several interrelated Federal grant programs, including the State Homeland Security Program, that together fund a range of preparedness activities, including planning, organization, equipment purchases, training, and exercises, as well as management and administrative costs.

The State Homeland Security Program provides financial assistance directly to each State and U.S. Territory to prevent, respond to, and recover from acts of terrorism and other catastrophic events. The program supports implementation of the State Homeland Security Strategy to address identified planning, equipment, training, and exercise needs.

In addition to the State Homeland Security Program, the Homeland Security Grant Program includes other interrelated grant programs with similar purposes. Depending on the fiscal year and State or Territory, the Homeland Security Grant Program includes the following:

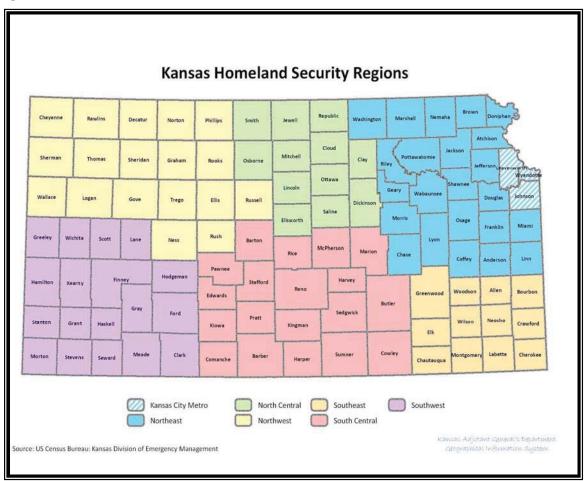
- Urban Areas Security Initiative
- Operation Stonegarden
- Metropolitan Medical Response System Program
- Citizen Corps Program

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Appendix D Kansas Highway Patrol's Homeland Security Program Organization

The Homeland Security Grant Program is funded through FEMA and is administered by the Kansas Highway Patrol, the State of Kansas' State Administrative Agency for the Homeland Security Grant Program. The Homeland Security Operations section of the Kansas Highway Patrol is responsible for grants administration.

Homeland Security Grant Program funds are passed by the Kansas Highway Patrol Homeland Security Operations to subgrantees, defined as any county, regional council, or State agency awarded funds from the Kansas Highway Patrol in its role as the State Administrative Agency. Regional councils represent homeland security regions. Six of seven regional councils are represented by a fiscal agent. (Kansas City does not use the fiscal agent.) The fiscal agent is the government/nonprofit entity responsible for meeting fiscal and reporting requirements to the Kansas Highway Patrol on behalf of the regional councils.





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Each regional council is overseen by a chairperson. Regional councils are responsible for bylaws and governing structures.

The Kansas Highway Patrol primarily interacts with regional councils to discuss any actions related to programmatic requirements of Kansas Highway Patrol-administered Homeland Security Grant Program grants and to serve as a resource for Homeland Security Grant Program guidance, questions, or concerns raised by the regional councils.

The intent and outcome of these grants is to support objectives as outlined by FEMA within the National Preparedness Goal, National Priorities, National Incident Management System, National Response Framework, and the National Infrastructure Protection Plan.

In its role as the State Administrative Agency, the Kansas Highway Patrol intends to meet these standards, with local, regional, and State capabilities being the highest priorities. Other key partners in homeland security at the State level are the Kansas Bureau of Investigation, Kansas Department of Transportation, Kansas Department of Agriculture, Kansas Department of Health and Environment, Kansas Division of Emergency Management, Kansas State Fire Marshall, and Kansas Department of Animal Health.

Appendix E Major Contributors to This Report

Richard T. Johnson, Director
Paul M. Streit, Audit Manager
Armando Lastra, Program Analyst
Tessa May-Fraser, Program Analyst
Michael Staver, Program Analyst
Sue Vernier, Auditor
Katrina Bynes, Referencer

Appendix F Report Distribution

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The OIG seeks to protect the identity of each writer and caller.