



January 2012
PE 11-23-512

PERFORMANCE REVIEW

DEPARTMENT OF MILITARY AFFAIRS & PUBLIC SAFETY HOMELAND SECURITY STATE ADMINISTRATIVE AGENCY

AUDIT OVERVIEW

The Homeland Security State Administrative Agency Has Created Policies and Procedures to Improve Management of Homeland Security Federal Emergency Management Agency Grant Funds

The Homeland Security State Administrative Agency Should Develop Performance Measures for Accountability and Transparency

The Homeland Security State Administrative Agency Should Develop a Website



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EXECUTIVE SUMMARY

This performance review of the Homeland Security State Administrative Agency is part of the agency review of the West Virginia Department of Military Affairs and Public Safety, as authorized by West Virginia Code §4-10-8(b)(4).

Report Highlights:

Issue 1: The Homeland Security State Administrative Agency Has Created Policies and Procedures to Improve Management of Homeland Security Federal Emergency Management Agency Grant Funds.

- The Homeland Security State Administrative Agency has awarded 323 grants to recipients in the amount of \$84,758,570 since September 2005.
- The DHSEM, which includes the HSSAA, was investigated during 2005 for the mismanagement of grant funds. The agency has significantly improved grants management by creating and following best practices policies and procedures.
- The agency should adopt additional best practices to further improve the management of grants.

Issue 2: The Homeland Security State Administrative Agency Should Develop Performance Measures for Accountability and Transparency.

- The HSSAA lacks performance measures despite its vital role in strengthening the state's homeland security through identifying the state's needs in the *West Virginia Homeland Security Strategy* and awarding grants to meet the *Strategy's* goals.
- The HSSAA should adopt performance measures in regard to desk audits, site visits, completing aspects of the *Strategy*, issuing reports to the Federal Emergency Management Agency, and processing payments to grant recipients.

Issue 3: The Homeland Security State Administrative Agency Should Develop a Website.

- A website for the HSSAA should include information for the public such as the amount of grant monies issued to subgrantees, how the HSSAA is accounting for the grant monies, and how agencies can apply for grant funds.
- The HSSAA should also distribute subgrantee information such as the application, financial reports, progress reports, equipment lists, and the subgrantee manual on the

website.

Recommendations

1. *The Legislative Auditor recommends that the Homeland Security State Administrative Agency review current policies and procedures to update any that are not currently being used or that have changed.*
2. *The Legislative Auditor recommends that the Homeland Security State Administrative Agency reevaluate its use of time extensions given its ineffectiveness and the possible non-compliance issues it could have with the DHS.*
3. *The Legislative Auditor recommends that the Homeland Security State Administrative Agency consider implementing the following policies and procedures for further improvement of the grants management program:*
 - a. *require photographic evidence of equipment purchased with grant funds,*
 - b. *require better documentation for Progress Reports, and*
 - c. *require within the grant application a listing of which goals and objectives from the Homeland Security Strategy the subgrantee will achieve with the grant.*
4. *The Homeland Security State Administrative Agency should develop performance measures related to its primary agency responsibilities.*
5. *The Homeland Security State Administrative Agency should develop a user-friendly and transparent website for use by the general public and the agency's stakeholders.*

ISSUE 1

The Homeland Security State Administrative Agency Has Created Policies and Procedures to Improve Management of Homeland Security Federal Emergency Management Agency Grant Funds.

Issue Summary

The Homeland Security State Administrative Agency (HSSAA) has improved the management of United States Department of Homeland Security (DHS) grant funds since 2005. The agency follows best practices for grants management. The agency also follows policies and procedures created internally with a few exceptions. The Legislative Auditor recommends that the HSSAA address two areas where the agency does not follow policies and procedures. Additionally, the Legislative Auditor recommends adopting three additional best practices to further improve grants management.

Since 2005, the HSSAA has awarded over 300 homeland security grants which amount to nearly \$85 million.

Background

In response to terrorist attacks in 2001, the federal government required states to designate an administrative office that is used to plan and organize the administration of federal grant monies from the federal government. For West Virginia, this office is called the HSSAA. This point of contact was designated by the Governor in 2002 and originally placed in the West Virginia Department of Military Affairs and Public Safety (DMAPS) in the Division of Homeland Security and Emergency Management (DHSEM) because grants were originally distributed by the Federal Emergency Management Agency (FEMA). The Cabinet Secretary initiated an investigation of DHSEM in 2005 for the possible mismanagement of funds. As a result of this investigation, the State was required to pay back over \$1 million to the federal DHS, and to provide over \$4 million to state subgrantees for obligated funds that were not available from the federal government. In 2005, the HSSAA was moved within the Office of the Cabinet Secretary. Since 2005, the HSSAA has awarded over 300 homeland security grants to state agencies, counties, municipalities and public service districts. These grants amount to nearly \$85 million. This information can be seen in Table 1. Grant categories have been defined in Appendix C.

Table 1
HSSAA Grants Awarded to Subgrantees
9/1/05 - 12/19/11

Grant Category	Subgrants	Amount Awarded
Citizen Corps	5	\$848,898
Public Safety Interoperable Communications	8	\$8,422,844
Buffer Zone Protection	26	\$2,044,415
Emergency Management Performance	4	\$9,327,796
Interoperable Emergency Communication	3	\$495,107
Task Force Emergency Readiness	2	\$346,400
State Funds*	11	\$20,000,000
Regional Catastrophic Preparedness	2	\$781,792
Homeland Security [^]	262	\$42,491,318
Total	323	\$84,758,570

* In 2008, the Legislature approved a one-time \$20,000,000 appropriation to build radio towers for improved radio communication for first responders.

[^] Money granted from Federal Department of Homeland Security to be used on security issues not addressed by other grant programs.

Source: *The West Virginia Homeland Security State Administrative Agency*

Additionally, the HSSAA is annually monitored by the federal DHS. The annual site-visit includes a financial and programmatic review that is then reported. Due to the sensitive nature of the agency, these reports are not published for public view. Reports issued for 2007 and 2008 provide the reader with achievement ratings for different issues found within the Homeland Security Strategy. These ratings were on a 1 to 5 scale, 5 being the highest rating. The subsections rated between a 2.4 and a 3 for the HSSAA. The most recent report was issued in 2010; this report style was very different from previous reports and did not include achievement ratings. The 2010 federal DHS monitoring report did not provide the HSSAA much information on how the agency performed but aided the HSSAA in revising the Homeland Security Strategy.

The HSSAA is responsible for planning and assessing the homeland security needs of the state, managing grants and reporting to FEMA and the federal DHS.

The HSSAA Is Responsible for Planning Homeland Security Needs of the State and Managing FEMA Grants.

The HSSAA is responsible for planning and assessing the homeland security needs of the state, managing grants and reporting to FEMA and the federal DHS. Specifically, the HSSAA administers all aspects of the grant process for Homeland Security grants from FEMA.

Grants are awarded to various state agencies, counties, municipalities, and public service districts. The process for selecting subgrantees is based on the perceived risks addressed in the Homeland Security Strategy. Unlike most other agencies, the HSSAA is not established in state or federal code, or administrative rules. There are no concrete operating procedures that have been established from any branch of government. Executive Orders have been written regarding continuity of operations and of government planning and the National Incident Management System database which are areas that the HSSAA administers.

The DHSEM Mismanaged Funds During Federal FYs 2002 through 2004.

From May 2005 through December 2005, the Homeland Security Grant Program was investigated by the federal DHS and the DMAPS. Results of these investigations concluded that during federal fiscal years 2002 through 2004, the DHSEM approved nearly \$1.2 million in unallowable costs and over-obligated grant funding to subgrantees or vendors in the amount of \$4.3 million. As a result, Senate Bill 795 was passed to make a supplementary appropriation to the DMAPS. Money was also drawn from the Governor's Contingency Fund. Combined, these monies were used to repay \$5,480,323. Of this amount, \$1,141,352 was repaid to the federal government and \$4,338,970 was repaid to the vendors or state subgrantees.

As part of the investigation, the federal DHS also required that the HSSAA make immediate programmatic corrections. The Cabinet Secretary made the following changes to ensure against future unallowable expenditures:

- moved the HSSAA to the Office of the Secretary, under the direct supervision of the Cabinet Secretary,
- hired experienced grants management staff,
- provided a new grants management policy and procedures manual,
- attended specific Homeland Security grants management workshops,
- co-located all programmatic grant files,
- implemented a sub-grantee monitoring program,
- ensured compliance with requirements for documentation and certification of expenditures, and
- increased coordination with the U.S. Department of Homeland Security Office of Grants and Training.

Unlike most other agencies, the HSSAA is not established in state or federal code, or administrative rules.

During federal fiscal years 2002 through 2004, the DHSEM approved nearly \$1.2 million in unallowable costs and over-obligated grant funding to subgrantees or vendors in the amount of \$4.3 million.

The DHS Reviewed the HSSAA's Grants Awarded During FY 2005 through 2007 and Found Areas that Needed Improvement.

In November 2009, the Department of Homeland Security Office of Inspector General released a report titled: *The State of West Virginia's Management of State Homeland Security Program Grants Awarded During Fiscal Years 2005 through 2007*. This report addressed the strengths and weaknesses of the HSSAA and found six reportable conditions where state management of the grant funds could be improved, resulting in seven recommendations. The reportable conditions included risk assessment that was not documented, analysis of capabilities and performance that were not performed, subgrantee monitoring procedures and on-site visits that were insufficient, grant funds that were not obligated timely, detailed equipment lists that were not maintained, and financial status reports that were submitted late. The HSSAA has actively pursued the improvement of each of these areas. As of December 2010, the Department of Homeland Security Office of Inspector General found that each of the seven recommendations had been resolved. However, two recommendations remain open according to the Department of Homeland Security Office of Inspector General. These recommendations are: 1) develop procedures for developing and retaining documentation on how data was used in its identification and analysis of primary threats and vulnerabilities, and the corresponding risk assessment and 2) develop and implement procedures for analyzing capability and performance data to determine improvements in performance and progress towards achieving program goals. The Inspector General states:

“These actions address the intent of the recommendation, however, the recommendation cannot be closed until the procedures are fully developed and implemented. The status of the recommendation remains Resolved and Open.”

In other words, the Inspector General recognizes that the recommendations have been addressed by the HSSAA. However, the recommendations remain open to allow proper time for the policies and procedures to be put into operation.

The DHS Office of Inspector General reviewed grants management of the HSSAA from fiscal years 2005 through 2007. The Inspector General issued several recommendations. As of December 2010, all recommendations were resolved; two remained open to ensure policies and procedures have been put into place.

The HSSAA Has Been Recognized for Promising Grants Management Practices by the DHS.

The HSSAA has been recognized in the federal DHS *Promising Grants Management Practices* Report in 2008 and 2010. These reports are a collection of grants best practices from across the nation, which are being shared with the intent of improving homeland security grants programs. Both reports recognized the monitoring aspects of the HSSAA. The agency provided the following procedural documents: monitoring protocol, monitoring cover letter, monitoring report, equipment listing form, financial report, progress report, and reimbursement form. These documents can also be found on the National Center for Justice Planning's website.

The Legislative Auditor's Review of the HSSAA Finds That the Agency Is Following Best Practices for Grants Management

The Legislative Auditor reviewed a sample of grants from the HSSAA to evaluate the performance of the agency, in addition to reviewing the policies and procedures of the agency. The grants reviewed were awarded by the HSSAA from fiscal years 2009 through 2011. Table 2 shows the number of grants awarded to subgrantees during these years and the sample size as percentage of total grants awarded. Due to the way federal grants are awarded, the grants were from federal fiscal years 2007 through 2010¹. The grants were organized by general information, financial information, and correspondence.

The HSSAA has been recognized for grant monitoring in the federal DHS Promising Grants Management Practices Report in 2008 and 2010.

¹The federal fiscal year starts on October 1.

Table 2

Grants Awarded by the HSSAA
Fiscal Years 2009-2011

Fiscal Year	Total Grants Awarded	Grants Reviewed by the Legislative Auditor*	Sample Size as Percentage of Total Grants Awarded
2009	46	10	21.74%
2010	58	10	17.24%
2011	43	10	23.26%

* Grants were randomly selected by the Legislative Auditor.
Source: West Virginia Homeland Security State Administrative Agency and the Legislative Auditor's office.

In October 2005, the Environmental Protection Agency's Inspector General released a report titled "Guide to Opportunities for Improving Grant Accountability" (*Guide*). This report was a joint effort as part of the United States Comptroller General's Domestic Working Group (*Group*) to recognize issues found in government agencies. The *Group* found that grant accountability varies across agencies. The *Guide* was written to share specific innovative approaches taken by grants agencies so that others may use the practices. This *Guide* was used by the Legislative Auditor to evaluate the HSSAA's grants management program. The Legislative Auditor found the following grants management practices were being followed:

- preparing policies and procedures before issuing grants,
- providing grant management training to staff and grantees,
- including clear terms and conditions in grant award documents,
- monitoring the financial status of grants, and
- ensuring results through performance monitoring.

The Legislative Auditor reviewed a sample of grants from the HSSAA and found the HSSAA is following five grants management best practices as identified in the "Guide to Opportunities for Improving Grant Accountability."

Preparing Policies and Procedures before Issuing Grants

The HSSAA has developed a sub-grant administrative manual which is given to grant recipients once awards are announced. This manual covers all aspects of the grant process from application to monitoring. It also provides forms and listings of support documentation. The agency has also created policies and procedures to be used internally for awarding

and monitoring sub-grants. These policies relate to end-of-month, quarter, and year processes, desk auditing, drawdown processes, and payment processes. The *Guide* states that federal departments have found that establishing department-wide policies and procedures on an Internet site is beneficial. The HSSAA should provide applicants with one location for locating detailed information about funding opportunities, applications, forms, submission dates, awarded grants and grant policies. However, the HSSAA does not have a website. The importance of having a website is discussed in Issue 3.

Providing Grant Management Training to Staff and Grantees

Agency staff and grantees need sufficient training so that they can understand the regulations, policies, and procedures governing grant funds. The HSSAA conducts one to two trainings per year, generally when a cycle of subgrants is awarded. This training provides an overview of the process of the grant cycle which includes reporting to the HSSAA, record keeping and documentation, fiscal and administrative requirements, equipment standards, and monitoring. The HSSAA also reviews the Homeland Security Strategy with subgrantees. Additionally, the HSSAA staff are available to any subgrantee for questions or concerns that may arise during the grant process.

Federal departments have found that establishing department-wide policies and procedures on an Internet site is beneficial.

Including Clear Terms and Conditions in Grant Award Documents

As noted in the *Guide*, the terms, conditions, and provisions in the award agreement, if well designed, can render all parties more accountable for the award. The HSSAA provides several pages of special conditions and assurances to grant applicants. These address compliance to federal rules and regulations, submission of reports to the HSSAA, public release of information, noncompliance, purchasing, and program accountability. These conditions have been placed with the application so that sub-grantees are aware of their responsibilities and any penalties before accepting any federal grant monies.

However, the HSSAA does not have a website. The importance of having a website is discussed in Issue 3.

Monitoring the Financial Status of Grants

Ineffective grant monitoring increases the risk of improper payments and untimely grant expenditures. It may also result in the misuse or waste of funds. As previously mentioned, the DHSEM was investigated in 2005 for misuse and waste of funds. As a result, the HSSAA has created a financial monitoring program. Subgrantees are required to submit monthly financial reports that include invoices/

receipts dated from that period for preapproved expenses. These reports are reviewed by HSSAA financial staff for accuracy and all supporting documentation such as invoices and proof of payment. Once proper documentation is obtained, the HSSAA uses a Grant Commitment module that is maintained by the State Auditor's Office. Also, Crystal Reports¹ is used if necessary.

Ensuring Results through Performance Monitoring

Sub-grantees are required to submit monthly progress reports that should convey specific activities, progress, achievements and difficulties encountered during that month. The HSSAA Grants Manager also stated *“Through the monthly reporting processes, the SAA is usually aware if a project is not moving as quickly as possible and the SAA will contact subgrantees and simply discuss over the phone.”* Both processes allow the HSSAA to monitor the performance of each grant. If goals are not being achieved, the HSSAA will assist the sub-grantees with reporting, understanding allowable expenses and tracking expenses.

The HSSAA's grants management has deviated from established policies and procedures. The agency should update all policies and procedures to match current practices.

The HSSAA Should Address Policies Not Being Followed

Through the review of grants, the Legislative Auditor found that the HSSAA had one policy that was antiquated and needed to be updated to meet current standards. This policy is to check for the DMAPS received stamp on request for reimbursement forms submitted by subgrantees as the first step of the “Monthly Report: Desk Audit Procedures for Program Staff,” the HSSAA Grants Manager stated:

“This procedure has not been updated since the SAA began accepting report submissions through email. In the past, reports were submitted through the U.S. Mail and this stamp process was part of the mail sorting process at the SAA.”

To resolve this issue, the HSSAA should review and revise the “Monthly Report: Desk Audit Procedures for Program Staff” along with other policies and procedures for other changes.

¹ *Crystal Reports software enables users to design reports using a wide range of data sources and gives users the ability to use on-report sorting and filtering options in the State's Financial Information Management System (FIMS).*

Secondly, the HSSAA is not following a policy that the office created. The HSSAA provides a document titled “Special Conditions & Assurances” to subgrantees in the application document. This document reviews all terms and conditions of the granting process. One such condition states *“In general, time extensions for this program are unallowable. Unexpended sub-grant funds remaining at the close of the sub-grant period shall be deobligated.”* The Legislative Auditor reviewed 30 grants in total; 16 of the grantees were allowed time extensions. When the HSSAA was asked about the allowance of time extensions, the Grants Manager provided the following statement:

“This is a special condition that only [West Virginia] issues. More than anything it is used by the SAA to attempt to influence subgrantees into moving as quickly as possible to complete a project as quickly as possible. The SAA does issue extensions in order to ensure that projects are completed especially when it deals with public safety projects. There are many reasons that extensions are needed such as procurement processes, [back ordering] of equipment etc. and yes sometimes subgrantee management plays a role.”

Noncompliance of grant terms and conditions could result in the DHS placing penalties against the HSSAA or subgrantees.

According to the Code of Federal Rules, noncompliance of grants can occur if a subgrantee fails to comply with any term of an award including a state plan or application. There are federal penalties for grant noncompliance. The DHS could temporarily withhold cash payments, disallow the cost of the activity, suspend or terminate the current award, or withhold further awards. While the HSSAA attempts to influence the timeliness of subgrantees, the sample of grants shows that this practice has not been effective. Either grantees know that the HSSAA will provide time extensions (despite saying it will not) or grantees are unable to comply with the time requirements of the grants. If this problem continues, it is plausible that the DHS could place penalties against the HSSAA or subgrantees. The HSSAA should review this policy as it is ineffective and could create serious compliance issues with the DHS. The HSSAA should create a better system to keep subgrantees on track throughout the time of the individual grant and prevent time extensions.

The HSSAA Should Consider Making Further Improvements to the Grants Management System

The Legislative Auditor suggests the following ideas for the HSSAA to consider:

1. require photographic evidence of equipment purchased with grant funds,
2. require better documentation for Progress Reports, and
3. require within the grant application a listing of which goals and objectives from the Homeland Security Strategy the subgrantee will achieve with the grant.

Six states, including West Virginia, were recognized for grant monitoring best practices in the 2010 DHS *Promising Grants Management Practices* Report. As listed in the report, three states, Kentucky, Massachusetts and Vermont, require photographic evidence of equipment. Massachusetts has stated that it no longer requires photographic evidence of equipment but can be part of a site visit. Vermont provided the most information regarding this practice. In the Vermont Homeland Security Unit (VTHSU) Programmatic Monitoring Guidelines, staff are required to review equipment and take pictures of valuable, serialized equipment. VTHSU staff are also required to complete a picture log that explains the location where photographs were taken and provides a short description of the photographs. Photographic evidence of equipment purchased with grant monies shows the location and condition of equipment. This can assist the HSSAA staff in determining if equipment is being properly used and is in the proper location.

Additionally, in correspondence with Kentucky Homeland Security, the Grants Director stated:

“These pictures are appreciated by our auditors. Also, these pictures are included in the closeout report that is sent to the local authorizing official and project manager. These pictures may also be used in our application and/or compliance workshops.”

Photographic evidence of equipment purchased will add value to the monitoring of grants.

The Legislative Auditor recommends the HSSAA adopt three additional grants management practices to make additional improvements to the grants management system.

Secondly, many of the Progress Reports of the grant sample obtained by the Legislative Auditor from the HSSAA were lacking important information. Several reports provided little to no information about the progress of the grant. The Grants Manager for the HSSAA stated:

“Being a small state, the SAA deals with subgrantees regularly on an unofficial basis and really knows what is happening even if progress reports were not submitted. Because subgrantees submit monthly financial reports and invoices are required before payments can occur the SAA knows it has complete control of the costs associated with the subgrant and absolutely nothing would get paid for if not allowed.”

Even though the HSSAA is aware of subgrantee activities, the subgrantee should document this information. Documentation would relieve staff from the requirement to remember all the details of each grant. Documentation of any changes would place the responsibility on the subgrantee. Additionally, if HSSAA staff were to be unavailable, monthly progress report documentation would be available for review. Also, the HSSAA could provide to subgrantees examples of previous grant progress reports during training sessions. This would assist subgrantees in properly documenting events of the grant. Examples of progress reports provided to subgrantees should thoroughly document the events that have transpired during the month regarding the grant. Examples should include meetings held, requests for proposals, invoices received, equipment inventoried, etc.

Currently, the HSSAA requires grantees that use State Homeland Security Funding and Law Enforcement Funding to submit the goals and objectives the subgrantee plans to achieve with the grant. *However, the HSSAA awards grants from other grant categories that are not required to submit goals and objectives from the Homeland Security Strategy.* In the DHS *Promising Grants Management Practices* Report from 2010, Arizona required applicants to justify how the project supports the State Strategy and State Preparedness Report. This justification includes how the project fits into one (or more) of the State Initiatives. The Legislative Auditor believes that requiring applicants to submit Homeland Security Strategy goals and objectives will require applicants to be aware of State Homeland Security issues. Also, it should encourage applicants to think more collectively instead of individually.

The HSSAA should keep photographic evidence of grant purchased equipment, require thorough documentation on month subgrantee progress reports, and require subgrantees to report goals and objectives from the Homeland Security Strategy to be achieved through each grant.

Conclusion

Through the early experience of mismanagement of Homeland Security funds, the HSSAA has made considerable progress to improve the management and appearance of the HSSAA. The Legislative Auditor has found that since 2005, the HSSAA has implemented new procedures to create an efficient grants management program. The Legislative Auditor recommends addressing two policies and procedures which would address the inconsistency between written procedures and actual practices.

Recommendations

1. *The Legislative Auditor recommends that the Homeland Security State Administrative Agency review current policies and procedures to update any that are not currently being used or that have changed.*
2. *The Legislative Auditor recommends that the Homeland Security State Administrative Agency reevaluate its use of time extensions given its ineffectiveness and the possible non-compliance issues it could have with the DHS.*
3. *The Legislative Auditor recommends that the Homeland Security State Administrative Agency consider implementing the following policies and procedures for further improvement of the grants management program:*
 - a. *require photographic evidence of equipment purchased with grant funds,*
 - b. *require better documentation for Progress Reports, and*
 - c. *require within the grant application a listing of which goals and objectives from the Homeland Security Strategy the subgrantee will achieve with the grant.*

The Legislative Auditor has found that since 2005, the HSSAA has implemented new procedures to create an efficient grants management program.

ISSUE 2

The Homeland Security State Administrative Agency Should Develop Performance Measures for Accountability and Transparency.

Issue Summary

The HSSAA has an important function to plan and coordinate the State's strategy for prevention, preparedness, and response related to threats or emergencies against the citizens of West Virginia. This function is largely carried out through awarding homeland security grants provided by the federal government. The HSSAA has distributed over \$84 million in homeland security grants over the last six years, and it has developed a *Homeland Security Strategy*. One of the purposes of the strategy is to identify "*the goals and objectives. . . by which performance is measured.*"² Although the HSSAA has identified the need for goals and performance measures, the Legislative Auditor finds that the agency has not developed performance measures to assess the progress in achieving the agency's goals and objectives. The Legislative Auditor recommends that the HSSAA develop performance measure for various aspects of its operation, including measures of the completion rate of the Homeland Security Strategy goals.

The Legislative Auditor finds that the agency has not developed performance measures to assess the progress in achieving the agency's goals and objectives.

HSSAA Does Not Have Performance Measures Despite Its Vital Security Role

The HSSAA plays a key role in strengthening the homeland security of the state. It provides pass-through federal funds from FEMA to the State for homeland security needs. The HSSAA's primary responsibility is to identify these specific types of needs using the State's *Homeland Security Strategy (Strategy)* and then to award and administer homeland security grants to state governmental entities (cities, counties, public service districts, etc.).

It is important that the HSSAA identify its progress in achieving the security needs of the state to the Legislature and the public. State agencies are required to submit division-level performance measures for the *Operating Detail* of the State's Executive Budget as part of the

² *West Virginia Homeland Security State Administrative Agency, West Virginia Homeland Security Strategy (West Virginia Department of Military Affairs and Public Safety, January 2010), p. 1.*

appropriation request process. Other information reported includes the agency's mission statement, goals, and objectives. However, the DMAPS has not provided performance measures for the HSSAA to be included in the Operating Detail.

The Director of the HSSAA indicated that while the HSSAA has attempted to create performance measures, no specific measures have yet to be created. The Director noted that both internal and external performance measures are necessary for the operation and evaluation of an agency and that performance measures have been discussed extensively but no consensus has been found on what the measures should be.

The Director of the HSSAA noted that both internal and external performance measures are necessary for the operation and evaluation of an agency.

HSSAA's Mission Is not Established by Federal or State Code

The HSSAA is found in the *Operating Detail* of the State's Executive Budget under the Office of the Secretary of the DMAPS. No mission statement is provided for the HSSAA in the *Operating Detail*. However, DMAPS provides a mission statement located on the homepage of its website. The mission statement on the DMAPS homepage is as follows:

West Virginia Homeland Security State Administrative Agency Mission Statement

The mission of the West Virginia Homeland Security State Administrative Agency is to lead the State's coordination and collaboration efforts with public and private partners to provide a comprehensive prevention, preparedness, and response to strategy to protect the people of the State of West Virginia.

The Legislative Auditor normally examines the agency's mission statement to determine if it is statutorily supported. The performance of an agency is tied to what the agency considers its mission, and the mission should be clearly understood and it should not be more or less than what is statutorily required. However, the Legislative Auditor determines that

the agency’s mission statement has no statutory foundation as indicated in the following table.

The Homeland Security State Administrative Agency’s mission statement is:	
fully supported by statute.	
not supported by statute.	X
is less than statutorily required.	
is more than statutorily mandated.	
is determined administratively as allowed by statute.	

Agency mission statements usually are derived from the statutory requirements of the agency and performance measures are tied to the agency mission statement. The HSSAA is not established in state code, and the agency could not provide any federal citations at the Legislative Auditor’s request.³ The Director of the HSSAA noted that it is unclear how the agency created the mission statement without a statutory mandate. Although the HSSAA is without a statutory mandate, the Legislative Auditor finds that the HSSAA mission statement is consistent with the work of the HSSAA.

Although the HSSAA is without a statutory mandate, the Legislative Auditor finds that the HSSAA mission statement is consistent with the work of the HSSAA.

Performance Measures Help To Assess How Well the Agency Is Functioning

The HSSAA needs to develop performance measures strongly tied to the agency’s overall mission and relevant to its primary responsibilities. Such measures would assist the agency and the public to assess how well the agency is meeting its mission in strengthening homeland security. Establishing performance measures would result in identifying areas where performance is good and areas where the HSSAA needs to improve. Given the lack of performance measures on the part of the HSSAA, the Legislative Auditor identified areas where the HSSAA should consider establishing performance measures. They relate to the policies that have been created in response to the agency’s past problems (in the awarding of homeland security grants), and also to the area of strengthening homeland security. The areas are 1) desk audits of grantees, 2) site visits, 3) the

³ The agency provided a page from the federally issued FY 2011 Homeland Security Grant Program guidance document that shows that State Administrative Agencies are the only eligible applicants for the federal homeland security grants.

completion rate of various aspects of the Homeland Security Strategy, 4) reports to FEMA, and 5) payment processing to grant recipients.

HSSAA Desk Audits

The HSSAA conducts desk audits on the monthly submissions of information from subgrantees. This information includes a narrative, a financial report (including invoices and copies of checks used to pay invoices), and a detailed equipment list (if applicable). The HSSAA is kept aware of the grant status through the receipt and review of this information. This activity is required for the HSSAA to complete in order to approve and process reimbursement to the subgrantee. The HSSAA does not monitor the desk audit process and does not maintain readily accessible information regarding the performance of this process. The HSSAA should consider developing timeliness goals for when desk audits should be performed and measure the completion rate of the goal. The HSSAA should develop other goals and measures that are appropriate for the desk audit process.

The HSSAA should consider developing timeliness goals for when desk audits should be performed and measure the completion rate of the goal. The HSSAA should develop criteria for grants requiring site visits and timeliness requirements for site visits. The HSSAA should consider the rate of completion of the Strategy's goals, and establish a timeline or certain years for the completion of various phases of the Strategy.

HSSAA Site Visits

The HSSAA schedules site visits if requested by the subgrantee, or if the HSSAA determines that a site visit is needed. The lack of monitoring was a previous problem for the HSSAA. Site visits should be a stronger priority for the HSSAA. The HSSAA should develop criteria for grants requiring site visits and timeliness requirements for site visits. The HSSAA should conduct at least one site visit for certain types of grants (such as equipment) that meet the criteria. In FY 2009, the HSSAA conducted site visits for 25 out of 46 grants. In 2010, the HSSAA conducted site visits for 14 out of 58 grants. However, without established criteria for site visits, the Legislative Auditor is unable to determine how well the agency is doing in conducting site visits.

Completing Aspects of the Homeland Security Strategy

The HSSAA should also develop performance measures tied to the State Strategy and the fulfillment of its goals within a certain timeframe since the grants awarded are based on the achieving components of the Strategy. The HSSAA should consider the rate of completion of the Strategy's goals, and establish a timeline or certain years for the completion of various phases of the Strategy.

In addition, the HSSAA should assess the strategic goals of the strategy and develop performance measures for key objectives. For example, strategic goal 2 in the State Strategy is to enhance preparedness for all-hazard incidents. The first objective is to strengthen citizen preparedness and participation. An operation activity for this goal is to: *Identify, recruit, and train disaster response volunteers by partnering with the private sector, non-governmental, community-based and faith-based organizations.* A performance measure for this activity would be to establish a benchmark of the number or percentage of grants needed to accomplish this goal. The goal should also have a timeframe. The performance measure might be stated: *The HSSAA will issue [x] number of grants by 2013 to strengthen citizen preparedness and participation.* The HSSAA would then review its grants and identify what percentage of the grants addressed this activity in a specific timeframe. The HSSAA could determine where it stands in meeting the timeline goal through supporting this activity. This information would also allow the public to understand the progress that the agency has made in strengthening the state's preparedness for all hazard incidents.

Reports to FEMA

The submission of reports to FEMA is tied to FEMA's electronic system. If the quarterly report is not submitted within 30 days of the close of the financial quarter, the HSSAA report is flagged as being late. If the semi-annual report is not submitted to FEMA within the time constraints of the FEMA system, it is also flagged as late. Lateness in submission of either type of report can result in the State being prevented from drawing down funds. The HSSAA is not tracking its performance in meeting these requirements because it has never been prevented from drawing down the federal grant funds. The agency should track the submissions because flagging of reports may be cumulative and too many late reports could result in the prevention of the State from the drawing down of federal funds.

Payment Processing to Grant Recipients

The HSSAA has internal requirements for entering, paying and filing grant reimbursements. The HSSAA assumes that this process ensures that the HSSAA pays all transactions in a timely manner. The policy states:

The HSSAA should assess the strategic goals of the strategy and develop performance measures for key objectives. This information would allow the public to understand the progress that the agency has made in strengthening the state's preparedness for all hazard incidents.

When the transaction has been approved and submitted back to the SAA accountant the transaction will be entered within 2 days and sent to the auditor for payment within 5 days.

The HSSAA believes that it is meeting these requirements because it has not received any complaints from the grant recipients. While the lack of complaints may be an indicator, it does not measure the HSSAA's performance in meeting these goals. The HSSAA should monitor its performance in this area to determine if its internal policy is being met, or if it has a situation of non-compliance with the policy that needs to be addressed.

Other internal performance measures might also address:

- the annual report on preparedness to the FEMA;
- the preparation of the State's Continuity plans; and
- the number of attendees completing the United States Department of Homeland Security training annually.

Conclusion

The importance of the HSSAA's purpose for homeland security makes the development of performance goals and measures equally important. As it currently stands, the Legislature and the general public do not know the progress the agency has made in enhancing the state's homeland security. There are a variety of performance goals and measures that can be developed for various aspects of the HSSAA's operations such as internal processes and achieving the outcomes of improving homeland security, which can be measured through showing the completion of Homeland Security Strategies. The Legislative Auditor provided a few performance measures for the HSSAA to consider. These do not exhaust the measures that should be considered. The West Virginia Homeland Security State Administrative Agency should consider developing other performance measures that it deems appropriate and this should be made a priority.

As it currently stands, the Legislature and the general public do not know the progress the agency has made in enhancing the state's homeland security.

Recommendation

4. *The Homeland Security State Administrative Agency should develop performance measures related to its primary agency responsibilities.*

ISSUE 3

The Homeland Security State Administrative Agency Should Develop a Website.

Issue Summary

The Legislative Auditor conducted a literature review on assessments of government websites and developed an assessment tool to evaluate West Virginia’s state agency websites (see Appendix D). The assessment tool lists a number of website elements; however, some elements should be included in every state website, while other elements such as social media links, graphics and audio/video features may not be necessary or practical for certain agencies. **Table 1 shows an evaluation score of zero percent because the HSSAA does not have a website.**

Table 3 Homeland Security State Administrative Agency Website Evaluation Score			
Substantial Improvement Needed	More Improvement Needed	Modest Improvement Needed	Little or No Improvement Needed
0-25%	26-50%	51-75%	76-100%
Homeland Security State Administrative Agency 0%			
<i>Source: The Legislative Auditor’s review of the home page of Department of Military Affairs and Public Safety website.</i>			

The HSSAA Does Not Have a Website

The HSSAA does not have a website although it is the first agency to be mentioned on the DMAPS home page. When a visitor clicks on the agency name, a picture of the HSSAA Director and the agency’s mission statement appears. When the Legislative Auditor first began the review of the DMAPS, the HSSAA page contained a link to its website, but when this link was activated, a statement appeared that this site was undergoing construction and was not available. This link has since been removed from the HSSAA page.

The HSSAA does not have a website although it is the first agency to be mentioned on the DMAPS home page.

The Legislative Auditor asked the agency why it does not have a website. The Director replied that the HSSAA is not created in statute, and that some information relating to the HSSAA is available on the DMAPS home page under the “Grants” and “FAQs” tabs. Some relevant information has also been posted to another division of DMAPS, the Division of Homeland Security and Emergency Management website. The Legislative Auditor reviewed the information available at these two locations. This information is listed as part of the HSSAA operations. The information is limited to one 2010 grant and several questions and answers. The Director also indicated that the HSSAA has been in the process of clarifying its structure and “it has seemed unproductive to continue to create additional infrastructure to maintain.” The Director indicated that the HSSAA will create a separate web page in the future.

Websites Can Promote Transparency and Accountability

As long as the HSSAA remains without a website, the HSSAA is neither transparent nor accountable to the public. A transparent agency promotes accountability and provides information for citizens and stakeholders about what the agency is doing. It encourages public participation while also utilizing tools such as the internet and methods to collaborate across all levels of government. A transparent agency allows interaction between the agency and citizens on a host of issues. The Legislative Auditor’s criteria for a transparent website includes general agency contact and location information, public records such as statutes, rules, audits and grants; budget data; mission statement; calendar of events; agency publications; agency organizational chart; Freedom of Information Act (FOIA) information; performance measures and outcomes; the agency’s history and the website update status for each page.

The Director indicated that the HSSAA has been in the process of clarifying its structure and will create a separate web page in the future.

The HSSAA Misses Opportunities to Provide Information

Websites provide a cost-effective means and convenient location for information to be provided to agency stakeholders and the general public. The HSSAA needs to develop a website which includes the following:

- Basic information for the general public and detailed information for subgrantees.

- Detailed information on making grant applications, including documents needed to apply for grants.
- The West Virginia HSSAA internal instruction manual for subgrantees, and a description of the payment reimbursement process.
- Detailed information on how subgrantees can prepare for the monitoring visit, and all necessary monitoring forms.
- The current federal funding allocation for the state homeland security grants.
- Comprehensive contact information including the mailing and physical address of the agency.
- West Virginia HSSAA information bulletins and FEMA Office of Grant and Training information bulletins.
- Resources and links to other websites.

Conclusion

As discussed in Issue 1, the HSSAA provides a valuable and necessary service in assessing the homeland security needs of the State, and administering federal grants provided through FEMA. However, without a website this agency is neither accessible nor transparent. A website would expedite providing a significant amount of information relating to the grant administration process, and reduce the cost of providing this information through printed documents.

A website would expedite providing a significant amount of information relating to the grant administration process, and reduce the cost of providing this information through printed documents.

Recommendation

5. *The Homeland Security State Administrative Agency should develop a user-friendly and transparent website for use by the general public and the agency's stakeholders.*

Appendix A: Transmittal Letter

WEST VIRGINIA LEGISLATURE *Performance Evaluation and Research Division*

Building 1, Room W-314
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0610
(304) 347-4890
(304) 347-4939 FAX



John Sylvia
Director

December 30, 2011

Mr. David Hoge, Director
Homeland Security State Administrative Agency
Department of Military Affairs and Public Safety
Building 1, Room W-400
1900 Kanawha Blvd., East
Charleston, WV 25305

Dear Mr. Hoge:

This is to transmit a draft copy of the Agency Review of the Homeland Security State Administrative Agency. This report is scheduled to be presented during the January 2012 interim meeting of the Joint Committee on Government Operations and the Joint Committee on Government Organizations on Monday, January 9 between 4-6 p.m. in the House Chambers. It is expected that a representative from your agency be present at the meeting to orally respond to the report and answer any questions the committees may have.

If you would like to schedule an exit conference to discuss any concerns you may have with the report, please notify us on Tuesday, January 3, 2012. We need your written response by noon on Friday, January 6, 2012 in order for it to be included in the final report. If your agency intends to distribute additional material to committee members at the meeting, please contact the House Government Organization staff at 340-3192 by Thursday, January 5, 2012 to make arrangements.

We request that your personnel not disclose the report to anyone not affiliated with your agency. Thank you for your cooperation.

Sincerely,

Handwritten signature of John Sylvia in cursive script.
John Sylvia

C: Joseph Thornton, Secretary

Joint Committee on Government and Finance

Appendix B: Objective, Scope and Methodology

Objective

This agency review on the West Virginia Homeland Security State Administrative Agency (HSSAA) is part of the Agency Review of the West Virginia Department of Military Affairs and Public Safety pursuant to West Virginia Code §4-10-8(b)(4). The objectives of this report were to review the internal controls for grants administration, the performance measures and the website of the HSSAA. Our specific objectives included determining:

Internal Controls for Grants Administration

- if the HSSAA has policies and procedures in place to control grants administration and is following the policies and procedures,
- if the HSSAA has improved grants management since 2005, and
- if the HSSAA could further improve grants management.

Performance Measures

- if the HSSAA has relevant performance measures, and
- if appropriate performance measures can be developed by the HSSAA.

Website

- if the HSSAA hosts a website, and
- if there is website content that would be appropriate for the agency to post.

Scope

Our audit scope was from the designation of the HSSAA in 2002 through December 2011. Grants reviewed were from July 2008 through September 2011.

Methodology

To achieve our objectives related to internal controls for grants administration, we interviewed the HSSAA director and grants manager, and reviewed state and federal Code, and the policies and procedures of the HSSAA. We also performed a review of grants awarded by the HSSAA during FY 2009 through FY 2011 (147 grants). Ten grants were selected from each federal fiscal year for a total of 30 to be used as a sample. Grants were selected using a

random number generator. The grants were then reviewed and compared to the policies and procedures set in place by the HSSAA to determine if the HSSAA has improved grants management. The grant sample was not reviewed as a financial or equipment audit.

To achieve our objectives related to performance measures, we interviewed the HSSAA director and grants manager, and reviewed policies and procedures of the agency. This information was then used to create suggestions for agency performance measures.

To achieve our objectives related to the website, we interviewed the HSSAA staff, in addition to reviewing other states' state administrative agency websites. More specifically, we reviewed Texas for the content listed on the agency's website and how that information could provide transparency and accountability to the public or assist subgrantees. The Legislative Auditor also obtained information through the DHS Promising Grants Management Practices report published in 2010. The DHS report listed some information that should be included on agency websites; this information was then incorporated into our report. Finally, the Legislative Auditor used the criteria established for website evaluation and listed in Appendix D.

We conducted our performance audit in accordance with 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 on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix C: Federal Emergency Management Agency Grant Category Definitions

Table 1: HSSAA Grants Awarded to Subgrantees 9/1/05 - 12/19/11

- **Citizen Corps Program (CCP)**
The CCP provides funding to bring community and government leaders together to coordinate the involvement of community members and organizations in emergency preparedness, planning, mitigation, response, and recovery.
- **Public Safety Interoperable Communications**
The Public Safety Interoperable Communications (PSIC) Grant Program helps first responders better communicate during disasters. PSIC awards are used to assist public safety agencies in the acquisition of, planning and coordination of, deployment of, or training for the use of interoperable communications systems.
- **Buffer Zone Protection Program (BZPP)**
The BZPP provides funding to increase the preparedness capabilities of jurisdictions responsible for the safety and security of communities surrounding high-priority pre-designated Tier 1 and Tier 2 critical infrastructure and key resource assets, including chemical facilities, financial institutions, nuclear and electric power plants, dams, stadiums, and other high-risk/high-consequence facilities, through allowable planning and equipment acquisition.
- **Emergency Management Performance Grants (EMPG) Program**
The purpose of the EMPG Program is to assist state, local, tribal and territorial governments in preparing for all hazards by providing a system of emergency preparedness for the protection of life and property in the United States from hazards and to vest responsibility for emergency preparedness jointly in the federal government and the states and their political subdivisions. The federal government, through the EMPG Program, provides necessary direction, coordination, and guidance, and provides necessary assistance, as authorized in this title so that a comprehensive emergency preparedness system exists for all hazards.
- **Interoperable Emergency Communications Grant Program (IECGP)**
The IECGP provides governance, planning, training and exercise funding to states, territories, and local and tribal governments to carry out initiatives to improve interoperable emergency communications, including communications in collective response to natural disasters, acts of terrorism, and other man-made disasters. If a State Administrative Agent and Statewide Interoperability Coordinator point of contact certify that its state or territory has fulfilled such governance, planning, training and exercise objectives, the Program provides the flexibility to purchase interoperable communications equipment with any remaining IECGP funds.

- **Task Force Emergency Readiness**

The Task Force for Emergency Readiness (TFER) pilot program initiative is to support and strengthen the catastrophic disaster emergency planning capacity of individual states. The TFER initiative centers on the creation and employment of a dedicated planning team, which will be formed around a set of highly-skilled planners with strong backgrounds in state or regional catastrophic preparedness planning, National Guard civil-military support operations, and Defense Support to Civil Authorities (DSCA).

- **State Funds**

In 2008, the Legislature approved a one-time \$20,000,000 appropriation to build radio towers for improved radio communication for first responders.

- **Regional Catastrophic Preparedness Grant Program (RCPGP)**

The RCPGP provides funding to enhance catastrophic incident preparedness in selected RCPGP sites. RCPGP is intended to support coordination of regional all-hazard planning for catastrophic events, including the development of integrated planning communities, plans, protocols, and procedures to manage a catastrophic event.

- **State Homeland Security Program (SHSP)**

The SHSP provides funding to support the implementation of State Homeland Security Strategies to address the identified planning, organization, equipment, training, and exercise needs at the state and local levels to prevent, protect against, respond to, and recover from acts of terrorism and other catastrophic events. States are required to ensure that at least 25 percent (25%) of SHSP appropriated funds are dedicated towards law enforcement terrorism prevention-oriented planning, organization, training, exercise, and equipment activities, including those activities which support the development of fusion center capabilities.

Appendix D: Website Criteria Checklist and Point System

Website Criteria Checklist and Points System			
User-Friendly	Description	Total Points Possible	Total Agency Points
Criteria	The ease of navigation from page to page along with the usefulness of the website.	18	00
		Individual Points Possible	Individual Agency Points
Search Tool	The website should contain a search box (1), preferably on every page (1).	2 points	0 points
Help Link	There should be a link that allows users to access a FAQ section (1) and agency contact information (1) on a single page. The link's text does not have to contain the word help, but it should contain language that clearly indicates that the user can find assistance by clicking the link (i.e. "How do I...", "Questions?" or "Need assistance?")	2 points	0 points
Foreign language accessibility	A link to translate all webpages into languages other than English.	1 point	0 points
Content Readability	The website should be written on a 6 th -7 th grade reading level. The Flesch-Kincaid Test is widely used by Federal and State agencies to measure readability.	No points, see narrative	
Site Functionality	The website should use sans serif fonts (1), the website should include buttons to adjust the font size (1), and resizing of text should not distort site graphics or text (1).	3 points	0 points
Site Map	A list of pages contained in a website that can be accessed by web crawlers and users. The Site Map acts as an index of the entire website and a link to the department's entire site should be located on the bottom of every page.	1 point	0 points
Mobile Functionality	The agency's website is available in a mobile version (1) and/or the agency has created mobile applications (apps) (1).	2 points	0 points
Navigation	Every page should be linked to the agency's homepage (1) and should have a navigation bar at the top of every page (1).	2 points	0 points
FAQ Section	A page that lists the agency's most frequent asked questions and responses.	1 point	0 points
Feedback Options	A page where users can voluntarily submit feedback about the website or particular section of the website.	1 point	0 points

Website Criteria Checklist and Points System			
Online survey/poll	A short survey that pops up and requests users to evaluate the website.	1 point	0 points
Social Media Links	The website should contain buttons that allow users to post an agency’s content to social media pages such as Facebook and Twitter.	1 point	0 points
RSS Feeds	RSS stands for “Really Simple Syndication” and allows subscribers to receive regularly updated work (i.e. blog posts, news stories, audio/video, etc.) in a standardized format. All agency websites should have a RSS link on their websites.	1 point	0 points
Transparency	Description	Total Points Possible	Total Agency Points
Criteria	A website which promotes accountability and provides information for citizens about what the agency is doing. It encourages public participation while also utilizing tools and methods to collaborate across all levels of government.	32	00
		Individual Points Possible	Individual Agency Points
Email	General website contact.	1 point	0 points
Physical Address	General address of stage agency.	1 point	0 points
Phone Number	Correct phone number of state agency.	1 point	0 points
Location of Agency Headquarters	The agency’s contact page should include an embedded map that shows the agency’s location.	1 point	0 points
Administrative officials	Names (1) and contact information (1) of administrative officials.	2 points	0 points
Administrator(s) biography	A biography explaining the administrator(s) professional qualifications and experience.	1 point	0 points
Privacy policy	A clear explanation of the agency/state’s online privacy policy.	1 point	0 points

Website Criteria Checklist and Points System			
Public Records	<p>The website should contain all applicable public records relating to the agency’s function. If the website contains more than one of the following criteria the agency will receive two points:</p> <ul style="list-style-type: none"> • Statutes • Rules and/or regulations • Contracts • Permits/licensees • Audits • Violations/disciplinary actions • Meeting Minutes • Grants 	2 points	0 points
Complaint form	A specific page that contains a form to file a complaint (1), preferably an online form (1).	2 points	0 points
Budget	Budget data is available (1) at the checkbook level (1), ideally in a searchable database (1).	3 points	0 points
Mission statement	The agency’s mission statement should be located on the homepage.	1 point	0 points
Calendar of events	Information on events, meetings, etc. (1) ideally imbedded using a calendar program (1).	2 points	0 points
e-Publications	Agency publications should be online (1) and downloadable (1).	2 points	0 points
Agency Organizational Chart	A narrative describing the agency organization (1), preferably in a pictorial representation such as a hierarchy/organizational chart (1).	2 points	0 points
Graphic capabilities	Allows users to access relevant graphics such as maps, diagrams, etc.	1 point	0 points
Audio/video features	Allows users to access and download relevant audio and video content.	1 point	0 points
FOIA information	Information on how to submit a FOIA request (1), ideally with an online submission form (1).	2 points	0 points
Performance measures/outcomes	A page linked to the homepage explaining the agencies performance measures and outcomes.	1 point	0 points

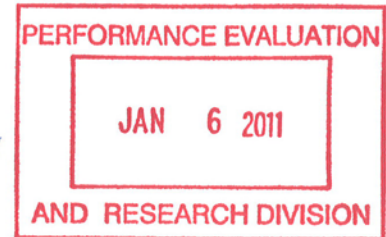
Website Criteria Checklist and Points System

Agency history	The agency's website should include a page explaining how the agency was created, what it has done, and how, if applicable, has its mission changed over time.	1 point	0 points
Website updates	The website should have a website update status on screen (1) and ideally for every page (1).	2 points	0 points
Job Postings/links to Personnel Division website	The agency should have a section on homepage for open job postings (1) and a link to the application page Personnel Division (1).	2 points	0 points

Appendix E: Agency Response



State of West Virginia
OFFICE OF THE SECRETARY
DEPARTMENT OF MILITARY AFFAIRS AND PUBLIC SAFETY
1900 Kanawha Blvd., E.
Charleston, West Virginia 25305
Telephone: (304) 558-2930
Facsimile: (304) 558-6221



EARL RAY TOMBLIN
GOVERNOR

6 January 2012

JOSEPH C. THORNTON
CABINET SECRETARY

Mr. John Sylvia, Director
Legislative Auditor's Office
Performance Evaluation and Research Division
Building 1, Room W314
1900 Kanawha Boulevard, East
Charleston, WV 25305

RE: WVDMAPS/HSSAA Response to Legislative Auditor's Agency Review Report

Dear Mr. Sylvia:

Please accept this letter as an official response by the West Virginia Department of Military Affairs and Public Safety (DMAPS) Homeland Security State Administrative Agency (HSSAA) to your draft report dated 30 December 2011.

Although there were only three issues raised, we looked at each one separately. The first one relates to the improvement of the management of homeland security grant funds subsequent to moving the HSSAA under the direct supervision of the DMAPS Cabinet Secretary and commends the policies and procedures developed in light of that move. You suggest a few additional practices be adopted. The second relates to performance measures and you conclude we should develop some appropriate measures. The third issue notes the lack of an HSSAA website.

We have also reviewed the report in its entirety and concur with a number of the recommendations. This is to advise you that we intend to closely evaluate all suggestions made by your report and evaluate the ability to implement additional management procedures, accurate performance measures and website improvements to comply with the spirit of your review.

Finally, as always, if you require additional information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Thornton".

Joseph C. Thornton
Cabinet Secretary

Appendix F: Agency Comments and Our Evaluation

We provided a draft copy of this report to the Department of Military Affairs and Public Safety Office of the Secretary and the Homeland Security State Administrative Agency (HSSAA) for comment. The HSSAA provided an agency response which is reprinted in Appendix E. In commenting on the content of this report, the HSSAA has made no significant comments. Therefore, there have been no changes to this report.

In addition, the report will be available at <http://www.legis.state.wv.us/Joint/PERD/perd.cfm>.

If you or your staff members have any questions about this report, please contact me at (304) 347-4895 or jsylvia@mail.wvnet.edu.

John Sylvia

Director



WEST VIRGINIA LEGISLATIVE AUDITOR

PERFORMANCE EVALUATION & RESEARCH DIVISION

Building 1, Room W-314, State Capitol Complex, Charleston, West Virginia 25305

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