NOV 1 7 2017



MEMORANDUM FOR:

John Roth

Inspector General

Mark Jones

Council of Inspectors General on Integrity and Efficiency

FROM:

Stacy Marcott

Deputy Chief Financial Officer

SUBJECT:

Quarterly High-Dollar Overpayments Report

July to September 2017

Attached is the Department's quarterly High-Dollar Overpayments Report, as required by Section 3(f) of Executive Order 13520, *Reducing Improper Payments*. During the reporting period, a total of twenty high-dollar overpayments totaling \$12.3 million were identified through improper payment testing. Nineteen overpayments were resolved totaling \$12.2 million, and one overpayment is still outstanding totaling \$119,000 as of September 30, 2017. This report also contains information on high-dollar overpayments reported in previous reports that remain uncollected as of this reporting period.

The Department is committed to eliminating payment error in federal programs and increasing transparency. As responsible stewards of taxpayer dollars, reducing improper payments remain a top priority. We continue to monitor programs and strengthen controls to reduce the instances of improper payments, take steps to mitigate systemic weaknesses, and address specific root causes.

Attachment

## Department of Homeland Security High-Dollar Overpayments Report for the Current Quarter Ending September 30, 2017

| High-Dollar Overpayments Report for the Current Quarter Ending September 30, 2017  Current Quarter Activity |  |              |       |                                       |  |                               |  |  |              |   |              |                |                    |                     |                 |                        |
|---|--|--------------|-------|---------------------------------------|--|-------------------------------|--|--|--------------|---|--------------|----------------|--------------------|---------------------|-----------------|------------------------|
| Component   | Recipient<br>Type<br>(Entity or<br>Individual) | City         | State | Program(s)<br>Responsible             | Recovery Actions<br>Taken or Planned   | Category (Bill)               | Cause of<br>Overpayment<br>Category    | Why the Overpayment Occurred And Actions to Prevent Reoccurrence   | Payment Date | High \$<br>Overpayment<br>Date Identified |              | Correct Amount | Overpayment Amount | Recovered<br>Amount | Amount Resolved | Outstanding<br>Balance |
| FEMA  | Entity   | Indianapolis | IN :  | Homeland<br>Security Grant<br>Program | FEMA has contacted Grantee to provide documentation within 60 days or a Notice for Bill collection will be submitted.  | Insufficient<br>Documentation | Documentation<br>Submission<br>Problem | Grantee falled to submit required documentation for IPERA testing within the appropriate timeframe. The FEMA program office will reach out to the grantee and emphasize the documentation reternion requirement as noted in 44CFR and the audit requests requirements. | 4/27/2016    | 9/30/2017                                 | \$182,375.63 | \$63,245.90    | \$119,129.73       | \$0.00              | \$0.00          | \$119,129.73           |
| FEMA  | Entity   | Alexandria   | VA    | Management<br>Division-<br>Vendor     | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COS) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. |                               | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate unit cost billed with the contract. FEMA RMC will coordinate with Procurement office for updated training on contract billing requirements.   | 12/30/2015   | 9/30/2017                                 | \$216,615.37 | \$0.00         | \$216,615.37       | \$0.00              | \$216,615.37    | \$0.00                 |
| FEMA  | Entity   | Alexandria   | VA    | Management<br>Division-<br>Vendor     | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COS) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. |                               | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate unit cost billed with the contract. FEMA RMC will coordinate with Procurement office for updated training on contract billing requirements.   | 7/1/2016     | 9/30/2017                                 | \$223,540.40 | \$0.00         | \$223,540.40       | \$0.00              | \$223,540.40    | \$0.00                 |
| FEMA  | Entity   | Alexandria   | VA    | Division-<br>Vendor                   | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COs) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. |                               | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate<br>unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>requirements.  | 9/27/2016    | 9/30/2017                                 | \$181,562.28 | \$0.00         | \$181,562.28       | \$0.00              | \$181,562.28    | \$0.00                 |
| FEMA  | Entity   | Alexandria   | VA    | Division-<br>Vendor                   | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COs) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. |                               | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate<br>unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>requirements.  | 4/29/2016    | 9/30/2017                                 | \$427,994.04 | \$0.00         | \$427,994.04       | \$0.00              | \$427,994.04    | \$0.00                 |
| FEMA  | Entity   | Baltimore    | MD    | Management<br>Division-<br>Vendor     | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COs) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. |                               | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate<br>unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>requirements.  | 5/16/2016    | 9/30/2017                                 | \$375,696.69 | \$0.00         | \$375,696.69       | \$0.00              | \$375,696.69    | \$0.00                 |
| FEMA  | Entity   | Vienna       | VA    | Management<br>Division-<br>Vendor     | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COs) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. |                               | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate<br>unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>requirements.  | 7/26/2016    | 9/30/2017                                 | \$257,463.19 | \$0.00         | \$257,463.19       | \$0.00              | \$257,463.19    | \$0.00                 |
| FEMA  | Entity   | Baltimore    | MD    | Division-<br>Vendor                   | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COs) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. | Insufficient<br>Documentation | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate<br>unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>requirements.  | 9/2/2016     | 9/30/2017                                 | \$403,107.94 | \$0.00         | \$403,107.94       | \$0.00              | \$403,107.94    | \$0.00                 |
| FEMA  | Entity   | Vienna       | VA    | Division-                             | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COS) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. |                               | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate unit cost billed with the contract. FEMA RMC will coordinate with Procurement office for updated training on contract billing requirements.   | 9/2/2016     | 9/30/2017                                 | \$233,197.03 | \$0.00         | \$233,197.03       | \$0.00              | \$233,197.03    | \$0.00                 |
| FEMA  | Entity   | Bilerica     | MA    | Division-<br>Vendor                   | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COS) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. | Vendor Billing<br>Error       | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate unit cost billed with the contract. FEMA RMC will coordinate with Procurement office for updated training on contract billing requirements.   | 5/13/2016    | 9/30/2017                                 | \$196,133.50 | \$85,393.00    | \$110,740.50       | \$0.00              | \$110,740.50    | \$0.00                 |
| FEMA  | Entity   | Fairfax      | VA    | Management<br>Division-<br>Vendor     | Coordinate with Procurement office for updated guidance and<br>training to be issued to Contract Officers (COs) on contract billing<br>requirements. Debt is not recoverable as Vendor performed<br>requested services, during the approved period of performance and<br>within the total price of the contract. However, the tester is unable to<br>validate the unit prices/hours charged on the invoice with the<br>contract prices listed. |                               | Lack of Program<br>Office Oversight    | During yearly IPERA testing, the test staff was unable to validate unit cost billed with the contract. FEMA RMC will coordinate with Procurement office for updated training on contract billing requirements.   | 5/27/2016    | 9/30/2017                                 | \$182,799.30 | \$0.00         | \$182,799.30       | \$0.00              | \$182,799.30    | \$0.00                 |

## Department of Homeland Security High-Dollar Overpayments Report for the Current Quarter Ending September 30, 2017

| Part      | rrent Quarter Act | ivity                           |            |       |                                   |  |                     | for the Current Quarter Ending September 3  | 30, 2017     |             |             |                 |                |                    |        |                 |                        |
|--|-------------------|---------------------------------|------------|-------|-----------------------------------|--|---------------------|---|--------------|-------------|-------------|-----------------|----------------|--------------------|--------|-----------------|------------------------|
| Fig. 6 Fig. 6 Fig. 6 Fig. 7 Fig. 6 Fig. 7 Fi | omponent          | Recipient<br>Type<br>(Entity or | City       | State |                                   |  | gory (Bill) Overpay | nent Why the Overpayment Occurred And Actions to Prevent  | Payment Date | Overpayment | Overpayment | Amount Paid     | Correct Amount | Overpayment Amount |        | Amount Resolved | Outstanding<br>Balance |
| Figure   F   | FEMA              | Entity                          | Bethesda   | MD    | Management<br>Division-<br>Vendor | training to be issued to Contract Officers (COs) on contract billing requirements. Debt is not recoverable as Vendor performed requested services, during the approved period of performance and within the total price of the contract. However, the tester is unable to Document of the contract of the price of the contract of the price of the pri |                     | unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>gram  | 3/29/2016    | 9/30/2017   |             | \$325,813.63    | \$0.00         | \$325,813.63       | \$0.00 | \$325,813.63    | \$0.00                 |
| Final Content   Final Conten   | FEMA              | Entity                          | Baltimore  | MD    | Management<br>Division-<br>Vendor | training to be issued to Contract Officers (COs) on contract billing requirements. Debt is not recoverable as Vendor performed requested services, during the approved period of performance and within the total price of the contract. However, the tester is unable to Validate the unit prices/hours charged on the invoice with the contract prices listed.   |                     | unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>requirements.   | 5/25/2016    | 9/30/2017   |             | \$404,272.68    | \$20,272.93    | \$383,999.75       | \$0.00 | \$383,999.75    | \$0.00                 |
| FEMA Etity Developed Control Developed Policy Developed P | FEMA              | Entity                          | Baltimore  | MD    | Management<br>Division-<br>Vendor | training to be issued to Contract Officers (COs) on contract billing requirements. Debt is not recoverable as Vendor performed requested services, during the approved period of performance and within the total price of the contract. However, the tester is unable to Docur Validate the unit prices/hours charged on the invoice with the   |                     | unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing  | 5/16/2016    | 9/30/2017   |             | \$926,931.73    | \$174,129.34   | \$752,802.39       | \$0.00 | \$752,802.39    | \$0.00                 |
| FEMA Entity Cincinnal Condition with Procurement office in contract life of the contract Life with the contract Life with the contract life of the contract  | FEMA              | Entity                          | Baltimore  | MD    | Management<br>Division-<br>Vendor | training to be issued to Contract Officers (COs) on contract billing requirements. Debt is not recoverable as Vendor performed requested services, during the approved period of performance and within the total price of the contract. However, the tester is unable to Document of the contract of the price of the contract of the price of the pri |                     | unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>gram  | 6/9/2016     | 9/30/2017   |             | \$995,821.78    | \$416,876.96   | \$578,944.82       | \$0.00 | \$578,944.82    | \$0.00                 |
| FEMA Entity Cincinnat OH Financial F | FEMA              | Entity                          | Beavercree | « ОН  | Management<br>Division-<br>Vendor | training to be issued to Contract Officers (COs) on contract billing requirements. Debt is not recoverable as Vendor performed requested services, during the approved period of performance and within the total price of the contract. However, the tester is unable to Document of the contract of the invoice with the   |                     | unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing  | 9/27/2016    | 9/30/2017   |             | \$927,899.26    | \$0.00         | \$927,899.26       | \$0.00 | \$927,899.26    | \$0.00                 |
| Financial Financial Circle (Continual Division- Insufficient Division- Divis | FEMA              | Entity                          | Cincinnati | ОН    | Management<br>Division-<br>Vendor | Coordinate with Procurement office for updated guidance and training to be issued to Contract Officers (COs) on contract billing requirements. Debt is not recoverable as Vendor performed requested services, during the approved period of performance and within the total price of the contract. However, the tester is unable to validate the unit prices/hours charged on the invoice with the   |                     | unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>gram  | 10/30/2015   | 9/30/2017   |             | \$2,599,895.50  | \$0.00         | \$2,599,895.50     | \$0.00 | \$2,599,895.50  | \$0.00                 |
| FEMA Entity Washington DC Financial Financial Management Division-Vendor Payments    Coordinate with Procurement office for updated guidance and training to be issued to Contract Officers (COs) on contract Difficient Division-Vendor Payments   Division-Vendor Paym | FEMA              | Entity                          | Cincinnati | ОН    | Management<br>Division-<br>Vendor | training to be issued to Contract Officers (COs) on contract billing requirements. Debt is not recoverable as Vendor performed requested services, during the approved period of performance and within the total price of the contract. However, the tester is unable to Docur Validate the unit prices/hours charged on the invoice with the   |                     | unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing  | 10/30/2015   | 9/30/2017   |             | \$1,374,012.15  | \$0.00         | \$1,374,012.15     | \$0.00 | \$1,374,012.15  | \$0.00                 |
| ICE Entity Chicago IL CEDRO HO DMD This payment is not recoverable because it was an ICE administrative error in the contract and has since been corrected.  IL CEDRO HO DMD This payment is not recoverable because it was an ICE administrative error in the contract and has since been corrected.  Insufficient Documentation Documentation Documentation The vendor and Office of Acquisition Management came to an agreement to pay outstanding travel and retention nicentives for contactors traveling outside a 50 miles radius. The Retention and Insufficient Weaknesses of the contract the payment was not stated on the contract the payment was considered improper.  The vendor and Office of Acquisition Management came to an agreement to pay outstanding travel and retention incentives for contactors traveling outside a 50 miles radius. The Retention and Insufficient Weaknesses of the contract the payment was not stated on the contract the payment was considered improper.   | FEMA              | Entity                          | Washingtor | DC    | Management<br>Division-<br>Vendor | Coordinate with Procurement office for updated guidance and training to be issued to Contract Officers (COs) on contract billing requirements. Debt is not recoverable as Vendor performed requested services, during the approved period of performance and within the total price of the contract. However, the tester is unable to validate the unit prices/hours charged on the invoice with the   |                     | unit cost billed with the contract. FEMA RMC will coordinate with<br>Procurement office for updated training on contract billing<br>gram  | 3/1/2016     | 9/30/2017   |             | \$1,842,224.09  | \$0.00         | \$1,842,224.09     | \$0.00 | \$1,842,224.09  | \$0.00                 |
| Total \$14.035.013.45 \$1.726.687.73 \$12.308.225.72 \$0.00 \$12.180.105.00 \$110.   | ICE               | Entity                          | Chicago    | IL    |                                   | This payment is not recoverable because it was an ICE Insu   | montation Manage    | agreement to pay outstanding travel and retention incentives for contactors traveling outside a 50 miles radius. The Retention portion was supposed to be included on the modification but only included the "Travel Cost". Since Retention and Incentive was not stated on |              | 9/5/2017    | N/A         | \$1,757,657.26  | \$966,769.60   | \$790,887.66       | \$0.00 | \$790,887.66    | \$0.00                 |
|  | ,                 |                                 |            |       |                                   | ,  |                     |   |              |             | Total       | \$14,035.013.45 | \$1,726.687.73 | \$12,308.325.72    | \$0.00 | \$12,189,195.99 | \$119,129.73           |

## Department of Homeland Security High-Dollar Overpayments Report for the Quarter Ending September 30, 2017

| Deb | s Under ( | Collection by DHS                           |                 |       |                           |  |                   |  |              |                   |                       |                     |   |                        |                     |
|-----|-----------|---|-----------------|-------|---------------------------|--|-------------------|--|--------------|-------------------|-----------------------|---------------------|---|------------------------|---------------------|
| Cor | nponent   | Recipient Type<br>(Entity or<br>Individual) | City            | State | Program(s)<br>Responsible | Recovery Action Taken or Planned   | Payment Date      | High \$ Overpayment<br>Date Identified | Amount Paid  | Correct<br>Amount | Overpayment<br>Amount | Recovered<br>Amount | Amount waived or determined to be uncollectable | Outstanding<br>Balance | Days<br>Outstanding |
|     | FEMA      | Entity                                      | Farmingtonmills | МІ    | Vendor Payment            | Notice of potential Debt sent to vendor for resolution of improper transaction.<br>Originally reported as a duplicate payment in Q3 of \$54K-however further<br>research demonstrated this is an overpayment of an incentive fee. An<br>overpayment of incentive fee requires the Contract Officer to determine if it<br>is a recoupable improper payment. FEMA will submit the documentation to<br>the CO for debt collection determination and provide RM&A an update by<br>November 15, 2017. | November 25, 2014 | December 31, 2016                      | \$108,769.17 | \$0.00            | \$108,769.17          | \$0.00              | \$0.00  | \$108,769.17           | 273                 |
|     |           |   |                 |       |                           |  |                   | Total                                  | \$108,769.17 | \$0.00            | \$108,769.17          | \$0.00              | \$0.00  | \$108,769.17           |                     |

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|                      |   |            |           |                        |                                     | f Homeland Secu<br>verpayments Rep<br>ding September | oort                                      |                |                   |                       |                     |                        |                     |
|----------------------|---|------------|-----------|------------------------|-------------------------------------|--|---|----------------|-------------------|-----------------------|---------------------|------------------------|---------------------|
| <b>Debts Sent to</b> | Treasury Offset Prog                        | gram for C | ollection |                        |                                     |  |   |                |                   |                       |                     |                        |                     |
| Component            | Recipient Type<br>(Entity or<br>Individual) | City       | State     | Program(s) Responsible | Recovery Action Taken or<br>Planned | Payment Date   | High \$<br>Overpayment<br>Date Identified | Amount<br>Paid | Correct<br>Amount | Overpayment<br>Amount | Recovered<br>Amount | Outstanding<br>Balance | Days<br>Outstanding |
|                      |   |            |           |                        |                                     |  | Total                                     | ¢n nn          | \$0.00            | \$0.00                | \$0.00              | \$0.00                 | 1                   |
|                      |   |            |           |                        |                                     |  | Total                                     | \$0.00         | \$0.00            | \$0.00                | \$0.00              | \$0.00                 | <u> </u>            |

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## Department of Homeland Security High-Dollar Overpayments Report for the Quarter Ending September 30, 2017

| ebts Cleared | or Collected by 0                           | Componen         | t     |                                    |  |                   |  |                                 |              |                   |                     |  |                        |  |
|--------------|---|------------------|-------|------------------------------------|--|-------------------|--|---------------------------------|--------------|-------------------|---------------------|--|------------------------|--|
| Component    | Recipient Type<br>(Entity or<br>Individual) | City             | State | Program(s) Responsible             | Recovery Action Taken To Recoup<br>Overpayment   | Payment Date      | High \$ Overpayment<br>Date Identified | Date<br>Overpayment<br>Recouped | Amount Paid  | Correct<br>Amount | Recovered<br>Amount | Waived Amount<br>or<br>Documentation<br>Received | Outstanding<br>Balance | Days taken to<br>Recoup<br>Overpayment |
| FEMA         | Entity                                      | Fort<br>Harrison | MT    | Homeland Security Grant<br>Program | Notice of potential Debt sent to grantee for resolution of improper transaction. The Program Office submitted the missing invoices that supports the payment amount. No further action required. | March 23, 2015    | December 30, 2016                      | N/A                             | \$114,682.58 | \$0.00            | \$0.00              | Documentation<br>Received                        | \$0.00                 |  |
| FEMA         | Entity                                      | New York         | NY    | Transit Security Grant<br>Program  | Notice of potential Debt sent to grantee for resolution of improper transaction. The Program Office submitted the missing invoices that supports the payment amount. No further action required. | October 23, 2014  | December 30, 2016                      | N/A                             | \$203,090.42 | \$0.00            | \$0.00              | Documentation<br>Received                        | \$0.00                 |  |
| FEMA         | Entity                                      | Hingham          | MA    | Port Security Grant<br>Program     | Notice of potential Debt sent to grantee for resolution of improper transaction. The Program Office submitted the missing invoices that supports the payment amount. No further action required. | December 31, 2014 | December 30, 2016                      | N/A                             | \$100,348.38 | \$0.00            | \$0.00              | Documentation<br>Received                        | \$0.00                 |  |
|              |   |                  |       |                                    |  |                   |  |                                 |              |                   |                     |  |                        |  |
|              |   |                  |       |                                    |  |                   |  | Total                           | \$418,121.38 | \$0.00            | \$0.00              |  | \$0.00                 |  |