

Report to Congressional Committees

February 2007

HURRICANES KATRINA AND RITA

Federal Actions Could Enhance Preparedness of Certain State-Administered Federal Support Programs

HURRICANES KATRINA AND RITA: Federal Actions Could Enhance Preparedness of Certain State-Administered Federal Support Programs (GAO-07-219)

On page 26, in line 5 of the second paragraph, "see table 5" is revised to read "see table 3." On page 27, in line 3 of the second paragraph, "see table 6" is revised to read "see table 4." On page 28, in line 1 of the third paragraph, "Table 7" is revised to read "Table 5." On page 30, in line 6 of the first paragraph, "see table 8" is revised to read "see table 6." On page 38, in line 3 of the last paragraph, "in table 9" is revised to read "in table 7." On page 41, in the last line of the second paragraph, "in table 10" is revised to read "in table 8."





Highlights of GAO-07-219, a report to congressional committees

Why GAO Did This Study

Hurricanes Katrina and Rita displaced over 1 million people and affected some of the poorest areas of the country. Many of those affected by the hurricanes received federal assistance from the Old Age, Survivors, and Disability Insurance (Social Security), Supplemental Security Income (SSI), Food Stamp, Unemployment Insurance (UI), and Temporary Assistance for Needy Families (TANF) programs beforehand and others were newly eligible after the storms. Under the Comptroller General's authority, GAO assessed the (1) challenges the hurricanes created for programs to take applications and pay benefits, (2) factors that helped or hindered programs' efforts, and (3) areas that warrant further attention and actions being taken to improve programs' disaster response. To do this work, GAO reviewed policies, reports, and plans, and interviewed program officials at the federal level and in Alabama, Florida, Louisiana, Mississippi, and Texas.

What GAO Recommends

GAO recommends that HHS take steps, such as disseminating information on promising practices and further study of case management approaches as part of its efforts to improve delivery of human services during disasters, as well as work with states to collect information on the need for TANF disaster planning. HHS agreed with the recommendations on actions to strengthen its recent efforts but did not agree to address TANF planning specifically.

www.gao.gov/cgi-bin/getrpt?GAO-07-219.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Barbara Bovbjerg at (202) 512-7215 or bovbjergb@gao.gov.

HURRICANES KATRINA AND RITA

Federal Actions Could Enhance Preparedness of Certain State-Administered Federal Support Programs

What GAO Found

The mass destruction and displacement of people caused by the hurricanes created new challenges, including an unprecedented demand for services from these five programs. The demand for food stamps and UI benefits, and the disaster assistance they provide, rose sharply. New evacuee policies were created to provide food stamps and TANF assistance to evacuees nationwide. In contrast, Social Security and SSI had a significant increase for replacement benefits, but did not have a large increase in new applications.

Disaster plans, flexible service delivery options, and access to contingency funding facilitated response, but not all programs had these elements in place. The federally administered Social Security and SSI programs had service delivery disaster plans in place to meet demand. However, such strategies were sometimes lacking for the state-administered Food Stamp, UI, and TANF programs. Flexible service delivery options such as 800 numbers and Internet application services and debit cards for issuing benefits expedited services. Last, access to contingency funding was key to facilitating disaster response.

Gaps remain in preventing improper payments, easing access to services, and improving disaster planning for the state-administered programs, although new efforts hold potential for addressing these areas. Some program officials said they relaxed program rules to better ensure that those in need received aid, which may have increased the risk of improper payments. Program officials are taking actions to address improper payments, although more sharing of information across programs and states would be useful. Regarding access to services, disaster victims sometimes faced difficulties accessing aid from multiple programs, a long-standing problem exacerbated by a disaster. The Department of Health and Human Services (HHS) has begun a promising effort—with links to state program administrators—to improve delivery of human services during disasters. This effort would be strengthened by additional actions, including collecting and disseminating information on service delivery and improper payments during disasters. Finally, to address planning gaps, federal officials are working with states to improve service delivery planning for the Food Stamp and UI programs, although HHS needs to work more systematically with states to assess the need for additional planning for state TANF programs.

Federal and State Responsibilities for Key Program Functions Vary					
	Social				
	Security	Food			
Key functions	and SSI	Stamps	UI	TANF	
Funding benefits	•	•	0	•	
Funding administrative costs	•	•	•	(
Establishing eligibility rules	•	•	0	•	
Supplying program offices and staffing	•	0	0	0	

Source: GAO analysis.

Contents

Letter		1
	Results in Brief	3
	Background	5
	Widespread Devastation and Displacement of People Created	
	Service Delivery Challenges such as Unprecedented Demand	10
	Disaster Planning, Service Delivery Options, and Access to Funding	
	Facilitated Response, but Not All Programs Had These Measures	
	in Place	21
	Gaps in Disaster Response Remain; Efforts Under Way Hold	
	Promise for Improving Human Service Programs' Disaster	
	Response	34
	Conclusions	44
	Recommendations for Executive Action	45
	Agency Comments and Our Evaluation	46
Appendix I	Objectives, Scope, and Methodology	50
Appendix II	Comments from the Social Security Administration	54
Appendix III	Comments from the Department of Health &	
	Human Services	56
Annondin IV	Comments from the U.S. Department of Labor	<u></u>
Appendix IV	Comments from the U.S Department of Labor	61
Appendix V	GAO Contact and Staff Acknowledgments	63
apponuia i	3110 Continue and Start Hermowicusments	JU
Related GAO Products	<u> </u>	64

Tables		
	Table 1: Selected Federal Support Programs	6
	Table 2: Federal and State Responsibilities for Key Functions That	
	Support Taking Applications and Issuing Benefits	7
	Table 3: Program Application Options before the Hurricanes, by	
	State26	
	Table 4: Program Benefit Payment Methods before the Hurricanes,	27
	by State Table 5: Lessons Learned about Strategies to Facilitate Response	4.1
	and Considerations for Disaster Planning	29
	Table 6: Program Funding	31
	Table 7: Some of the Initiatives States We Reviewed Are Exploring	
	to Improve Disaster Preparedness	39
	Table 8: Selected White House Report Recommendations to HHS to	
	Improve the Delivery of Human Services during Disasters	41
Figures		
	Figure 1: FEMA Designated Disaster Counties for Hurricanes	
	Katrina and Rita	11
	Figure 2: SSA District Office in Downtown New Orleans after	
	Hurricane Katrina and Flooding	12
	Figure 3: Disaster Food Stamp Recipients under Hurricanes Katrina and Rita	14
	Figure 4: Food Stamp Recipients in Hurricane-Affected States,	14
	August to December 2005	15
	Figure 5: UI Claims in Hurricane Affected States, August to	
	December 2005	16
	Figure 6: DUA Initial Applications Nationwide, January 2001 to	
	August 2006	17
	Figure 7: States That Requested TANF Contingency Funds	10
	Following Hurricanes Katrina and Rita	19
	Figure 8: Nationwide Social Security and SSI Immediate Payments, August 31 to October 31, 2003, through 2006	21
	Figure 9: Lake Charles Food Stamp and TANF Program Office	41
	Damaged by Hurricane Rita	24
	Figure 10: DUA Payment Process	33

Abbreviations

ACF	Administration for Children and Families
APHSA	American Public Human Services Association

COOP continuity of operations

DHS Department of Homeland Security
DUA disaster unemployment assistance

EBT electronic benefit transfer
EFT electronic fund transfer
ESF emergency support function

FEMA Federal Emergency Management Agency

FNS Food and Nutrition Service

HHS Department of Health and Human Services

IG Office of Inspector General

NASWA National Association of State Workforce Agencies

NRP National Response Plan

OPHEP Office of Public Health Emergency Preparedness

PIN personal identification number SSA Social Security Administration SSI Supplemental Security Income

TANF Temporary Assistance for Needy Families

UI Unemployment Insurance USDA Department of Agriculture

This is a work of the U.S. government and is not subject to copyright protection in the United States. It may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



United States Government Accountability Office Washington, DC 20548

February 7, 2007

Congressional Committees:

Hurricane Katrina made landfall in Louisiana and Mississippi on August 29, 2005, and alone caused more damage than any other natural disaster in the history of the United States. Hurricane Rita followed less than a month later, adding to the devastation. These hurricanes displaced over 1 million residents in the most directly affected states—Alabama, Louisiana, Mississippi, and Texas—and affected some of the poorest areas in the country. The Federal Emergency Management Agency (FEMA) provided cash payments to help individuals and households with immediate disaster assistance such as shelter, clothing, and personal necessities. Beyond this FEMA aid, many in the affected areas were receiving assistance from other federal programs before the hurricanes, and others who lost their homes, employment, or other forms of support became newly eligible for assistance after the storms. Key among these programs are Old Age, Survivors; and Disability Insurance (Social Security); Supplemental Security Income (SSI); the Food Stamp Program; Unemployment Insurance (UI); and the Temporary Assistance for Needy Families (TANF) programs. Because millions of individuals and families nationwide rely on benefits and services provided by these programs, assessing these programs' hurricane response could help better prepare for ensuring Americans' income security in future emergencies.

These programs primarily provide cash or food assistance to replace lost employment income or help low-income individuals meet basic needs, and represent a significant federal financial investment. In a recent year, Social Security and SSI provided \$530.3 billion in income support nationwide, while the Food Stamp, UI, and TANF programs combined provided over \$92 billion in benefits and services to eligible individuals during the same time period. To assist Congress in identifying what lessons can be learned to improve federal response following major disasters such as Hurricanes Katrina and Rita, we prepared this report under the Comptroller General's authority to conduct evaluations under his own initiative. Specifically we assessed (1) the challenges Hurricanes Katrina and Rita created in the immediate aftermath for these programs to take applications and pay benefits; (2) what helped the programs expedite applications and benefit payments after the hurricanes, and what issues, if any, emerged; and (3) which areas warrant further attention, and what actions are being taken to address these.

To do this work, we reviewed policies, procedures, and other relevant documents for the five programs, as well as recent reports on the response to Hurricane Katrina. We interviewed headquarters and regional officials for each of the four agencies that oversee the five selected federal basic support programs: the Social Security Administration (SSA)—Social Security and SSI; U.S. Department of Agriculture (USDA)—Food Stamp Program; U.S. Department of Labor (Labor)—UI; and U.S. Department of Health and Human Services (HHS)—TANF. In addition to regular food stamps and UI benefits, the Food Stamp and UI programs also have disaster components to provide assistance in response to major disasters. In this report, we refer to Social Security and SSI as federally administered programs because the federal government establishes key program policies, funds all benefit and administrative costs, and operates offices primarily with federal employees. In contrast, we refer to the Food Stamp, UI, and TANF programs as state-administered because states are responsible for operating program offices and, to varying degrees among the programs, share responsibility with the federal government for setting policies and procedures, and providing funding.

We conducted site visits in Louisiana and Texas to meet with federal, state, and local officials and conducted phone interviews with state officials in Alabama and Mississippi and federal officials in Atlanta who are responsible for regional program oversight. We also conducted phone interviews with state officials in Florida to learn about their experience in responding to recent tropical storms and hurricanes and in hosting evacuees from Hurricane Katrina. To obtain insights on hurricane victims' perspectives on programs' hurricane response, we interviewed national and state advocacy groups for beneficiaries. In addition, we reviewed federal, state, and office-specific disaster preparedness plans and guidance. To assess the reliability of data on applications filed and benefits received, we reviewed relevant documentation, and interviewed federal officials knowledgeable about the data. We determined the data were sufficiently reliable for the purposes of our report. We coordinated with the federal Offices of the Inspector General (IG) and state auditors on these and other issues. We also spoke with a Department of Homeland

¹These reports include U.S. House of Representatives, A Failure of Initiative: Final Report of the Select Bipartisan Committee to Investigate the Preparation for and Response to Hurricane Katrina (Washington, D.C. Feb. 15, 2006); The White House, The Federal Response to Hurricane Katrina: Lessons Learned (Washington, D.C.: Feb. 23, 2006); and U.S. Senate, Report of the Committee on Homeland Security and Government Affairs. Hurricane Katrina: A Nation Still Unprepared (Washington, D.C.: May 2006).

Security (DHS) official about plans for the delivery of federal disaster assistance. We conducted our work between November 2005 and December 2006 in accordance with generally accepted government auditing standards. See appendix I for more information about our objectives, scope, and methodology.

Results in Brief

Hurricanes Katrina and Rita caused widespread destruction and displacement of people, resulting in challenges for federal basic support programs, including an unparalleled demand for services. Many individuals from the affected region moved to various locations throughout the country, and in some areas, the programs had to serve a large concentration of evacuees. The demand for disaster food stamps, regular food stamps, UI benefits, and disaster unemployment assistance rose sharply. Newly available federal TANF funds for evacuees were used to provide aid to needy families affected by the hurricanes. In contrast, Social Security and SSI did not experience a large increase in new applications, but did experience increased demand for the replacement of lost or missed benefits.

Disaster plans, flexible service delivery options, and access to federal contingency funding helped facilitate hurricane response, but not all programs had these measures in place. The federally administered Social Security and SSI programs had service delivery disaster plans in place to address an unprecedented demand for replacement benefits. Disaster planning at the service delivery level varied across the state-administered federal programs, and in some cases, these programs struggled to ramp up capacity quickly to try to meet demand. In addition, while some programs had preexisting service delivery options that helped expedite services after the hurricanes, other programs did not have these options available. For example, SSA had the flexibility to shift staff where needed and already had a nationwide 800 number and an Internet application process to expedite services for Social Security and SSI prior to Katrina. In contrast, the UI programs in Louisiana and Mississippi had always required in-office visits for filing claims. After the hurricane, Labor helped both states route calls from their residents to UI claims takers in other states with call centers—an innovative action for this program. Access to federal contingency funds was also important for expediting services, and Congress and agencies acted quickly to address immediate funding needs.

Gaps remain in the areas of preventing improper payments, easing access to services, and improving disaster planning for the state-administered programs, although efforts are under way that may address these areas.

As program officials relaxed some program rules to better ensure that those eligible received aid, the risk of improper payments increased. Some efforts are under way to identify improper payments that occurred and whether sufficient internal controls were in place. Sharing this type of information among programs and states can help reduce programs' vulnerability to fraud and abuse during emergencies. Even though some efforts were made to ease individuals' access to aid, disaster victims still faced difficulties accessing aid from multiple programs, a long-standing problem even under routine conditions. In addition, to address some gaps in service delivery planning, USDA is revising its disaster food stamp program handbook and taking other steps to improve disaster planning. Labor has similar efforts under way, including developing information for states on improving disaster preparedness. HHS officials cited legislative restrictions that limit their ability to regulate states, emphasizing that TANF disaster planning is a state responsibility. However, HHS has not systematically worked with states to get information on states' TANF disaster preparedness or identify promising practices for dissemination. The White House study on federal response to Hurricane Katrina, noting some of the difficulties in the delivery of human services, recommended that HHS take a leading role in improving disaster response in delivering human services. In response, HHS has taken initial steps to work with states and other federal agencies to explore ways to improve the delivery of human services for disaster victims. More attention to specific plans for collecting and disseminating promising practices and exploring case management approaches would strengthen this promising effort.

To build on HHS' recent efforts to improve the delivery of human services during disasters, we recommend HHS take several actions, including drawing on its existing human services network and expertise to explore further case management options for service delivery during disasters as well as collecting and disseminating information on promising practices related to disaster planning, service delivery, and mitigating risks for improper payments. Finally, to better ensure disaster preparedness for the TANF program, we recommend that HHS work with states to see what steps may be needed to ensure key planning elements are in place.

In commenting on a draft of this report, SSA, USDA, and Labor agreed with our findings. HHS agreed with our recommendations related to its recent efforts to improve the delivery of human services. However, HHS disagreed with our recommendation that it work with states on TANF disaster preparedness, stating that it is more appropriate to address TANF issues as part of HHS' comprehensive cross-program planning efforts, rather than requiring a separate initiative for TANF, singling it out as a

special case, and reinforcing a "siloed approach" to delivering services. We agree with HHS that it is essential that its effort to improve human services during disasters look across multiple programs and not take a fragmented approach. However, we still think that HHS needs to have more systematic information about state TANF programs' preparedness to carry out its federal oversight responsibilities for this important income support program for low-income families. It can obtain this information through its cross program effort or in other ways and we have clarified our recommendation language to reflect that. We also provided DHS a copy of the draft and incorporated its technical comments as appropriate.

Background

Hurricanes Katrina and Rita affected over 1 million people and caused extensive damage in the four most directly affected states: Alabama, Louisiana, Mississippi, and Texas. Many of those affected depended on federal assistance programs such as Social Security, SSI, the Food Stamp Program, UI, and TANF before the hurricanes. While all of these are federal programs, some are funded, designed, and administered by a combination of federal and state governments.

Programs Provide Routine Services and Some Disaster Assistance

The Social Security and UI programs pay cash benefits to replace lost employment income when individuals stopped working. The Food Stamp, SSI, and TANF programs pay cash benefits or provide other assistance to help low-income individuals meet their basic needs. Besides the routine assistance these programs provide, the Food Stamp and UI programs also offer disaster food stamps and disaster unemployment assistance (DUA) in the event of a major disaster. Table 1 describes the benefits and services of each program.

Table 1: Selected Federal Support Programs Assistance to help low-income individuals meet basic needs					
Food Stamp Program	Provides nutrition assistance to low-income households				
Disaster Food Stamp Program	Provides immediate short-term nutrition assistance to households in response to major disasters (initiated by states with U.S. Department of Agriculture approval)				
Supplemental Security Income (SSI)	Provides minimum cash income to qualified aged, blind, or disabled persons				
Temporary Assistance for Needy Families (TANF)	Provides cash assistance and services targeted to needy families including emergency payments, child care, transportation assistance, and other social services				
Assistance to replace lost employment income					
Unemployment Insurance (UI)	Provides temporary cash benefits to workers who lose their jobs through no fault				
Disaster Unemployment Assistance (DUA)	of their own				
	Provides monetary assistance to workers who lost their jobs as a result of a major disaster and who are not eligible for regular state UI				
Old Age, Survivors, and Disability Insurance (Social Security)	Provides monthly benefits to qualified retired workers and disabled workers and their dependents, and survivors of deceased workers				

Source: GAO analysis of USDA, SSA, HHS, and Labor program information.

Although the programs serve similar needs, the federal and state governments have varying roles and levels of responsibility for each program. Table 2 illustrates the federal and state responsibilities for key program areas. The federally administered Social Security and SSI programs are fully funded by SSA and staffed by federal employees.² Generally, eligibility rules and benefit amounts are established in federal law. During emergency situations, any of SSA's regional commissioners has the authority to invoke disaster procedures to expedite the processing of initial claims generated as a result of a disaster. In addition, SSA has ongoing "immediate payment" procedures to replace payments to beneficiaries who cannot access their monthly benefits by mail or direct deposit.³ Once invoked, the procedures are in effect for all related claims taken nationwide. Over 1,300 SSA offices provide Social Security and SSI services to the public.

²The states have responsibility for making disability determinations under the standards and criteria set forth by SSA and with funding from the federal government.

³SSA may issue immediate payments when (1) a recipient's benefits are delayed, (2) a recipient's eligibility for Social Security or SSI has already been determined, and (3) the recipient has a financial emergency.

Table 2: Federal and State Responsibilities for Key Functions That Support Taking Applications and Issuing Benefits

				Program			
Key Program Areas	Social Security	SSI	Disaster Food Stamp Program	Food Stamp Program	DUA	UI	TANF
Funding benefits	•	•	•	•	•	0	(
Funding administrative costs	•	•	(1	•	•	(
Establishing program rules for eligibility and benefit amounts	•	•	•	•	•	0	•
Ensuring quality control	•	•	(•	((0
Supplying program offices and staffing	•	•	0	0	0	0	0
Service delivery options for taking applications	•	•	0	0	0	0	0
Benefit payment options	•	•	•	•	0	0	0

Source: GAO analysis of SSA, USDA, Labor, and HHS program statutes, guidance, and information.

The other programs are all state-administered federal programs in which the federal government and states vary in their responsibilities. USDA fully funds food stamp and disaster food stamp benefits and generally sets program rules and benefit levels nationally. States pay 50 percent of administrative costs, have some options to set program rules,⁴ and operate Food Stamp Program offices. The UI program is funded by state and federal taxes on employers. Labor oversees and monitors state UI programs, and states determine eligibility criteria, benefit amounts, and duration of payments, which vary across states.⁵ While Labor oversees the DUA program, FEMA funds the benefits and administrative costs for this program. For the TANF program, states receive funds from HHS in the form of a capped block grant.⁶ Federal funding levels do not vary based on caseload, although TANF emergency and loan funds were created by law

⁴The Farm Security and Rural Investment Act of 2002 makes available to states various options that are intended to simplify food stamp program rules, streamline food stamp eligibility and benefit rules, and help ensure that food stamp participants experience as smooth a transition from welfare to work as possible.

⁵Most states pay a maximum of 26 weeks of UI benefits, which may be extended in times of high unemployment.

⁶To receive its TANF block grant funds, each state must contribute its own funds up to a specified level.

as safety net mechanisms for states to access additional federal resources in the event of a recession or other emergency. Within federal guidelines, each state determines what aid and services to provide, what eligibility requirements to use, and how to deliver the services. As a result, state programs vary widely. States typically have local or regional welfare offices, and in the states we reviewed, most of the Food Stamp and TANF programs are co-located.

Eligibility rules for the disaster food stamp and DUA programs are relaxed to allow individuals who might not qualify for regular program benefits to receive disaster assistance. For example, a broad range of resources are counted to determine eligibility for regular food stamps, whereas only accessible resources such as cash and savings accounts are considered for disaster food stamps. Based on household size, the Disaster Food Stamp Program automatically pays applicants the maximum monthly allotment payable under the regular Food Stamp Program. In addition, regular food stamp clients may receive a supplemental amount that increases their monthly benefit to the maximum monthly disaster benefit allotment. In the past, disaster food stamp applications were generally accepted over a period of 7 days, and applicants received 1 month of benefits. DUA benefits are provided to individuals who were affected by the disaster but do not qualify for regular UI program benefits. Eligible individuals may include persons who are self-employed or have a short work history. Before applying for DUA, individuals must apply for UI and be found ineligible. Applicants normally must file for DUA within 30 days and are allowed 21 days to submit the required supporting documentation. Individuals can receive DUA for up to 26 weeks.

Basis for Federal Support Programs Assisting Disaster Victims The Robert T. Stafford Disaster Relief and Emergency Assistance Act (the Stafford Act) primarily established the programs and processes for the federal government to provide major disaster and emergency assistance to states, local governments, tribal nations, individuals, and qualified private nonprofit organizations. Upon a governor's request, the President can declare an "emergency" or a "major disaster" under the Stafford Act, which triggers specific types of federal relief. For Hurricane Katrina, the President made a major disaster declaration for Louisiana, Mississippi, and Alabama on August 29, 2005. For Hurricane Rita, the President made the same declaration for Louisiana and Texas on September 24, 2005. These declarations authorized the federal government

to engage in various emergency response activities, such as providing temporary housing and disaster unemployment assistance.⁷

For purposes of the National Response Plan (NRP), presidentially-declared disasters under the Stafford Act are considered incidents of national significance. The Department of Homeland Security (DHS) and FEMA may activate certain provisions of the National Response Plan (NRP) to coordinate federal support for disaster response. One provision specified in the NRP cites expediting the processing of new claims for federal benefits as a goal. While the NRP specifically mentions Social Security and DUA benefits, there are additional federal requirements for continuing federal benefit payments during emergencies.

Federal agencies have been required since 1999 to have plans in place to ensure they could continue essential functions such as benefit payments in the event of an emergency. FEMA provided federal agencies guidance for developing continuity-of-operation (COOP) plans to address events that could disrupt normal agency operations and directed them to develop plans for their headquarters and subcomponent levels. However, the guidance did not explicitly direct federal agencies in the actions they should take regarding program services provided by states.

⁷The Food Stamp Act and the Stafford Act authorize USDA to establish temporary emergency standards of eligibility and to provide emergency benefits to replace food lost in a disaster.

⁸The NRP designates 15 emergency support functions (ESF) that address specific disaster response needs. ESF-6, identified as "Mass Care, Housing, and Human Services," cites expediting the processing of federal benefits.

Widespread
Devastation and
Displacement of
People Created
Service Delivery
Challenges such as
Unprecedented
Demand

Hurricanes Katrina and Rita caused large-scale destruction and displacement of people, resulting in challenges for federal basic support programs such as an unparalleled demand for services. Many people in the affected areas depended on federal assistance before the hurricanes and needed help to continue getting their aid. As a result of the hurricanes, many others were newly eligible because they had lost their homes or jobs, or were temporarily displaced. The demand for food stamps, disaster food stamps, UI, and DUA benefits rose sharply. Newly available federal TANF funds were used to provide aid to needy families affected by the hurricanes. In contrast, Social Security and SSI did not have a large increase in new applications, but did experience a large increase in requests for the replacement of lost or missing benefits.

Hurricanes Caused Widespread Devastation and Large-Scale Displacement FEMA designated 117 counties and parishes across Alabama, Louisiana, Mississippi, and Texas as disaster counties. (See fig. 1.) Most people fled the area as a result of the hurricanes. Homes, businesses, and entire communities were damaged or destroyed. According to the U.S. Bureau of Labor Statistics, an estimated 1.2 million people age 16 and over evacuated as a result of Hurricane Katrina. The U.S. Census estimated that the population of disaster-designated counties in Louisiana alone decreased by almost 345,000 between July 1, 2005, and January 1, 2006. In contrast, Mississippi's population decreased by approximately 42,000, and Alabama's population remained about the same. According to the Red Cross, 8 months following the disasters, more than 750,000 persons remained displaced across all 50 states.

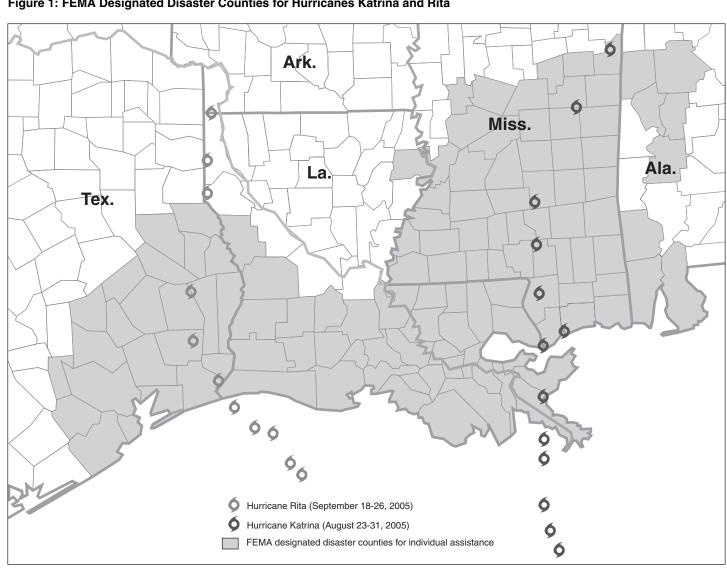


Figure 1: FEMA Designated Disaster Counties for Hurricanes Katrina and Rita

Sources: GAO analysis of FEMA data. Map Resources (map).

In addition to facing the large number of hurricane victims seeking assistance, the programs we reviewed faced challenges providing services after the hurricanes because of damage and disruption to their own facilities. In hurricane-affected areas, records, equipment, and program offices were damaged or destroyed. Coastal areas in Louisiana, Mississippi, Texas, and Alabama were heavily damaged. Many program offices were closed for only a few days, but several damaged facilities did

not open for months, and a few were permanently closed as a result of the destruction, such as the SSA district office in New Orleans shown in figure 2.



Figure 2: SSA District Office in Downtown New Orleans after Hurricane Katrina and Flooding

Source: SSA Office of Inspector General.

Demand for Services Rose Sharply after the Storms

In the aftermath of the hurricanes, demand for services increased dramatically for all programs. Many individuals in the hurricane-affected states already depended on federal assistance programs before the hurricanes. For example, the Urban Institute estimated that about 21 percent of the people in Orleans Parish, the county that includes New Orleans, were receiving food stamps in 2000. According to SSA data, over 1.2 million Social Security beneficiaries were located in counties affected by Hurricane Katrina. Demand for services rose significantly for the many

 $^{^9\}mathrm{The}$ Urban Institute, Katrina: Demographics of a Disaster (Washington, D.C.: Sept. 9, 2005).

hurricane victims who were newly eligible, adding to the existing demand for services of those already receiving benefits.

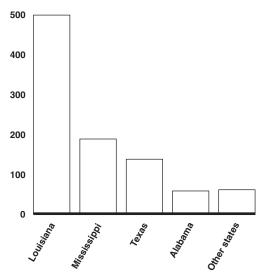
Disaster Food Stamps and Regular Food Stamp Program: Caseloads for disaster food stamps and regular food stamps increased significantly following the hurricanes. In addition to providing disaster food stamps to hurricane victims in the disaster-affected states, USDA—for the first time ever—adopted a policy of providing disaster food stamps to evacuees nationwide. Usually disaster food stamps are available only in areas where the disaster occurred. This new policy authorized states across the country to provide the maximum monthly food stamp benefits to Katrina victims for up to 3 months. ¹⁰ Seventeen states, including the 4 hurricane-affected states—Alabama, Louisiana, Mississippi, and Texas—issued disaster food stamps to evacuees.

With the new evacuee policy and significant need for disaster food stamps in the hurricane-affected states, caseloads for the Disaster Food Stamp Program far exceeded those of any previous disaster. For example, USDA issued \$274 million for disaster food stamp assistance during the 2004 disaster season. In contrast, USDA issued over \$680 million for disaster food stamp assistance to close to 1.5 million households as a result of Hurricanes Katrina and Rita. Figure 3 shows the number of households that received disaster food stamps in each hurricane-affected state and in all other states. Households who would not normally qualify for regular food stamps because of their income or resources could apply for and receive disaster food stamps if they met certain program requirements.

¹⁰USDA revised the evacuee policy after it was issued to include hurricane evacuees who relocated to another area within their home state.

Figure 3: Disaster Food Stamp Recipients under Hurricanes Katrina and Rita

Number of households (in thousands) **600**



States that provided disaster food stamps

Source: GAO analysis of USDA data.

Note: Disaster food stamp numbers for the hurricane affected states include both disaster food stamps paid to hurricane victims in the hurricane-affected states and to evacuees from other states. States were not required by USDA to report the number of evacuees they served. Therefore, these totals may exclude some evacuee recipients because some states reported evacuees served and some did not.

Caseloads for regular food stamps also increased following the hurricanes. As shown in figure 4, Louisiana and Texas experienced a dramatic rise in new recipients of regular food stamps following Hurricane Katrina. The number of recipients continued to rise after Hurricane Rita. Alabama and Mississippi had smaller but significant increases in their caseloads.

Number of households (in thousands) 1.400 1,200 1,000 800 600 400 200 August September October November December Year 2005 Alabama Louisiana Mississippi

Figure 4: Food Stamp Recipients in Hurricane-Affected States, August to December 2005

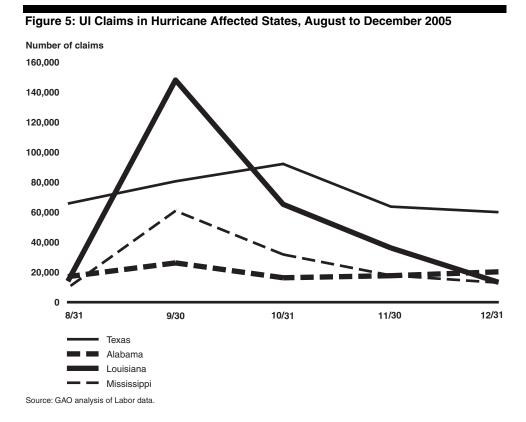
Note: Numbers reflect recipients of regular food stamps only, not disaster food stamps.

In addition to new applicants applying for disaster food stamps, in the affected areas most regular Food Stamp Program recipients received benefits to replace food destroyed in the disaster as well as automatic supplements without having to apply at a disaster site. According to USDA, Alabama issued \$4.3 million in supplemental benefits to almost 30,000 households. Mississippi provided supplemental benefits to over 224,000 households, totaling more than \$24.1 million. Louisiana provided 282,626 households with over \$33.3 million in supplemental benefits as a result of Hurricanes Katrina and Rita.

UI and DUA programs: More than half a million people lost their jobs following Hurricanes Katrina and Rita—as a result the UI program had a sharp rise in applicants for regular UI and DUA benefits. Regular UI claims increased across all four states following Hurricanes Katrina and Rita. (See fig. 5.) Louisiana and Mississippi experienced a substantial jump in UI claims after Hurricane Katrina. For example, in Louisiana, regular UI

Source: GAO analysis of USDA data.

claims increased by approximately 134, 000 in September 2005—an increase of over 900 percent.

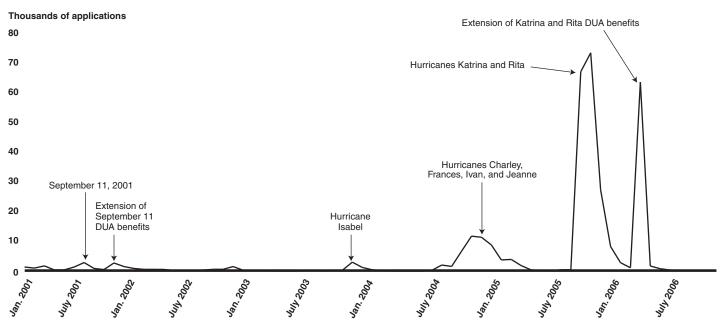


The DUA program received a greater number of applications following the hurricanes than for any other disaster in the history of the program. Over 233,000 DUA claims were filed, compared with just over 7,000 filed after the September 11 terrorist attacks, according to Labor data. (See fig. 6.) In addition, on March 6, 2006, Congress extended DUA benefits for eligible individuals for an additional 13 weeks beyond the 26 weeks DUA is typically payable. As shown in figure 6, this caused an additional surge in claims. The majority of DUA claims were filed in Louisiana—almost 185,000. According to Labor, after hurricanes Katrina and Rita, a total of \$413.7 million was paid in DUA benefits to beneficiaries from the four

 $^{^{11} \}mbox{The Katrina Emergency Assistance Act of 2006, Pub. L. No. 109-176.}$

affected states—far more than FEMA paid following any disaster or in any other year in the 32-year history of the program.

Figure 6: DUA Initial Applications Nationwide, January 2001 to August 2006



Time of national disasters

Source: GAO analysis of Labor data.

Although hurricane evacuees may file for UI and DUA benefits in the state to which they evacuated, they receive benefits from the state where they were employed. Therefore, the increase in UI claims reflects an increase in workloads both for the state where the claims were taken, and for the state where the claims were adjudicated and benefits paid. For example, in Texas 38,000 Louisiana evacuees received UI and DUA benefits during November 2005. Almost 300,000 Louisiana evacuees across the country received over \$1 billion in regular UI and DUA benefits following Hurricanes Katrina and Rita.

TANF: The TANF program also experienced an increase in workloads as new federal funding became available for evacuees. Congress passed legislation on September 21, 2005, to ease states' access to the existing TANF contingency and loan funds. ¹² We had previously reported that the

¹²TANF Emergency Response and Recovery Act of 2005, Pub. L. No. 109-68.

contingency fund, as originally established in 1996, has not proven to be an inviting option to states in need for several reasons, including the requirement that states use increased amounts of their own funds to be eligible for the additional federal funds. 13 The post-hurricane legislation eliminated this funding requirement and gave all states that were assisting hurricane victims immediate access to TANF contingency funds to provide short-term, nonrecurrent payments to evacuees from Alabama, Florida, Louisiana, and Mississippi. The maximum contingency fund amount each state was eligible to receive was 20 percent of its annual TANF block grant. In total, 20 states requested TANF contingency funds to provide emergency cash assistance to evacuees.¹⁴ (See fig. 7.) Information on the total hurricane victim and evacuee TANF caseload is not readily available, however. HHS asked states to report on the total number of newly approved evacuee families receiving TANF cash assistance or nonrecurrent, short-term benefits through the end of October 2005, but reporting did not continue beyond that time. Based on our interviews with hurricane-affected states, we have some indication that regular TANF caseloads were not affected overall, but the evacuee program contributed to increased workloads in those states that provided emergency benefits.

¹³Our previous report noted that the usefulness of the contingency fund could be improved for hard-pressed states if Congress eliminated restrictive requirements for states to provide a share of contingency funding, and limits on the amount of contingency funds to which each state has access. (See GAO, Welfare Reform: Challenges in Maintaining a Federal-State Fiscal Partnership, GAO-01-828 (Washington, D.C.: Aug. 10, 2001) and GAO, Welfare Reform: Challenges in Saving for a "Rainy Day," GAO-01-674T (Washington, D.C.: Apr. 26, 2001).

¹⁴Regional HHS officials we interviewed said that some states may not have accessed contingency funds because they did not get many evacuees, and some states thought they had sufficient resources to enroll evacuees in their own TANF program.

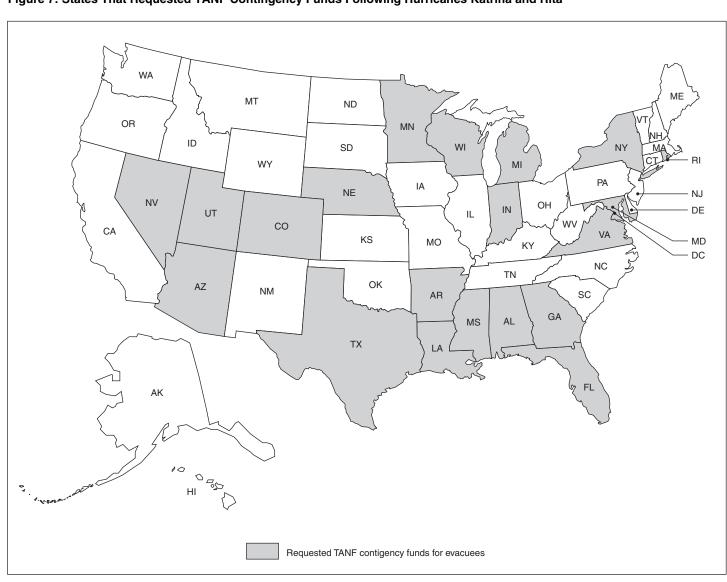


Figure 7: States That Requested TANF Contingency Funds Following Hurricanes Katrina and Rita

Sources: GAO analysis of HHS data. Copyright Corel Corp, all rights reserved (map).

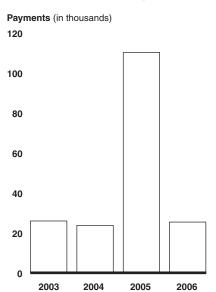
In addition, Congress gave Alabama, Louisiana, and Mississippi access to TANF loan funds—a loan in name only, not expected to be repaid—to support hurricane victims within their own state. These states were given access to an additional 20 percent of their block grant amounts. Mississippi and Alabama chose to implement emergency TANF programs for hurricane-affected residents of their own states that were consistent

with the one time, emergency payments they provided to evacuees from other states. Instead of providing emergency payments, Louisiana established a contract with Louisiana Family Recovery Corps to provide services such as mental health services to families across the state that were displaced by the hurricanes.

Social Security and SSI: SSI and Social Security experienced a significant increase in requests for immediate payments following the hurricanes, but did not have a large rise in new applicants. From August 31, 2005, to October 31, 2005, 110,141 immediate payments were made nationwide. This is a dramatic increase when compared to similar time periods in previous years. For example, in 2004, 23,697 immediate payments were issued nationwide during the same time period. While Social Security and SSI programs did not experience a large increase in new applicants after the hurricanes, these programs may see an increase over time. SSA officials we interviewed said that some hurricane victims may have long-term health issues, making them eligible for SSI and/or Social Security Disability Insurance. Others who are eligible may eventually choose to retire and apply for Social Security.

¹⁵SSI is based on financial need and Social Security Disability Insurance is based on having a Social Security earnings record.

Figure 8: Nationwide Social Security and SSI Immediate Payments, August 31 to October 31, 2003, through 2006



Source: GAO analysis of SSA data

Disaster Planning, Service Delivery Options, and Access to Funding Facilitated Response, but Not All Programs Had These Measures in Place Disaster planning, flexible service delivery options, and access to federal contingency funds helped facilitate programs' hurricane response, but not all programs had these measures in place. Programs with pre-existing disaster plans in place were better positioned than other programs to meet the unprecedented demand for services. Some programs had flexibility and preexisting service delivery options that facilitated taking applications and issuing benefits. These included call centers, Internet application processes, and debit card systems to pay benefits. Some programs put new procedures and systems in place to expedite services and pay benefits, but in some cases, officials encountered difficulties implementing new options. In addition, access to federal contingency funds was also important for expediting services, and Congress and agencies acted quickly to address immediate funding needs.

Programs with Disaster Plans for Service Delivery Were Better Prepared to Address Unprecedented Demand

Social Security and SSI were the only programs for which the federal government had authority for service delivery and had disaster policies and procedures already in place to respond to emergencies and disasters. SSA used FEMA guidance to develop COOP plans for the Social Security and SSI programs. SSA was prepared to set up temporary, full-service

offices because the agency has an agreement with the General Services Administration (GSA) to secure trailers and leased office space on short notice. Other plans enabled SSA to communicate with more than 1,200 SSA employees directly affected by Hurricanes Katrina and Rita. On a routine basis, SSA employees are given telephone numbers to call to receive instructions during emergencies. SSA also provided detailed guidance to regional offices and offices that serve the public and required them to have plans in place. The regional officials we contacted told us they review offices' plans annually and require managers to review procedures with staff periodically.

While SSA had clear federal lines of authority for all aspects of program service delivery during disasters, the other agencies we reviewed did not. Federal planning requirements and guidance vary across the stateadministered federal programs. The Food Stamp Act requires states to have plans to address certain events related to operating a Disaster Food Stamp Program. USDA additionally provides states guidance in a number of areas such as strategies for issuing food stamp benefits when routine procedures cannot be used. 16 States must review disaster food stamp program plans annually, make revisions as necessary, and submit revisions to USDA. According to USDA officials, states generally run a large-scale disaster food stamp program at off-site locations such as civic centers or sports stadiums that can accommodate more applicants than local food stamp offices could serve. Food Stamp Program officials in Mississippi had a partnership with the state emergency management agency to provide tents, water, security personnel, and other necessities. In contrast, there are no federal requirements for states to develop disaster plans for the UI, DUA, and TANF programs, and Labor and HHS officials told us they have not provided states guidance on the issue; therefore, states have flexibility in developing disaster plans.

However, even with disaster planning for the Food Stamp Program, we found that some local Food Stamp Program and TANF offices in the states we reviewed were overwhelmed in the aftermath of the hurricanes. Similarly, some local UI programs were also unprepared for a large-scale disaster. Local food stamp, TANF, and UI officials we visited in Louisiana reported difficulty finding supplies, additional security, and facilities to

¹⁶Food and Nutrition Service (FNS), USDA, Electronic Benefit Transfer (*EBT*) Disaster Plan Guide, (Alexandria, Virginia: October 2000) and FNS Handbook 320 Disaster Food Stamp Program, (Alexandria, Virginia: 2005). USDA plans to issue an update of the handbook in 2007.

manage the large volume of people seeking services. In an extreme example, Hurricane Rita damaged the food stamp/TANF office in Lake Charles, Louisiana, destroying most of the building, furnishings, and equipment. (See fig. 9.) After Hurricane Rita, officials relocated to another office, but initially did not have any state or federal assistance to find supplies and basic office equipment as well as security and other assistance to manage large crowds of people seeking disaster food stamps. At first, local officials used their personal cell phones to conduct business.

Figure 9: Lake Charles Food Stamp and TANF Program Office Damaged by Hurricane Rita



Food Stamp Program and TANF office damaged by Hurricane Rita, Lake Charles, Louisiana

Discarded office furniture and equipment from hurricane damage

Source: GAO.

Flexible Service Delivery Options Helped Expedite Applications and Ensure Payments, but Not All Programs Had These Options in Place

Programs that had flexible service delivery options in place before the hurricanes or could quickly implement them were better positioned to manage increased demand and the mobility of evacuees than other programs. These service delivery options included: flexible staffing, options for taking applications, and alternatives for issuing benefits.

Flexible Staffing

Social Security and SSI had greater flexibility than state-administered federal programs to shift staffing where needed. SSA deployed 171 employees from across the country to help out in areas serving large numbers of hurricane victims. SSA shifted all workloads from offices forced to close to other offices and opened temporary locations in GSA trailers or in other federal buildings. The Food Stamp and UI programs shifted staff from other duties and other locations within their states to address increased demand for services. For example, Florida officials sent food stamp eligibility workers from other parts of the state to the panhandle area, where evacuees were concentrated. However, even with additional staff, some programs in Louisiana and Mississippi did not have enough staff statewide to meet demand.

State-administered federal programs also relied on temporary workers and help from other states, but these arrangements were not always in place. UI officials in Texas, who were prepared to hire temporary workers as part of routine operations, could quickly recruit workers for call centers. While other states offered to help, Food Stamp and UI program officials in hurricane-affected states did not have arrangements in place before the hurricanes to easily make use of out-of-state workers. USDA, Labor, and the American Public Human Services Association (APHSA)—a professional association of state and local human services program officials—helped recruit workers from other states. This included helping to work through agreements and logistics for out-of-state workers, but in some cases, these arrangements were cumbersome. For example, it took about 5 weeks to work out an agreement for Texas to help take UI claims for Louisiana, according to regional Labor officials. In total, 15 states sent about 163 Food Stamp Program workers, and 21 states sent workers or helped take UI and DUA claims for the hurricane-affected states.

Options to Take Applications

SSA had application options in place for Social Security and SSI that facilitated its response to Hurricanes Katrina and Rita. Even though these programs did not experience a sharp increase in new applications, they had the following options in place:

- nationwide 800 number,
- call centers,
- an Internet application process, and
- electronic data exchanges among states for birth certificates and other documents needed for new claims or for reconstructing lost paper files.

SSA relied on its telephone and Internet services to serve those who were newly eligible, as well as those already receiving services. In addition, SSA had software in place that enabled its staff to flag applicants from disaster-affected areas for expedited service.

State-administered federal programs with application options that were not dependent on in-office visits were better positioned to respond to significant increases in applications and to evacuees crossing state lines than other programs. Before the hurricanes, application options for the Food Stamp, TANF, and UI programs varied by state. (See table 3.)

Table 3: Program Application Options before the Hurricanes, by State

				Program	
State	Social Security	SSI	Disaster Food Stamp Program	UI & DUA	Food Stamp Program & TANF°
Alabama	Online,	Call center,	In person for new	Call center	In person
Louisiana	call center, in person	in person ^a	applicants ⁵	In person	In person
Mississippi	iii person			In person	In person
Texas				Call center, online	In person
Florida				Call center, online	In person, call center, online

Source: GAO analysis of program information from SSA, HHS, USDA, and Labor and states.

[°]In Alabama, Louisiana, Mississippi, and Texas, some exceptions are made for special needs cases to allow individuals to apply via telephone.

Some states adopted new forms and procedures to expedite processing of applications after Hurricane Katrina. Louisiana and Mississippi developed an abbreviated, Web-based application form for UI and DUA. Texas officials developed an abbreviated application form for the Food Stamp Program and implemented an online system to input applications with laptop computers. Florida officials also developed a shortened application to run an emergency TANF program for hurricane evacuees and changed their online application so individuals could self-identify if they did not have the required documentation. Food stamp employees in Alabama and Mississippi manually completed simplified application forms at sites designated for disaster food stamps and sent the forms to a centralized data entry location to expedite processing.

The UI programs in Louisiana and Mississippi adapted call center technology to completely change the way UI and DUA claims were taken

^aSSI applicants can complete disability reports online, but must complete an interview in person or over the phone to apply for benefits.

^bMost supplemental and replacement benefits were done automatically without the need for an application form.

in their states. Before Hurricane Katrina, both states mainly required inoffice visits for filing claims. After the hurricane, the Mississippi UI program set up call centers to take UI and DUA claims. In addition, Labor helped Mississippi and Louisiana route calls from their residents to UI claims takers in other states with call centers—an action that had never been taken before. At the same time, interstate claims presented some challenges to the UI program. In Louisiana and Mississippi, phone service was disrupted in some areas, and the few operational phone lines, overwhelmed with calls, were busy for extended periods. Other states taking claims for Louisiana and Mississippi could not easily get applicant information from program officials. A national client advocacy group told us that some hurricane victims grew frustrated and gave up.

Options for Issuing Benefits

Florida

Table 4: Program Benefit Payment Methods before the Hurricanes, by State

EBT

For Social Security, SSI, and the Food Stamp Program, benefit payment methods are determined on a federal level and are consistent across states. (See table 4.) Payment procedures for the UI program and TANF are determined by each state and can vary across states.

	Program					
State	Social Security & SSI	Food stamps	Disaster food stamps	UI	DUA	TANF
Alabama	Checks, direct deposit,	EBT ^a	EBT	Checks, direct deposit	Checks, direct deposit	EBT
Louisiana	emergency advancepayments.	EBT	EBT	Checks direct deposit	Checks, direct deposit	EBT
Mississippi	immediate	EBT	EBT	Checks	Checks	EBT
Texas	payments	EBT	EBT	Checks	Checks	EBT

EBT

Source: GAO analysis of program information from SSA, HHS, USDA, Labor and states.

Checks,

direct deposit

SSA could provide immediate emergency checks nationwide—an important measure because Hurricane Katrina disrupted mail delivery of monthly Social Security checks, and many SSA and SI beneficiaries in the hurricane-affected areas were dependent on this income source. The emergency payments were not the usual U.S. Treasury checks, but third-party drafts drawn on a commercial bank and often completed by hand. After Hurricane Katrina hit, SSA asked the vendor to produce a large supply of these blank checks quickly and developed a letter for financial

Checks,

direct deposit

EBT

^aProgram recipients use electronic benefit transfer (EBT) cards.

institutions to help authenticate the third-party draft checks. SSA also worked with the Louisiana Banking Association to help reassure banks that the checks were legitimate.

Programs that had debit card systems before the hurricanes were able to provide benefits without interruption, but some experienced challenges processing and issuing benefits. Food stamp recipients use electronic benefit transfer (EBT) cards with personal identification numbers (PIN), which work much like debit cards. These cards can be used across all states with the exception of cards issued by the state of Wyoming. 17 The Food Stamp and TANF programs in all the states we interviewed use debit card systems for both food stamps and TANF and could continue paying benefits to those who evacuated or relocated to other states. However, Louisiana experienced some disruption in activating new debit cards because the 800 number used to provide PINs was routed through New Orleans, where the telephone lines were down. The state's EBT vendor set up a system to issue debit cards with pre-selected PINs until the 800 number was restored. In addition, some retailers did not know how to process EBT transactions manually in areas where telephone service and electronic communications were disrupted. The Louisiana UI program, overwhelmed in efforts to issue unemployment checks, rushed to implement a debit card system and encountered a number of challenges. For example, it was difficult to distribute debit cards to evacuees located around the state and country.

Table 5 presents a summary of strategies we identified that facilitated hurricane response for taking applications and paying benefits, as well as actions to consider for disaster planning. Some practices were specific to planning and preparing for disasters. Others were steps programs were taking to streamline procedures and use technology to improve routine program operations, such as online applications and call centers.

¹⁷For this report, EBT cards will be referred to as debit cards.

Table 5: Lessons Learned about Strategies to Facilitate Response and Considerations for Disaster Planning Strategies to Facilitate Response What Worked Actions to Consider for Disaster Planning Temporary facilities and mobile units enabled Have arrangements for alternate office sites Increasing operating capacity and programs to continue operations in areas or mobile units in place providing basic necessities for customers damaged by the hurricanes Have arrangements for alternate The Food Stamp Program operates at communication systems to be available alternative sites to accommodate a large during power outages number of people while maintaining routine Have procedures for increasing supplies services Have agreements in place with other Partnerships with other federal or state agencies and organizations to help with agencies such as the General Services security and basic necessities for customers Administration and states' emergency management agencies Procedures such as 800 numbers to Have procedures to communicate with staff Communicating with staff affected communicate with staff for emergencies and before major disruptions by the disaster disasters SSA has standard procedures and shifted Train staff with other duties or from other Increasing staffing staff nationwide programs ahead of time so they will be familiar with program rules and procedures Some state-administered federal programs shifted staff from across the state or from one duty to another Retired workers and hurricane affected Identify need and sources for obtaining workers who are temporarily unemployed workers before disasters occur served as temporary workers Plan for training and other arrangements for hiring and accommodating temporary workers USDA, Labor, and ASPHA helped recruit Have agreements to get workers from other workers from other states, assisted with states, which may address housing, logistics and in some cases, provided reimbursement, and other logistics reimbursement 800 numbers and call centers helped **Expediting applications** Have application options available to increase capacity and to rely on when routine programs handle large increases in applications processes are disrupted The UI program greatly expanded capacity by routing calls to non-hurricane affected states Online application options helped programs Have other options available when handle large increases in applications communication via Internet is disrupted Abbreviated forms enabled programs to take Have abbreviated application forms available that collect key information needed and process applications in a much shorter for computer systems to process applications time Off-site or centralized processing centers Have alternative procedures to expedite away from customers helped some programs processing more efficiently provide services

Strategies to Facilitate Response	What Worked	Actions to Consider for Disaster Planning
Expediting and continuing benefit payments	Immediate emergency checks enabled SSA to expedite payment of benefits	Have well-established procedures for ensuring quality control
	Debit cards were portable and could be used by hurricane victims who moved within their home states or to other states	Have procedures to address disruption in service when phone lines and ATMs were down
		Plan for distributing new cards when disaster victims do not have a stable address
	Electronic Funds Transfer could be used by hurricane victims who moved within their home states or to other states	May need to have contingencies for hurricane damaged areas where electricity was out and financial institutions were closed
	SSA had partnerships to help with alternative procedures such as working with financial institutions to substantiate immediate emergency checks and with the U.S. Postal Service to set up temporary mail stations	Have agreements and alternative procedures in place to expedite and continue benefits

Source: GAO analysis of program information from and interviews with SSA, USDA, Labor, HHS, states, and professional and advocacy organizations.

Additional Funding Was Available for Increased Costs, but Some Funding Questions Remain for State-Administered Federal Programs The availability of federal and state funds to meet the increased demand for assistance was key to facilitating program response, although the funding structure varied greatly among the programs. Funding varies as to the source—federal funds, state funds, or a combination—and as to whether the funding levels are fixed or open-ended entitlements from which eligible applicants are guaranteed receipt. (See table 6.) For Social Security and SSI, federal funding was available and there were no funding constraints that limited SSA's ability to deliver services. In contrast, all other programs had some role for states to share costs or a new federal funding source was made available, creating some uncertainty and confusion.

Regular programs	Entitlement ^a	Funding source for benefits	Funding source for administrative costs
Food Stamps	Yes	100% federal	50% federal and 50% state
UI	Yes	100% funded by state tax on employers	100% funded by federal tax on employers
TANF	No	Capped federal funding with required state funding	Capped federal funding with required state funding ^d
SSI	Yes	100% federal⁵	100% federal
Social Security	Yes	100% federal	100% federal
Disaster programs	Entitlement	Funding source for benefits	Funding source for administrative costs
Disaster Food Stamp Program	Yes	100% federal paid by USDA	50% federal (USDA) and 50% state funding
DUA	Yes	100% federal paid by FEMA	100% federal paid by FEMA
TANF Emergency Funds	No	100% federal paid by HHS (Contingency Fund and Loan Fund°)	100% federal paid by HHS (Contingency Fund and Loan Fund)

Source: GAO analysis of SSA, USDA, Labor, and HHS program information.

^cLoan funds are loans in name only—states are not expected to repay them. Congress used its existing authority to appropriate these funds under the loan program, but the loans were intended to function similar to the contingency funds.

^dThere is a spending cap on the amount states may spend of their federal TANF funds and their state maintenance-of-effort funds on certain administrative activities.

USDA provided some additional funding to address increased demand for disaster food stamps and regular foods stamps. This included paying 50 percent of the administrative costs to have food stamp workers from other states help the hurricane-affected states. In addition, USDA reimbursed Florida for sending teams of state officials to Louisiana and Mississippi to provide technical assistance on setting up disaster sites.

Congress provided access to TANF contingency funds for any state to be reimbursed for providing short-term, one time payments to evacuees, but some states may not have been prepared to run such a program. ¹⁸ According to HHS officials, some states had rules and procedures to run a

^aAll individuals who qualify for Social Security or UI receive assistance. However, these programs are traditionally considered to be different from other entitlement programs because they have work history requirements.

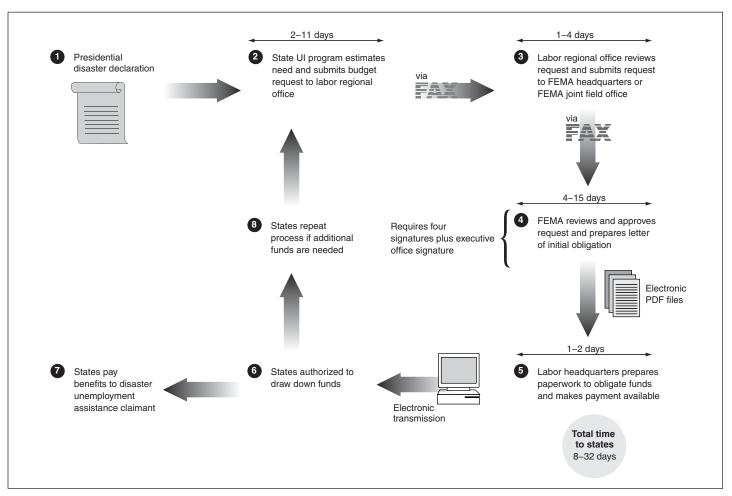
^bFederal SSI benefits are augmented by state funds in some states.

¹⁸By providing cash assistance through short-term, one-time payments, recipients do not need to meet federal work requirements or time limits on assistance that are in place for ongoing cash aid funded with other federal TANF funds.

one-time emergency program as part of their regular TANF program and others did not. For example, states such as Arkansas modified their state TANF plans to operate an emergency program. However, HHS officials said that some states may have needed approval from their state legislature, which could have prevented them from implementing an emergency program for evacuees in a timely manner. In addition, HHS officials also said that restrictions associated with the Katrina contingency funds may have discouraged states from using the funding. For example, contingency funds had to be provided directly to hurricane victims, and states were prohibited from using the funds to pay third parties such as child care providers. Given concerns about potential fraud and abuse, states may have considered it more appropriate to pay third parties for services rather than giving money to hurricane victims.

Labor provided funds to hurricane-affected states to help the UI program address increased demand, but Labor and state officials we interviewed said the payment process for DUA is time-consuming and may not cover all costs incurred during major disasters. Labor provided additional funds to hurricane-affected states that helped them repair damaged facilities, hire temporary workers, and reimburse states that helped take UI claims. Labor officials said they had some reserve administrative funding available because unemployment claims had been lower than expected before the hurricanes. However, Labor officials also said that during a normal program year, these funds would not have been available. In contrast, FEMA funds both benefits and administrative costs for DUA. Labor and some state officials we interviewed said that the DUA funding process is time-consuming. In some cases, states had to borrow state funds to continue paying benefits or withhold disaster benefits while waiting for funding. Funding requests go through various levels of approval at both Labor and FEMA—ranging from 8 to 32 days—and states may need to repeat the process multiple times because funding is provided in small increments. (See fig. 10.) In addition, FEMA does not reimburse states for the administrative costs of taking DUA claims that are denied. Labor officials said that when a large number of DUA claims are taken, states have to absorb the costs for denied claims. For example, Alabama UI officials said that about 44 percent of their DUA claims for Hurricane Katrina were denied. Labor also noted that FEMA does not reimburse states for automation of DUA claims processing or DUA-related disaster preparedness and said it hopes to work with FEMA on these issues.

Figure 10: DUA Payment Process



Source: GAO analysis of Labor information. Art Explosion (images).

Gaps in Disaster Response Remain; Efforts Under Way Hold Promise for Improving Human Service Programs' Disaster Response

Gaps remain in the areas of preventing improper payments, easing access to services, and improving disaster planning for state-administered programs, although efforts are under way that may address these areas. As program officials relaxed some program rules to better ensure that those eligible received aid, the risk of improper payments increased. Some efforts are under way to identify improper payments that occurred and whether sufficient internal controls were in place. Even though some efforts were made to ease individuals' access to aid, disaster victims still faced difficulties accessing aid from the multiple human service programs providing it, a long-standing problem even under routine conditions. In addition, federal agencies have taken steps designed to improve states planning for service delivery for the Food Stamp, UI, and DUA programs, although HHS needs more information on the planning needs of state TANF programs. In response to the White House study on hurricane response, HHS has taken initial steps to work with states and other federal agencies to explore ways to improve the delivery of human services for disaster victims. More attention to specific plans for collecting and disseminating promising practices and exploring case management approaches would strengthen this promising effort.

Programs Faced Challenges Balancing Program Integrity with Access to Services after the Hurricanes Balancing program access with preventing improper payments is a long-standing challenge states face in their daily operations that became more apparent following the hurricanes. In the wake of the hurricanes, verification rules typically in place for state-administered programs were sometimes eased to help individuals who lacked documents customarily used to establish identity or eligibility to be assisted by programs. For example, USDA allowed states to accept a signed affidavit as proof of identity from food stamp applicants who lacked identity documents and postponed verifying disaster victims' eligibility for benefits until December 2005. Alabama officials we interviewed also said they allowed TANF applicants to self-declare their eligibility. Labor waived rules to allow states to pay DUA benefits based on applicants' self-reported employment information and allowed applicants 90 days to submit supporting documents. To facilitate UI and DUA payments, Louisiana automatically gave claimants 12 weeks of benefits and suspended requirements for them

¹⁹ Individuals affected by Hurricane Katrina were not asked non-financial questions that would affect their eligibility and states' verification of individuals' eligibility, unless questionable, was postponed until December 2005. States accepting applications from evacuees were still expected to verify identity and other eligibility factors such as residency and resources when possible or when deemed questionable.

to make weekly reports to confirm their continuing eligibility.²⁰ Officials for these state-administered programs acknowledged that they focused on easing access to services to meet people's needs during the disaster while at the same time realizing that relaxing controls to provide emergency payments may have increased risks for improper payments.

Immediately following the hurricanes, it was also sometimes difficult for states to take their usual preventive measures to screen applicants to determine if they were currently participating in or had provided false information to the program to which they applied. States sometimes took special measures to determine applicants' eligibility for program assistance. For example, in Florida, food stamp program integrity officials were present at application intake sites to monitor for suspicious activity and review questionable cases. Alabama and Florida sent food stamp applications to centralized locations for electronic processing where the states' computer systems were used to identify current program participation within their respective states.²¹

States also took measures to identify ineligible individuals after making payments. When victims applied to programs in other states, program administrators for some of the states we reviewed told us they usually contacted the applicant's home state to determine if the applicant was already enrolled in the home state's program. However, because the telephone services were unavailable for prolonged periods in some areas—parts of Louisiana were without service for about 6 weeks—state officials sometimes could not use routine procedures to determine whether out-of-state evacuees were receiving food stamps or disaster food stamps in their home states. In such situations, some states used other measures to identify ineligible individuals. For example, the American Public Human Services Association asked states to send Louisiana lists of evacuees receiving food stamp benefits in their state to ensure Louisiana knew individuals were receiving food stamp benefits while out of state.

²⁰Under state law, Louisiana has the flexibility to suspend certain rules or regulations that may prevent or hinder providing necessary services to help cope with an emergency. Labor officials said that even though they understood why Louisiana provided 12 weeks of benefits and suspended weekly reporting requirements, it advised the state that taking this action created a conflict with federal Unemployment Compensation law and DUA regulations.

²¹As required by the Food Stamp Act, USDA and the states have a quality control system in place for regular food stamp payments. The act additionally requires the states to have a fraud prevention plan when operating the disaster food stamp program.

HHS regional officials in Dallas said that New Mexico and Oklahoma took the initiative to notify Louisiana when they enrolled evacuees in their TANF programs. For the UI program, Labor worked with businesses to make sure employers notified Louisiana of workers who returned to work. Following the hurricanes, Louisiana began matching its state's UI participant rolls to the National Directory of New Hires to identify individuals working in other states and therefore ineligible to receive UI benefits. As for the TANF program, in 2006 Louisiana began monitoring TANF debit card use to identify participants who resided out-of-state and were therefore no longer be eligible for TANF.

Our work and that of the programs' IG offices have highlighted programs' vulnerability to fraud when providing assistance to disaster victims. In the case of FEMA assistance, we reported that the lack of appropriate controls for confirming disaster victims' eligibility for assistance resulted in millions of dollars in questionable payments.²³ Like FEMA, making payments to disaster victims increased the programs' we reviewed risk for fraud. The SSA IG and the USDA IG found reasonable controls were in place to prevent and detect improper payments for the Social Security and SSI programs and for the Food Stamp Programs in Alabama and Florida. The USDA IG has conducted a similar review for Louisiana, Mississippi, and Texas and plans to issue its report in early 2007. The Labor IG has issued several management letters to Labor program officials to assist them in reducing potential fraud. These letters reported some potential fraud such as individuals receiving multiple UI and/or DUA benefits in Louisiana or Mississippi, while also receiving other work-related assistance from the same or another state. The HHS IG has not conducted or planned any work specifically related to TANF assistance provided hurricane victims, although it has looked more generally at improper payments under selected states' TANF programs. Under the TANF block grant, states bear the main fiscal risk of improper payments although the federal government has an interest in ensuring funds are properly spent.²⁴

²²The National Directory of New Hires is a federal-level database of information on newly hired employees nationwide.

²³GAO, Expedited Assistance for Victims of Hurricanes Katrina and Rita: FEMA's Control Weaknesses Exposed the Government to Significant Fraud and Abuse, GAO-06-655 (Washington, D.C.: June 16, 2006).

²⁴GAO, TANF and Child Care Programs; HHS Lacks Adequate Information to Assess Risk and Assist States in Managing Improper Payments, GAO-04-723 (Washington, D.C.: June 18, 2004).

Hurricanes Highlighted the Long-standing Challenge to Ease Individuals' Access to Multiple Programs Disaster victims also faced difficulty accessing needed aid from multiple programs providing assistance, another long-standing problem even under routine conditions. Our earlier work has highlighted the cumbersome process that applicants who are eligible for more than one form of aid have to go through to apply for each program. They typically visit several different program offices and repeatedly provide some of the same information for each application. The difficulty of seeking aid from multiple programs and providers can be exacerbated during disasters. For example, we previously reported that when multiple charitable organizations offered assistance to victims of the September 11 terrorists' attacks, victims faced a maze of service providers and felt that they needed help finding and accessing the available assistance.

A review of the overall federal response as well as our work pointed out some of the situations faced by those seeking aid after the hurricanes. The 2006 White House study of the federal response to Hurricane Katrina reported that some efforts to assist those in need were undermined by difficulties victims encountered in their attempts to obtain program services. For example, the report noted that the disaster recovery centers established to help victims were not always set up to take applications for all services needed or to assist victims with services they were currently receiving. Similarly, an advocacy group for low-income families that we interviewed said it was especially difficult for hurricane victims with children or without transportation to visit more than one location to apply for multiple programs.

Our previous work indicates that service delivery challenges posed by multiple providers can be mitigated if sufficient attention is paid to enhancing coordination among service providers and on easing access to aid. As we noted in our report on assistance provided after September 11, the existence of established working relationships among relevant federal programs and states—with frequent contacts and an understanding of each other's roles and responsibilities—can make a difference in performance in the chaos of a disaster. In that report, we also noted that regarding easing access to aid for those eligible, several strategies can help improve access. These include the following:

²⁵GAO, Means-Tested Programs: Determining Financial Eligibility is Cumbersome and Can Be Simplified, GAO-02-58 (Washington, D.C.: Nov. 2, 2001).

²⁶GAO, September 11: More Effective Collaboration could Enhance Charitable Organizations' Contributions in Disasters, GAO-03-259 (Washington, D.C.: Dec. 19, 2002).

- 1. a clearinghouse of available assistance can help inform victims in need of aid;
- 2. the provision of case management services can help to identify gaps in service, target aid to those most in need, and provide aid over the long term;²⁷
- 3. the adoption of a simplified, one-stop application process that could minimize applicants' burden by streamlining the process and might include questions that can help to minimize fraud and abuse; and
- 4. data sharing across programs, in addition to easing the application process, could help to reduce the risks of improper payments due to duplicate payments and reduce the costs of program administration.²⁸

While any data-sharing efforts face challenging privacy issues and inherent differences in program requirements, they hold potential for improving access for people in need as well as more efficient program administration.²⁹

Programs Are Taking Steps to Improve Disaster Preparedness, but Gaps Remain for TANF

The states we reviewed are exploring a variety of initiatives to improve disaster preparedness for the Food Stamp, UI, and DUA programs, as shown in table 7. For example, Florida officials said they plan to train UI claim takers statewide to take DUA applications as a way to increase staffing levels when needed. Also, as a way to expedite disaster food stamp processing, Alabama is developing a Web-based application form to allow clients to pre-register online and take completed forms to application processing sites. On the other hand, initiatives to develop formal disaster preparedness plans for the TANF program were not being taken by any of the states we reviewed. As discussed earlier, no federal requirements exist for TANF disaster planning at the state level.

²⁷In some human service programs, program funds may be used for case management services. Also, recent amendments to the Stafford Act allow the use of federal funds for case management under certain conditions. Pub. L No. 109-295.

²⁸GAO, Human Service Programs: Demonstration Projects Could Identify Ways to Simplify Policies and Facilitate Technology Enhancements to Reduce Administrative Costs, GAO-06-942 (Washington, D.C.: Sept. 19, 2006).

²⁹For more information on data sharing challenges, see GAO, *The Challenge of Data Sharing: Results of a GAO-Sponsored Symposium on Benefit and Loan Programs*, GAO-01-67 (Washington, D.C.: Oct. 20, 2000).

Table 7: Some of the Initiatives States We Reviewed Are Exploring to Improve Disaster Preparedness

01 1 1 1 1 1 1 1 1 1	
Strategies to facilitate preparedness	Initiatives states are exploring
Increase physical capacity	 Identifying alternative sites for providing food stamp and UI call center services
	 Installing back-up generators to ensure UI offices can provide services during power outages
Increase staffing	Training all UI program workers statewide to take DUA applications
	 Training all food stamp workers statewide to take disaster food stamp applications
Expedite application taking	Implementing Web-based UI and food stamp applications to allow online filing
Continue benefit payments and issue new benefits	Implementing a debit card systems to pay UI benefits
	 Devising alternative procedures for issuing food stamp customers debit cards and PIN numbers during disasters
Improve overall preparedness	Contracting for an independent study of state's UI disaster response

Source: GAO analysis based on information provided by states.

At the federal level, SSA headquarters administrators are taking actions to help improve disaster preparedness for Social Security and SSI program services. After responding to an emergency or disaster situation, SSA routinely solicits feedback from SSA employees involved in its disaster response to identify lessons learned. SSA uses the feedback it receives to compile lessons learned and to revise the agency's disaster strategies. For example, SSA officials we interviewed noted they sometimes needed a means to contact other government agencies outside of normal work hours. In light of the recent feedback, SSA formally compiled information for contacting key U.S. Department of the Treasury officials around the clock if events arise concerning payments to SSA customers. SSA issued a memo reminding all regions of the employee emergency 800-number and the procedures for providing employees cards that contain the number. Also, beginning in 2007, SSA plans to take additional steps to remind employees of the importance of knowing the agency's emergency contact procedures. In addition to broadly sharing information within the agency, SSA also shares its experiences with postal delivery and customers' benefit payments with the U.S. Postal Service and U.S. Department of the Treasury, respectively.

Federal officials for the Food Stamp Program are also pursuing initiatives to improve disaster preparedness for this program. USDA sponsored a national meeting that representatives from all states attended to discuss food stamp debit card issues and plans to revise the current *Disaster Food Stamp Program Handbook* to highlight some of the strategies states used for Hurricane Katrina and to clearly outline all the waiver choices available to states.

Labor is also taking steps to improve disaster preparedness for the UI program. Labor officials said that an assessment conducted after Hurricane Katrina found that most states are not adequately prepared for emergencies that exceed their processing capacity for the UI program. To help states prepare for future disasters, Labor established a new DUA coordinator position to assist state coordinators when needed and provided recommendations to FEMA to streamline the DUA funding process. In addition, Labor has contracted to document federal and state UI program administrators' lessons learned, assess state UI disaster preparedness, and draw on the disaster strategies of others such as SSA and FEMA. The contractor also plans to help Labor develop issue papers with recommendations for improving disaster preparedness. Time will tell whether these steps will lead to improved preparedness among state programs or whether additional guidance from Labor will be warranted.

HHS has taken some steps to work with states on disaster preparedness for the TANF program but does not have plans to work more systematically with all states to assess whether additional planning is needed. HHS said that officials in its Atlanta office, covering Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee, reviewed these states' overall state disaster preparedness plans, noting how widely these plans varied in the degree of detailed information included. This region took other actions, including sharing practices within the hurricane-affected region. For example, HHS regional staff held meetings in 2006 with state commissioners and program representatives for TANF and other HHS programs in Alabama, Florida, and Mississippi. HHS said it had plans to visit three additional states to discuss disaster preparedness if travel funds permit. HHS also said that TANF disaster preparedness is a state responsibility and, as we noted earlier, there are no specific federal requirements for state TANF programs to have plans in place. In addition, HHS has noted its lack of authority to regulate states. In creating the TANF block grant, Congress emphasized the importance of state flexibility, and to that end, legislation restricted HHS' regulatory authority over the states except to the extent expressly provided in the law. With states having flexibility in developing

disaster plans as well as HHS' limited role, HHS does not have any systematic information on states' preparedness nationwide for providing TANF assistance in disasters.

Federal Efforts to Improve Delivery of Human Services during Disasters Hold Promise In response to the White House study recommendations for improving human service programs response to disaster, HHS has taken steps to clarify and enhance its national role in coordinating emergency human services within the existing structure of the National Response Plan.³⁰ Human services refer to a broad array of federal programs that can provide disaster assistance to victims, including the ones we address in this report and others. The White House study contained a number of recommendations that echo our findings in this report and in our previous work related to improving service delivery. Selected study recommendations are shown in table 8.

Table 8: Selected White House Report Recommendations to HHS to Improve the Delivery of Human Services during Disasters

White House Recommendations

- Designate HHS as the single federal coordinating entity for providing human services during disasters
- Federal programs should plan and prepare for the delivery of services in a disaster environment
- Develop an inventory of human services programs of the federal government
- Develop a single, comprehensive enrollment process for all human service programs
- Identify statutory authorities to waive impediments to delivering services during an emergency and to fund administrative costs
- Develop process to assess victims' needs and process applications at one-stop centers
- HHS should coordinate with the Department of Homeland Security (DHS) to develop deployable interagency teams
- Inventory existing federal infrastructure and resources that could be utilized

Source: GAO analysis of the recommendations contained in the White House study.

In response to the White House study recommendations issued in February 2006, HHS has developed a strategy to facilitate delivery of emergency human services at multiple levels within HHS and across other

³⁰HHS' strategy is designed to better integrate the delivery of human services into the National Response Plan's Emergency Support Function 6—the delivery of mass care, housing, and human services; the coordinator for this support function is DHS.

federal programs providing human services. To oversee its efforts, HHS identified human services coordinators within the Secretary's Office of Public Health Emergency Preparedness (OPHEP) and the Administration for Children and Families (ACF), which oversees the TANF program as well as other key programs that provide aid to low-income and vulnerable individuals and families. HHS has also created an interagency human services work group to compile information on ways to improve human services programs' response to a disaster and to establish a mechanism to coordinate planning for service delivery among federal agencies.

HHS' efforts also include links to state program agencies, which are important when states have key service delivery responsibilities that determine response. At the regional level, ACF human services coordinators will work with state and federal agencies and nongovernment organizations to coordinate planning efforts to address human services needs during disasters. At the local level, ACF regional administrators will coordinate support for state agencies administering HHS programs, and to the extent possible, for other federal human service programs.

In addition, other HHS efforts are under way:

- On the basis of input on major human services needs during the Hurricane Katrina response, HHS is creating an inventory of the federal infrastructure and resources (such as databases of emergency volunteers or federally funded health centers) available to assist disaster victims as well as information on existing federal waiver authorities that can help human services programs adjust to meet disaster needs.
- For future disasters, HHS is working with states to ensure that they have a plan to use disaster recovery centers to enroll individuals in HHS programs. HHS plans to have staff on-site at disaster recovery centers to help states enroll and re-enroll disaster victims in human services programs at a single location. HHS participation at the disaster recovery center level would be in response to a state's request through FEMA and would likely entail on-site technical assistance.
- HHS solicited and received suggestions from state agencies and private businesses on the feasibility of using a debit card system as a simple and efficient means to deliver assistance to disaster victims. HHS plans to convene a panel that includes persons with technical and

programmatic expertise to evaluate the suggestions and decide the next steps, which officials said could be to pilot debit card use.

As HHS continues to develop information on options for facilitating the delivery of human services to disaster victims, HHS officials say they are considering other approaches, including case management. More specifically, HHS noted that many of its programs provide case management within each program and that its Office of Refugee Resettlement operates a case management network that could serve as a model for the use of a case management system for all federal and state programs for major disasters. However, HHS had not developed further information on this promising approach, such as a study paper, to facilitate further consideration of case management. Also, while HHS' efforts have generally focused on measures program administrators can take to deliver human services assistance to disaster victims, HHS efforts have not placed as much emphasis on collecting and sharing information with program administrators on strategies for mitigating risks for improper payments. Sharing information on how fraud occurred and on the promising practices that can be used during emergencies to reduce programs' vulnerability to fraud and abuse can help program administrators and policymakers make informed decisions about reasonable controls for emergency payments and provide enhanced oversight.

HHS' initial approach shows promise and is in keeping with strategies that are key to enhancing human services programs' response to future events, discussed earlier, such as involving states and exploring ways to ease access, such as through case management. HHS will also face hurdles due to the number of programs involved, the variation in program requirements, as well as the variation across states and localities in program policies and service delivery approaches. At the same time, HHS is well positioned to make progress in this area, particularly because of its expertise in administering human services programs, experience working with vulnerable populations typically targeted by these programs, its regional presence, and its long-standing working relationships with states.

In addition to HHS' efforts focused on human services programs, DHS has recently created an interagency task force on disaster assistance coordination, based on an executive order issued in August 2006.³¹ The task force's mission is to improve the promptness and efficiency with which disaster victims obtain access to federal disaster assistance. Its initial plan, due by March 2007, will explore several strategies, including a single and streamlined point of application for assistance; a clearinghouse that includes information on all forms and sources of disaster assistance (federal, state, local, and private sector); as well as controls to reduce improper payments. DHS has formed the interagency task force, which includes a representative of HHS, and expects to implement all elements of the plan by December 2008.

HHS officials told us that they are participating on the DHS task force and have provided some information to DHS about the steps they have taken to improve disaster response across federal programs. HHS officials said, however, that the HHS interagency taskforce last convened in August 2006 and will not reconvene until HHS has more clarification on how its efforts relate to DHS' and where coordination is needed. HHS has developed timetables for some aspects of the work it plans to do, but these time frames may change in order to support and not conflict with DHS' work.

Conclusions

The scope and destruction of Hurricanes Katrina and Rita brought widespread displacement of residents in affected states, creating extraordinary challenges for the federal basic support programs we reviewed and testing these programs' capacities to quickly and effectively respond. Despite the efforts these programs made to serve those in need, the magnitude of the challenges exposed differences in programs' disaster preparedness for the federally administered and the state-administered programs. While the role of the federal government in disaster preparedness is clear for the federally administered Social Security and SSI programs, the role of federal oversight varies for state-administered federal programs. In these programs, states play an important role in preparedness and make key decisions about program operations generally. At the same time, because of the large number of people served and the significant federal investment in these programs, the federal government has an important role to play in ensuring that these programs are taking

³¹The executive order states that it is the policy of the federal government that disaster victims eligible for financial or other assistance delivered by any department or agency of the executive branch (federal disaster assistance) are to have prompt and efficient access to federal disaster assistance, as well as information regarding assistance available from state and local government and private-sector sources.

appropriate steps to prepare nationwide and in facilitating the sharing of information across states. The steps USDA and Labor are taking should help state programs increase their preparedness to quickly expand capacity and better meet increased demand in the event of a major disaster in the future. While we acknowledge certain restrictions on HHS' ability to regulate states, HHS needs to know more about state TANF programs' preparedness to carry out its federal oversight responsibilities.

Federal agencies and states we reviewed are generally taking actions to improve preparedness of their respective programs. In addition, HHS has taken a significant step by initiating a broad effort to explore how preparedness and response can be improved across human services programs. The inherent difficulties of moving forward on issues that involve numerous federal agencies as well as states, while at the same time changing long-standing ways of doing business, call for sustained attention and leadership commensurate with the daunting challenges. Sustaining and building upon the existing momentum will not be easy but could lead to meaningful changes in the future. With appropriate focus and follow-through, these efforts could result in useful information on lessons learned and promising approaches that could be widely disseminated in the near term. In the longer term, these efforts could lead to coordinated service delivery approaches that are effective and efficient in getting available assistance to those in need, resulting in an overall improved response by human services programs in future events. This would benefit those directly affected by disasters and lead to improved use of government resources.

Recommendations for Executive Action

In recognition of the importance of HHS' effort to improve the delivery of human services in future disasters, we recommend that the Secretary of HHS or his designee take the following steps to strengthen its efforts:

- Work with DHS and its interagency work group to determine the most efficient and effective way to conduct HHS' work related to improving the provision of human services during disasters without duplicating efforts.
- Establish mechanisms for routinely collecting and disseminating
 information on promising practices for delivering human services
 during disasters. These mechanisms should help ensure that
 information can be collected from and provided to state and local
 officials directly involved in service delivery, as well as draw on the
 experiences of other federal programs. Key areas of focus should
 include:

- disaster planning,
- service delivery, and
- eligibility determination and verification procedures that mitigate risks for making improper payments during an emergency situation.
- Develop specific information on options for implementing case management services across federal assistance programs during disasters, drawing on its human services expertise and in concert with other federal agencies as appropriate.

In addition, to better ensure the disaster preparedness of the TANF program, we recommend that the Secretary of HHS, as part of its overall efforts or separately as needed, develop a systematic approach to work with all states to identify key elements of disaster planning needed for the TANF program, share this information among states, and take steps to understand the extent to which all states have these key planning elements in place, and to consider whether additional actions are warranted to better ensure disaster preparedness among state TANF programs.

Agency Comments and Our Evaluation

We provided SSA, USDA, HHS, and Labor with a draft of this report for comment. In commenting on the draft, SSA, USDA, and Labor agreed with our findings as they pertain to their programs. HHS agreed with the three recommendations related to its recent efforts to improve the delivery of human services and disagreed with our recommendation to work with states to address disaster planning for state TANF programs. We also provided DHS a copy of the draft and incorporated its technical comments as appropriate. Written comments from SSA, HHS, and Labor appear in appendixes II, III, and IV.

SSA appreciated being cited for its flexibility and efforts to perform needed activities and services in the face of many challenges posed by Hurricanes Katrina and Rita. It also echoed one of the report's themes, acknowledging the importance of easing access to services in future emergencies.

In its comments, Labor noted that it hopes to work with FEMA to address some of the funding issues for administering DUA that we identified as well as some additional administrative issues and we have added that information to the report. Labor also noted that some of the steps one of the states took to facilitate eligible individuals access to UI and DUA payments created a conflict with Federal Unemployment Compensation

law and DUA regulations for issuing payments. We have added that information to the report.

Regarding HHS' response to our recommendations, it agreed with our recommendation about working with DHS and its interagency work group to improve the delivery of human services during disasters and noted that it is already participating in these efforts. As our recommendation notes, it is also important that the HHS and DHS efforts do not duplicate each other. In addition, HHS agreed with our recommendation about establishing mechanisms for routinely collecting and disseminating promising practices for delivering human services during disasters and said it has already initiated these efforts. HHS also agreed with our recommendation on developing options for implementing case management services across federal assistance programs during disasters and noted that it will look to engage DHS and its interagency work group in collaborating on this effort.

HHS disagreed with our recommendation that it work with states on TANF disaster preparedness. HHS stated that it is more appropriate to address TANF issues as part of its comprehensive cross-program planning efforts, rather than requiring a separate initiative for TANF, singling it out as a special case, and reinforcing a "siloed approach" to delivering services. It also cited its belief that TANF disaster preparedness is an appropriate state responsibility and that there are no federal requirements for such planning, as we have already noted in the report. We agree with HHS that it is essential that its effort to improve human services during disasters look across multiple programs and not take a fragmented approach. Our recommendation did not specify the particular approach HHS should take to work with states to understand their level of preparedness for TANF. HHS can obtain this information through its cross-program effort or in other ways and we have clarified our recommendation language to reflect that. Also, we focus on TANF among HHS programs because it was the HHS program included in this report; we did not review other HHS programs. We also understand and believe that we state clearly in the report the limitations on HHS' authority to regulate states. However, we remain convinced that HHS, as part of its federal oversight responsibilities, should do more to obtain systematic information about all state TANF programs to identify whether additional steps are needed to ensure that this important income support program for low-income families is prepared for disasters. HHS also provided some additional information on steps it has taken to explore TANF preparedness with some states and we have added this information to the report.

We are sending copies of this report to the Social Security Administration; the Departments of Agriculture, Health and Human Services, Homeland Security, and Labor; appropriate congressional committees, and other interested parties. We will also make copies available to others upon request. In addition, the report will be available at no charge on GAO's Web site at http://www.gao.gov. Please contact me at (202) 512-7215 if you have any questions about this report. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Other major contributors to this report are listed in appendix V.

Barbara D. Bovbjerg

Director, Education, Workforce, and Income Security Issues

Congressional Committees

The Honorable Max Baucus Chairman The Honorable Charles E. Grassley Ranking Minority Member Committee on Finance United States Senate

The Honorable Bennie G. Thompson Chairman Committee on Homeland Security House of Representatives

The Honorable David Obey Chairman Subcommittee on Labor, Health and Human Services, Education and Related Agencies Committee on Appropriations House of Representatives

The Honorable Jim McDermott
Chairman
The Honorable Jerry Weller
Ranking Minority Member
Subcommittee on Income Security and Family
Support
Committee on Ways and Means
House of Representatives

The Honorable Michael R. McNulty Chairman The Honorable Sam Johnson Ranking Minority Member Subcommittee on Social Security Committee on Ways and Means House of Representatives

Appendix I: Objectives, Scope, and Methodology

Objectives:

Our report addresses the efforts of the Old Age, Survivors, and Disability Insurance (Social Security), Supplemental Security Income (SSI), Food Stamp, Unemployment Insurance (UI), and Temporary Assistance for Needy Families (TANF) programs to provide individuals with financial assistance in the aftermath of Hurricanes Katrina and Rita. The federal agencies that oversee these programs are the Social Security Administration (SSA)—Social Security and SSI; U.S. Department of Agriculture (USDA)—Food Stamp; U.S. Department of Labor (Labor)—UI; and U.S. Department of Health and Human Services (HHS)—TANF. The focus of our work is the disaster planning that federal and state agencies carry out specific to service delivery rather than information technologyrelated disaster planning. We designed our study to provide information on (1) challenges the hurricanes created for the programs to take applications and pay benefits; (2) measures that helped programs take applications and pay benefits, and (3) the actions programs are taking to improve future disaster responses and what else may be needed. We used a mix of approaches that included (1) reviews of related reports, federal requirements, and federal and state agency data and (2) contacts with state, federal, and private-sector officials.

We used data from SSA, USDA, and Labor to quantify the hurricanes' impact on taking applications and issuing benefit payments. To assess the reliability of those data elements, we (1) reviewed relevant documentation and (2) interviewed federal agency officials knowledgeable about the data. We determined the data to be sufficiently reliable for the purposes of this report. Additional details on our review are presented below.

We visited program offices in Baton Rouge, Lake Charles, and New Orleans, Louisiana, and in Austin, Houston, and Dallas, Texas. We also conducted interviews of officials in Alabama, Mississippi, and Florida. We conducted our work from November 2005 through December 2006 in accordance with generally accepted government auditing standards.

Literature Reviews

To gain an understanding of the challenges programs faced and to identify issues key to our work, we reviewed others' assessments of governments' and private-sector hurricane response. We used previously issued GAO reports to provide information on disaster victims' access to human service programs and programs' attention to preventing improper payments.

Review of Federal Requirements

We reviewed federal rules for funding program benefit payments and administrative costs, including (1) the Stafford Act, (2) the QI, TMA, and Abstinence Programs Extension and Hurricane Katrina Unemployment Relief Act, and the TANF Emergency Response and Recovery Act of 2005.² Based on the National Response Plan, Presidential Decision Directive 67, FEMA Federal Preparedness Circular 65, the Food Stamp Act, and USDA guidance to states, we developed information on programs' disaster-related responsibilities. These documents spell out federal requirements for programs' disaster-related responsibilities. We used the FEMA and USDA disaster planning guidance to identify key strategies for major disasters.

Contacts with States and State Advocacy Groups

We interviewed state Food Stamp Program, UI, and TANF officials responsible for program policy and administration to develop information on their states' disaster response and to obtain related documents. We visited Louisiana and Texas—states which have sustained significant damage and both sheltered the greatest number of evacuees—to conduct in-person interviews with state headquarters officials having policy or administrative responsibilities. In Louisiana we visited Baton Rouge, Lake Charles, and New Orleans to interview office managers and staff in two Food Stamp/TANF³ and two UI offices to obtain information on their experiences in providing services following the hurricanes. We additionally met with a State Disability Determination Services office

¹U. S. House of Representatives, Select Bipartisan Committee to Investigate the Preparation for and Response to Hurricane Katrina, *A Failure of Initiative*. (Washington, D.C.: Feb. 15, 2006); The White House, *The Federal Response to Hurricane Katrina: Lessons Learned*. (Washington, D.C.: Feb. 23, 2006); and Department of Homeland Security, Office of Inspector General, *A Performance Review of FEMA's Disaster Management Activities in Response to Hurricane Katrina*., OIG-06-32 (Washington, D.C.: March 2006).

²Pub. L. No. 109-91 and Pub. L. No. 109-68, respectively.

³The states we reviewed generally provided food stamps and TANF services out of a common office.

manager to obtain information on the hurricanes' effect on SSA disability workload. In Texas, we visited Austin, Dallas, and Houston to conduct similar interviews with office managers and staff in two Food Stamp/TANF offices and one UI call center.

Of the states for which major disaster declarations were made for Hurricanes Katrina and Rita, we contacted Alabama and Mississippi—the other states where individuals received federal cash disaster assistance. We conducted telephone interviews with state headquarters officials also responsible for program policy and administration to similarly develop information on their states' disaster response and to obtain documentation. Based on federal, state, and private-sector officials identifying Florida as a state employing innovative disaster strategies, we conducted telephone interviews with Florida Food Stamp, UI, and TANF program administrators to develop information on their recent experience with Hurricane Wilma and innovative disaster strategies. Our findings are limited to the states we reviewed and are not generalizable to other states.

For each state affected by Hurricanes Katrina and Rita, we also attempted to contact one organization that advocates for populations the programs serve to obtain advocates' views on programs' hurricane response and areas warranting attention. The advocacy groups we spoke with are the Center for Public Policy Priorities, Public Policy Center of Mississippi, and Southeast Louisiana Legal Services. Finally, as another effort to obtain states perspectives, we contacted by e-mail the state audit agency for each of the 50 states and the District of Columbia to inquire about any work they had ongoing or information they could provide related to our study.

Contacts with Federal Agencies and National Advocacy Groups

At the federal level, we interviewed SSA, USDA, Labor, and HHS headquarters and regional officials responsible for program policy and administration to obtain information on their disaster response and to obtain documentation. We conducted interviews with SSA, USDA, Labor, and HHS officials in headquarters locations and in regional offices for the states we visited. We additionally visited two offices in Louisiana and two offices in Texas to interview SSA office managers and staff who provided

⁴SSA contracts to have State Disability Determination Services (DDS) evaluate Social Security and SSI claimants' medical disability. DDS staff are state employees, but the federal government fully funds DDS operations. SSA is State DDS' only client, and in all areas except personnel-related issues (e.g., compensation, employee benefit, etc.) DDS staff take direction from SSA.

Appendix I: Objectives, Scope, and Methodology

Social Security and SSI program services to the public in the hurricanes' aftermath. As with the states, we conducted telephone interviews with federal regional officials that oversee the federal basic support programs in Alabama, Mississippi, and Florida. We met with HHS headquarters officials to obtain information on HHS' plans for responding to the White House's recommendations that it devise and evaluate strategies to streamline disaster victims' access to human services programs. We additionally interviewed a Department of Homeland Security (DHS) official to determine DHS' plan to implement the Executive Order requiring it to chair a task force set up to make recommendations for improving delivery of federal disaster assistance. At that the time of our work, each of the respective federal Offices of the Inspectors General (IG) were reviewing the controls programs had in place to prevent improper payments. To avoid duplicating their work, we did not assess programs' controls. However, when available, our report includes information on the IGs' findings.

We also drew on information obtained at a conference we attended sponsored by the American Public Human Services Association (APHSA) in December 2005, for human service agencies, and telephone interviews with representatives of APHSA, the Food Research and Action Center (FRAC), the National Association of State Workforce Agencies (NASWA), and the National Employment Law Project to obtain additional insights on programs' disaster response and assistance provided victims. We additionally met with APHSA officials and NASWA to obtain more details of their organizations' insights on the programs' disaster response.

Appendix II: Comments from the Social Security Administration



January 08, 2007

Ms. Barbara D. Bovbjerg
Director, Education, Workforce,
and Income Security Issues
Room 5968
U.S. Government Accountability Office
Washington, D.C. 20548

Dear Ms. Bovbjerg:

Thank you for the opportunity to review and comment on the draft report, "Hurricanes Katrina and Rita: Federal Actions Could Enhance Preparedness of Certain State Administered Federal Support Programs" (GAO-07-219). We are pleased to be cited as an agency that demonstrated flexibility to perform needed activities and services and for responding diligently in the face of many challenges presented by Hurricanes Katrina and Rita. Enclosed please find a copy of our formal comments as they relate to the report's findings and contents.

If you have any questions, please contact Ms. Candace Skurnik, Director, Audit Management and Liaison Staff, at (410) 965-4636.

Sincerely,

Jame B. Barnhart

Enclosure

SOCIAL SECURITY ADMINISTRATION BALTIMORE MD 21235-0001

Appendix II: Comments from the Social Security Administration

COMMENTS ON THE GOVERNMENT ACCOUNTABILITY OFFICE (GAO) DRAFT REPORT, "HURRICANES KATRINA AND RITA: FEDERAL ACTIONS COULD ENHANCE PREPAREDNESS OF CERTAIN STATE-ADMINISTERED FEDERAL SUPPORT PROGRAMS" (GAO-07-219)

Thank you for the opportunity to review and comment on the above subject report. We are pleased with the recognition that GAO gave to the Social Security Administration (SSA) regarding our disaster planning and service delivery efforts.

We have reviewed the report and acknowledge that in planning for future emergencies, the Federal sector must streamline the process when people are in critical need of services.

Appendix III: Comments from the Department of Health & Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Assistant Secretary for Legislation

Washington, D.C. 20201

JAN 18 2007

Ms. Barbara D. Bovbjerg Director, Workforce, and Income Security U.S. Government Accountability Office Washington, DC 20548

Dear Ms. Bovbjerg:

Enclosed are the Department's comments on the U.S. Government Accountability Office's (GAO) draft report entitled, "Hurricanes Katrina and Rita: Federal Actions Could Enhance Preparedness of Certain State-Administered Federal Support Programs" (GAO-07-219).

The Department has provided several technical comments directly to your staff.

The Department appreciates the opportunity to comment on this draft report before its publication.

Sincerely.

Wincent J. Ventimiglia
Assistant Secretary for Legislation

COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE DRAFT REPORT ENTITLED, "HURRICANES KATRINA AND RITA: FEDERAL ACTIONS COULD ENHANCE PREPAREDNESS OF CERTAIN STATE-ADMINISTERED FEDERAL SUPPORT PROGRAMS" (GAO-07-219)

The Department of Health and Human Services (HHS) appreciates the opportunity to comment on the above-referenced Government Accountability Office (GAO) draft report.

GAO Recommendations

In recognition of the importance of HHS' effort to improve the delivery of human services in future disasters, we recommend that the Secretary of HHS or his designee take the following steps to strengthen its efforts:

- Work with DHS and its interagency work group to determine the most efficient and effective way to conduct HHS's work related to improving the provision of human services during disasters without duplicating efforts.
- Establish mechanisms for routinely collecting and disseminating information on promising practices for delivering human services during disasters. These mechanisms should help ensure that information can be collected from and provided to state and local officials directly involved in service delivery, as well as draw on the experiences of other federal programs. Key areas of focus should include:
 - o disaster planning,
 - o service delivery, and
 - eligibility determination and verification procedures that mitigate risks for making improper payments during an emergency situation.
- Develop specific information on options for implementing case management services across federal assistance programs during disasters, drawing on its human services expertise and in concert with other federal agencies as appropriate.

In addition, to better ensure the disaster preparedness of the TANF program, we recommend that the Secretary of HHS develop a systematic approach to work with all states to identify key elements of disaster planning needed for the TANF program, share this information among states, and take steps to understand the extent to which all states have these key planning elements in place, and to consider whether additional actions are warranted to better ensure disaster preparedness among state TANF programs.

HHS Comments on the GAO Recommendations

HHS concurs with the recommendation that it work with DHS and its interagency work group to improve the provision of human services during disasters, and would note that HHS already fully participates in these efforts.

HHS concurs with the recommendation that it establish mechanisms for routinely collecting and disseminating information on promising practices for delivering human services during disasters. This work has already begun through the work of the ACF regional offices, and will continue.

HHS concurs with the recommendation that it develop options for implementing case management services across federal assistance programs during disasters, and will look to engage the DHS and its interagency work group in collaborating in this effort.

Lastly, HHS strongly disagrees with the suggestion that the Secretary of HHS develop a "systematic approach to work with all states to identify key elements of disaster planning needed for the TANF program" Effective disaster planning pulls a range of different State-level programs and services into a comprehensive, integrated plan to address the needs of the affected population. The TANF program has been integrated into the ACF and HHS disaster planning initiative. To single out TANF as a special case requiring its own initiative fails to acknowledge HHS' comprehensive strategy and instead reverts to a regressive "silo mentality" whereby TANF and other programs are told to "do their own thing" when we know that comprehensive cross-program planning at both the Federal and State levels is essential.

GAO Report Statements and HHS Comments – Supplementary Information to Be Considered for Inclusion in the Report

GAO made the following statements related to the Temporary Assistance for Needy Families (TANF) Program:

Disaster Preparedness

- Page 4 "HHS officials cited legislative restrictions that limit their ability to regulate states, emphasizing that TANF disaster planning is a state responsibility. However, HHS has not systematically worked with states to get information on states' TANF disaster preparedness or identify promising practices for dissemination."
- Pages 37 and 38 "On the other hand, initiatives to develop formal disaster preparedness plans for the TANF program were not being taken by any of the states we reviewed. As discussed earlier, no federal requirements exist for TANF disaster planning at the state level."
- Page 41 "At the regional level, ACF human services coordinators will work
 with state and federal agencies and non-government organizations to coordinate
 planning efforts to address human services needs during disasters. At the local
 level, ACF regional administrators will coordinate support for state agencies
 administering HHS programs, and to the extent possible, for other federal human
 service programs."

2

 Page 43 – "While we acknowledge certain restrictions on HHS' ability to regulate states, HHS needs to know more about state TANF programs' preparedness to carry out its federal oversight responsibilities."

HHS Comments on the Above Statements

First, HHS believes that TANF disaster preparedness is an appropriate State responsibility and there are no Federal requirements for such planning. However, this fact does not mean that ACF has been idle with respect to these recent disasters. During the Katrina and Rita disasters, ACF's Region IV, Atlanta Office, secured copies of all of its States' disaster preparedness plans. ACF learned that these plans are not distinctive to the TANF program and vary widely in the degree of detailed information included in the plans. Second, ACF's Region IV staff held meetings in 2006 with the State Commissioners in Alabama, Florida, and Mississippi and program representatives (e.g., TANF, Child Support, Developmental Disabilities) to discuss disaster preparedness. Further, there are plans to visit three additional States in 2007, if travel funds permit. Third, ACF Region IV staff has developed a procedural manual for personnel deployed to affected areas; the manual contains State contacts and other pertinent information together with a kit with supplies that will be provided to each person deployed. Fourth, the report should note that ACF Region IV staff shared State policies related to TANF cash assistance and nonrecurrent short-term benefits with all its States during hurricane season 2005. Also, policies and practices were shared between Regions IV and VI.

Reporting

Page 17 – "The post-hurricane legislation eliminated this funding requirement and gave all states who were assisting hurricane victims immediate access to TANF contingency funds to provide short-term, nonrecurrent payments to evacuees from Alabama, Louisiana, and Mississippi."

HHS Comment on the Above Statement

This should be rewritten as, "The post-hurricane legislation eliminated this funding requirement and gave all states that were assisting hurricane victims immediate access to TANF contingency funds to provide short-term nonrecurrent cash payments to evacuees from Alabama, Florida, Louisiana, and Mississippi."

Also on page 17 – "Because HHS did not require states to report on hurricane victims or evacuee caseloads, these numbers are not readily available. . .states are not required to provide HHS data on the numbers receiving short-term nonrecurrent payments funded by TANF funds."

Appendix III: Comments from the Department of Health & Human Services

	HHS Comment on the Above Statement
	In early September 2005, ACF asked each State to explain how it would serve hurricane
	evacuees. Specifically, States were asked if they would provide expedited benefits to
	evacuees and if States would offer employment services to these individuals. States did
	report the total number of newly approved evacuee families receiving TANF cash
	assistance or nonrecurrent short-term benefits provided in cash. Information on hurricane
	victims who were not evacuees was not collected. Initially, aggregate caseload numbers
	were reported via a conference call with all States on September 9, 2005. Thereafter, the
	data were collected three times a week through the end of October 2005.
	4
L	

Appendix IV: Comments from the U.S Department of Labor

U.S. Department of Labor

Assistant Secretary for Employment and Training Washington, D.C. 20210



JAN 17 2007

Ms. Barbara D. Bovbjerg
Director
Education, Workforce and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Bovbjerg:

Thank you for the opportunity to comment on the draft report, "Hurricanes Katrina and Rita: Federal Actions Could Enhance Preparedness of Certain State-Administered Federal Support Programs" GAO-07-219. We applaud the Government Accountability Office's (GAO) efforts to document the challenges the hurricanes created for the Federal-State Unemployment Insurance (UI) system, including the handling of the administrative cost associated with UI and Disaster Unemployment Assistance (DUA) claims, the factors that helped or hindered the programs' efforts, and suggested actions to improve future disaster response.

As the report notes, the Department has documented the lessons learned from the aftermath of Hurricanes Katrina and Rita and assessed state UI disaster preparedness. While not required by Federal law, the Department will be providing states with guidance on developing effective disaster preparedness plans. However, since the UI and DUA programs are state-administered, it is ultimately each state's responsibility to develop adequate plans consistent with state and Federal law to respond to massive unemployment events.

We note that on page 31, the report states, "FEMA funds both benefits and administrative costs for DUA." While this is accurate, we note that no DUA funds have been provided for automation of DUA claims processing or DUA-related disaster preparedness, and states are prohibited by law from using their UI administrative grants for these costs. We are hoping to work with FEMA to address this problem as well as to reduce the time required for approval of DUA benefit funds.

Appendix IV: Comments from the U.S Department of Labor

2

In addition, we note that on page 33, the report states that "To facilitate UI and DUA payments, Louisiana automatically gave claimants 12 weeks of benefits and suspended requirements for them to make weekly reports to confirm their eligibility." While the Department understood why Louisiana took such an unprecedented action, we also advised that doing so created a conflict with Federal Unemployment Compensation (UC) law and DUA regulations because issuing payment before a claimant's certification has been received is not a "method of administration" for determining if payment of UC is "due" as provided under Section 303(a) (1) of the Social Security Act and 20 CFR 625.8(f).

Thank you for the opportunity to comment on this report. If you have any questions, please do not hesitate to call me at 202-693-2700.

Sincerely,

Emily Stover DeRocco

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Barbara D. Bovbjerg (202) 512-7215

Acknowledgments

In addition to the contact named above, Gale Harris, Assistant Director; Laura Heald, Analyst-in-Charge; Jacquelyn Stewart; Maura Hardy; and Amanda Mackison made significant contributions to this report. In addition, Cheri Harrington, Olivia Herman, and Bill Keller provided assistance in data collection; Tovah Rom provided writing assistance, Jessica Botsford provided legal assistance, Mimi Nguyen assisted with the graphics, and Monika Gomez and Lise Levie provided technical assistance.

Related GAO Products

Hurricanes Katrina and Rita: Unprecedented Challenges Exposed the Individuals and Households Program to Fraud and Abuse; Actions Needed to Reduce Such Problems in Future. GAO-06-1013. Washington, D.C.: September 27, 2006.

Catastrophic Disasters: Enhanced Leadership, Capabilities, and Accountability Controls Will Improve the Effectiveness of the Nation's Preparedness, Response, and Recovery System. GAO-06-618. Washington, D.C.: September 6, 2006.

Child Welfare: Federal Action Needed to Ensure States Have Plans to Safeguard Children in the Child Welfare System Displaced by Disasters. GAO-06-944. Washington, D.C.: July 28, 2006.

Expedited Assistance for Victims of Hurricanes Katrina and Rita: FEMA's Control Weaknesses Exposed the Government to Significant Fraud and Abuse. GAO-06-655. Washington, D.C.: June 16, 2006.

Hurricanes Katrina and Rita: Coordination between FEMA and the Red Cross Should Be Improved for the 2006 Hurricane Season. GAO-06-712. Washington, D.C.: June 8, 2006.

Improper Payments: Federal and State Coordination Needed to Report National Improper Payment Estimates on Federal Programs. GAO-06-347. Washington, D.C.: April 14, 2006.

Welfare Reform: Better Information Needed to Understand Trends in States' Uses of the TANF Block Grant. GAO-06-414. Washington, D.C.: March 3, 2006.

TANF and Child Care Programs: HHS Lacks Adequate Information to Assess Risk and Assist States in Managing Improper Payments. GAO-04-723. Washington, D.C.: June 18, 2004.

Means-Tested Programs: Determining Financial Eligibility Is Cumbersome and Can Be Simplified. GAO-02-58. Washington, D.C.: November 2, 2001.

September 11: More Effective Collaboration Could Enhance Charitable Organizations' Contributions in Disaster. GAO-03-259. Washington, D.C.: December 19, 2002.

Related GAO Products

Public Assistance: PARIS Project Can Help States Reduce Improper Benefit Payments. GAO-01-935. Washington, D.C.: September 6, 2001.

Benefit and Loan Programs: Improved Data Sharing Could Enhance Program Integrity. HEHS-00-119. Washington, D.C.: September 13, 2000.

Welfare Reform: Better Information Needed to Understand Trends in States' Uses of the TANF Block Grant. GAO-06-114. Washington, D.C.: March 3, 2006.

GAO's Mission	The Government Accountability Office, the audit, evaluation and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.
Obtaining Copies of GAO Reports and Testimony	The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's Web site (www.gao.gov). Each weekday, GAO posts newly released reports, testimony, and correspondence on its Web site. To have GAO e-mail you a list of newly posted products every afternoon, go to www.gao.gov and select "Subscribe to Updates."
Order by Mail or Phone	The first copy of each printed report is free. Additional copies are \$2 each. A check or money order should be made out to the Superintendent of Documents. GAO also accepts VISA and Mastercard. Orders for 100 or more copies mailed to a single address are discounted 25 percent. Orders should be sent to:
	U.S. Government Accountability Office 441 G Street NW, Room LM Washington, D.C. 20548
	To order by Phone: Voice: (202) 512-6000 TDD: (202) 512-2537 Fax: (202) 512-6061
To Report Fraud,	Contact:
Waste, and Abuse in Federal Programs	Web site: www.gao.gov/fraudnet/fraudnet.htm E-mail: fraudnet@gao.gov Automated answering system: (800) 424-5454 or (202) 512-7470
Congressional Relations	Gloria Jarmon, Managing Director, JarmonG@gao.gov (202) 512-4400 U.S. Government Accountability Office, 441 G Street NW, Room 7125 Washington, D.C. 20548
Public Affairs	Paul Anderson, Managing Director, AndersonP1@gao.gov (202) 512-4800 U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, D.C. 20548