



DISASTER CONTRACTING Opportunities Exist for FEMA to Improve Oversight

Report to Congressional Requesters

February 2025

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GAO Highlights

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Highlights of [GAO-25-107136](#), a report to congressional requesters
February 2025

Disaster contracting

Opportunities Exist for FEMA to Improve Oversight

Why GAO Did This Study

FEMA obligates billions of dollars annually on contracts to respond to natural disasters. These include contracts for providing temporary housing to those affected by disasters.

GAO was asked to review FEMA's use and oversight of its disaster contracts. This report examines (1) how and to what extent FEMA used contracts to support its response and recovery efforts from fiscal years 2018 through 2023; (2) steps FEMA took to provide oversight of contractor performance; and (3) the extent to which FEMA identified contract oversight staffing needs, among others.

GAO analyzed contracting data on FEMA's obligations. GAO selected a nongeneralizable sample of 15 contracts and orders across three disasters. At the time of selection, 12 selected contracts accounted for 42 percent of total contract obligations across the three disasters. GAO subsequently selected three additional contracts to review ongoing oversight activities. GAO also reviewed training and staffing documents, conducted site visits to observe contract performance and oversight activities, and interviewed agency officials.

What GAO Recommends

GAO is making seven recommendations, including that FEMA reiterates to oversight staff the importance of documenting contractor performance and takes steps to ensure those performing oversight duties have proper certification and authorization; and that DHS incorporates potential risks into its staffing model. DHS and FEMA concurred with the recommendations.

What GAO Found

U.S. states and territories have experienced several devastating and costly natural disasters requiring aid from the Federal Emergency Management Agency (FEMA). From fiscal years 2018 through 2023, FEMA obligated more than \$10 billion on contracts—mostly for services, such as housing inspections—to conduct response and recovery efforts. Three disasters in that time frame include the Kentucky floods, Hurricane Ian, and the Maui wildfires. Contract obligations for these disasters totaled more than \$1 billion.

Maui Wildfires Damage



Source: Damage at site of Maui wildfires; GAO (photo). | GAO-25-107136

GAO reviewed 15 contracts from the three disasters and found that FEMA took oversight steps, such as assessing contractor reports of work performed and conducting site inspections. However, FEMA did not always document oversight activities or details of contractor performance, such as whether a contractor performed work within the time frame specified in the contract. Without this documentation, FEMA and others may not know whether FEMA received the level and quality of services or goods that it purchased.

Additionally, some FEMA staff performed oversight without the required authorization or certification, which is not in accordance with Department of Homeland Security (DHS) guidance or FEMA policy. For example, some FEMA housing specialists conducted activities like filling out contractor assessment forms without having received certification or authorization for performing such tasks. Without FEMA identifying who across the agency is currently performing contract oversight duties and ensuring they are appropriately certified and authorized, there is increased risk that FEMA has unqualified staff performing contract oversight. These staff may not properly assess the goods and services received in accordance with the contract.

FEMA uses DHS's staffing model to identify certain contract oversight staff needs. This model, however, does not fully adhere to staffing model key principles. For instance, the model does not incorporate risk factors, such as attrition. Doing so would better position FEMA to retain the staff it needs.

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Abbreviations

COR	contracting officer's representative
DHS	Department of Homeland Security
FAC-C (Professional)	Federal Acquisition Certification in Contracting
FAC-COR	Federal Acquisition Certification for Contracting Officer's Representatives
FAR	Federal Acquisition Regulation
FEMA	Federal Emergency Management Agency
FPDS	Federal Procurement Data System
OCPO	Office of the Chief Procurement Officer
OMB	Office of Management and Budget

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February 6, 2025

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

The Honorable Timothy M. Kennedy
Ranking Member
Subcommittee on Emergency Management and Technology
Committee on Homeland Security
House of Representatives
The Honorable Shri Thanedar
Ranking Member
Subcommittee on Oversight, Investigations, and Accountability
Committee on Homeland Security
House of Representatives

The Honorable Troy A. Carter, Sr.
House of Representatives

The Honorable Glenn F. Ivey
House of Representatives

The Federal Emergency Management Agency (FEMA) is the federal agency with primary responsibility for coordinating disaster response and recovery activities. FEMA provides direct support to disaster response and recovery efforts and frequently contracts with the private sector to obtain goods and services to carry out its operations. Use of contracts, including advance contracts that are awarded prior to a disaster, can play a key role in the aftermath of a disaster. For example, we previously reported that FEMA obligated over \$3.1 billion on contracts to support response and recovery efforts for the 2017 hurricane season.¹

The contracting officer has the authority to enter into, administer, or terminate contracts, and to delegate certain oversight activities to a contracting officer's representative (COR), according to federal acquisition regulations and agency policy. These oversight activities can include conducting site inspections and reviewing contractor-produced documentation. After a contract is awarded, effective contract management and oversight are essential to ensuring the government receives the goods and services for which it has contracted. To effectively manage its contracts, FEMA needs a sufficient and properly trained contracting workforce. We and

¹GAO, *2017 Disaster Contracting: Observations on Federal Contracting for Response and Recovery Efforts*, [GAO-18-335](#) (Washington, D.C.: Feb. 28, 2018).

the Department of Homeland Security's (DHS) Office of the Inspector General previously identified acquisition workforce and contract oversight challenges at FEMA.²

You asked us to assess FEMA's use and oversight of its disaster contracts. This report examines (1) how and to what extent FEMA used contracts related to natural disasters to support its response and recovery efforts from fiscal years 2018 through 2023; (2) the steps FEMA took to provide oversight of contractor performance on selected contracts and any challenges encountered; and (3) the extent to which FEMA identified and monitored contract oversight training and staffing needs.

To assess how and to what extent FEMA used contracts related to natural disasters to support its response and recovery efforts from fiscal years 2018 through 2023 (the most recent year of data available during our review), we merged data from the Federal Procurement Data System (FPDS) and FEMA's contracting writing system, known as the Procurement Request Information System Management. We analyzed the data to identify characteristics of disaster and emergency contracts such as total obligations, contract type, and obligations by product or service code. For the purposes of this review, we excluded FEMA's COVID-19-related contract obligations.³ To assess the reliability of the FPDS and Procurement Request Information System Management data, we reviewed FPDS and FEMA documentation, interviewed agency officials, conducted electronic data testing to look for obvious errors or outliers, and compared documentation from contracts and orders we selected for review to FPDS data. Based on the steps we took, we determined that the FPDS data and the Procurement Request Information System Management data were sufficiently reliable for the purposes of our report.

To assess the steps FEMA took to provide oversight of contractor performance on selected contracts and any challenges encountered, we selected a nongeneralizable sample of 15 contracts and orders across three disasters—Hurricane Ian, the 2022 Kentucky floods, and the 2023 Maui wildfires.⁴ Our disaster selection factors included selecting recent disasters (fiscal years 2022 and 2023) and those with high contract obligations; and obtaining a mix of natural disaster types, such as a hurricane, flood, and fire. Our contract and order selection criteria included selecting those with the highest obligations and with at least 6 months of contractor performance, to allow sufficient time for contract oversight activities. Hereafter, we refer to these

²For example, see GAO, *FEMA Disaster Workforce: Actions Needed to Improve Hiring Data and Address Staffing Gaps*, [GAO-23-105663](#) (Washington, D.C.: May 2, 2023); and *2017 Disaster Contracting: Action Needed to Better Ensure More Effective Use and Management of Advance Contracts*, [GAO-19-93](#) (Washington, D.C.: Dec. 6, 2018). Department of Homeland Security, Office of Inspector General, *FEMA Did Not Properly Award and Oversee the Transitional Sheltering Assistance Contract*, [OIG-20-58](#) (Washington, D.C.: Aug. 5, 2020).

³FEMA obligated almost \$3 billion on contracts from fiscal years 2020 through 2023 in response to the COVID-19 pandemic. We excluded these obligations because they were not for a weather-related disaster, and the large amount of obligations would otherwise skew the data analysis.

⁴An order refers to an order of supplies (delivery order) or services (task order) against an established contract or with government sources. See Federal Acquisition Regulation 2.101. In July 2022, eastern Kentucky suffered severe flooding, which resulted in 44 deaths and almost 9,000 damaged or destroyed homes. Hurricane Ian—the third costliest hurricane to strike the United States—made landfall in late September 2022 with maximum sustained winds of 150 miles per hour, resulting in 149 deaths and structural damage to homes, vehicles, and businesses. In August 2023, the Maui wildfires—the worst natural disaster in Hawaii's history—killed more than 100 people and destroyed more than 2,200 structures.

contracts and orders collectively as contracts, unless otherwise specified.⁵ See appendix I for more details on the selected contracts.

For each selected contract, we identified and analyzed contract oversight documentation, requirements, and performance standards. We considered a contract as incorporating performance-based acquisition methods if it included quantifiable performance metrics, thresholds, and the method of surveillance to measure contractor performance. We interviewed FEMA contracting officers and CORs to understand the oversight steps they took and to identify oversight challenges. We compared the oversight steps in the contract to related documentation; the Federal Acquisition Regulation (FAR); DHS and FEMA acquisition policies related to assessing contractors' performance; and standards for internal control in the federal government.⁶ We determined that the information and communication and monitoring components of internal controls were significant to this objective. Additionally, we determined that the principles that management should use and internally communicate quality information to achieve objectives, and establish and operate monitoring activities to monitor the internal control system and evaluate the results, were also significant. We conducted site visits in April 2024 to areas in Florida damaged by Hurricane Ian and in May 2024 to the site of the Maui wildfires to observe contract performance and oversight activities.⁷

To assess the extent to which FEMA identified and monitored contract oversight training needs, we analyzed contract oversight responsibilities outlined in DHS and FEMA policy and guidance and compared them against required contract oversight training materials. We also reviewed the FAR and Office of Management and Budget (OMB) guidance on Federal Acquisition Certification in Contracting (FAC-C (Professional)) and Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR) requirements. To assess the extent to which FEMA identified its contract oversight staffing needs, we analyzed DHS's staffing model—which FEMA uses—and compared the model against selected staffing model key principles we identified in prior work and standards for internal control.⁸ We determined that the control activities component of internal controls was significant to this objective, along with the principle that management should design control activities to achieve objectives and respond to risks. We interviewed DHS officials responsible for maintaining and validating the staffing model and FEMA officials that used it.⁹ We analyzed data on the number of FEMA

⁵The contracts we selected for review include definitive contracts, calls on blanket purchase agreements, and task orders on indefinite-delivery indefinite-quantity contracts. FPDS categorizes definitive contracts as those that have a defined scope of work that do not allow for individual orders under them. Blanket purchase agreements are agreements between government agencies and qualified vendors with pre-negotiated terms and conditions, including prices, in place for future purchases and are a simplified method of fulfilling repetitive needs for supplies and services. Blanket purchase agreements are not contracts. FAR 13.303. Indefinite-delivery indefinite-quantity contracts are awarded to one or more contractors when, above a specified minimum, the exact quantities and timing for products or services during the contract period are not known at the time of award. FAR 16.504.

⁶GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁷We did not conduct a site visit to Kentucky as the selected contracts' periods of performance had ended or were ending soon, and it was not possible to observe contract performance or oversight activities.

⁸We developed these key principles for staffing models and reported them in prior work. See GAO, *U.S. Citizenship and Immigration Services: Additional Actions Needed to Manage Fraud Risks*, [GAO-22-105328](#) (Washington, D.C.: Sept. 19, 2022); *U.S. Citizenship and Immigration Services: Actions Needed to Address Pending Caseload*, [GAO-21-529](#) (Washington, D.C.: Aug. 18, 2021); and *Federal Protective Service: Enhancements to Performance Measures and Data Quality Processes Could Improve Human Capital Planning*, [GAO-16-384](#) (Washington, D.C.: Mar. 24, 2016). For internal controls, see [GAO-14-704G](#).

⁹DHS's Office of the Chief Financial Officer performs independent verification, validation, and accreditation of models and simulations across DHS. In January 2024, DHS's Office of the Chief Financial Officer verified, validated, and accredited the DHS contracting job series staffing model.

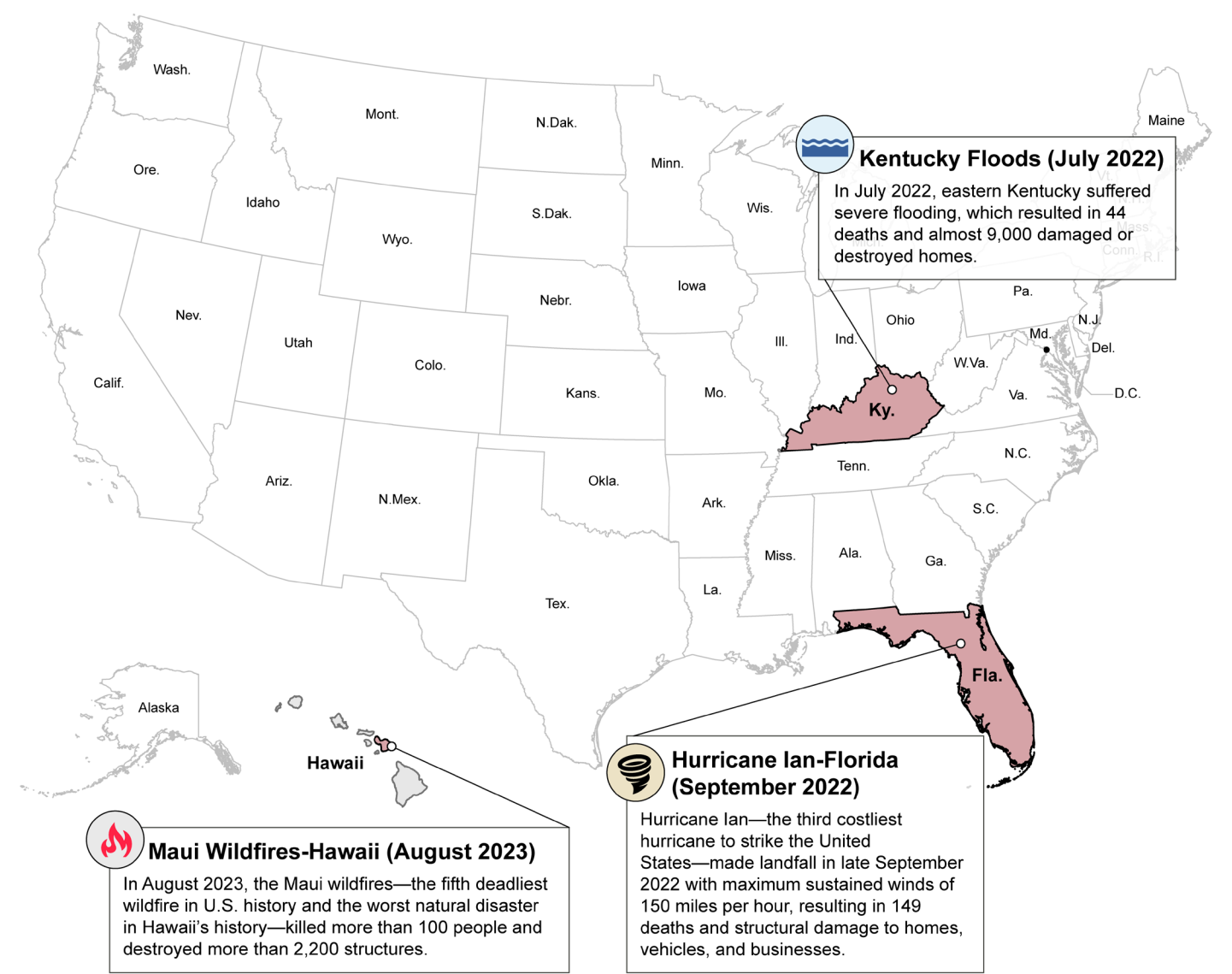
contracting officers and CORs and the extent to which these staff had the proper certifications. To assess the reliability of the data, we compared the data to the CORs' certification documentation associated with our sample of selected contracts. We also interviewed FEMA officials that used the data to discuss any potential data reliability issues. We determined that the contracting officer and COR certification data were sufficiently reliable for the purposes of this report. See appendix I for additional details about our objectives, scope, and methodology.

We conducted this performance audit from October 2023 to February 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

The United States suffered several devastating natural disasters from 2018 through 2023, including hurricanes, floods, and wildfires. Three recent disasters during that time frame that resulted in significant damage included the Kentucky floods and Hurricane Ian in 2022 and the Maui wildfires in 2023. See figure 1 for a timeline and key information about these disasters.

Figure 1: Timeline and Key Information Related to Selected Disasters, 2022-2023



Source: GAO analysis of Federal Emergency Management Agency (FEMA) and other federal and state government documentation; Sergei Sizkov/adobestock.com (icons); and Map Resources.
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When disasters hit, state and local entities are typically responsible for carrying out disaster response efforts. The Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, establishes a process by which the Governor of the affected state or the Chief Executive of an affected Indian tribal government may

request a presidential major disaster declaration to obtain federal assistance.¹⁰ According to the DHS National Response Framework—a guide to how the federal government, states and localities, and other public and private sector institutions should respond to disasters and emergencies—the Secretary of Homeland Security is responsible for ensuring that federal preparedness actions are coordinated to prevent gaps in the federal government’s efforts to respond to all major disasters, among other emergencies.¹¹ The framework also designates FEMA as the lead agency to coordinate the federal disaster response efforts across 30 federal agencies. The Administrator of FEMA serves as the principal advisor to the President, the Secretary of Homeland Security, and the National Security Council regarding emergency management.

FEMA’s Contracting Workforce

In FEMA’s role as the lead coordinator of federal disaster response efforts across federal agencies, its contracting workforce plays a key role in awarding and overseeing contracts. FEMA’s contracting efforts are supported by its contracting workforce within FEMA’s Office of the Chief Component Procurement Officer, located in FEMA headquarters and in its 10 regional offices. The office provides program offices with acquisition support and can allocate contracting resources as needed throughout the regional offices. The office is led by FEMA’s Chief Component Procurement Officer, who oversees FEMA’s contracting officers as the Head of the Contracting Activity.

Contract oversight is largely the responsibility of the contracting officer and the COR appointed to a particular contract. At DHS, contracting officers may also appoint technical monitors to assist in contract oversight. Contracting officers, CORs, and technical monitors all serve important roles in contract oversight, as detailed below.

- **Contracting officers.** The contracting officer has authority to enter into, administer, and terminate contracts and make related determinations. The contracting officer also has the overall responsibility for ensuring the contractor complies with the terms of the contract. As part of their responsibilities, the contracting officer may delegate certain oversight responsibilities to a COR, such as reviewing contractor invoices.
- **CORs.** CORs assist in the monitoring and administration of a contract. They are often selected based on their knowledge of the program, and they are required, according to the FAR, to be certified.¹² CORs must complete a variety of classes to achieve this certification, including classes on how to conduct contract oversight.¹³ Per DHS policy, a contracting officer must appoint a COR to every contract award that is above

¹⁰42 U.S.C. § 5170. The Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 93-288 (1974), as amended, permits the President to declare a major disaster after a state’s governor or chief executive of an affected Indian tribal government—a governing body of an Indian or Alaska Native tribe, band, nation, pueblo, village, or community that is federally recognized—finds that the emergency or major disaster is of such a severity and magnitude that responding to it is beyond the State, Indian tribal government, and local government’s capabilities. 42 U.S.C. §§ 5170(a)-(b), 5122(6). Governor means the chief executive of any state, which includes, among others, Puerto Rico and the U.S. Virgin Islands. 42 U.S.C. § 5122 (4) and (5).

¹¹Department of Homeland Security, *National Response Framework*, 4th ed. (Oct. 28, 2019).

¹²FAR 1.602-2(d)(2).

¹³The Office of Federal Procurement Policy and the Federal Acquisition Institute have issued policies and resources outlining training requirements that CORs must complete to achieve their certification.

the simplified acquisition threshold, which is generally \$250,000.¹⁴ CORs do not have the authority to make any commitments or changes that affect price, quality, quantity, delivery, or other terms and conditions of the contract.

- **Technical monitors.** According to DHS and FEMA policy, in addition to a COR, a contracting officer may appoint a technical monitor. Technical monitors can perform contract oversight duties similar to those of a COR, including monitoring, surveillance, and quality assurance. DHS and FEMA policy state that technical monitors must be certified at the same level as the COR on a given contract, and contracting officers must also issue appointment letters for all technical monitors.

Advance and Post-Disaster Contracts

The Post-Katrina Emergency Management Reform Act of 2006 required FEMA to establish advance contracts—those that are established prior to disasters and that are typically needed to quickly provide life-sustaining goods and services in the immediate aftermath of disasters.¹⁵ According to FEMA's 2007 advance contracting strategy, the agency should maximize the use of advance contracts to the extent they are practical and cost-effective, which should help preclude the need to procure goods and services under unusual and compelling urgency. As of fiscal year 2024, FEMA has 109 advance contracts in place covering goods and services such as tarps, food and water, information technology and communication support, and housing and lodging assistance. In addition to advance contracts, FEMA uses post-disaster contracts, which are those that are awarded after a disaster occurs.¹⁶

Performance-Based Acquisition and Quality Assurance Surveillance Plans

A key mechanism for oversight of service contracts is performance-based acquisition, which relies on measurable performance standards and a method of assessing a contractor's performance against those standards.¹⁷ Measurable performance standards and financial incentives are meant to encourage competitors to develop and implement innovative and cost-effective methods of performing the work. The FAR directs federal agencies to use performance-based acquisition to the maximum extent practicable when acquiring certain services.¹⁸ The FAR Council described performance-based contracts as defining agency needs in terms of the desired outcome rather than the manner by which the contractor completes the work. The acquisition's requirements and desired outcomes should be identified and the contract should include

¹⁴When the head of the agency determines acquisitions of supplies or services are to support response to an emergency or major disaster, the simplified acquisition threshold is \$800,000 for any contract to be awarded and performed, or purchase to be made, inside the United States. FAR 2.101.

¹⁵Pub. L. No. 109-295, § 691 (2006) (codified at 6 U.S.C. § 791). For example, advance contracts may be indefinite delivery contracts or blanket purchase agreements, including those under the General Services Administration schedules, as well as interagency agreements or interagency reimbursable work agreements. Orders on indefinite-delivery indefinite-quantity contracts or calls on blanket purchase agreements can be placed in response to a disaster.

¹⁶FEMA and other agencies may also award new contracts to support disaster response efforts following a disaster declaration. In our prior work, FEMA officials told us that these post-disaster contract awards may be required, for example, if advance contracts reach their ceilings, or if goods and services that are not suitable for advance contracts are needed. [GAO-19-93](#).

¹⁷FAR 37.102(a) and FAR 37.601.

¹⁸FAR 37.000 and FAR 37.601.

measurable performance standards that enable the government to determine whether the contractor has met the performance objectives.¹⁹

The Homeland Security Acquisition Manual requires the use of a quality assurance surveillance plan when the government describes the required results from a contract rather than outlining how the work is to be accomplished (referred to as a performance work statement). Quality assurance surveillance plans are meant to specify all of the work that requires surveillance and the method of surveillance the government will use. These plans often include a matrix outlining the performance objectives and metrics the contractor is required to meet and any enforcement penalties the government can levy if the contractor does not satisfy the performance requirements. As such, the elements included in the quality assurance surveillance plans are key to providing the government with the tools to conduct oversight for performance-based service contracts.

Prior GAO Reports on FEMA Contracting

Over the past decade, we have reported on FEMA's oversight of disaster contracts and found gaps that could impede the agency's ability to monitor contractor performance. For example, in January 2014, we found that FEMA did not develop quality assurance surveillance plans and did not complete annual contractor performance assessments for some contracts.²⁰ We recommended that FEMA determine the extent to which quality assurance surveillance plans were not developed for its contracts, determine the reasons why, and develop additional actions to ensure that quality assurance surveillance plans are developed for future awards. We made a similar recommendation to FEMA to ensure that it had complete and timely information about past contractor performance. FEMA concurred and addressed these recommendations by reviewing its contracts to determine the extent to which these issues were prevalent, and taking action to ensure that it followed these oversight steps, such as developing a best practices guide for its CORs.²¹

In September 2015, we reported that FEMA did not have a sufficient process in place to prioritize its disaster workload and cohesively manage its contracting officers.²² As a result, we issued eight recommendations to FEMA, all of which the agency concurred with. FEMA addressed seven of these recommendations.²³ For example, FEMA updated its standard operating procedures to address how contracting staff prioritize workloads prior to being deployed to a disaster.

¹⁹69 Fed. Reg. 43712 (July 21, 2004).

²⁰GAO, *National Flood Insurance Program: Progress Made on Contract Management but Monitoring and Reporting Could Be Improved*, [GAO-14-160](#) (Washington, D.C.: Jan. 15, 2014).

²¹In response to our recommendation, FEMA provided us with copies of the quality assurance surveillance plans for each of the contracts it administered under the National Flood Insurance Program, thereby demonstrating that all of those contracts had a quality assurance surveillance plan. In addition, FEMA provided us with a copy of the Risk Insurance Division's "Best Practices for Contracting Officer's Representatives," published in December 2014. This document was intended to align the performance of COR duties with the achievement of the Risk Insurance Division's goals and objectives. It addressed our concern about why a quality assurance surveillance plan was not developed for the contract we selected for our January 2014 report, since the document reinforces basic contract management requirements that were not previously fully implemented.

²²GAO, *Disaster Contracting: FEMA Needs to Cohesively Manage Its Workforce and Fully Address Post-Katrina Reforms*, [GAO-15-783](#) (Washington, D.C.: Sept. 29, 2015).

²³FEMA did not implement one recommendation related to improving coordination. We closed that recommendation as not implemented.

We have also reported on FEMA's workforce, including its contracting workforce. For example, in May 2023, we reported that FEMA had an overall 35 percent staffing gap across different positions within the agency.²⁴ The contracting staff had a lower staffing gap (15 percent) than some of the other positions. We made three recommendations to FEMA, all of which the agency concurred with and addressed. For example, FEMA took steps to discuss and develop documented plans evaluating hiring efforts to address staffing gaps in the agency's disaster workforce.

FEMA Obligated Billions of Dollars from 2018 through 2023 to Respond to Natural Disasters

Based on our analysis of FPDS and FEMA procurement system data, FEMA obligated billions of dollars from fiscal years 2018 through 2023, primarily for services to respond to natural disasters. About three quarters of these obligations were used to address damage due to hurricanes (rather than other types of disasters). About 83 percent of these obligations were used to procure services, such as disaster planning support and installation of plumbing, heating, and waste disposal systems. We found that FEMA's competition rate—the percentage of total disaster-related obligations reported for competitive contracts—was between 78 and 100 percent for the period covered by our analysis.²⁵ FEMA increasingly relied on fixed-price contracts on which the government pays a fixed, or in appropriate cases, an adjustable price, for a good or service.²⁶ The proportion of FEMA's obligations on contracts awarded to small businesses varied over this time, ultimately representing a higher proportion of total obligations in fiscal year 2023 than in fiscal year 2018.

FEMA Obligated More Than \$10 Billion on Contracts Related to Natural Disasters

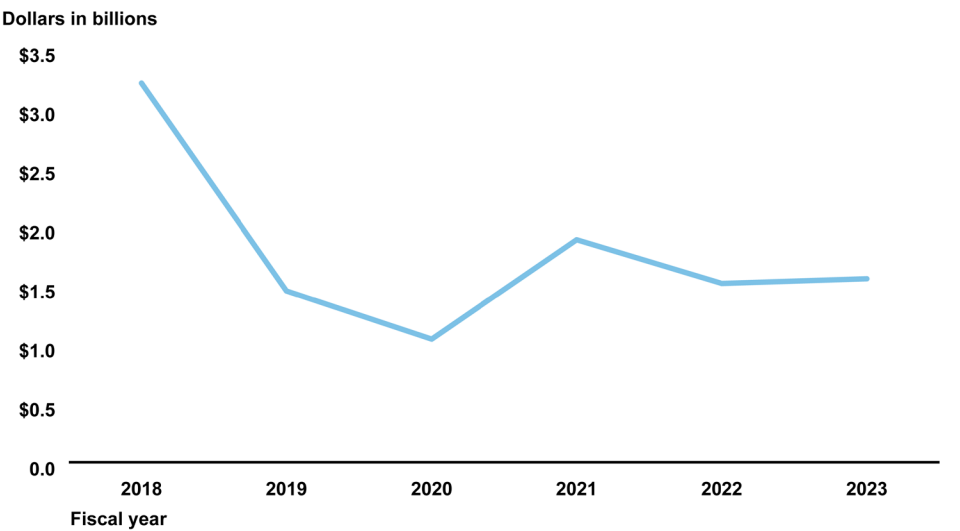
Based on our analysis of FPDS and FEMA procurement system data, FEMA obligated about \$1.7 billion annually on contracts related to natural disasters, on average, from fiscal years 2018 through 2023, for a total of more than \$10 billion over the 6-year period. See figure 2 for details on FEMA's annual obligations during this time frame.

²⁴[GAO-23-105663](#).

²⁵Competitive contracts included contracts and orders coded in FPDS as "full and open competition," "full and open after exclusion of sources," and "competed under simplified acquisition procedures" as well as orders coded as "subject to fair opportunity" and as "fair opportunity given," and "competitive set aside." Noncompetitive contracts included contracts and orders coded in FPDS as "not competed," "not available for competition," and "not competed under simplified acquisition procedures," as well as orders coded as an exception to "subject to fair opportunity," including "urgency," "only one source," "minimum guarantee," "follow-on action following competitive initial action," "other statutory authority," and "sole source."

²⁶We included firm-fixed-price, fixed-price with award fee, fixed-price incentive, and fixed-price with economic price adjustment contracts when reporting on fixed-price contract obligations in this report.

Figure 2: FEMA’s Annual Obligations on Contracts Related to Natural Disasters, Fiscal Years 2018–2023



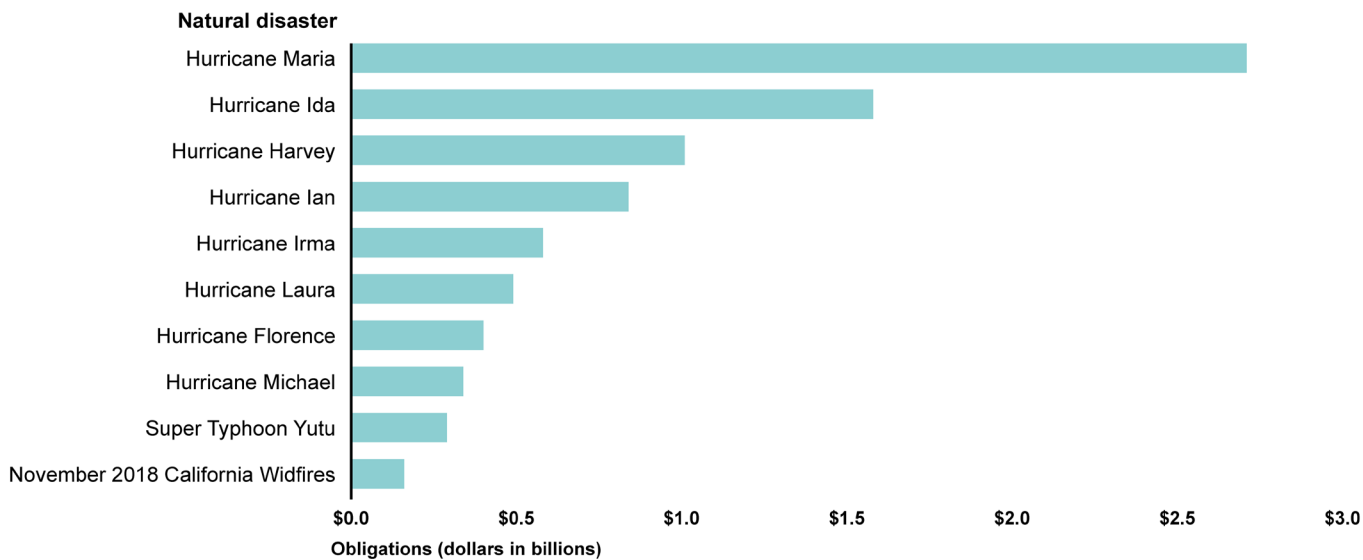
Source: GAO analysis of Federal Procurement Data System and Federal Emergency Management Agency (FEMA) procurement data.
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Fiscal Year	Obligations
2018	\$3,209,180,178.53
2019	\$1,449,637,179.00
2020	\$1,041,299,592.01
2021	\$1,484,360,343.45
2022	\$1,514,229,153.62
2023	\$1,554,391,769.15

Note: For the purposes of this review, GAO excluded COVID-19-related obligations.

Most of the obligations identified above were for hurricane relief, with Hurricane Maria—which made landfall on Puerto Rico and the Virgin Islands in 2017—accounting for \$2.7 billion of the total. Three of the top five disasters, as measured by total contract obligations from fiscal years 2018 through 2023, occurred in 2017. These obligations demonstrate the ongoing response and recovery needs for catastrophic disasters years after these disasters occur. See figure 3 for details on the 10 natural disasters with the highest FEMA obligations on contracts (\$8.4 billion across all 10 disasters) during this time frame.

Figure 3: Ten Natural Disasters with the Highest Obligations by FEMA on Related Contracts, Fiscal Years 2018–2023



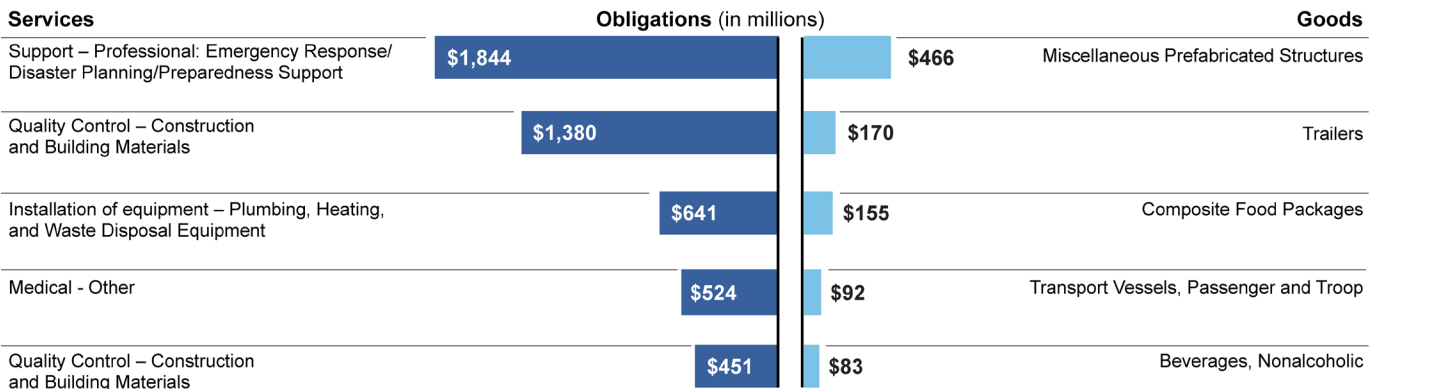
Source: GAO analysis of Federal Emergency Management Agency (FEMA) procurement data. | GAO-25-107136

Disaster Name	Obligations
Hurricane Maria	\$2,711,335,156.19
Hurricane Ida	\$1,578,521,766.76
Hurricane Harvey	\$1,006,187,454.68
Hurricane Ian	\$843,854,390.06
Hurricane Irma	\$579,622,399.62
Hurricane Laura	\$490,041,539.44
Hurricane Florence	\$401,710,545.12
Hurricane Michael	\$340,126,213.87
Super Typhoon Yutu	\$287,039,826.13
November 2018 California Wildfires	\$163,182,322.82

Note: For the purposes of this review, GAO excluded COVID-19-related obligations. GAO also excluded obligations on disaster-related contracts awarded by other agencies.

Service contract obligations accounted for about 83 percent of FEMA's total contract obligations for natural disaster response and recovery for the period covered by our analysis. The remaining 17 percent of the obligations were for goods. See figure 4 for the services and goods with the highest contract obligations during this time frame.

Figure 4: Services and Goods with the Highest FEMA Obligations on Contracts Related to Natural Disasters, Fiscal Years 2018–2023



Source: GAO analysis of Federal Procurement Data System and Federal Emergency Management Agency (FEMA) procurement data. | GAO-25-107136

Services	Obligations	Goods	Obligations
Support – Professional: Emergency Response/Disaster Planning/Preparedness Support	\$1,844	Miscellaneous Prefabricated Structures	\$466
Architect and Engineering – General: Other	\$1,380	Trailers	\$170
Installation of equipment – Plumbing, Heating, and Waste Disposal Equipment	\$641	Composite Food Packages	\$155
Medical - Other	\$524	Transport Vessels, Passenger and Troop	\$92
Quality Control – Construction and Building Materials	\$451	Beverages, Nonalcoholic	\$83

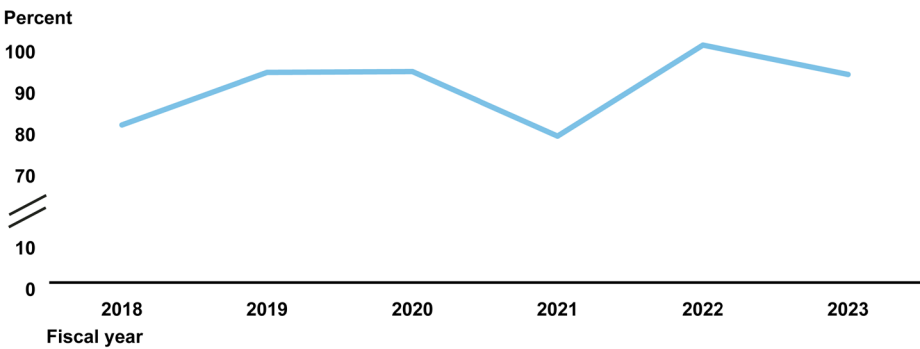
Note: The types of services and goods in this figure are derived from the Federal Procurement Data System’s product and service codes. These codes describe the products and services purchased by the federal government. For the purposes of this review, GAO excluded COVID-19-related obligations.

We found that FEMA’s competition rate—the percentage of total obligations reported for competitive contracts—was between 78 and 100 percent for the period covered by our analysis.²⁷ Competition is a cornerstone of the acquisition system and a critical tool for achieving the best possible return on investment for taxpayers. The benefits of competition in acquiring goods and services from the private sector are well established. Competitive contracts can help save the taxpayer money, improve contractor performance, curb fraud, and promote accountability for results.²⁸ Federal statute and acquisition regulations generally require that covered contracts be awarded on the basis of full and open competition. See figure 5 for the percent of FEMA’s obligations on competitive contracts from fiscal years 2018 through 2023.

²⁷Competitive contracts included contracts and orders coded in FPDS as “full and open competition,” “full and open after exclusion of sources,” and “competed under simplified acquisition procedures,” as well as orders coded as “subject to fair opportunity,” “fair opportunity given,” and “competitive set aside.” Noncompetitive contracts included contracts and orders coded in FPDS as “not competed,” “not available for competition,” and “not competed under simplified acquisition procedures.” Noncompetitive contracts also included orders coded as an exception to “subject to fair opportunity,” including “urgency,” “only one source,” “minimum guarantee,” “follow-on action following competitive initial action,” “other statutory authority,” and “sole source.”

²⁸Office of Management and Budget, Office of Federal Procurement Policy, *Enhancing Competition in Federal Acquisition* (May 31, 2007). GAO, *Defense Contracting: Actions Needed to Increase Competition*, [GAO-13-325](#) (Washington, D.C.: Mar. 28, 2013).

Figure 5: Percent of FEMA’s Obligations on Contracts Related to Natural Disasters that Were Competed, Fiscal Years 2018–2023



Source: GAO analysis of Federal Procurement Data System and Federal Emergency Management Agency (FEMA) procurement data.
| GAO-25-107136

Fiscal Year	Percent
2018	80.7%
2019	93.4%
2020	93.6%
2021	78.0%
2022	100.0%
2023	92.9%

Note: Competitive contracts included contracts and orders coded in the Federal Procurement Data System (FPDS) as “full and open competition,” “full and open after exclusion of sources,” and “competed under simplified acquisition procedures,” as well as orders coded as “subject to fair opportunity,” “fair opportunity given,” and “competitive set aside.” Noncompetitive contracts included contracts and orders coded in FPDS as “not competed,” “not available for competition,” and “not competed under simplified acquisition procedures,” as well as orders coded as an exception to “subject to fair opportunity,” including “urgency,” “only one source,” “minimum guarantee,” “follow-on action following competitive initial action,” “other statutory authority,” and “sole source.” For the purposes of this review, GAO excluded COVID-19-related obligations.

FEMA Has Increasingly Relied on Fixed-Price Contracts

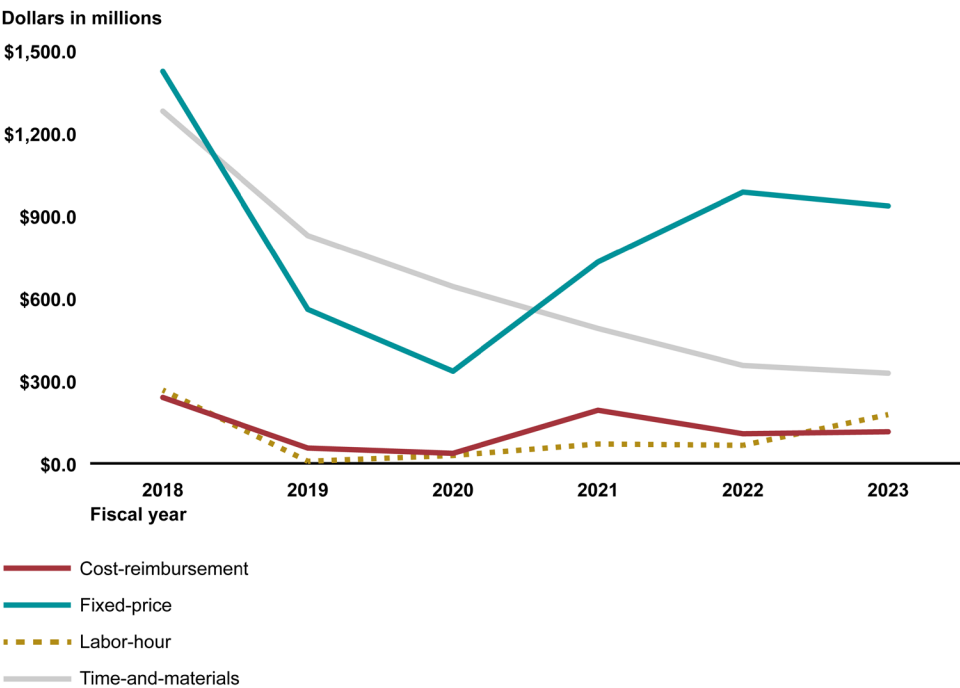
Based on our analysis of FPDS and FEMA procurement system data, FEMA’s obligations on fixed-price contracts grew since fiscal year 2020, while obligations on time-and-materials contracts declined over the time frame we assessed.²⁹ One type of fixed-price contract—firm-fixed-price—presents the least cost risk to the government as it pays a fixed price for a good or service, and the contractor generally assumes the risk of a cost overrun.³⁰ Time-and-materials contracts are considered higher-risk to the government than fixed-price contract types because the government is not guaranteed a completed end item or service, and these contracts provide less incentive to the contractor to work efficiently or control costs. A labor-hour contract is a variation of a time-and-materials contract, differing only in that the contractor does not supply materials. Cost-reimbursement contracts involve higher-cost risk for the government because the government pays a

²⁹Under time-and-materials contracts, payments to contractors are based on the number of labor hours billed at a fixed hourly rate—which includes wages, overhead, general and administrative expenses, and profit for each category of labor—and the covered cost of materials, if applicable.

³⁰A contract’s type, such as fixed-price, does not necessarily address schedule and quality risks. The government still bears schedule and quality risks when using this contract type.

contractor’s qualifying costs of performance up to an established ceiling regardless of whether the work is completed.³¹ See figure 6 for FEMA’s obligations by contract type from fiscal years 2018 through 2023.

Figure 6: FEMA Obligations on Contracts Related to Natural Disasters by Contract Type, Fiscal Years 2018–2023



Source: GAO analysis of Federal Procurement Data System and Federal Emergency Management Agency (FEMA) procurement data.
| GAO-25-107136

Fiscal Year	Cost Reimbursement	Fixed-Price	Labor Hours	Time and Materials
2018	\$239,346,274.90	\$1,424,104,608.89	\$266,086,181.27	\$1,279,643,113.47
2019	\$55,567,240.15	\$559,091,743.20	\$7,552,752.79	\$827,425,442.86
2020	\$36,462,070.71	\$334,439,927.11	\$28,584,466.22	\$641,813,127.97
2021	\$192,802,360.64	\$731,395,806.30	\$70,425,821.52	\$489,736,354.99
2022	\$107,506,991.11	\$985,866,405.89	\$65,527,077.12	\$355,328,679.50
2023	\$114,798,898.51	\$935,278,866.52	\$176,978,081.89	\$327,335,922.23

Note: For the purposes of this review, GAO excluded COVID-19-related obligations.

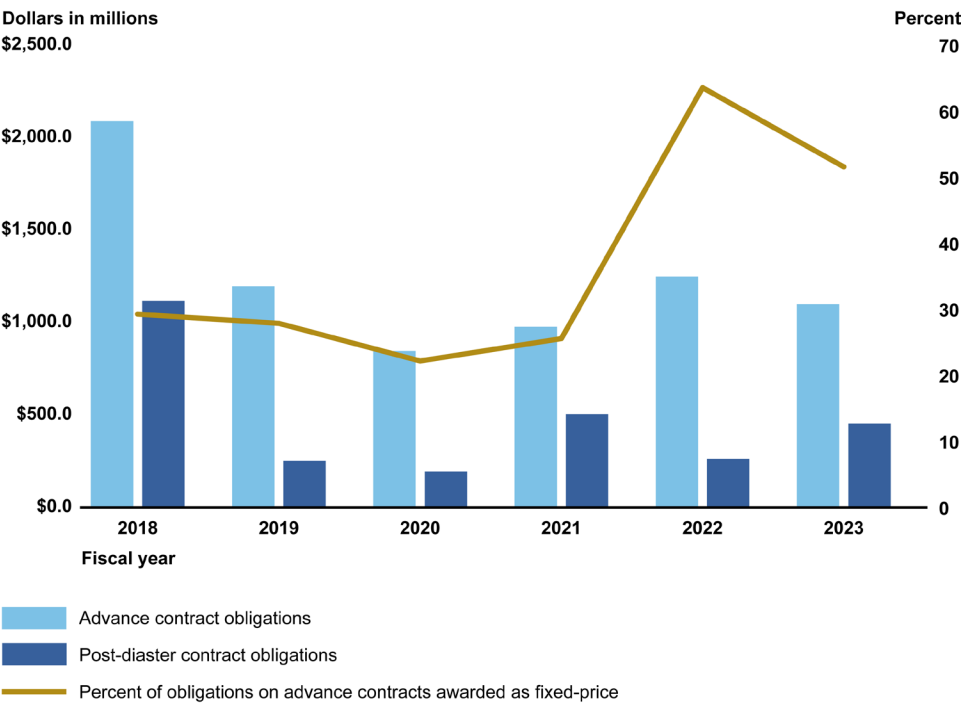
This trend in the obligations on fixed-price contracts can also be seen in the contracts FEMA awarded prior to a disaster—known as advance contracts. In fiscal year 2018, 29 percent of FEMA’s total obligations on advance contracts were on those that used a fixed-price approach—that percentage has since increased to about 52 percent in fiscal year 2023.³² See figure 7 for FEMA’s obligations on advance contracts and contracts

³¹GAO, *Contract Management: Extent of Federal Spending under Cost-Reimbursement Contracts Unclear and Key Controls Not Always Used*, [GAO-09-921](#) (Washington, D.C.: Sept. 30, 2009).

³²FEMA’s advance contracts represent about 73 percent of its total obligations over this time frame, regardless of contract type.

awarded in response to a specific disaster, referred to as post-disaster contracts, and the percent of obligations on advance contracts that were awarded with fixed-price terms during this time frame.

Figure 7: FEMA Obligations on Advance and Post-Disaster Contracts Related to Natural Disasters and the Percent of Advance Contracts Awarded as Fixed-Price, Fiscal Years 2018–2023



Source: GAO analysis of Federal Procurement Data System and Federal Emergency Management Agency (FEMA) procurement data.
GAO-25-107136

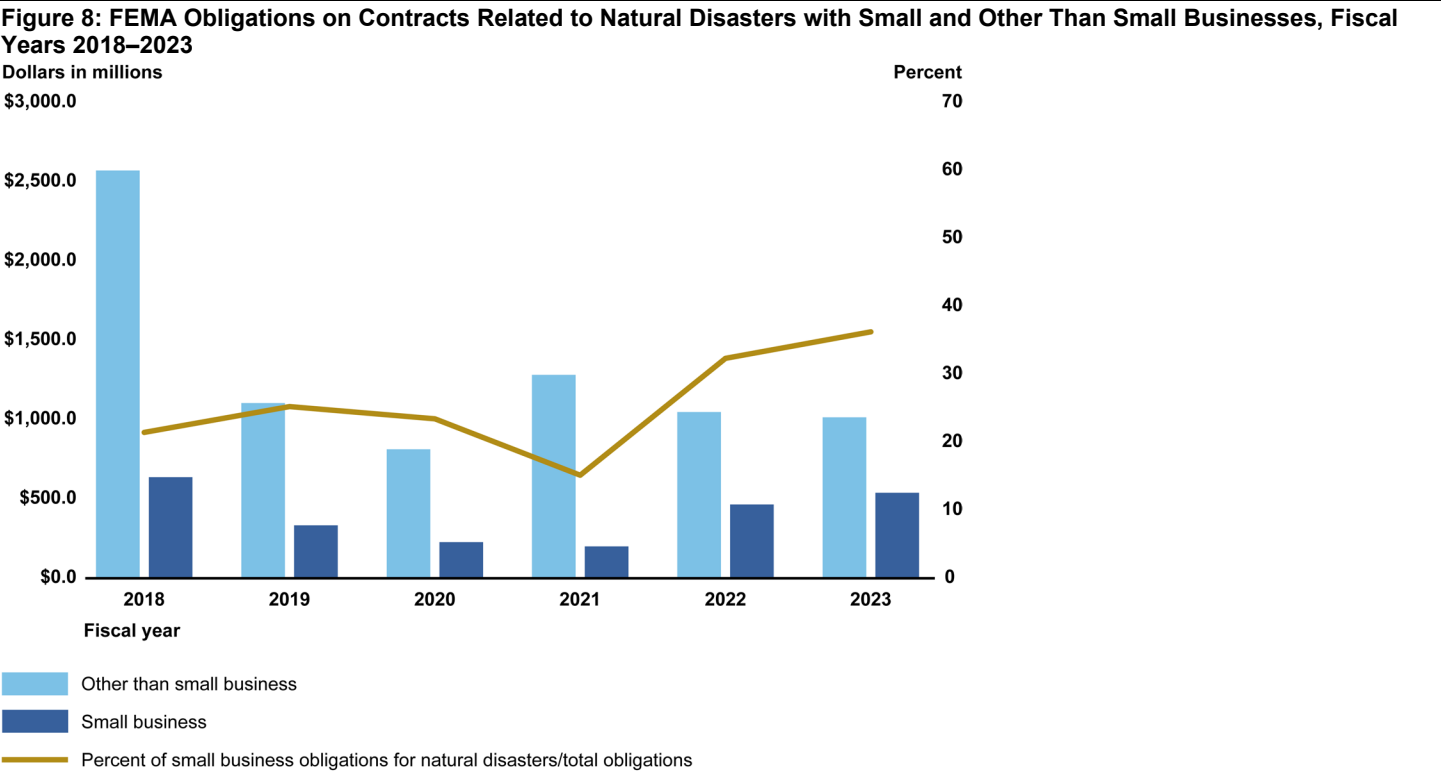
Fiscal Year	Advance Contracts	Post-Disaster Contracts	Percent of obligation on Advance Contracts Awarded as Fixed Price
2018	\$2,089,970,979.17	\$1,119,209,199.36	29.3%
2019	\$1,197,389,682.18	\$252,247,496.82	27.9%
2020	\$846,741,711.88	\$194,557,880.13	22.2%
2021	\$977,919,464.40	\$506,440,879.05	25.6%
2022	\$1,250,344,636.07	\$263,884,517.55	63.6%
2023	\$1,099,561,278.02	\$454,830,491.13	51.6%

Note: For indefinite-delivery contracts or blanket purchase agreements—two contract and agreement types used as advance contracts—obligations occur when the order or call is placed to respond to a disaster. FEMA and other agencies may also award new contracts to support disaster response efforts following a disaster declaration. In GAO’s prior work, FEMA officials said that these post-disaster contract awards may be required, for example, if advance contracts reach their ceilings, or if goods and services that are not suitable for advance contracts are needed. See [GAO-19-93](#). For the purposes of this review, GAO excluded COVID-19-related obligations.

The Proportion of Obligations on Contracts FEMA Awarded to Small Businesses Varied

Based on our analysis of FPDS and FEMA procurement system data, the proportion of FEMA’s obligations on natural disaster-related contracts awarded to small businesses varied over this time frame, ultimately

representing a higher proportion of obligations—over 34 percent—by 2023.³³ We previously reported that small businesses are an important driver of the nation’s economic growth.³⁴ See figure 8 for FEMA’s obligations on natural disaster-related contracts to small and other than small businesses, and small business obligations on natural disaster-related contracts as a percent of total obligations during this time frame.



Source: GAO analysis of Federal Procurement Data System and Federal Emergency Management Agency (FEMA) procurement data.
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Fiscal Year	Other than Small Business	Small Business	Small Business Obligations on Contracts as a Percent of Total Obligations
2018	\$2,571,529,532.43	\$637,650,646.10	19.9%
2019	\$1,105,453,482.45	\$344,183,696.55	23.7%
2020	\$813,256,098.10	\$228,043,493.91	21.9%
2021	\$1,283,218,282.12	\$201,142,061.33	13.6%
2022	\$1,048,517,033.15	\$465,712,120.47	30.8%
2023	\$1,015,112,882.35	\$539,278,886.80	34.7%

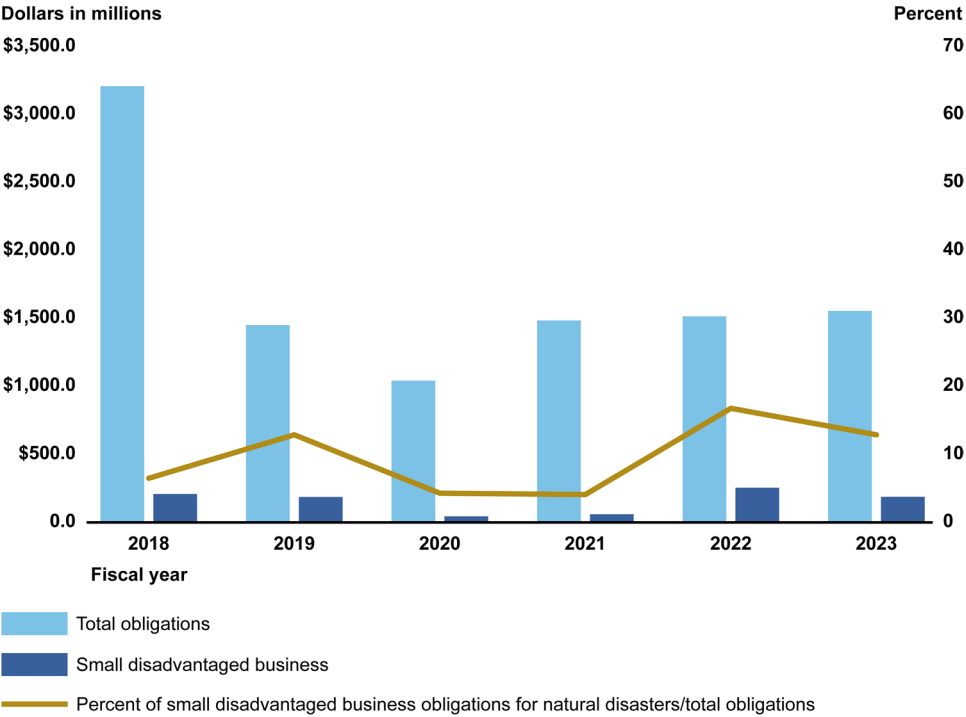
Note: For the purposes of this review, GAO excluded COVID-19-related obligations.

³³A small business includes a business, including its affiliates, that is independently owned and operated, is not dominant in its field of operations, and meets relevant standards established by the Small Business Administration. FAR 2.101; FAR 19.102.

³⁴GAO, *Small Business Research Programs: Increased Performance Standards Likely Affect Few Businesses Receiving Multiple Awards*, [GAO-24-106398](#) (Washington, D.C.: Mar. 29, 2024).

Obligations on natural disaster-related contracts awarded to small disadvantaged businesses were 4 percent of total FEMA obligations in fiscal years 2020 and 2021, but increased to about 13 percent in fiscal year 2023.³⁵ See figure 9 for FEMA’s obligations on natural disaster-related contracts to small disadvantaged businesses and as a percent of total obligations during this time frame.

Figure 9: FEMA Obligations on Contracts Related to Natural Disasters with Small Disadvantaged Businesses, Fiscal Years 2018–2023



Source: GAO analysis of Federal Procurement Data System and Federal Emergency Management Agency (FEMA) procurement data.
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Fiscal Year	Total Obligations	Small Disadvantaged Business Obligations	Small Disadvantaged Business Obligations on Contracts as a Percent of Total Obligations
2018	\$3,209,180,178.53	\$209,189,283.10	6.5%
2019	\$1,449,637,179.00	\$187,624,457.17	12.9%
2020	\$1,041,299,592.01	\$44,900,152.59	4.3%
2021	\$1,484,360,343.45	\$60,266,090.71	4.1%
2022	\$1,514,229,153.62	\$255,009,708.70	16.8%
2023	\$1,554,391,769.15	\$199,791,468.97	12.9%

Note: For the purposes of this review, GAO excluded COVID-19-related obligations.

³⁵Small businesses that are owned and controlled by socially and economically disadvantaged individuals may qualify as small, disadvantaged business concerns. FAR 2.101. 13 C.F.R. § 124.1001. For the purposes of eligibility, individuals presumed to be socially disadvantaged include Asian-Pacific-, Subcontinent-Asian-, Black-, Hispanic-, and Native-Americans. 13 C.F.R. § 124.103. To be considered economically disadvantaged, business owners generally have a net worth and income under certain thresholds, among other criteria. 13 C.F.R. § 124.104.

FEMA Missed Opportunities to Better Assess Performance and Improve Oversight for Selected Contracts

FEMA conducted various oversight steps for the 15 contracts we selected. However, we identified five instances in which FEMA missed opportunities to better assess contractor performance by improving the use of performance-based acquisition methods. Additionally, we found eight instances in which FEMA assigned individuals to conduct contract oversight who lacked the required certification or had not received the contracting officer's authorization to perform oversight tasks.

FEMA Took Various Approaches to Oversight

FEMA performed various oversight steps for our 15 selected contracts. This included collecting and assessing contractor-produced reports on a recurring basis; outlining performance standards, and holding a contractor accountable for meeting those standards; shadowing contracted inspectors; conducting unannounced site inspections; and reviewing sign-in sheets and invoices. For example:

- For a \$47 million call center contract for Hurricane Ian recovery, FEMA used specific, quantifiable performance metrics, thresholds, and a plan detailing the method of surveillance to oversee the contract. The purpose of the contract was to provide surge support to FEMA's National Processing Service Center staff to help with increased call volume, which FEMA often relies on during periods of high disaster activity. The contractor staff were to answer calls from survivors and organizations and assist them in applying for disaster assistance, such as FEMA's Individual Assistance and Public Assistance grants.³⁶ The COR told us that they applied the monetary disincentives specified in the contract when the contractor did not meet the performance metrics, such as deducting 1 percent from the total invoice when the contractor did not meet sufficient staffing levels within required time frames. The contract contained clear and measurable performance metrics, such as expectations for how quickly calls were answered, how many times a caller hung up before receiving assistance, and the number of hours worked. There were thresholds for meeting these metrics and different methods of surveillance that the COR could use to monitor them. The COR for this contract told us that the monetary disincentives for not meeting the performance standards were effective for improving contractor performance. For example, FEMA officials said the contractor made investments to improve its quality control to avoid the disincentives, and the COR told us that the contractor performed well and was responsive.
- For a temporary housing contract with nearly \$89 million in obligations that involved installing, maintaining, and deactivating housing units for survivors of the Kentucky floods, FEMA used individual performance standards for each site. The technical monitors scored the contractor in specific areas of performance, such as the level of customer service, the quality of repairs performed, and how thoroughly the contractor deactivated the housing unit and left the site as it was found. FEMA then tabulated monthly averages for all the quality assurance surveillance plan forms. FEMA used these scores to track and understand contractor performance over time and provide specific, detailed evidence of the extent to which the contractor met performance requirements. The COR for this contract informed us that the technical monitors went into the

³⁶FEMA's Individual Assistance Program provides assistance to disaster survivors to cover necessary expenses and serious needs such as housing assistance, counseling, childcare, unemployment compensation, or medical expenses, that cannot be met through insurance or low-interest loans. FEMA's Public Assistance Program provides assistance for a variety of recovery activities and projects, including the repair and reconstruction of damaged schools, hospitals, and other public infrastructure.

field to fill out the quality assurance surveillance plan forms and graded the contractor's maintenance in real time.

- For a housing inspection contract with \$2 million in obligations, the contractor was responsible for conducting housing inspections for survivors to help inform FEMA's grant decisions for the Maui wildfires. The COR and technical monitor graded the contractor's performance against the quality assurance surveillance plan's performance metric, collected biweekly quality control reports, and had inspection coordinators prepare reports on production levels. FEMA personnel also told us that they shadowed contracted inspectors on occasion to monitor their disaster reporting, make corrections, and address any disaster-specific issues not addressed in guidance. As a result of these efforts, the COR told us that the contractor met all the performance requirements for the metric listed in the quality assurance surveillance plan.

FEMA Missed Opportunities to Better Assess Contractor Performance in Selected Contracts

Although 14 of the 15 contracts we reviewed were for services, nine of those 14 were identified as performance-based acquisitions, including the prior three examples.³⁷ As noted previously, the FAR states that agencies generally must use performance-based acquisition methods to the maximum extent practicable for service contracts. The FAR also requires performance-based service contracts to include measurable performance standards and states that a quality assurance surveillance plan should specify all work requiring surveillance and the method of surveillance. We found that FEMA did not fully implement performance-based acquisition methods in three of the nine contracts that were structured as performance-based acquisitions, such as by failing to fully use the quantifiable performance metrics, thresholds, or the method of surveillance described in the contract to measure performance. FEMA officials we spoke with on these contracts were unaware that the contract's quality assurance surveillance plan should be prepared in conjunction with the performance work statement, or said they chose not to use it. Additionally, we found two instances where FEMA did not use performance-based acquisition methods on a service contract but told us either it would have been beneficial to do so or they did not consider it. Without reiterating to contracting officers and CORs the preference for and purpose of fully implementing performance-based acquisition methods for service contracts, FEMA is missing opportunities to obtain a more complete and quantifiable understanding of contractor performance and more detailed information to inform how it structures and oversees future contract awards.

Below are some examples where FEMA did not fully implement performance-based acquisition methods:

- On a \$185 million public assistance inspections task order in support of the Hurricane Ian recovery identified as a performance-based acquisition, the task order included performance metrics to assess the quality of the inspection and whether the services were completed on time—two of the main performance goals of the task order. However, there is no documentary evidence that the COR assessed the contractor's performance against these metrics and thus evidence that FEMA officials knew the quality and timeliness of contractor-performed public assistance inspections. FEMA provides public assistance grant

³⁷Five of the service contracts in our sample were not structured by FEMA as performance-based acquisitions for various reasons. For example, the contracting officer for one of the contracts informed us that they decided not to use a performance-based acquisition since they received an acquisition package with a statement of work that outlined the manner in which the work was to be performed rather than the purpose of the work. Our sample also included one goods contract, for which performance-based acquisition is not the preferred method.

funds for a variety of recovery activities and projects, including the repair and reconstruction of damaged schools, hospitals, and other public infrastructure. This contract was for contractor personnel to perform inspections of public infrastructure to determine eligibility for public assistance grant funds.

FEMA officials administering this contract told us they generally focused on reviewing and approving contractor invoices and reports and took action against contractor employees who were not performing well—such as an inspector caught sleeping on the job. A technical monitor staffed to this contract filled out two contractor performance evaluation worksheets during the contract’s period of performance, but they contained no documented use of the performance metrics to develop the ratings. The evaluation worksheets were the only FEMA-produced documentation officials provided us when we asked about oversight. Additionally, the base contract’s quality assurance surveillance plan included additional contractor performance documents that officials agreed could have provided useful information had they been filled out as the contractor performed the work. These documents included a customer complaint record and a discrepancy report. Instead, the COR filled out these documents and provided them to us after our site visit, which was 14 months into the contract’s period of performance.

Figure 10: Hurricane Ian Damage



Source: Damage at site of Hurricane Ian; GAO (photo). | GAO-25-107136

- Officials on an approximately \$1 million cargo flight task order for the Maui wildfires, identified as a performance-based acquisition, did not use the base contract's quality assurance surveillance plan when administering the task order. This task order involved the use of contracted flights to return cargo from Maui to various states in the continental United States. The COR informed us that due to the task order's 7-day period of performance, rather than use the base contract's quality assurance surveillance plan, they decided to assess the contractor on the requirements listed in the task order's statement of work, such as providing hourly flight status updates and ensuring enough flight crew personnel. FEMA officials told us they conducted their oversight via email, text message, and flight tracking software.
- An \$80 million responder lodging contract—which involved the use of contractors to identify and book hotel rooms for FEMA responders in support of the Maui wildfires response and recovery—was not structured as a performance-based acquisition and did not have measurable performance metrics or a quality assurance surveillance plan. The COR informed us that a quality assurance surveillance plan would have been helpful to conduct oversight and to hold the contractor accountable. The COR told us they experienced challenges with contractor invoices that took weeks to fix and received contractor-produced documentation that lacked adequate detail. The contract was not required to have an acquisition plan, which is where the determination to follow performance-based acquisition methods is typically documented, and the contracting officer did not consider structuring the contract as a performance-based acquisition.

In addition to not fully implementing performance-based acquisition methods, we also observed three instances of FEMA not documenting the oversight activities performed. In the examples below, the CORs were unaware of the importance of documenting their oversight of contractor performance or failed to do so.

Agency oversight policies do not require a specific level of documentation of oversight activities; rather, CORs have the discretion to determine what oversight documentation is necessary for a particular contract. Typically, a contract with a performance work statement does not require FEMA officials to produce a specific level of documentation of its oversight activities. However, COR guidance and the COR appointment letter include documenting surveillance activities of contractor performance as one of a COR's duties. Additionally, *Standards for Internal Control in the Federal Government* states that management should evaluate and document the results of ongoing monitoring and separate evaluations to identify issues.³⁸ Furthermore, FEMA's COR training stresses the importance of documentation during contract oversight, including emphasizing that monitoring is not sufficient unless it is documented. The examples in which FEMA did not fully document all of its oversight are as follows:

- Officials overseeing a nearly \$51 million responder lodging contract—which involved the use of a contractor to transport, set up, and maintain housing for FEMA staff on the ground responding to the Kentucky floods—did not keep documentation demonstrating that the contractor met all of the performance requirements. FEMA officials developed performance requirements, metrics, and a method of surveillance, in line with the requirements for a performance-based acquisition, but the COR told us they generally did not use them. While FEMA collected evidence demonstrating that the contractor met the requirement to resolve maintenance issues within a set time frame, the COR informed us that most of their oversight was conducted visually with an informal checklist. Additionally, while there were quantifiable metrics for the contractor to set up the sites, such as completing construction within 36 hours of receiving the order, the COR relied mainly on contractor-produced daily reports to supplement the on-site visual inspections they performed of the contractor's work. However, there was no FEMA-produced documentary evidence showing that the COR used the metrics to assess contractor performance, such as whether the contractor

³⁸[GAO-14-704G](#).

set up the sites within 36 hours of awarding the contract. The COR told us that they included the contractor's reports in the file as required, but they were not required to create any specific documentation to track contractor performance. The COR told us they did not retain copies of the informal checklists, and agreed that in this instance it would have been appropriate to create and maintain additional documentation to support their oversight.

- In the case of an approximately \$118 million responder lodging contract that required the contractor to deliver, set up, operate, and demobilize temporary housing units for FEMA personnel responding to Hurricane Ian, FEMA officials were unable to produce documentary evidence to support their conclusion that the contractor met performance requirements. FEMA officials provided us with emails between the COR and the contractor on minor performance issues. FEMA officials said that the COR assigned to the contract saved all of the oversight documentation on their agency laptop and the documentation was not stored on a shared FEMA server. However, it is impossible to know whether that was the case because FEMA officials told us they removed all data from the COR's laptop—in accordance with agency policy—after the COR left FEMA after the contract was awarded. FEMA officials told us they developed procedures to ensure CORs store contract oversight documentation on a shared FEMA server going forward to avoid repeating this situation.
- In a previously mentioned approximately \$1 million cargo flights task order for the Maui wildfires response, FEMA failed to document its decision and rationale for not applying the monetary disincentives outlined in the base contract's quality assurance surveillance plan against the contractor for flight delays. Specifically, an outbound flight from Maui on this task order departed 2 days after the period of performance ended. The COR told us that they decided not to recommend that the contracting officer apply the monetary disincentives listed in the base contract's quality assurance surveillance plan because the cause of the delays was beyond the contractor's control. For example, individuals responsible for loading the aircraft had access to one cargo loader rather than the two loaders they anticipated. In addition, FEMA officials said that their leadership gave priority to flights inbound to Maui over outbound ones, and the delayed flight was an outbound one. FEMA officials administering this contract added that this decision contributed to the flight delays, but agreed they should have documented their decision to not apply the monetary disincentives. FEMA also failed to issue a contract modification to adjust the task order's period of performance to account for the flight delays.³⁹

FEMA officials told us they plan to reiterate the responsibility, as outlined in the COR appointment letters and training, for CORs to document their oversight activities on future responder lodging contracts, which is one area where we identified the documentation gaps. This is an important step, but it is also important to ensure the CORs overseeing contracts for other goods and services are familiar with the importance of documentation. Without reiterating to CORs their role in documenting contractor performance during contract oversight activities, FEMA and other decisionmakers, such as Congress, may not know whether FEMA received the level and quality of services or goods that it purchased.

³⁹We discussed with FEMA officials the fact that no contract modification was issued to extend the task order's period of performance to account for the flight delays. FEMA officials acknowledged they should have issued one.

Some FEMA Oversight Staff Do Not Have Required Certification or Authorization

In eight of the 15 contracts we reviewed, we found that FEMA had personnel performing oversight functions without proper certification or contracting officer authorization. Staff performing contract oversight included CORs and technical monitors, as well as personnel with other titles such as security managers or manufactured housing specialists.

The DHS COR Guidebook and FEMA's Acquisition Manual require technical monitors to have the same level of COR certification as the primary COR, a policy that has been in place since 2020. FEMA's Acquisition Manual also requires contracting officers to issue an appointment letter authorizing technical monitors to serve on a contract. In each of the examples below, FEMA contracting and program office staff told us they were unaware of the technical monitor COR certification and contracting officer authorization requirements.

The oversight duties being performed by uncertified personnel included filling out quality assurance surveillance plans, conducting site inspections, and reviewing contractor-produced documentation. For example:

- In the previously mentioned nearly \$51 million FEMA responder lodging contract for the Kentucky floods, the COR informed us that they requested a technical monitor to help manage the workload. FEMA officials told us that the technical monitor assisted the COR and routed responders' complaints to the contractor to ensure they were addressed. While the COR told us they made the contracting officer aware of the assignment, the contracting officer did not issue an official technical monitor appointment letter as required by FEMA policy. In addition, the individual serving as technical monitor did not have an active COR certification as required by policy. FEMA officials administering this contract told us that they were unaware of the requirement for the technical monitor to receive an appointment letter and be certified at the same level as the COR.
- For a nearly \$4 million technical support services contract for the Maui wildfires, FEMA used a technical monitor to assist the COR in performing oversight. This contract involved the preparation of a comprehensive, long-term recovery plan and a detailed implementation plan for the affected communities. The technical monitor on this contract received deliverables from the contractor, and the COR told us they relied on the technical monitor to send updates on the contractor's performance. The deliverables included status reports of the contractor's progress in developing the recovery and implementation plans. Officials subsequently informed us that this technical monitor did not have a COR certification and was not nominated and appointed according to agency policy. Officials told us that the COR was not aware that the technical monitor needed to be nominated. Without the technical monitor's supervisor sending a nomination letter to the contracting office, the contracting officer did not know to issue the appointment letter, and thus the technical monitor was not appointed.

Figure 11: Maui Wildfires Damage

Source: Damage at site of Maui wildfires; GAO (photo). | GAO-25-107136

- FEMA awarded an approximately \$2.5 million language services contract that involved the use of on-site and on-call interpreters to assist Maui wildfires survivors in applying for individual assistance. The interpreters were for languages commonly spoken in Hawaii, such as Ilocano, Hawaiian, and Japanese. On this contract, FEMA had an individual serving as a technical monitor who did not have a COR certification or contracting officer authorization in the contract file. The COR told us that they deployed to the disaster site for the first 3 months to set up the language services schedule and establish relationships with FEMA managers onsite. The technical monitor told us that they stayed onsite when the COR returned to the continental United States. FEMA officials said having the COR perform oversight remotely and leaving the technical monitor onsite was less costly. The technical monitor for this contract told us they worked with the COR to perform oversight, including duties such as reviewing sign-in sheets, invoices, and assignment trackers, and granting approval for interpreters to work extra hours. The COR and technical monitor told us they relied on this information when recommending whether the contracting officer should exercise the contract's next option period. FEMA officials involved with the contract were not aware of the requirement for the technical monitor to have COR certification and contracting officer authorization.

FEMA officials told us they have not conducted technical monitor requirements training for their contracting and program office staff. According to *Standards for Internal Control in the Federal Government*, management should internally communicate the necessary quality information to achieve the entity's objectives. Without training contract oversight staff (including contracting officers, CORs, and program office staff) on DHS and FEMA requirements for technical monitor certification and authorization, there is increased risk that FEMA has unauthorized or unqualified personnel performing contracting oversight on contracts and may not properly assess the goods and services received in accordance with the contract.

We also identified situations in which individuals with titles other than a COR or technical monitor, such as security managers and manufactured housing specialists, were performing contract oversight, which is not in accordance with FEMA policy. FEMA issued a memorandum in 2020 specifying that contract administration

duties are limited to CORs and technical monitors and that these individuals must have the proper level of COR certification and be appointed by the contracting officer. We found that officials with other titles were performing contract oversight duties without certification or authorization.

Moreover, FEMA officials told us they do not have insight into how many staff may be working on active contracts without required contracting officer authorization or COR certification, even though they might be performing contract oversight tasks. We found that developing this insight is complicated by the fact that not all oversight officials are using the COR or technical monitor titles. According to *Standards for Internal Control in the Federal Government*, management should use quality information to achieve the entity's objectives. Without understanding who in the agency is performing contract oversight and ensuring oversight is performed only by officials that have been appropriately certified and authorized, FEMA may have unqualified personnel performing contract oversight. For example:

- For two security contracts we reviewed, FEMA assigned security managers to assist the primary CORs in performing oversight duties, but not all of the managers had the required contracting officer authorization or COR certification.⁴⁰ The primary COR for one contract told us that the other security managers are not required to be certified CORs. However, like technical monitors, security managers supported the COR in contract monitoring and oversight. For example, security managers—other than the primary COR and alternate COR—would travel to sites where contracted armed guards were assigned to collect guard sign-in sheets and activity reports and to perform site inspections. FEMA provided examples of security managers correcting contractor performance, such as directing security guards to use the required firearm holster or wear the correct uniform. A senior FEMA contracting official we spoke with—who oversees the management of armed security guard contracts—acknowledged that some individuals in the security cadre feel they have the right to give the contractor technical direction or performance feedback even though they are not officially authorized to do so.
- For the previously mentioned \$89 million temporary housing contract in response to the Kentucky floods, FEMA used manufactured housing specialists to perform site inspections and fill out maintenance and deactivation quality assurance surveillance plan forms. Only 25 of the 35 specialists were COR-certified. FEMA officials subsequently told us that while they initially believed that manufactured housing specialists were not required to be COR-certified, they recognize now—in part due to our review—that the specialists perform duties similar to that of a COR and they were out of compliance with DHS and FEMA policies. Going forward, according to the program office, these specialists will be required to have a COR certification and undergo the necessary training.

FEMA Identified and Monitored Required Training and Staffing Needs but Shortcomings Remain in Adhering to Staffing Model Key Principles

FEMA tracks contracting officers' and CORs' required trainings and corresponding certifications and notifies CORs when their certifications expire. Additionally, FEMA officials said they attempt to ensure that each of the active contracts only have certified CORs assigned to them. FEMA also uses a DHS staffing model to predict potential contracting officer needs through an annual agency-wide staffing exercise. The staffing model, however, does not fully adhere to key principles for staffing models that we identified in prior work. According

⁴⁰To safeguard Disaster Relief Centers, federal employees, and visitors, FEMA often uses contracted armed security guard services. FEMA's security cadre is responsible for oversight of these contracts and assigns a security manager who serves as the primary COR.

to DHS, components such as FEMA could use the staffing model’s outputs as a resource to justify budget needs or to advocate for additional resources to stakeholders, such as agency leadership. The number of FEMA contracting officers has remained both below the annual staffing model outputs and authorized levels for the past two fiscal years.

FEMA Identified and Monitored Required Contract Oversight Training and Staff’s Certification Status

According to agency policies, contracting officials must complete the FAC-C (Professional) or FAC-COR training, depending on their position.⁴¹ These courses provide an overview of contracting officer and COR oversight duties, among other responsibilities. The certifications provide government-wide standards for education, training, and experience for core competencies among several contracting disciplines—creating consistent competencies among individuals performing contracting work.⁴²

FEMA tracks FAC-C (Professional) and FAC-COR certifications for contracting officials via Federal Acquisition Institute Cornerstone OnDemand—a training enrollment and acquisition workforce management system. In January 2023, the Office of Federal Procurement Policy updated FAC-C (Professional) requirements and now contracting officers must earn 100 hours of continuous learning within a 2-year period to maintain their certification.⁴³ Table 1 summarizes the certification status of the FEMA contracting job series, such as contracting officers, contract specialists, and procurement analysts, among others.

Table 1: FEMA Contracting Job Series by FAC-C (Professional) Status as of August 2024

FAC-C (Professional) certification status	Totals
Certified contracting officers	186
Officials within 36-month certification grace period ^a	12
Total number of individuals in contracting job series	198

FAC-C (Professional): Federal Acquisition Certification in Contracting; FEMA: Federal Emergency Management Agency
Source: GAO analysis of Federal Acquisition Institute Cornerstone OnDemand data. | GAO-25-107136

^aAccording to FEMA officials, they consider these individuals as contract specialists until they meet FAC-C (Professional) requirements. As such, these individuals do not have warrants or serve in a contracting officer role.

FEMA had over 2,000 individuals formally certified as CORs as of August 2024, with varying levels of FAC-COR certification. According to DHS policy, the agency limits the type of contracts CORs are qualified to oversee based on their level of certification. Generally speaking, a COR Level II certification allows qualified individuals to oversee lower risk contracts, such as firm-fixed-price contracts, whereas a COR Level III

⁴¹FAC-C (Professional) is a single-level certification for contracting officers, which includes the completion of four foundational courses, 1 year of experience, and passing the professional certification exam. Comparatively, FAC-COR is a multilevel certification with different training and experience requirements based on the level for which an individual is certified. For example, a Level III COR will have higher training and experience requirements in comparison to a Level II COR.

⁴²There is a third certification specific to Program and Project Managers. However, we did not include FEMA’s program or project manager’s certifications as part of our review.

⁴³The Office of Federal Procurement Policy, within OMB, develops federal procurement policies.

certification allows qualified individuals to oversee higher risk contracts, such as time-and-materials contracts.⁴⁴

Out of FEMA’s total CORs, over 370 had expired certifications as of August 2024. FEMA took steps to notify CORs of their expiring certifications and officials said they took steps to ensure affected individuals did not serve on active contracts. For example, FEMA has an intranet page dedicated to FAC-COR recertification, sent email reminders to individuals who needed recertification, and held multiple information sessions on the renewal process in 2023 and 2024. FEMA told us the reason that these individuals had expired certifications was because employees had not completed their continuous training requirements prior to May 2024, which is the start of a new 2-year continuous learning period.⁴⁵ FEMA officials said they provided a list of these individuals to DHS for the Federal Acquisition Institute—the agency responsible for fostering and promoting the development of a federal acquisition workforce—and recommended revoking their COR certifications. Officials said once the certifications are revoked, they will begin to share requirements with the CORs about how to get recertified. Officials also said they complete regular reviews of FEMA’s active contracts to ensure that only certified CORs serve on them.⁴⁶ According to FEMA officials, one-third of the certified CORs serve on active contracts, and they feel that the agency has the appropriate number of CORs. Table 2 summarizes the number of FEMA CORs by certification level.

Table 2: FEMA Contracting Officer’s Representatives (COR) by FAC-COR status as of August 2024			
FAC-COR certification level	Total with current FAC-COR certification	Total with expired FAC-COR certification	Total
Level II certification ^a	1,137	290	1,427
Level III certification ^b	962	88	1,050
Total number of CORs^c	2,099	378	2,477

FAC-COR: Federal Acquisition Certification in Contracting for Contracting Officer’s Representatives; FEMA: Federal Emergency Management Agency
Source: GAO analysis of Federal Acquisition Institute Cornerstone OnDemand data. | GAO-25-107136

^aFAC-COR Level II certifications are for “other than high risk or major investment” contracts, such as firm-fixed-price contracts.

^bFAC-COR Level III certifications are for “high risk or major investment contracts,” such as time-and-materials contracts.

^cDue to the size and complexity of DHS’s portfolio, the department does not issue Level I certifications. Officials said some CORs may come to FEMA with FAC-COR Level I certification, but they do not issue certifications at this level. As a result, the total number of CORs here does not include CORs with Level I certifications.

We found that the FAC-C (Professional) and FAC-COR training materials and documents generally discussed oversight duties outlined in agency guidance, such as monitoring contractor performance. CORs for nine of the 15 selected contracts in our sample said the required training provided a high-level overview of their required oversight duties. Officials for 10 of the 15 selected contracts also suggested that on-the-job training is essential or necessary to become effective in their position.⁴⁷ For example, FEMA officials for one selected contract said

⁴⁴Due to the size and complexity of DHS’s portfolio, the department does not issue Level I certifications. Officials said some CORs may come to FEMA with their FAC-COR Level I certification, but they do not issue certifications at this level.

⁴⁵CORs with either a FAC-COR Level II or III certification must complete 40 hours of continuous learning every 2 years to maintain their status.

⁴⁶We found that FEMA appointed CORs for the 15 contracts we selected and the primary CORs were certified at the appropriate level.

⁴⁷We asked officials associated with selected contracts a series of semi-structured interview questions to gain their perspectives on roles and responsibilities, among other areas, when overseeing a FEMA contract. Some of the questions solicited open ended responses. COR summary statements included throughout this report emerged as common themes from those interviews. Not all CORs contributed to discussions or commented on themes related to each summary statement.

no COR training class can prepare someone to be successful on the first day and field experience, on-the-job training, and mentorship are more important.

DHS and FEMA also offer additional contract oversight training classes and resources for contracting officials. For example, in 2023, FEMA provided additional training on contractor performance ratings and general best practices for oversight as part of the agency's community of practice engagement sessions. Several FEMA officials we spoke with also described receiving or providing additional branch and mission specific training.

FEMA Uses DHS's Staffing Model but the Model Does Not Fully Adhere to Key Principles

DHS's Office of the Chief Procurement Officer (OCPO) developed a model to better understand contracting staffing needs and to create a transparent process for supporting budget or additional resource requests. The staffing model is specific to the contracting job series that includes contracting officers.⁴⁸ Each DHS component, including FEMA, could contribute to its unique iteration of the standardized model and may use its outputs to help manage staff needs within the contracting job series.⁴⁹ DHS OCPO and the components make changes to fixed data in the model, such as the hours required to complete new contract awards, modifications, and additional tasks, to keep the information in the model current during triennial updates. DHS requires components to use the model during its annual staffing exercise, which is an exercise that allows the heads of contracting activity to verify and update the previous year's historical data to project the next fiscal year workload and staffing requirement.⁵⁰ According to DHS, the staffing model's output can provide officials with the data they need to justify current staffing resource levels to their leadership or to support future staffing requirements.

We previously identified key principles for staffing models, and reported that models that reflect those principles can enable agency officials to make informed decisions on workforce planning.⁵¹ We compared DHS OCPO's staffing model with five of the key principles we previously identified and found that DHS met two, partially met two, and did not meet one (see table 3 below).⁵²

⁴⁸Other positions considered as part of this job series include contract specialists, negotiators, administrators, and procurement analysts. However, this does not include other contracting support positions, such as CORs and technical monitors. A more recent version of the model includes staffing information on the purchasing and procurement clerical and technician job series but does not project staffing needs or totals for these positions.

⁴⁹DHS's Office of Program Accountability and Risk Management developed a separate staffing model to justify major program offices' workforce needs, such as program managers, contracting officers, and CORs. We evaluated this staffing model, among other acquisition workforce issues, in a recent report. See GAO, *Homeland Security: Actions Needed to Address DHS's Acquisition Workforce Challenges and Data*, [GAO-25-107075](#) (Washington, D.C.: Dec. 12, 2024).

⁵⁰Heads of the contracting activity are officials who have overall responsibility for managing the contracting activity. DHS has nine heads of the contracting activity for components across the agency, including FEMA.

⁵¹We selected relevant key principles for staffing models based on our prior work. See [GAO-16-384](#); [GAO-21-529](#); and [GAO-22-105328](#).

⁵²In total, there are six key principles for staffing models. We did not select one key principle related to ensuring the correct number of staff needed and appropriate mix of skills. This principle states that officials use the staffing model to determine the number of staff needed and the appropriate mix of skills needed to accomplish the agency mission. Through our analysis and discussions with DHS officials, we determined that this model is specific to the roles and responsibilities of contracting officers and it would not be reasonable for this model to include other positions. As a result, we determined this key principle was not applicable to our assessment.

Table 3: GAO Assessment of the DHS Office of the Chief Procurement Officer’s (OCPO) Staffing Model Against Selected Key Principles

Staffing model key principle	GAO assessment (Met, partially met, or not met)
Incorporate work activities, frequency, and time required to conduct them Incorporate mission, tasks, and time it takes to conduct activities, incorporate elements mandated by law or key goals into model design	Met
Involve key stakeholders Ensure staffing model involves key internal stakeholders for their input and establishes roles and responsibilities for maintaining the model	Met
Ensure data quality Ensure that the staffing model’s assumptions reflect operating conditions; ensure the credibility of data used in the models; and preserve the integrity of data maintained in the models	Partially met
Inform budget and workforce planning Use staffing model to inform budget planning, prioritization activities, and workforce planning (e.g., long-term strategies for acquiring, developing, and retaining staff)	Partially met
Incorporate risk factors Incorporate risk factors, including attrition, and address risks if financial or other constraints do not allow full implementation of the staffing model	Not met

Source: GAO analysis of Department of Homeland Security (DHS) information. | GAO-25-107136

Note: Based on agency documents and interviews with DHS officials, GAO defined “met” as DHS incorporated the principle into the OCPO staffing model; “partially met” as DHS incorporated some aspects of the principle into the OCPO staffing model; and “not met” as DHS did not incorporate the principle into the OCPO staffing model. In total, there are six key principles for staffing models that GAO identified in prior work. GAO did not select one key principle related to ensuring the correct number of staff needed and appropriate mix of skills. This principle states that officials use the staffing model to determine the number of staff needed and the appropriate mix of skills needed to accomplish the agency mission. Through its analysis and discussions with DHS officials, GAO determined that this model is specific to the roles and responsibilities of contracting officers and it would not be reasonable for this model to include other positions. As a result, GAO determined this key principle was not applicable to its assessment.

The following sections detail our assessment of DHS’s staffing model against the key principles.

Incorporate work activities, frequency, and time required to conduct them (Met). DHS OCPO’s staffing model provides a breakdown of contracting and additional tasks by the time it takes to complete them or the frequency with which they occur. For example, the model provides a breakdown of the hours required to complete each action per contract type, and values for classified and unclassified actions.⁵³ This information helps forecast the total contracting labor hours projected for the following fiscal year. The model uses total forecasted labor hours, time available per year, and ratio of nonsupervisory to supervisory employees to calculate the total number of staff needed for the following fiscal year.

The model also factors the time and frequency to complete additional tasks into its staffing estimates, such as completing contractor performance assessment reports, training, and customer meetings. For example, FEMA’s fiscal year 2024 completed model estimated that for every hour spent on awarding contract actions, each contracting officer would spend another 59 minutes on tasks and responsibilities outside of those required to award a contract action.

⁵³FEMA and the Office of Chief Procurement Officer’s Office of Selective Acquisitions are the only DHS components to process classified actions.

Involve key stakeholders (Met). DHS involves key stakeholders, such as different offices within OCPO as well as DHS components, as it updates its model and conducts its annual staffing exercise. While DHS owns the model, its components own the projections resulting from the annual exercise. Different offices within OCPO and DHS components (i.e., key internal stakeholders) have defined roles and responsibilities during the triennial and annual updates. Some roles and responsibilities within OCPO during these updates include:

- performing detailed reviews of data sent by components' heads of contracting activity, and
- determining the standardized hour assumptions in the staffing model.

Some components' heads of contracting activity roles and responsibilities during these updates include:

- verifying the model data from the previous fiscal year, and
- updating certain data fields within the model to provide a more precise staffing projection for the upcoming fiscal year.

Ensure data quality (Partially met). DHS uses credible data sources and has taken steps to ensure that the staffing model's assumptions reflect operating conditions. The staffing model incorporates data from the National Finance Center, the Federal Procurement Data System, and Operational Status Reports.⁵⁴ We consider these sources as generally authoritative and widely used across the federal government. To reflect current operating conditions, DHS solicits and incorporates component data or input during annual and triennial updates.

- As part of DHS's annual staffing exercise, component representatives verify model data from the previous fiscal year and update certain fields to create more precise staffing projections. Component representatives are expected to document any changes or updates they make to the model. Components run the current model to project staffing needs for the upcoming fiscal year during this process.
- During the triennial update, DHS updates certain data that remain constant during the annual staffing exercise, such as hours required to complete contracting actions, within the model to help ensure the model's yearly estimates are accurate. Specifically, components provide data to inform the underlying assumptions of the model, such as hours per action. DHS completed its most recent triennial update in 2022.⁵⁵ This update included revisions to include new awards, modifications, and additional tasks data points within the model, among others. Overall, the 2022 update found that nonsupervisory employees had less time available for contracting activities.⁵⁶

However, DHS has not documented all aspects of its staffing model, and officials said doing so is an ongoing process. For example, DHS documented some changes as a result of its 2022 triennial update and the instructions within the model that components follow during the annual staffing exercise. However, DHS has not documented—outside of the model—the steps used to create and maintain the model. DHS officials said this is an ongoing process and did not identify time frames for documenting all aspects of its staffing model.

⁵⁴Operational Status Reports are internal DHS documents that provide data on the volume of contracting actions not tracked in the Federal Procurement Data System from the previous fiscal year, such as interagency agreements—which DHS policy defines as agreements between agencies or components to acquire supplies or services. The data for the Operational Status Report are input by the component or head of the contracting activity.

⁵⁵DHS officials said FEMA did not submit changes to the staffing model as part of the triennial update.

⁵⁶Non-supervisory contracting officials had a 4.2 percent decrease in time available for contracting activities in 2022 in comparison to when the model was standardized in 2018.

Standards for Internal Control in the Federal Government states that management should clearly document internal control and all transactions and significant events in a manner that allows the documentation to be readily available for examination.⁵⁷ Without documenting the steps it used to create and maintain the model, DHS risks losing institutional knowledge to preserve the staffing model's integrity.

Inform budget and workforce planning (Partially met). DHS officials said four components—including FEMA—used their staffing model to inform workforce planning, but they are not aware of the extent to which components use it for long-term workforce planning or budgetary purposes. According to a DHS memorandum, the intent of accredited staffing models is to create a credible and consistent method for justifying component human capital needs. DHS components could use the OCPO model to justify current or additional staffing resources for contracting officers, track staffing levels, or better understand staffing needs. For example, DHS officials said the Cybersecurity and Infrastructure Security Agency used the model to support staffing needs when setting up its contracting office.⁵⁸

DHS officials said they are not aware of whether components use the model's outputs to inform long-term workforce planning. Officials noted that their staffing model is one management tool that can help components assess risks and prioritize resources. The staffing model helps tell the story of why DHS or its components need a certain number of staff, according to DHS officials. Those officials said that determining staffing needs through the model is a good practice, but the ultimate decision comes down to how many contracting staff the department or a component can afford. As a result, DHS does not require its components to meet the staffing model outputs.

DHS officials said all components have a hard time keeping contracting officers onboard and there are a limited number of qualified candidates available. This is supported by FEMA's current gap between the staffing model outputs and the actual number of contracting job series staff. FEMA's onboard staff for the contracting job series have remained both below the annual staffing model outputs and authorized levels for the past 2 fiscal years. FEMA's annual staffing exercise projected that the agency would need 244 employees within the contracting job series for fiscal year 2024—which includes contracting officers. Comparatively, FEMA's authorized staffing levels for the same fiscal year equated to 215 employees. As shown in table 4, FEMA had 198 individuals under the contracting job series onboard as of August 2024—resulting in a 17-person shortfall from authorized levels and a 46-person shortfall from what the staffing model said FEMA needed. Table 4 also shows FEMA's staffing model projections, authorized staffing level, total contracting job series onboard, and the difference between the model's projected output and total contracting job series staff onboard for fiscal years 2023 and 2024.⁵⁹

⁵⁷[GAO-14-704G](#).

⁵⁸The Cybersecurity and Infrastructure Security Agency is a DHS component responsible for providing guidance to support state, local, and industry partners in identifying the critical infrastructure sectors and essential workers needed to maintain the nation's services and functions.

⁵⁹According to DHS's executive report for the fiscal year 2024 annual staffing exercise, the entire department's onboard staffing numbers remained below authorized staffing levels from fiscal years 2018 through 2024.

Table 4: Federal Emergency Management Agency (FEMA) Staffing Model Projections vs. Onboard Contracting Job Series Staff, Fiscal Years 2023-2024

Fiscal year	Staffing model projection	Authorized staffing level	Total contracting job series staff onboard ^a	Difference between projected output and total staff onboard	Difference between authorized and onboard staff
2023	215	213	198	17	15
2024	244	215	198	46	17

Source: GAO analysis of Department of Homeland Security (DHS) information. | GAO-25-107136

^aThe fiscal year 2023 information in this column is based on data for the entire corresponding fiscal year. The fiscal year 2024 information is based on data as of August 2024.

FEMA officials said they hire outside support to help with oversight, and competing interests affect the agency’s ability to hit staffing numbers. FEMA officials said the agency contracted for approximately 30 staff to perform duties within the contracting job series to help execute and oversee disaster contracts.⁶⁰ According to FEMA officials, they do not account for these contractors in the staffing model’s projections. They said competing budget constraints and interests, such as balancing supervisory and nonsupervisory positions, impact their ability to hit the authorized staffing numbers, which they suggested will continue to be a challenge. Additionally, FEMA officials said the increase in projected staffing needs between fiscal years 2023 and 2024 was due to the staffing model’s inclusion of classified contracting actions.⁶¹

FEMA officials said the staffing model is one tool they use to justify or manage staffing levels. For example, FEMA officials said they used the staffing model information in FEMA’s Office of the Chief Component Procurement Officer’s November 2023 Resource Allocation Plan, which showed the agency had a deficit of 25 personnel. Further, FEMA’s Office of the Chief Component Procurement Officer workforce analysis from fiscal years 2022 and 2024 shows historical data staffing model results against onboard staff. According to FEMA officials, budget constraints prevented the agency from hiring additional personnel. FEMA officials also said they will continue to use the staffing model for future workforce analysis and staffing requests.

While the Resource Allocation Plan addresses some hiring challenges through its request to hire additional contractor support, FEMA did not provide evidence that it incorporated the results of the staffing model or its outputs into other aspects of long-term workforce planning, such as strategies for retaining current contracting staff. According to the November 2023 Resource Allocation Plan, FEMA’s Office of the Chief Component Procurement Officer needs more personnel to balance an increasing workload with a decreasing workforce. This plan also states that the office must posture itself to be prepared to support an increase in disasters, among other things. Another FEMA Resource Allocation Plan using 2022 information states that existing staff will have to cover the workload of the employee gap identified in the staffing model and agency demands have driven away contracting staff. The Resource Allocation Plans we reviewed do not identify long-term strategies to address potential challenges such as retaining current contracting staff.⁶² Using DHS’s staffing model to

⁶⁰FEMA officials told us that 10 contractor staff will perform this work after January 29, 2025, unless FEMA receives funding for continued contractor support.

⁶¹DHS did not incorporate classified contracting actions until fiscal year 2024.

⁶²One Resource Allocation Plan describes a Hiring and Retention Work Group that identified hiring and retention challenges in fiscal year 2021, as well as solutions. As part of this effort, the plan states that FEMA held a series of listening sessions with staff to capture feedback. The Resource Allocation Plan mentions this group and its efforts but does not elaborate on any strategies for improving retention. Additionally, a Resource Allocation Plan we reviewed for a subsequent year does not address retention challenges.

inform retention strategies for contracting staff, an element of long-term workforce planning, would put FEMA in a better position to proactively address potential workforce challenges.

Incorporate risk factors (Not met). DHS did not formally account for risks in its staffing model, such as attrition, but officials stated they informally consider them. For example, DHS officials said components are able to run scenarios with data outside of the staffing model, which they could use to see what aspects give them the most insight in terms of planning regarding risks. DHS officials said it is difficult to predict or incorporate some risks into the staffing model, such as the COVID-19 pandemic or disasters. While we acknowledge the challenge of incorporating these risks into the staffing model, it does not diminish the benefit of doing so. We have previously reported that incorporating key workforce-related risk factors in staffing models improves the accuracy of the model and allows an agency to better align its staff with workforce needs.⁶³ Without DHS including risks in its staffing model, components, such as FEMA, may not be able to accurately predict or account for future contracting officer staffing needs.

Our findings regarding DHS's staffing model align with the findings and recommendations of an internal DHS review. DHS's Program Analysis and Evaluation Office conducted an independent review to accredit OCPO's staffing model in January 2024.⁶⁴ According to its review, with full accreditation, components can begin to use the staffing model's results to assist with budgetary and resource justifications. As part of the review, the office made several recommendations to DHS to improve the maturity of the model, several of which align with our findings. For example, the Program Analysis and Evaluation Office recommended that DHS document its staffing model methodology and analyze and report on risks, such as not meeting recommended staffing model outputs, or incorporate scenario planning tools into its model.⁶⁵ A Program Analysis and Evaluation official said they expect OCPO to implement recommendations where possible and based on what makes the most sense. DHS officials said they have completed some of the Program Analysis and Evaluation Office's staffing model recommendations, such as incorporating an automated data check to one of the model's data tabs.

Neither DHS nor FEMA Have a Staffing Model Specific to Other Contract Oversight Staff

Neither DHS nor FEMA have a staffing model to account for other critical contract oversight staff, such as CORs or technical monitors. DHS and FEMA officials told us they have yet to comprehensively assess all contract oversight positions because these positions are often assigned as another duty and responsibilities may vary across the department. According to a DHS official, the OCPO staffing model is specific to the contracting job series (i.e., contracting officers) and cannot be adapted to other contract oversight positions. FEMA officials said they track COR certification status and believe they have a sufficient number of certified

⁶³[GAO-22-105328](#).

⁶⁴According to DHS's fiscal year 2021 Homeland Security Capacity Assessment, the Program Analysis and Evaluation Office oversees DHS's and its components' capacity to use evidence and identify concrete steps for improvement.

⁶⁵DHS OCPO, *Verification, Validation, and Accreditation Report, Series 1102 Staffing Models, Version 2.0* (Jan. 4, 2024).

CORs, but do not track the number of hours individuals may work to conduct contract oversight.⁶⁶ Since DHS developed and maintains the staffing model, FEMA officials said a similar model for CORs is not something the agency could implement on its own. FEMA officials also said it would be difficult to implement a COR staffing model since CORs have different job series titles and the position is often another duty as assigned.

We recently recommended that DHS establish a methodology for identifying information about the acquisition workforce and identify methods to ensure it maintains comprehensive data across 11 disciplines that constitute the acquisition workforce, including for CORs. In a December 2024 report, we found that DHS did not know which or how many personnel fell under DHS's 11 acquisition related-disciplines, including the COR position.⁶⁷ In that report, we noted that officials said that because DHS does not have full information on the entirety of its acquisition workforce, it is difficult to identify the appropriate number and types of positions needed and develop talent within the department. We concluded that taking additional steps to improve its strategic acquisition workforce management will better enable DHS to ensure its acquisition workforce—which includes CORs—is supporting its current and future mission needs. DHS did not agree with these recommendations. We reiterated the importance of establishing a methodology to identify information on who is serving in acquisition disciplines and having comprehensive data to inform and make better agency human capital decisions. We will continue to follow-up with the agency on the status of implementing these recommendations. Taking steps to address these recommendations could, in turn, help FEMA develop better information on its COR workforce.

Conclusions

Effective contract management and oversight are essential to ensuring the government receives the goods and services it has contracted for, even in the wake of a natural disaster. FEMA, however, has missed opportunities to apply performance-based methods or document contractor performance on one-third of the contracts we reviewed. Reiterating to contracting officers and CORs the preference for and purpose of implementing performance-based acquisition methods for service contracts, when warranted, will help FEMA better oversee contractor performance. It will also help ensure FEMA knows whether those needing FEMA's assistance receive the timely and high-quality goods and services they need in times of emergency.

FEMA also has opportunities to better ensure its contract oversight staff are adequately trained and authorized to perform oversight duties. FEMA has guidance on who can perform oversight and what the appointment and certification requirements are, but without training contract oversight staff (including contracting officers, CORs, and program office staff) on DHS and FEMA requirements for technical monitor certification and authorization, potentially unauthorized or unqualified personnel may continue to perform contract oversight functions. Moreover, without FEMA taking steps to identify who across the agency is currently performing contract oversight duties on active contracts, including those who may be performing oversight functions with titles

⁶⁶FEMA officials said that Federal Acquisition Institute Cornerstone OnDemand provides some visibility into the staff who have been certified as CORs. However, the Cornerstone OnDemand data fields are not mandatory. We found that over 1,000 CORs did not specify their location (e.g., FEMA office, state, or city), and the Federal Acquisition Institute Cornerstone OnDemand data do not distinguish whether the staff serve as a part-time or a full-time COR. As a result, Cornerstone OnDemand FAC-COR certification data may not fully reflect certain characteristics of FEMA's CORs.

⁶⁷[GAO-25-107075](#).

other than COR or technical monitor, the risk of unauthorized or unqualified staff continuing to perform oversight functions is further amplified.

Finally, while DHS has a contracting officer staffing model, it does not fully meet certain key principles for staffing models, such as documenting the steps it used to create and maintain the model and incorporating potential risks. Without fully adhering to these key principles, DHS and its components, such as FEMA, may lose institutional knowledge for maintaining and updating the model, and may be unable to accurately predict or account for future staffing challenges. Moreover, FEMA does not use the model's results to inform long-term workforce planning for staff retention, which can limit its ability to address workforce challenges.

Recommendations for Executive Action

We are making a total of seven recommendations, including two to DHS and five to FEMA. Specifically:

The FEMA Administrator should ensure that its Office of the Chief Component Procurement Officer reiterates to contracting officers and CORs, such as through a memorandum or training, the preference for and purpose of implementing performance-based acquisition methods for service contracts. (Recommendation 1)

The FEMA Administrator should ensure that its Office of the Chief Component Procurement Officer reiterates to CORs, such as through a memorandum or training, the COR's role in documenting oversight activities taken to ensure contractor performance on service contracts. (Recommendation 2)

The FEMA Administrator should ensure that its Office of the Chief Component Procurement Officer trains contract oversight staff (including contracting officers, CORs, and program office staff) on DHS and FEMA requirements for technical monitors to have the appropriate level of COR certification and the appropriate authorizations to serve on contracts. (Recommendation 3)

The FEMA Administrator should ensure that its Office of the Chief Component Procurement Officer take steps to identify who within the agency is performing contract oversight duties on active contracts, and ensure that those individuals have the proper COR certification and contracting officer authorization. (Recommendation 4)

The Secretary of Homeland Security should ensure that its Office of the Chief Procurement Officer documents the steps it used to create and maintain the contracting job series staffing model. (Recommendation 5)

The Secretary of Homeland Security should ensure that its Office of the Chief Procurement Officer incorporates potential risks into its contracting job series staffing model. (Recommendation 6)

The FEMA Administrator should ensure its Office of the Chief Component Procurement Officer uses the results of the contracting job series staffing model to help inform long-term workforce planning, to include staff retention. (Recommendation 7)

Agency Comments

We provided a draft of this report to DHS for review and comment. DHS provided written comments, which are reproduced in appendix II. DHS concurred with the recommendations and identified steps they plan to take to address each of them. With respect to our fourth recommendation, FEMA stated that it plans to conduct a quarterly review of active contracts to ensure that CORs performing contract oversight duties have the proper certification and authorization. In addition to CORs, to fully address the fourth recommendation, FEMA should also ensure other staff that we found were performing oversight functions, such as technical monitors, security managers, and manufactured housing specialists, are identified, properly certified, and authorized to perform those oversight duties, as appropriate. DHS also provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Homeland Security, and the Senior Official Performing the Duties of FEMA Administrator. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact Travis J. Masters at (202) 512-4841 or masterst@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



Travis J. Masters
Director, Contracting and National Security Acquisitions

Appendix I: Objectives, Scope, and Methodology

You asked us to assess the Federal Emergency Management Agency’s (FEMA) use and oversight of its disaster contracts. This report examines (1) how and to what extent FEMA used contracts related to natural disasters to support its response and recovery efforts from fiscal years 2018 through 2023; (2) the steps FEMA took to provide oversight of contractor performance on selected contracts and any challenges encountered; and (3) the extent to which FEMA identified and monitored contract oversight training and staffing needs.

To assess how and to what extent FEMA used contracts related to natural disasters to support its response and recovery efforts from fiscal years 2018 through 2023 (the most recent year of data available during our review), we merged data on FEMA contracts awarded during this period from the Federal Procurement Data System (FPDS) and FEMA’s contracting writing system, known as the Procurement Request Information System Management. We analyzed the data to identify characteristics of declared disaster and emergency contracts such as total obligations, contract type, and obligations by product or service code. For the purposes of this review, we excluded FEMA’s COVID-19-related contract obligations because they were not for a weather-related disaster, and the almost \$3 billion obligated on these contracts from fiscal years 2020 through 2023 would otherwise skew the data analysis. To assess the reliability of the FPDS and Procurement Request Information System Management data, we reviewed FPDS and FEMA documentation, interviewed agency officials, conducted electronic data testing to look for obvious errors or outliers, and compared documentation from contracts and orders we selected for review to FPDS data. Based on the steps we took, we determined that the FPDS data and the Procurement Request Information System Management data were sufficiently reliable for the purposes of our report.

To assess the steps FEMA took to provide oversight of contractor performance on selected contracts and any challenges encountered, we selected a nongeneralizable sample of 15 contracts and orders across three disasters—Hurricane Ian, the 2022 Kentucky floods, and the 2023 Maui wildfires.¹ Our disaster selection factors included selecting recent disasters (fiscal years 2022 and 2023) and those with high contract obligations; and obtaining a mix of natural disaster types, such as a hurricane, flood, and fire.

Our contract selection criteria included selecting contracts, orders, and blanket purchase agreement calls with the highest obligations and with at least 6 months of contractor performance, so as to allow for sufficient time for contract oversight activities to occur.² In situations where we selected an order or a blanket purchase agreement call, we also reviewed the underlying contract or agreement to determine the extent to which they contained contract oversight provisions related to the order or call we selected. Additionally, four of our selections were blanket purchase agreement calls whose base agreement was awarded against a General

¹In July 2022, eastern Kentucky suffered severe flooding, which resulted in 44 deaths and almost 9,000 damaged or destroyed homes. Hurricane Ian—the third costliest hurricane to strike the United States—made landfall in late September 2022 with maximum sustained winds of 150 miles per hour, resulting in 149 deaths and structural damage to homes, vehicles, and businesses. In August 2023, the Maui wildfires—the worst natural disaster in Hawaii’s history—killed more than 100 people and destroyed more than 2,200 structures. FEMA assigned each disaster the following disaster codes: Kentucky floods – DR-4663-KY, Hurricane Ian – DR-4673-FL, and Maui wildfires – DR-4724-HI.

²Blanket purchase agreements are agreements between government agencies and qualified vendors with pre-negotiated terms and conditions, including prices, in place for future purchases and are a simplified method of fulfilling repetitive needs for supplies and services. Blanket purchase agreements are not contracts, which is why our unit of analysis is the related calls. Federal Acquisition Regulation 8.405 and 13.303.

Services Administration Federal Supply Schedule contract.³ For those selections, we coordinated with the General Services Administration to obtain these Federal Supply Schedule contracts and analyzed them. We determined that they did not include any contract oversight provisions related to our selections. Hereafter, we refer to these contracts, orders, and calls collectively as contracts, unless otherwise specified. See table 5 for information on the selected contracts.

Table 5: Key Characteristics of Selected FEMA Contracts for Three Natural Disasters

Natural disaster	Contract description	Service/Good	Obligations (in millions) ^a	Performance-based acquisition ^b
Hurricane Ian	Lodging for FEMA responders	Service	\$118.6	No
	Public infrastructure inspections	Service	\$185.1	Yes
	Call center operations	Service	\$47.3	Yes
	Manufactured housing units	Good	\$29.4	Not applicable
Kentucky floods	Lodging for FEMA responders	Service	\$50.8	Yes
	Installing, maintaining, and deactivating manufactured housing units	Service	\$88.8	Yes
	Construction logistics support	Service	\$14.4	Yes
	Armed security guards	Service	\$3.2	No
Maui wildfires	Hotel reservations for FEMA responders	Service	\$80.2	No
	Air transportation for FEMA responders	Service	\$3.6	Yes
	Housing inspections	Service	\$2.0	Yes
	Air transportation for FEMA cargo	Service	\$1.1	Yes
	Language interpretation	Service	\$2.4	No
	Armed security guards	Service	\$12.4	No
	Conduct needs assessment and develop recovery support strategy	Service	\$3.8	Yes
Total obligations			\$643.1	

Source: GAO analysis of Federal Emergency Management Agency (FEMA) contract files and agency-provided data. | GAO-25-107136

^aContract obligations are current as of December 2024.

^bThe Federal Acquisition Regulation Council described performance-based contracts as defining agency needs in terms of the desired outcome rather than the manner by which the contractor completes the work. The acquisition's requirements and desired outcomes should be identified and the contract should include measurable performance standards that enable the government to determine whether the contractor has met the performance objectives. We categorized a contract as a performance-based acquisition if the contract's acquisition plan stated that was the intended approach and the contract incorporated quantifiable performance metrics, thresholds, and the method of surveillance to measure contractor performance.

³The General Services Administration's Federal Supply Schedules program provides federal agencies a simplified method of purchasing commercial products and services at prices associated with volume buying. A schedule is a set of contracts awarded to multiple vendors that provide similar products and services.

Of the 15 contracts we selected, 12 were awarded in fiscal years 2022 and 2023 and three were awarded in fiscal year 2024. The 12 contracts from fiscal years 2022 and 2023 accounted for 42 percent of the total contract obligations (more than \$1 billion in total) across the three disasters as of December 2023. The three contracts from fiscal year 2024 were active during the time of our review and are related to the Maui wildfires. We included these three contracts to increase the likelihood of observing contractor performance during our Maui site visit.

For each selected contract, we identified and analyzed contract oversight documentation, requirements, and performance standards. We considered a contract as incorporating performance-based acquisition methods if it included quantifiable performance metrics, thresholds, and the method of surveillance to measure contractor performance. We interviewed FEMA contracting officers and contracting officer's representatives (COR) to understand the oversight steps they took and to identify oversight challenges, if any. We compared the oversight steps in the contract to related documentation; federal regulations; Department of Homeland Security (DHS) and FEMA acquisition policies related to assessing contractors' performance; and standards for internal control.⁴ We determined that the information and communication and monitoring components of internal controls were significant to this objective. We determined that the principles that management should use and internally communicate quality information to achieve objectives, and establish and operate monitoring activities to monitor the internal control system and evaluate the results, were also significant. We conducted site visits in April 2024 to areas in Florida damaged by Hurricane Ian and in May 2024 to the site of the Maui wildfires to observe contract performance and oversight activities.⁵ During these visits, we met with officials responsible for administering contracts in our sample, corresponding contractors, and individuals affected by those disasters.

To assess the extent to which FEMA identified and monitored contract oversight training needs, we analyzed contract oversight responsibilities outlined in DHS and FEMA policy and guidance and compared them against required contract oversight training materials. We also reviewed the Federal Acquisition Regulation and Office of Management and Budget (OMB) guidance on Federal Acquisition Certification in Contracting (FAC-C (Professional)) and Federal Acquisition Certification for Contracting Officer's Representatives (FAC-COR) requirements. To assess the extent to which FEMA identified its contract oversight staffing needs, we analyzed DHS's staffing model—which FEMA uses—and compared the model against selected staffing model key principles we identified in prior work and standards for internal control.⁶ We determined that the control activities component of internal controls was significant to this objective, along with the principle that management should design control activities to achieve objectives and respond to risks. We interviewed DHS officials responsible for maintaining and validating the staffing model and FEMA officials that used it.⁷ We

⁴GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁵We did not conduct a site visit to Kentucky as the selected contracts' periods of performance had ended or were ending soon, and it was not possible to observe contract performance or oversight activities.

⁶We developed these key principles for staffing models and reported them in prior work. See GAO, *U.S. Citizenship and Immigration Services: Additional Actions Needed to Manage Fraud Risks*, [GAO-22-105328](#) (Washington, D.C.: Sept. 19, 2022); *U.S. Citizenship and Immigration Services: Actions Needed to Address Pending Caseload*, [GAO-21-529](#) (Washington, D.C.: Aug. 18, 2021); and *Federal Protective Service: Enhancements to Performance Measures and Data Quality Processes Could Improve Human Capital Planning*, [GAO-16-384](#) (Washington, D.C.: Mar. 24, 2016). Also see [GAO-14-704G](#).

⁷DHS's Office of the Chief Financial Officer performs independent verification, validation, and accreditation of models and simulations across DHS. In January 2024, DHS's Office of the Chief Financial Officer verified, validated, and accredited the DHS contracting job series staffing model.

analyzed data on the number of FEMA contracting officers and CORs and the extent to which these staff had the proper certifications. To assess the reliability of the data, we compared the data to the CORs' certification documentation associated with our sample of selected contracts. We also interviewed FEMA officials that used the data to discuss any potential data reliability issues. We determined that the contracting officer and COR certification data were sufficiently reliable for the purposes of this report.

We conducted this performance audit from October 2023 to February 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Comments from the Department of Homeland Security

U.S. Department of Homeland Security Washington, DC 20528

January 21, 2025

Travis J. Masters
Director, Contracting and National Security Acquisitions
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-25-107136, "Disaster Contracting: Opportunities Exist for FEMA to Improve Oversight."

Dear Mr. Masters:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS, or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition that in reviewing 15 contracts from the Kentucky floods, Hurricane Ian, and the Maui wildfires the Federal Emergency Management Agency (FEMA) took oversight steps, such as assessing contractor reports of work performed and conducting site inspections. GAO also acknowledged that as of fiscal year (FY) 2024, FEMA had 109 advance contracts in place covering goods and services such as tarps, food and water, information technology and communication support, and housing and lodging assistance. Maximizing the use of advance contracts to the extent they are practical and cost-effective helps preclude the need to procure goods and services under unusual and compelling urgency. FEMA remains committed to being a good steward of taxpayer funds by strengthening oversight of the billions of dollars obligated annually on contracts responding to natural disasters.

The draft report contained seven recommendations with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing accuracy, contextual, and other issues under a separate cover for GAO's consideration, as appropriate.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

Jim H. Crumpacker
Director

Departmental GAO-OIG Liaison Office
Enclosure

Enclosure: Management Response to Recommendations Contained in GAO-25-107136

GAO recommended the FEMA Administrator ensure that its Office of the Chief Component Procurement Officer (OCCPO):

Recommendation 1: Reiterates to contracting officers and CORs [Contracting Officer Representatives], such as through a memorandum or training, the preference for and purpose of implementing performance-based acquisition methods for service contracts.

Response: Concur. FEMA OCCPO will develop and issue Performance-Based Acquisition guidance to reinforce the purpose, benefits, and application of this method for service contracts to Contracting Officers and CORs, as appropriate. Estimated Completion Date (ECD): September 30, 2025.

Recommendation 2: Reiterates to CORs, such as through a memorandum or training, the COR's role in documenting oversight activities taken to ensure contractor performance on service contracts.

Response: Concur. FEMA OCCPO will ensure CORs understand their role in documenting oversight activities to ensure contractor performance on service contracts by issuing supplemental guidance to the DHS COR Guidebook 1 outlining COR duties, as appropriate, to include the COR's role in documenting oversight activities taken to ensure contractor performance on service contracts. Once complete, FEMA OCCPO will socialize this guidance on the COR Community site and the OCCPO Policy page.

In addition, FEMA OCCPO will build upon existing training for the current Contractor Performance Assessment Reporting System (CPARS)² and conduct additional FEMA COR "community of practice" training sessions focused on use of the CPARS as part of contractor oversight. These training sessions will particularly emphasize the importance of contractor oversight to ensure CORs have the proper certification and authorization to perform their oversight duties effectively. ECD: September 30, 2025.

Recommendation 3: Trains contract oversight staff (including contracting officers, CORs, and program office staff) on DHS and FEMA requirements for technical monitors to have the appropriate level of COR certification and the appropriate authorizations to serve on contracts.

Response: Concur. Although DHS does not have a technical monitor certification or specialization, the FEMA OCCPO Procurement Consulting and Resources Branch will incorporate requirements for Technical Monitor (TM) training, certification and "formal appointment"³ as defined by Section 3042.270 of the Federal Emergency Management Acquisition Manual⁴ into existing informal "brown bag" training sessions. The training sessions will have a focus on Quality Assurance Surveillance Plans (QASPs) and COR Nomination Packages. Further, QASPs and COR Nomination Packages topics are already part of the Purchase Request Package/Pre-Solicitation education efforts. ECD: September 30, 2025.

Recommendation 4: Take steps to identify who within the agency is performing contract oversight duties on active contracts and ensure that those individuals have the proper COR certification and contracting officer authorization.

Response: Concur. FEMA OCCPO will utilize a new "CORs on Active Contracts Report," that, once complete, will ensure that CORs performing contract oversight duties have the proper certification and authorization by auditing the certification status and level of the COR to ensure they are appropriately aligned to the contract action. Going forward, this report looking at active FEMA contracts will be conducted quarterly, and if CORs are found to not have the correct level of certification, Contracting Officers will take corrective action as appropriate to replace the COR with one who has the proper certification level. ECD: September 30, 2025.

Recommendation 5: Documents the steps it used to create and maintain the contracting job series staffing model.

Response: Concur. The Department's OCPO will update the current standard operating procedure on DHS' s contracting job series staffing model, as appropriate, to include the steps used to update and maintain the model. ECD: January 31, 2026.

Recommendation 6: Incorporates potential risks into its contracting job series staffing model.

Response: Concur. The Department's OCPO will incorporate potential risks, such as attrition, into the DHS contracting job series staffing model. Specifically, these risks will be included in staffing model for the FY 2026 OCPO Annual Staffing exercise, which is an annual activity where components project the number of contracting job series positions needed in the next FY. ECD: October 31, 2025.

Recommendation 7: Uses the results of the contracting job series staffing model to help inform long-term workforce planning, to include staff retention.

Response: Concur. FEMA OCCPO will utilize the results of the contracting job series staffing model as part of developing Resource Allocation Plans and requests for Contracting Series, 1102 personnel, as well as use the staffing model to analyze workload among the Acquisition Operational Branches to manage workload distribution. Finally, the annual staffing model results will be considered in development of the OCCPO succession plan to support workforce retention. ECD: September 30, 2025.

(1) "DHS Contracting Officer's Representative (COR) Guidebook," Version 2.0, dated October 2024.

(2) CPARS is the tool used to evaluate and record a contractor's performance on a contract.

(3) "Formal appointment" of a Technical Monitor means an individual is appointed to assist the COR with monitoring the contractor's performance.

(4) "Federal Emergency Management Acquisition Manual," Version 1.5, dated September 2024.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Travis J. Masters, (202) 512-4841 or masterst@gao.gov

Staff Acknowledgments

In addition to the contact named above, the following staff members made key contributions to this report: Janet McKelvey (Assistant Director), Jeff Hartnett (Analyst-in-Charge), Bonnie Binggeli, Andres De La Torre Perez, Lorraine Ettaro, Lori Fields, Steven Flint, Suellen Foth, Brittany Morey, Joseph Shir, and Anne Louise Taylor.

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