



U.S. DEPARTMENT OF HOMELAND SECURITY **OFFICE OF INSPECTOR GENERAL**

OIG-26-21

August 18, 2026

FINAL REPORT

FEMA Disaster Response Crew Violated Law and Policy by Skipping Homes with Political Signage





DHS OIG HIGHLIGHTS

FEMA Disaster Response Crew Violated Law and Policy by Skipping Homes with Political Signage

August 18, 2026

Why We Did This Audit

In 2024, FEMA deployed DSA program personnel to assist communities affected by Hurricanes Helene and Milton. According to the FEMA Administrator at the time of the hurricanes and an internal FEMA investigation, after Hurricane Milton, a DSA crew leader instructed their team to avoid homes advertising support for then-Presidential candidate Donald Trump. We conducted this audit to determine the extent to which FEMA followed its policies and procedures when canvassing communities impacted by Hurricanes Helene and Milton for the DSA program.

What We Recommend

We made four recommendations to improve FEMA's DSA program in future deployments.

OIG Access

FEMA delayed full access to its Field Assessment and Collection Tools system (more than 100 days) and Deployment Tracking System (40 days), which significantly impacted our audit timeliness and prevented access to information that later became unavailable.

What We Found

A Federal Emergency Management Agency (FEMA) Disaster Survivor Assistance (DSA) crew skipped homes during the response to Hurricane Milton due to the presence of political signage supporting then-Presidential candidate Donald Trump, violating FEMA policy and the *Hatch Act of 1939* (Hatch Act). This situation eroded public trust in FEMA's ability to treat everyone impartially, offer unbiased and consistent assistance, and ensure equal access to resources and tools.

- FEMA DSA crews canvassed 744,288 homes and other locations for both Hurricanes Helene and Milton and made no contact with 555,374 locations for reasons such as private property signs or safety concerns.
- We found that a DSA crew skipped 11 homes during the response to Hurricane Milton due to the presence of political signage supporting then-Presidential candidate Donald Trump, violating FEMA policy and the Hatch Act.

We could not determine if crews skipped locations for unallowable reasons during other disasters because the support contract for FEMA's Field Assessment and Collection Tools ended in September 2025 when then-Department of Homeland Security Secretary Noem did not act on FEMA's request to fund it before expiration. We requested access to the data in March 2025, but FEMA delays prevented us from obtaining the data prior to the contractor abruptly shutting down the system.

These issues occurred due to weaknesses in FEMA's training, documentation, and oversight. FEMA DSA crews did not receive ethics and Hatch Act training before deploying to disasters, DSA policies and procedures did not require crews to explain why they skipped homes, and DSA crew leaders were not required to conduct quality control reviews of survivor interactions.

FEMA Response

FEMA concurred with all four recommendations. Appendix C contains FEMA's management response in its entirety.



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Background

Hurricane Helene made landfall in the Big Bend area of the Florida Gulf Coast as a Category 4 storm on September 26, 2024. The storm caused widespread severe flooding, hundreds of fatalities, and billions of dollars in property damage from the Gulf Coast to the North Carolina mountains. On October 9, 2024, Hurricane Milton made landfall near Siesta Key, Florida, as a Category 3 storm, significantly impacting Florida communities still recovering from Helene. The President approved major disaster declarations for Florida, North Carolina, and Tennessee after the storms, providing Federal assistance to help communities clean up and start rebuilding.

Figure 1. Damage from Hurricane Helene in Buncombe County, NC



Source: Department of Defense, Defense Visual Information Distribution Service (DVIDS)

To reach hurricane survivors, the Federal Emergency Management Agency (FEMA) began deploying Disaster Survivor Assistance (DSA) crews in late September 2024. FEMA's DSA program is within the Individual Assistance Division under the Field Services Section, Individuals and Households Program Branch. DSA crews were composed of full-time DSA staff, FEMA staff from other divisions, and employees from other Federal agencies who volunteered to help FEMA during the recovery. The crews went door-to-door in communities (a practice known as canvassing) through January 2025 to register people for disaster assistance and provide in-



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person information and referrals to help with recovery support.¹ Figures 2 and 3 depict DSA canvassing activities after Hurricanes Helene and Milton.

Figure 2. DSA Crew Canvass in Buncombe County, NC, after Hurricane Helene



Source: DVIDS

Figure 3. DSA Crew Canvass in Palm Beach County, FL, after Hurricane Milton



Source: DVIDS

DSA crews documented their interactions (called surveys) with survivors in FEMA's Survey123 application,² part of FEMA's Field Assessment and Collection Tools (FACT) system and DSA's system of record.

In October 2024, FEMA officials received a complaint alleging that a DSA crew leader instructed their team to avoid homes in Florida advertising support for then-Presidential candidate Donald Trump following Hurricane Milton. FEMA referred the allegations to the Office of Special Counsel and the Department of Homeland Security Office of Inspector General (OIG) and conducted its own internal investigation of the activities.

We conducted this audit to determine the extent to which FEMA followed its policies and procedures when canvassing communities impacted by Hurricanes Helene and Milton for the DSA program.

¹ According to FEMA memorandum *Disaster Survivor Assistance Operations for 2025 Hurricane Season*, dated June 26, 2025, FEMA has since discontinued door-to-door canvassing as of the date of the memorandum but continues to provide support to survivors at fixed sites and state-led recovery centers.

² Survey123 was a web-based application that captured disaster survivor information such as interaction location and registration status. The application included a geolocation capability that could be displayed on a map for visualization, analysis, and reporting.



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Results of Audit

Key Finding: A FEMA DSA Crew Skipped 11 Homes for Unallowable Reasons

FEMA personnel violated policy when a DSA crew skipped 11 homes with political signage during the response to Hurricane Milton in Florida. These actions eroded public trust in FEMA's ability to treat everyone impartially, offer unbiased and consistent assistance, and ensure equal access to resources and tools after Hurricanes Milton and Helene.

FEMA DSA policies outline circumstances under which DSA crews may skip homes. According to FEMA's *DSA Field Operations Guide* (DSA Field Guide), September 2018, DSA crews confronted by hostile individuals may remove themselves if they feel threatened, if the person continues to be hostile, or if they feel unsafe. FEMA's *Disaster Survivor Assistance Just-In-Time Training 2024* (Just-in-Time Training), effective for disasters declared on or after March 22, 2024, provides the following safety-related factors for DSA crews to avoid:

- No trespassing sign posted;
- No soliciting sign posted;
- Private property sign posted;
- Climbing on or over debris; and
- Purple paint displayed, which signifies no trespassing.

FEMA DSA policy does not provide for any other circumstances in which it is permissible for DSA crews to skip homes. The DSA Just-in-Time Training directed crews to document their reasons for not visiting a home or other location by selecting one of five pre-defined choices in the outcome field of the

FEMA Lost Access to Canvassing Data Due to Contract Lapse

We cannot determine whether crews skipped homes for unallowable reasons during other disasters because we could not access Survey123 records. In March 2025, we requested FEMA provide access to Survey123 information for all disasters. FEMA delayed our access for months. On September 23, 2025, the contractor abruptly shut down the system, and FEMA staff lost access to Survey123 when FEMA's FACT support contract lapsed. FEMA could not renew the contract because then-Secretary Noem did not act on the FEMA request to fund the contract before its lapse.

According to FEMA staff, the Survey123 data FEMA retained after the system was shut down is not in an accessible, readable format. Personnel from the Contract Management Section of the Recovery Technology Programs Division told us FEMA will need to procure a new sole-source contract with the vendor to restore the data and decommission FACT properly. As of September 24, 2025, FEMA does not have a system of record for DSA activities.



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Survey123 application.³ As shown in Figure 4, the outcome field provided radio button choices for allowable reasons to skip homes. Crews could provide further explanation in an optional notes field.

Figure 4. FEMA DSA Survey123 Survivor Interaction Survey

DSA Survey 3.0.5

Select Survey Type *

☒ Survivor Interactions ☐ Community Interactions ☐ AIR

Crew Number *

13

Interaction Location *

☒ Home ☐ Community Location
☐ Public Space ☐ Private Sector
☐ Disaster Recovery Center (DRC) ☐ Event
☐ Registration Intake Center ☐ Shelter
☐ Mitigation Support Location ☐ Apartment Complex
☐ Other

Did you make contact? *

☐ Yes ☒ No

What was the outcome? *

☐ No Answer/Left Flyer ☐ Not Able to Access Property
☐ No Access/Loose Animals ☐ No Access/Private Property
☐ No Access/Gated

Notes (No PII)

Source: FEMA's DSA Just-In-Time Training

From late September 2024 through January 2025, DSA crews documented 744,288⁴ surveys for locations they canvassed after Hurricanes Helene and Milton. Crews recorded in Survey123 they made no contact at 555,374 of the 744,288 locations. Figure 5 provides the reasons crews selected no contact in the outcome field of Survey123.

³ If a crewmember encounters hostility, they can submit an incident report, which is separate from the field survey.

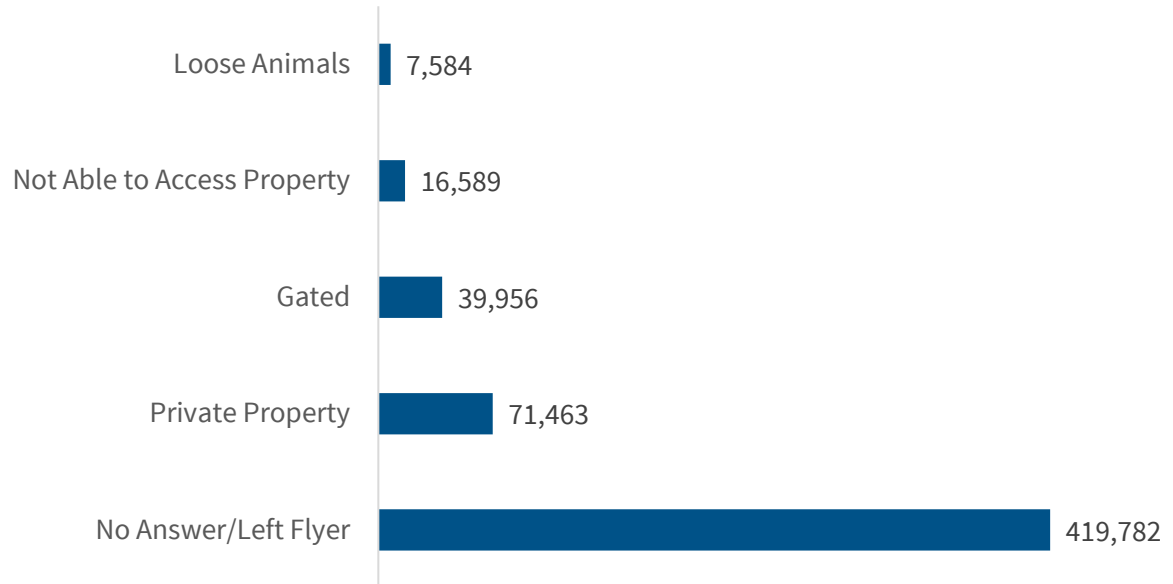
⁴ 744,288 represents total records crews added to Survey123 as visits, which includes locations crews may not have visited.



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Figure 5. Reasons for Locations with No Contact



Source: DHS OIG analysis of FEMA's Survey123 records

For the 555,374 locations with no contact, DSA crewmembers provided optional notes with additional information in 24,136 surveys (4 percent) and did not provide notes for 531,238 surveys (96 percent). We queried notes for 53,247 surveys, which included the 24,136 surveys for locations with no contact that included notes, to identify whether instances of political bias existed. **We identified 11 surveys with notes indicating potential political bias.** For the 11 surveys, crewmembers selected the following outcome radio button for locations with no contact:

- 8 surveys indicated "Not Able to Access Property."
- 2 surveys indicated "Private Property."
- 1 survey indicated "No Answer/Left Flyer."



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However, in the notes field all 11 surveys included the name of then-Presidential candidate Donald Trump to explain the reason for skipping the homes. The same DSA crew completed all 11 identified surveys. We did not identify additional instances where the information in the notes field indicated crews may have violated policy.⁵

According to the FEMA Administrator at the time of the hurricanes and an internal FEMA investigation, the crew skipped these homes after Hurricane Milton when the crew leader instructed their team to avoid homes advertising support for then-Presidential candidate Donald Trump. According to a DSA Branch Director, as stated in FEMA's internal investigation, a different DSA crew recanvassed the neighborhoods previously canvassed by the crew who skipped the homes. The Branch Director added that DSA crews received negative reactions from the public after the incident was published in media outlets.

Other Related Investigations

The Office of Special Counsel and FEMA's Office of Professional Responsibility also investigated the instances in which DSA crews skipped homes after Hurricane Milton and determined that personnel violated the Hatch Act and FEMA policy.

Additionally, DHS' Privacy Office investigated whether FEMA had impermissibly collected and maintained information on how individuals exercise their First Amendment rights during disaster survivor assistance efforts. Its report, *Potential Violations of the Privacy Act of 1974 and Other Policy Requirements by the Federal Emergency Management Agency*, was issued in August 2025.

Why This Happened: Weaknesses in Training, Documentation, and Oversight

DSA Officials Did Not Ensure Personnel Received Ethics and Hatch Act Training Before Being Deployed to the Disasters

FEMA did not ensure all personnel, including those from other agencies, deployed for Hurricanes Helene and Milton had knowledge of ethics rules or *Hatch Act of 1939* (Hatch Act)⁶ restrictions despite the public-facing nature of the DSA mission. According to the *Standards of Ethical Conduct for Employees of the Executive Branch*, Federal employees shall act impartially and shall endeavor to avoid any actions creating the appearance that they are violating the law or ethical standards.⁷

⁵ After our period of fieldwork had ended, our auditors identified another potential instance when a crewmember from a separate DSA crew may have skipped a home with a political sign after Hurricane Milton. DHS OIG referred the incident to FEMA.

⁶ The *Hatch Act of 1939*, 5 United States Code (U.S.C.) §§ 7321–7326, generally prohibits Federal employees from engaging in partisan political activity while on duty.

⁷ 5 Code of Federal Regulations (C.F.R.) § 2365.101.



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We reviewed training records for a judgmental, random sample of 25 DSA crew leaders and members deployed to canvass after Hurricanes Helene and Milton to verify whether they received training on the Hatch Act.

- **FEMA could not provide documentation to show 15 of the 25 crew leaders and members (60 percent) ever received Hatch Act training.**

We also interviewed 18 additional DSA crewmembers from a judgmental, random sample who were deployed to Hurricanes Milton and Helene.

- **11 of the 18 DSA crew leaders and members we interviewed said either they did not receive or did not know if they had received Hatch Act training.** Seven of the 18 DSA crew leaders and members said they received some Hatch Act training before deployment.
- **10 of the 18 crew leaders and members we interviewed demonstrated no clear understanding of the Hatch Act** despite 2 of them reporting they had received some Hatch Act training before deployment. Eight of the 18 DSA crew leaders and members demonstrated knowledge of the Hatch Act.

FEMA prepared DSA crews to reach out to disaster survivors by providing DSA training prior to deployment, but **FEMA DSA training did not cover ethics rules or Hatch Act provisions.** FEMA's *DSA Cadre Instructional Matrix*, April 3, 2024, required DSA crew leaders and members to receive either *DSA Specialist Training 7012* or DSA's Just-in-Time Training. These trainings covered tasks related to survey completion, registration intake, case status inquiries and updates, survivor needs assessment, and safety.

The Ethics Branch of FEMA's Office of the Chief Counsel provides ethics training for all new FEMA employees, which includes the Hatch Act. FEMA does not require most personnel⁸ to receive annual or periodic refresher training on these topics, although management should reinforce the organization's standards of conduct.⁹ The agency¹⁰ can designate additional employees who should receive annual ethics training in coordination with the DHS Designated Agency Ethics Official, the DHS Office of General Counsel, and the FEMA Office of the Chief Counsel.¹¹ In addition to providing annual training required by statute and regulations, the Ethics Branch provides ethics training to FEMA programs, divisions, and offices on both an ad hoc and recurring

⁸ Annual ethics training is required by regulation for certain federal employees, including those who must file confidential financial disclosures. 5 C.F.R. § 2638.307(a). DHS policy requires annual ethics training for all financial filers. DHS Management Directive 0480.1 (2003).

⁹ Management is responsible for ensuring employees are competent in their roles, trained, and that standards of conduct are reinforced. Management may consider using training to regularly communicate and reinforce the standards of conduct to the organization. *GAO Standards for Internal Control in the Federal Government* (GAO-14-704g), May 2025, Sections 4.05 and 1.07.

¹⁰ 5 C.F.R. § 2638.307(a)(4).

¹¹ 5 C.F.R. § 2638.104.



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basis. According to an official from FEMA's Office of the Chief Counsel Ethics Branch, the home agencies of personnel deployed to assist FEMA on DSA crews are responsible for providing required training to their employees. **FEMA did not verify if personnel deployed from other agencies had received ethics or Hatch Act training.**

After FEMA learned of the incidents where crewmembers skipped homes after Hurricane Milton, it provided mandatory training to all DSA crews, including deployed personnel. The training covered the Hatch Act and included case studies from the U.S. Office of Special Counsel, guidance for crews on public interactions, and safety and security procedures to follow when canvassing communities. FEMA did not update its ethics guidance to require that annual ethics and Hatch Act training, or refresher training, be administered to staff before deployments.

Recommendation 1: We recommend the Associate Administrator of the FEMA Office of Response and Recovery assess FEMA's policies and determine an appropriate frequency of ethics and Hatch Act training for all FEMA staff who are subject to deployment.

Recommendation 2: We recommend the Associate Administrator of the FEMA Office of Response and Recovery develop and implement a mechanism to ensure all personnel are knowledgeable about ethics and the Hatch Act before deploying to a disaster.

FEMA DSA Policies and Procedures Did Not Require Crews to Add Details for Why They Skipped Locations

FEMA policy did not require DSA crews to explain the reasons why they skipped or avoided locations. When DSA crewmembers do not interact with a survivor at an assigned location, they must choose the reason they did not make contact from a limited set of options in Survey123 (e.g., no answer/left flyer, not able to access property). Although the application includes an open text field for canvassers to add notes, these notes were not required or standardized. Neither the *DSA User Guide*, Version 2.6, June 2021; DSA's Just-in-Time Training; nor the DSA Field Guide requires crews to add notes. The *DSA User Guide* indicates the notes field is intended to "provide further detail and clarification as applicable." DSA Headquarters officials confirmed it was optional to add notes to survivor interaction surveys in Survey123.¹²

FEMA Did Not Require DSA Crew Leaders to Conduct Quality Control Reviews of Survivor Surveys

Although DSA crew leaders prepared daily summary reports to inform FEMA Headquarters of DSA activity in the field and the status of canvassing, FEMA did not require them to conduct quality

¹² Documentation is a necessary part of an effective internal control system. GAO-25-107721, May 2025, Section OV2.10.



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control reviews of surveys and include the outcome of those reviews in the reports. The daily summary report functioned as a high-level update of canvassing progress and did not include information from the survey notes field or on individual incidents crewmembers may have encountered in the field. The report provided updates on DSA's functions of field registrations, case updates, and case inquiries to reflect DSA field activity and provide pertinent information to DSA Headquarters leadership for decision-making. The DSA Field Guide required crew leaders to oversee work assignments to include progress of outreach efforts, confirm crews visited assigned locations, and submit canvassing information in the daily summary report for FEMA Disaster leadership. However, the DSA Field Guide did not require crew leaders to review entries in the survey notes field in Survey123 for potential policy violations.

Because FEMA did not require crew leaders to review Survey123 notes, Individual Assistance Program and Field Operations Directorate officials were not initially aware when crews violated policy during the Hurricane Milton response despite crewmembers including statements in the notes field indicating the unallowable reasons they skipped homes. The first instance of a note indicating a DSA crew skipped a home due to political signage occurred on October 19, 2024. A subsequent note on October 22 stated, "did not visit due to Trump flag." Nine additional notes concerning political signage followed. On October 28, 2024, 9 days after the initial entry, FEMA's Office of Professional Responsibility became aware of the policy violations when it received a complaint from the Transportation Security Administration on behalf of its personnel deployed to Hurricane Milton's DSA crews. We reviewed the daily summary reports for the days the crew skipped 11 homes for unallowable reasons and confirmed they did not contain information on skipping homes due to political signage.

Recommendation 3: We recommend the Associate Administrator of the FEMA Office of Response and Recovery implement a system of record for documenting survivor interactions.

Recommendation 4: We recommend the Associate Administrator of the FEMA Office of Response and Recovery update its policies and procedures to require that (a) Disaster Survivor Assistance crews use a standardized method to document whether locations were skipped and the reasons for skipping homes; and (b) Disaster Survivor Assistance crew leaders conduct quality control reviews of survivor interaction survey questions and include the outcome of those reviews in their summary reports.



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Appendix A: Objective, Scope, and Methodology

We conducted this audit to determine the extent to which FEMA followed its policies and procedures when canvassing communities impacted by Hurricanes Helene and Milton for the DSA program. The scope of our audit was 2024–2025 canvassing activities for Hurricanes Helene and Milton that impacted Florida, North Carolina, and Tennessee:

Major Disaster Declaration/Incident Period:

- Florida Hurricane Helene (DR-4828), September 23 through October 7, 2024
- North Carolina Tropical Storm Helene (DR-4827), September 25 through December 18, 2024
- Tennessee Tropical Storm Helene (DR-4832), September 26 through 30, 2024
- Florida Hurricane Milton (DR-4834), October 5 through November 2, 2024

Our audit publication was significantly delayed by three Government shutdowns in FY 2026, which covered 56 percent of the fiscal year through May 1.

To answer our audit objective, we reviewed relevant policies and procedures to assess guidance for DSA crews when canvassing. We interviewed FEMA officials to understand oversight of the program and canvassing activities in the field. We also interviewed a judgmental, random sample of 5 DSA crew leaders and 13 crewmembers of the 1,038 DSA personnel who canvassed communities after Hurricanes Helene and Milton to understand the canvassing process from beginning to end, including how areas are selected for canvassing, how crews perform door-to-door canvassing, and how crew leaders oversee canvassing in the field.

To determine whether crews skipped homes for reasons that would violate the DSA Field Guide and Just-in-Time Training, which govern DSA activities in the field, we obtained access to FEMA's FACT system and Survey123 application. We identified which surveys from Hurricanes Helene and Milton included notes in the optional note field and conducted a keyword search for terms to identify skipped homes and those that could indicate political bias, which would violate the guidance. We could not expand testing to disasters other than Hurricanes Helene and Milton due to FEMA losing access to the FACT database, which housed Survey123.

To determine whether crews received the required *DSA Just-in-Time Training 2024* or *DSA Specialist Training 7012* when deployed for Hurricanes Helene and Milton, we obtained access to FEMA's Deployment Tracking System (DTS), which maintains deployment records and training history for DSA crew leaders and members and compared the deployment dates for 1,038



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personnel deployed to Hurricanes Milton and Helene to their training dates to determine whether they received the required training before their deployment.

To understand how FEMA provided and tracked ethics and Hatch Act training to crews, we interviewed an official from FEMA's Office of the Chief Counsel Ethics Branch. We validated whether crews received recurrent training through interviews with DSA Headquarters officials. We requested documentation to support initial ethics and Hatch Act training for a judgmental, random sample of 25 DSA crew leaders and members deployed to Hurricanes Helene and Milton for canvassing to determine whether they received the training before deployment.

We reviewed reports and supporting exhibits issued by FEMA's Office of Professional Responsibility and the U.S. Office of Special Counsel to determine the outcome of these offices' investigations. Additionally, we reviewed the DHS Privacy Office's August 2025 investigation report and met with officials from that office to gain an understanding of their objective and scope. The Privacy Office's scope and methodology included potential incidents from November 2021 to August 2025, not just activities during Hurricanes Helene and Milton, to assess for potential violations of the *Privacy Act of 1974* (5 U.S.C. § 552a) and whether FEMA impermissibly collected and maintained information during DSA efforts.

To ensure reliability and completeness of the data we used, we obtained direct, read-only access to FEMA's FACT system and DTS. We compared the list of personnel deployed to Hurricanes Helene and Milton that FEMA provided to the information we obtained through direct access to the systems. We addressed discrepancies by communicating with FEMA officials and submitting follow-up data requests. We conducted virtual walkthroughs of the interface and contents for the FACT and DTS systems with DSA subject matter experts to understand the data they contained. We accompanied DSA crews during canvassing efforts for the 2025 California Wildfires disaster to observe and gain an understanding of DSA activities and oversight processes in the field. Additionally, to ensure accuracy of deployment dates, we judgmentally selected and interviewed a sample of 18 DSA crewmembers who participated in either the Hurricane Helene or Milton recovery effort and compared their testimony to what was recorded in DTS. We found the data we used to conduct our analyses was sufficiently complete and accurate for the purpose of our audit.

We assessed the internal controls supporting FEMA's management of the DSA program's canvassing activities. The control deficiencies we found are discussed in the Results of Audit section of this report. However, because our review was limited to specific internal control components, it may not have disclosed all internal control deficiencies that may have existed at the time of our audit.

We conducted this audit from December 2024 through April 2026 pursuant to the *Inspector General Act of 1978*, 5 U.S.C. §§ 401–424, and according to generally accepted government



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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.

DHS OIG's Access to DHS Information

During this audit, FEMA delayed our requests for direct, read-only access to the FACT and DTS databases. We requested access to the FACT database in March 2025 and were not provided access to the complete set of data. In July 2025, more than 100 calendar days later, we were provided access to Hurricanes Helene and Milton data only. Similarly, it took FEMA more than 40 calendar days to provide us with access to the DTS database. These delays significantly impacted our ability to meet project milestones and complete this audit in a timely manner. Additionally, FEMA's FACT database became inaccessible during our audit due to a lapse in funding for the FACT support contract. The loss of access prevented us from assessing whether political bias in canvassing was a systemic issue during the scope period of this audit.



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Appendix B:

Recommendations, Management Comments, and OIG Analysis

FEMA provided management comments on a draft of this report. Appendix C contains a copy of FEMA's response in its entirety. We also received technical comments and incorporated changes to the report where appropriate. FEMA concurred with all four recommendations. We consider two recommendations open and resolved and two recommendations open and unresolved. A summary of FEMA's responses to the recommendations and our analysis follows.

Recommendation 1: We recommend the Associate Administrator of the FEMA Office of Response and Recovery assess FEMA's policies and determine an appropriate frequency of ethics and Hatch Act training for all FEMA staff who are subject to deployment.

FEMA Response to Recommendation 1: Concur. FEMA's Office of Response and Recovery will assess FEMA's policies and determine an appropriate frequency of ethics and Hatch Act training for all FEMA staff who are subject to deployment. This assessment will be performed in coordination with the DHS Designated Agency Ethics Official, the FEMA Office of the Chief Human Capital Officer, and the FEMA Office of the Chief Counsel, as appropriate. Estimated Completion Date: July 31, 2026.

OIG Analysis: We consider these actions responsive to the recommendation, which is open and resolved. The recommendation will remain open until FEMA provides documentation to support that it determined an appropriate frequency of ethics and Hatch Act training for all FEMA staff who are subject to deployment.

Recommendation 2: We recommend the Associate Administrator of the FEMA Office of Response and Recovery develop and implement a mechanism to ensure all personnel are knowledgeable about ethics and the Hatch Act before deploying to a disaster.

FEMA Response to Recommendation 2: Concur. After completing the assessment to determine an appropriate frequency of ethics and Hatch Act training for all FEMA staff who are subject to deployment, the FEMA Office of Response and Recovery will implement training to ensure all personnel receive appropriate ethics and Hatch Act training prior to deployment. This work will be performed in coordination with the DHS Designated Agency Ethics Official, the FEMA Office of the Chief Human Capital Officer, and the FEMA Office of the Chief Counsel, as appropriate. Estimated Completion Date: September 30, 2026.

OIG Analysis: We consider these actions responsive to the recommendation, which is open and resolved. The recommendation will remain open until FEMA provides documentation to support that the FEMA Office of Response and Recovery has implemented a training program in an



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appropriate frequency as determined to ensure all personnel receive ethics and Hatch Act training prior to deployment.

Recommendation 3: We recommend the Associate Administrator of the FEMA Office of Response and Recovery implement a system of record for documenting survivor interactions.

FEMA Response to Recommendation 3: Concur. Since FEMA discontinued using Survey123 in September 2025, FEMA has collected non-identifiable aggregate information on survivor interactions to support disaster operations. This information includes total number of survivor interactions at a specific fixed location per day, total number of survivors who registered for FEMA disaster assistance, and total number of community referrals resulting from those survivor interactions. On June 24, 2026, FEMA provided the OIG with an example of the tool FEMA is currently using. FEMA requested that the OIG consider this recommendation closed and resolved, as implemented.

OIG Analysis: We consider these actions partially responsive to the recommendation, which is open and unresolved. FEMA's June 2025 memorandum that discontinued door-to-door canvassing only applied for the 2025 hurricane season, and the documentation FEMA provided was insufficient to show DSA crews are using a tool that replaced Survey123 to document survivor interactions. The recommendation will remain open until FEMA provides documentation to support the following: FEMA permanently changed the DSA program to eliminate door-to-door canvassing; FEMA updated policies on what information crews must obtain from survivors to complete surveys; and FEMA acquired and deployed a tool to replace Survey123 to track information as required.

Recommendation 4: We recommend the Associate Administrator of the FEMA Office of Response and Recovery update its policies and procedures to require that (a) Disaster Survivor Assistance crews use a standardized method to document whether locations were skipped and the reasons for skipping homes; and (b) Disaster Survivor Assistance crew leaders conduct quality control reviews of survivor interaction survey questions and include the outcome of those reviews in their summary reports.

FEMA Response to Recommendation 4: Concur. FEMA no longer conducts FEMA-led door-to-door outreach efforts, and staff now operate from fixed locations, determined by state and local officials. Further, FEMA discontinued the use of FACT products, including tools DSA staff previously used to collect data when interacting with survivors. Since this time, FEMA has collected non-identifiable aggregate information on survivor interactions to support disaster operations. This information includes total number of survivor interactions at a specific fixed location per day, total number of survivors who registered for FEMA disaster assistance, and total number of community referrals resulting from those survivor interactions. Quality control reviews consist of looking at the aggregate data, which is quantified and does not include any



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free text fields. On June 24, 2026, FEMA provided OIG with an example of the tool FEMA is currently using. FEMA is also developing an “In-Person Survivor Services Guide,” which will reinforce the change to the operating model. Estimated Completion Date: August 31, 2026.

OIG Analysis: We consider these actions partially responsive to the recommendation, which is open and unresolved. FEMA’s June 2025 memorandum that discontinued door-to-door canvassing only applied for the 2025 hurricane season, and the documentation FEMA provided was insufficient to show DSA crews are using a tool that replaced Survey123 to document survivor interactions. We will close the recommendation when we receive substantive documentation to show FEMA acquired and deployed the tool, and DSA crews are using it and the finalized and approved “In-Person Survivor Services Guide.”



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Appendix C: FEMA Comments on the Draft Report

FEMA's formal management response begins on the next page.



FEMA

BY ELECTRONIC SUBMISSION

July 7, 2026

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.
Inspector General

FROM: Christopher P. Logan
Associate Administrator of Policy and Program Analysis (A)
Federal Emergency Management Agency
Office of Policy and Program Analysis

SUBJECT: Management Response to Draft Report: "FEMA Disaster
Response Crew Violated Law and Policy by Skipping Homes
with Political Signage." (Project No. 25-015-AUD-FEMA)

Thank you for the opportunity to comment on this draft report. The Federal Emergency Management Agency (FEMA) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

FEMA leadership is pleased to note OIG's recognition of the importance of Disaster Survivor Assistance program personnel assisting communities affected by Hurricanes Helene and Milton, including that FEMA's Disaster Survivor Assistance crews canvassed over 744,000 homes and locations. FEMA remains committed to serving disaster survivors impartially and efficiently, which is demonstrated by the fact that—when concerns were raised regarding adherence to law and policy in performance of this work—FEMA leadership acted swiftly to investigate, remediate, and strengthen training and oversight.

As a result, FEMA increased mission readiness training and no longer conducts FEMA-led door-to-door outreach efforts. Staff now provide support to survivors from fixed locations determined by state and local officials through a data-informed approach. This approach aligns with the principles of locally implemented, state-managed and federally-supported disaster response, and allows FEMA to focus efforts on where they will have the greatest impact. In addition, the agency continues to enhance its procedures to ensure all survivors receive equal access to assistance, and to uphold the highest standards of ethical conduct.

In addition, upon learning that any homes were potentially skipped due to the presence of political signage, readers of this draft report should be aware that FEMA quickly conducted an internal investigation and referred the matter to the appropriate oversight bodies, to include the U.S. Department of Homeland Security (DHS or the Department)’s Office of Special Counsel and the DHS OIG. After the incident, FEMA provided additional mandatory Hatch Act and ethics training to all Disaster Survivor Assistance crews, including case studies and guidance for public interactions, in accordance with FEMA’s dedication to upholding the highest standards of integrity and conduct.

FEMA also understands that timely access to requested data and systems is necessary for the OIG to be able to complete its report accurately and on schedule, but disagrees with the OIG’s characterization that FEMA delayed full access to this system and the Deployment Tracking System. In fact, FEMA complied with all requests for data and systems access for both the Field Assessment and Collection Tools system and the Deployment Tracking System. In a memorandum between FEMA and the OIG,¹ the OIG requested a limited dataset for Hurricanes Helene and Milton from the Field Assessment and Collection Tools system and the Deployment Tracking System. The OIG confirmed access to this dataset in May 2025 and later expanded their Field Assessment and Collection Tools data request in June 2025. FEMA responded to both requests in a timely manner and provided OIG with access to all Field Assessment and Collection Tools system records from July 7, 2025, until September 24, 2025, when a contract funding lapse resulted in the system being turned off.

OIG requests for data, including requests for direct access to agency IT databases, should be evaluated on a case-by-case basis. DHS fully supports providing the OIG timely access to information “which relate[s] to the programs and operations with respect to which [the] Inspector General [IG] has responsibilities”² The law, however, does not state how the Department should provide access to the information or require the Department to provide OIG the data in the manner OIG requests. Accordingly, DHS is not required to provide the information to the OIG via direct access to agency systems, especially where the agency, as the steward of the data, assesses that the system may include a significant amount of data that is beyond the scope of the OIG’s stated objectives, including sensitive, classified, and otherwise confidential information. In order to ensure the appropriate handling and safeguarding of the information, DHS may seek information on the relevance of a data request to the scope and objectives of OIG’s work, especially in light of the types of sensitive data held by DHS. In addition, the law does not prohibit DHS from providing the requested information via alternative means to satisfy auditors’ need for “appropriate, sufficient evidence to provide a reasonable basis for addressing the audit objectives and supporting their findings and conclusions.”³

¹ Memorandum “Office of Inspector General request to Disaster Survivor Assistance database,” dated May 23, 2025.

² 5 U.S.C. § 406(a)(1)(A).

³ GAO-24-106786, Government Auditing Standards, § 8.90.

The draft report contained four recommendations with which FEMA concurs. FEMA previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for OIG'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.

Attachment

**Attachment: Management Response to Recommendations
Contained in 25-015-AUD-FEMA**

OIG recommended that FEMA's Associate Administrator of the Office of Response and Recovery:

Recommendation 1: Assess FEMA's policies and determine an appropriate frequency of ethics and Hatch Act training for all FEMA staff who are subject to deployment.

Response: Concur. The FEMA Office of Response and Recovery will assess FEMA's policies and determine an appropriate frequency of ethics and Hatch Act training for all FEMA staff who are subject to deployment. This assessment will be performed in coordination with the Department of Homeland Security Designated Agency Ethics Official, the FEMA Office of the Chief Human Capital Officer, and the FEMA Office of the Chief Counsel, as appropriate.

Estimated Completion Date: July 31, 2026.

Recommendation 2: Develop and implement a mechanism to ensure all personnel are knowledgeable about ethics and the Hatch Act before deploying to a disaster.

Response: Concur. Following completion of the assessment to determine an appropriate frequency of ethics and Hatch Act training for all FEMA staff who are subject to deployment, the FEMA Office of Response and Recovery will implement training to ensure all personnel receive appropriate ethics and Hatch Act training prior to deployment. This work will be performed in coordination with the Department of Homeland Security Designated Agency Ethics Official, the FEMA Office of the Chief Human Capital Officer, and the FEMA Office of the Chief Counsel, as appropriate.

Estimated Completion Date: September 30, 2026.

OIG recommended that FEMA's Assistant Administrator of Recovery:

Recommendation 3: Implement a system of record for documenting survivor interactions.

Response: Concur. In September 2025, FEMA discontinued the use of the Field Assessment and Collection Tools products, to include "Survey123," which was a tool previously used to collect data from our Disaster Survivor Assistance staff when interacting with survivors. Since this time, data collection on survivor interaction only consists of non-identifiable aggregate information to support disaster operations. This information includes total number of survivor interactions at a specific fixed location per

day, total number of survivors who registered for FEMA disaster assistance, and total number of community referrals resulting from those survivor interactions. On June 24, 2026, FEMA provided the OIG with an example of the tool FEMA is currently using under a separate cover.

FEMA requests that the OIG consider this recommendation resolved and closed, as implemented.

Recommendation 4: Update its policies and procedures to require that (a) Disaster Survivor Assistance crews use a standardized method to document whether locations were skipped and the reasons for skipping homes; and (b) Disaster Survivor Assistance crew leaders conduct quality control reviews of survivor interaction survey questions and include the outcome of those reviews in their summary reports.

Response: Concur. As previously noted, FEMA no longer conducts FEMA-led door-to-door outreach efforts and staff now operate from fixed locations, determined by state and local officials. This allows FEMA to reach disaster survivors more efficiently and focus efforts on where they will have the greatest impact.

As part of this change, FEMA discontinued the use of the Field Assessment and Collection Tools products, including tools previously used to collect data from Disaster Survivor Assistance staff when interacting with survivors. Since this time, data collection on survivor interaction only consists of non-identifiable aggregate information to support disaster operations. This information includes total number of survivor interactions at a specific fixed location per day, total number of survivors who registered for FEMA disaster assistance and total number of community referrals resulting from those survivor interactions. Quality control reviews consist of looking at the aggregate data, which is quantified and does not include any free text fields. On June 24, 2026 FEMA provided the OIG with an example of the tool FEMA is currently using, under a separate cover. FEMA is also developing an “In-Person Survivor Services Guide, which will reinforce the change to the operating model.

Estimated Completion Date: August 31, 2026.



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Appendix D: Report Distribution

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