

Description: Funds received under the EFSP are federal funds which must be accounted for under EFSP guidelines as well as federal accountability standards. One of the reviews for which EFSP funds are subject is the Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA) which tests for improper payments and includes the recovery of improper payments. All Local Boards and Local Recipient Organizations (LROs) are subject to this review and may be selected at any time for any Phase in which EFSP funds were received.

This Quick Reference Guide is provided to assist in the understanding of the *EFSP Responsibilities and Requirements Manual (EFSP Manual)*. For more complete information on EFSP accountability, audits, cost eligibility, and documentation requirements, please reference the **EFSP Manual**.

What is the IPERIA?

The IPERIA assessment is a federal review conducted by the Department of Homeland Security's (DHS) Federal Emergency Management Agency (FEMA) in compliance with the IPERIA as passed by Congress. This review tests for compliance by Local Boards and LROs with EFSP's expenditure and documentation requirements. Failure to provide appropriate documentation (insufficient) or to spend funds outside the purposes of EFSP (ineligible) can result in improper payments. IPERIA requires that any identified improper payments be recovered.

Why was my agency selected?

LROs are selected through a formula which is statistically based to meet the requirements of IPERIA.

What does my agency need to do?

Provide the required documentation outlined in the EFSP Responsibilities and Requirements Manual for the categories in which your agency was funded. This includes the requirement of a spreadsheet by funding category of all expenditures attributed to EFSP along with the vendor-originated, itemized invoice and proof of payment.

Sample spreadsheets and instructions for each program category are available on the EFSP website, efsp.unitedway.org.

If a form of payment other than a check is used, bank statements, credit card statements, and payments to the credit card company must be provided. Cash payments are ineligible.

How is IPERIA different from the Final Report compliance review?

Documentation should always be correct and complete upon initial submission to EFSP for any purpose. While EFSP works with Local Boards and LROs to resolve documentation problems, due to the timing of IPERIA, LROs must submit the proper documentation initially as there is little, if any, time for problem resolution.

What if my agency is found to have improper payments?

Like EFSP's Final Report compliance review process, any improper payments must be resolved or they will prevent future funds from being paid to the agency. These problems can be resolved through either the submission of appropriate, eligible documentation or the repayment of the improper costs.