

STIMULUS OVERSIGHT PANEL



**Second Quarterly Report
June 2010**

**Joseph Fisch, Chair
New York State Inspector General**

**Galen Kirkland
Human Rights Commissioner**

**Barry Kluger
MTA Inspector General**

**James Sheehan
Medicaid Inspector General**

BACKGROUND

On July 9, 2009, Governor David A. Paterson ordered the creation of a Stimulus Oversight Panel (“Panel”) to ensure that the over \$31 billion of federal funds provided to New York State under the American Recovery and Reinvestment Act of 2009 (ARRA) are utilized with transparency and accountability. The Panel is chaired by New York State Inspector General Joseph Fisch and includes state Division of Human Rights Commissioner Galen Kirkland, Metropolitan Transportation Authority Inspector General Barry Kluger and state Medicaid Inspector General James Sheehan. With the signing of Executive Order No. 31 on November 25, 2009, the Panel was formalized and provided expanded jurisdiction over state agencies receiving ARRA funds. The Executive Order charges the Panel with “the prevention and detection of waste, fraud, abuse and mismanagement of ARRA funds, the promotion of transparency and openness,” and the “distribut[ion] [of ARRA funds] in an equitable, fair and non-discriminatory manner.” The Executive Order also requires the Panel to “report on a quarterly basis on the status of ongoing activities and results of investigations performed under th[e] order to the Deputy Secretary for Infrastructure and Transportation and the Counsel to the Governor.” To that end, on March 4, 2010, the Panel issued its first quarterly report to the Governor’s Office. What follows is the Panel’s second quarterly report.

Since July 2009, the Panel has met on an ongoing basis to, among other things, discuss and refine its goals and methods of implementation. The Panel’s “Working Group,” comprised of employees of each Panel member, specifically executive staff, senior attorneys, investigators and auditors possessing specialized knowledge of construction, contracts, healthcare fraud and human rights issues, continues to meet on a bi-weekly basis. First Deputy Inspector General Kelly Donovan chairs the bi-weekly Working Group meetings. During these meetings, the Working Group examines the use of ARRA funds by each of the 22 New York State agencies designated to receive them, develops coordination with other state and federal law enforcement partners responsible for the oversight of ARRA funds, and discusses the progress of investigations whose allegations were received through the Stimulus Complaint hotline. The Working Group also initiates proactive reviews when deemed necessary.¹

SUMMARY FOR 2ND QUARTER (MARCH 1, 2010 – May 31, 2010)

The Working Group invites to its bi-weekly meetings each of the 22 New York State agencies receiving ARRA funding, to provide an overview of its use of ARRA funds and the internal controls in place to prevent fraud. This quarter, the Working Group has met individually with the following New York State agencies:

¹ Allegations of alleged corruption, fraud, criminal activity, conflicts of interest, abuse or discrimination should be sent directly to the Office of the Inspector General. Complaints can be made by phone (1-800-DO-RIGHT), e-mail inspector.general@ig.state.ny.us, or by written letter to: State Inspector General, Empire State Plaza, Agency Building 2, 16th Floor, Albany, New York 12223. Complaints can also be completed through the State Inspector General’s Web site: <http://www.ig.state.ny.us/complaints/fileComplaint.html>.

- The Department of Health
- The Department of Transportation
- The Metropolitan Transportation Authority
- The Office of Temporary and Disability Assistance
- The Environmental Facilities Corporation
- The State University of New York
- The New York State Energy Research & Development Authority

As detailed in the Panel's first quarterly report, the Working Group meets with a number of federal, state and city agencies it deems important to the successful oversight of ARRA funds. The meetings are held with a view towards expanding and further establishing a collaborative network by which to share information and resources, and have included representatives from the Inspector General offices of the U.S. Departments of Education, Transportation, Labor, Health and Human Services, Environmental Protection Agency, and Housing and Urban Development; it also has included members of the Federal Bureau of Investigation, the U.S. Attorney's Offices of both the Southern and Eastern Districts of New York, the New York School Construction Authority, and the Office of the New York City Comptroller. All of these agencies have committed to attend quarterly meetings to assess the oversight process, and a number of joint investigations have commenced and referrals have been made to federal Inspectors General.

On April 9, 2010, the NYS Inspector General's Office hosted the Panel's second quarterly meeting of our federal, state and New York City partners as detailed above. The Office of the New York City Comptroller presented the attendees with an overview of the stimulus funding received by the City of New York's governmental agencies. The presentation, led by Deputy Comptroller for Legal Affairs Ricardo E. Morales and Deputy Comptroller for Audit Tina Kim, not only provided valuable insight into the stimulus process in New York City, but also detailed the Comptroller's efforts to monitor these funds.

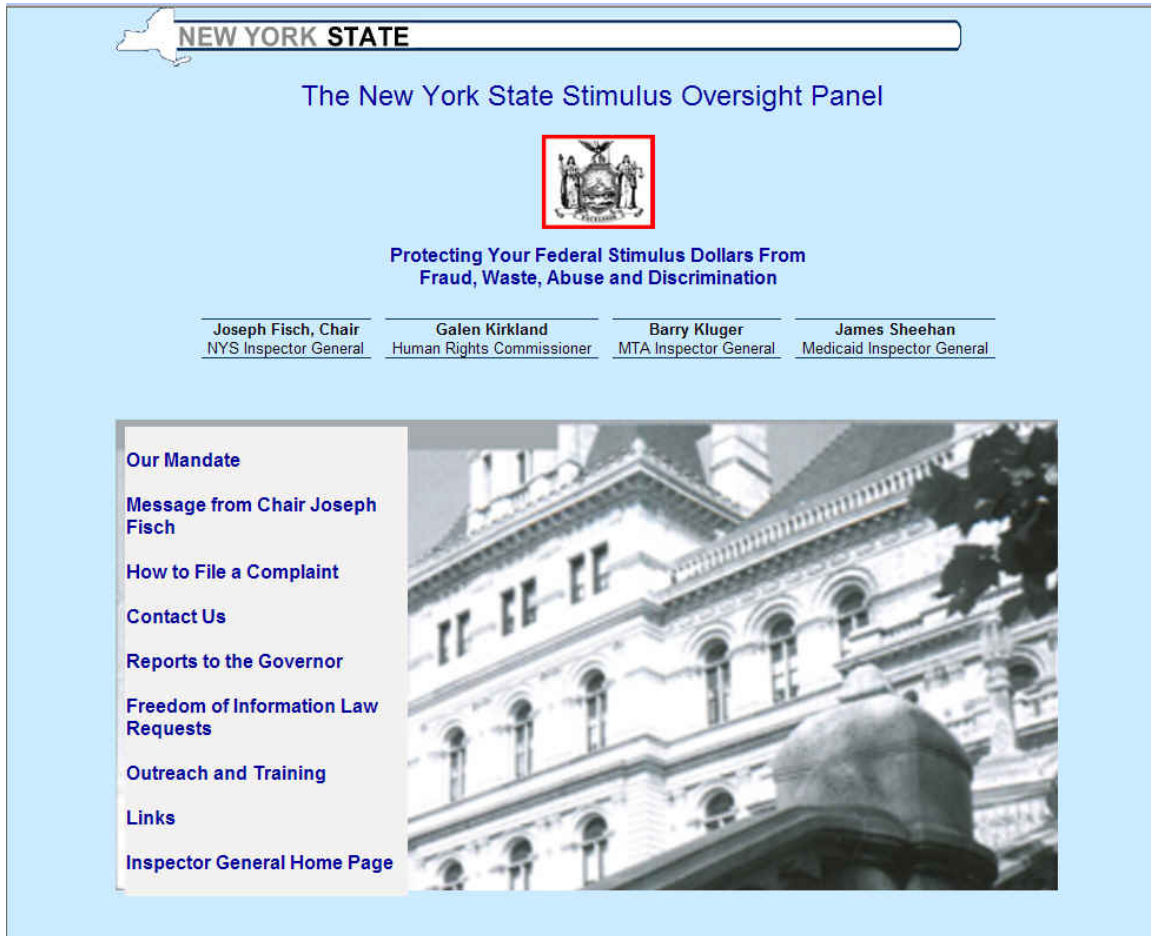
Members of the Working Group subsequently met separately with the New York City Comptroller's Office to maintain this dialogue, and will continue to work together to ensure that stimulus funding received by New York City is monitored carefully and investigated thoroughly.

THE NEW YORK STATE INSPECTOR GENERAL

The NYS Inspector General hosts the bi-weekly Working Group meetings, sets the agenda, schedules participants, and is the investigative body of New York State designated to receive complaints regarding the misuse of ARRA funds. To date, the NYS Inspector General is actively engaged in a number of complex investigations involving the misuse of ARRA funds, some of which include the cooperation of federal prosecutorial agencies.

The NYS Inspector General recently created a Stimulus Oversight Panel Web site the primary purpose of which is to educate the public on the Panel's mission and activities. The Web site explains Executive Order 31, the Panel's enabling order, and provides a link to its full text for those who wish to read it in its entirety. The Web site includes a message from Chair Fisch which describes the interplay of the varying expertise the four member agencies bring to the Panel and the importance of the continued involvement of the public to alert the Panel to misuse of ARRA funds. Those wishing to obtain training on fraud, waste and abuse prevention and detection related to ARRA programs can find contact information on the Web site (discussed further below). Perhaps most importantly, the Web site provides concerned citizens and whistleblowers with an additional means to submit allegations of fraud, waste or abuse of ARRA funds to the Panel via the Internet. Below is a reproduction of the Web site's home page, which can be accessed at the following address:

http://www.ig.state.ny.us/stimulus/stimulus_index.html.



The screenshot shows the home page of the New York State Stimulus Oversight Panel. At the top left, there is a logo for New York State with the text "NEW YORK STATE" in a white box. Below this, the title "The New York State Stimulus Oversight Panel" is centered. Underneath the title is the Seal of the State of New York, which is a red-bordered square containing a black and white illustration of a figure holding a scale and a sword. Below the seal, the text "Protecting Your Federal Stimulus Dollars From Fraud, Waste, Abuse and Discrimination" is centered. Below this text is a horizontal line with four columns of names and titles: "Joseph Fisch, Chair NYS Inspector General", "Galen Kirkland Human Rights Commissioner", "Barry Kluger MTA Inspector General", and "James Sheehan Medicaid Inspector General". Below the names is a vertical navigation menu on the left side with the following items: "Our Mandate", "Message from Chair Joseph Fisch", "How to File a Complaint", "Contact Us", "Reports to the Governor", "Freedom of Information Law Requests", "Outreach and Training", "Links", and "Inspector General Home Page". To the right of the navigation menu is a large photograph of the New York State Capitol building, showing its ornate architecture and a dome in the foreground.

The Inspector General recently designed and produced a Stimulus Oversight Panel brochure. This pamphlet provides a brief history of the creation of the Panel and its mission. Potential complainants are advised of the availability of federal whistleblower protection under the ARRA statute. It also identifies the various kinds of fraud, waste or abuse which the Panel has jurisdiction to investigate, as well as the various means to file a complaint with the Panel, including the hot line telephone number.

Protect Your
Federal Stimulus
Dollars in New York



Report Fraud, Waste, Abuse and Discrimination to
the NYS Stimulus Oversight Panel

Joseph Fisch, Chairman
NYS Inspector General

Barry Kluger
MTA Inspector General

James Sheehan
Medicaid Inspector General

Galen Kirkland
Human Rights Commissioner

Call: 1-800-DO-RIGHT (1-800-367-4448)

E-mail: inspector.general@ig.state.ny.us

New York's Stimulus Oversight Panel, created by Governor David A. Paterson, assures that federal funds provided through the American Recovery and Reinvestment Act (ARRA) are used with transparency and accountability.

You can do your part to ensure efficiency and save taxpayer dollars.

Contact us if you suspect any:

Bribery

Contract Fraud

Theft

Bid Rigging

Discrimination

Conflicts of Interest

You cannot be punished for making a complaint. Section 1553 of the ARRA extends federal whistleblower protection to anyone whose employer receives federal stimulus funds.

As a recipient of ARRA funds, you can receive training on ethical behavior and fraud prevention.

For more information or to file a complaint, visit the NYS Inspector General's Web site at www.ig.state.ny.us or write:

NYS Inspector General
Empire State Plaza
Agency Building 2, 16th Floor
Albany, New York 12223

Several state agencies receiving ARRA funds have been provided these brochures for distribution. Agencies such as the Department of Transportation and Environmental Facilities Corporation in collaboration with the Department of Health and Department of Environmental Conservation are in the process of distributing them to contractors, subcontractors and state employees working on ARRA projects across New York State. In just two months roughly 4,000 brochures have been disseminated.

Since the first quarterly reporting, the NYS Inspector General has focused on DHCR's distribution of ARRA funds through weatherization grants. As previously discussed, DHCR has been charged with distributing these funds via weatherization grants through a network of 66 community action groups throughout the state. The weatherization assistance program assists income-eligible families and individuals by reducing their heating/cooling costs and improving the safety of their homes through energy efficient measures.

The NYS Inspector General maintained its field presence with DHCR, assisting in fiscal and programmatic audits of projects receiving ARRA funding for weatherization. The NYS Inspector General has also developed an in-house training curriculum for presentation to community action groups and not-for-profits receiving ARRA funding through the weatherization program. The presentation is dedicated to fraud, waste and abuse awareness and presented to all employees – not just the executive staff – at the local office of the community action group. The Panel's brochure on fraud, waste and abuse along with the Inspector General's hotline phone number is distributed to all employees receiving the training. Thus far, 393 staff members from 16 of the 66 community action groups in 14 counties have received the NYS Inspector General training. Additional training sessions are currently scheduled for June with more to follow. Training sessions in two of the community action groups directly led to reports to the Inspector General of allegations of criminal activity regarding ARRA funds. Those allegations are currently under investigation.

This quarter, the Inspector General has focused on ARRA-funded clean water and drinking water projects. New York State received \$432 million in ARRA funding for its Clean Water State Revolving Fund (SRF) and \$86.8 million for its Drinking Water SRF.

The New York State Department of Environmental Conservation (DEC) is responsible for the Clean Water SRF. However, the New York State Environmental Facilities Corporation (EFC) administers the Clean Water SRF on behalf of DEC by providing financing for water quality projects to localities and municipalities. In the 20 years since its creation, EFC has provided over \$11 billion in financial assistance to municipalities throughout the state for clean water projects through low interest loans and loan forgiveness. The Clean Water SRF was appropriated \$432 million of ARRA funds with the prerequisite that the monies be committed to projects either under construction or under contract for construction by February 16, 2010. EFC has met this ARRA requirement and has committed the funding to 80 clean water projects throughout the state. EFC is also in the process of retaining an engineering firm to conduct onsite inspections of its stimulus projects.

In contrast, the New York State Department of Health (DOH) and EFC co-administer the Drinking Water SRF. Created in 1996, the Drinking Water SRF provides funding to localities and municipalities to maintain or develop new drinking water facilities which comport with federal guidelines and the community's safe drinking water needs. DOH, through its Bureau of Public Water Supply, screens applications and selects the projects to be funded by the Drinking Water SRF. EFC then contracts with the locality, provides the bonding and/or leveraging for the project, or arranges financing for the project. In certain instances, EFC will also provide technical assistance to aid municipalities in issuing bonds and assessments to the community to raise money for the water project.

Representatives of DEC, DOH and EFC have appeared at a number of Working Group meetings. In addition, on April 29, 2010, the NYS Inspector General met at the offices of EFC to discuss ways the NYS Inspector General could assist EFC with onsite inspections of ARRA-funded construction projects. The NYS Inspector General review found that responsibility rests with the locality – not EFC, DEC and DOH – to oversee the entire bidding process, including the selection of engineers and contractors; overseeing the contractor's compliance with Davis-Bacon (prevailing wage) and disadvantaged-, minority- and woman-owned business enterprise (D/M/WBE) requirements and the on-the-job supervision of work through completion of the project. Because few rural localities have encountered such large-scale sewage and drinking water projects, they may be more susceptible to waste, fraud and abuse. Through a detailed review of these clean water projects, the NYS Inspector General will draft recommendations to EFC to promote greater integrity oversight of the local projects.

To this end, on May 12, 2010, the NYS Inspector General visited a construction job site in Poestenkill, New York. The \$10 million project received half of its funding from ARRA to convert the hamlet's drinking water from individual well usage to a public water system deriving its water from the city of Troy. The scope of the project involved placing 16 miles of piping in ground to connect Poestenkill to the already existing water system in nearby Troy through a connection with the town of Brunswick. The project also involved the purchase of two plots of land: one for the construction of a large storage water tank and the other for the installation of a water pump. The new drinking water system will provide potable drinking water to 553 residences, an elementary school and several businesses. The ultimate goal is to reduce the reliance on wells, some of which are contaminated from land fills, oil spills and stream runoffs. Approximately 30 percent of the project has been completed to date with an anticipated final completion date of September 2010.



Workers prepare the mold for the circular concrete foundation of the water storage tank in Poestenkill.

During the visit to Poestenkill, the Inspector General met with DOH and EFC officials and reviewed all contract-related documents for the Poestenkill project including bid tabulation sheets, Request For Proposals and contract agreements while specifically noting ARRA-related provisions such as Buy American and Davis Bacon. Furthermore, the Inspector General met with the Town Supervisor of Poestenkill and representatives of the engineering company, CT Male and Associates, who oversee the project, as well as a representative of one of the two primary construction firms performing the work. Some of the topics discussed included compliance with prevailing wage laws, M/WBE utilization requirements and change order procedures and scrutiny. EFC informed the Inspector General that it requires monthly engineer reports, certified payroll records and M/WBE forms from the contractors. And, as of the date of the visit, one contractor had already exceeded its 6% WBE commitment. These reports and records were provided to the Inspector General. The Inspector General then conducted a site inspection which consisted of, among other things, viewing the installation of miles of pipe and the construction of a large water storage tank (depicted above).

The Inspector General has scheduled for June 3, 2010, a similar contract review and site visit for the Westchester ARRA-funded project located in Mamaroneck. That \$55.4 million project substantially funded by ARRA will upgrade biological nutrient removal at the Mamaroneck Waste Water Treatment Plant with the goal of reducing the

amount of nitrogen released into the Long Island Sound. The NYS Inspector General will conduct other contract and site reviews in upstate New York and Buffalo.

The Inspector General conducts confidential investigations of allegations of fraud, extortion, bid rigging, contract steering, and other malfeasances regarding recipients of ARRA funds. The Inspector General has dedicated five staff members to investigate allegations involving the misuse of ARRA funds. While some initial allegations have proved unsubstantiated, others appear founded and the Inspector General pursues evidence. To date, the Inspector General has issued countless subpoenas for financial records of suspected institutions and individuals. Thousands of pages of records have been and are currently being analyzed by the Inspector General and numerous witnesses have been interviewed. Furthermore, the Inspector General collaborates with federal law enforcement agencies, such as the U.S. Department of Transportation Inspector General and the U.S. Department of Housing and Urban Development Inspector General.

THE NEW YORK STATE DIVISION OF HUMAN RIGHTS

In addition to participating in the Panel's work described above and identifying recipients for further review of their compliance with civil rights laws, the Division of Human Rights ("Human Rights") has developed a best practices methodology for coordinated civil rights monitoring and enforcement by New York State agencies receiving stimulus money. To accomplish this task, Human Rights met with groups advocating for fair distribution, transparency and accountability of stimulus funding to identify issues and then researched their recommendations for compliance, data reporting and analysis. Human Rights also contacted all state agencies receiving ARRA funds to establish contacts and examine their general civil rights compliance procedures for stimulus contracts and grants. Based in part on the determination that most agencies receiving ARRA funds had not instituted any specific or new procedures for monitoring compliance with civil right laws regarding stimulus contracts, Human Rights developed a set of best practices and circulated it to the agencies for comment.

After receiving those comments, Human Rights solicited further input on its best practices methodology from the attendees of the April 8, 2010 meeting of the Governor's Economic Recovery and Reinvestment Cabinet. The meeting of approximately 50 people included members of the Governor's staff, members of Human Rights and two representatives from each state agency receiving ARRA funds. At the meeting, the members of the Governor's staff reiterated Governor Paterson's commitment to assuring compliance with civil rights laws regarding stimulus contracts. The Cabinet then created subgroups of agencies with similar missions who are receiving ARRA funds to facilitate implementation of Human Rights' best practices methodology. While the Cabinet created five subgroups, Human Rights has begun working with the largest group, the "infrastructure group," which is comprised of MTA, Department of Transportation, EFC, and others. These agencies spend the bulk of the ARRA funds and generally have the best civil rights monitoring programs.

In order to effectively implement the best practices and to monitor the respective state agencies, Human Rights has invoked the assistance of the State Chief Information Officer/Office for Technology to develop a statewide operational plan for the collection and analysis of workforce and prevailing wage data. Because individual state agencies are already mandated to collect this data, the computer system currently in development will serve as a statewide centralized resource to allow Human Rights to compare actual labor pool availability with the stimulus recipient's reported workforce. These comparisons will "red flag" variances for Human Rights to investigate possible discrimination or non-compliance with civil rights laws. Human Rights will be meeting shortly with the state agencies comprising the infrastructure group, and later with the state agencies of the remaining subgroups, regarding implementation of this computer system.

Human Rights anticipates that this system will minimize the burden on the individual agencies to compile data and select particular stimulus recipients for further examination. Human Rights also expects that in the future, the system will be utilized in the monitoring of civil rights compliance for non-stimulus state contracts and grants as well.

Finally, Human Rights continues to investigate complaints received by the Panel about discrimination in stimulus projects, and, as part of the Panel's work, to identify particular stimulus recipients or programs for detailed investigation.

METROPOLITAN TRANSPORTATION AUTHORITY INSPECTOR GENERAL

Section 1512 of the American Recovery and Reinvestment Act requires the submission of quarterly progress reports to the Federal Office of Management and Budget on expenditures of funds and the creation of jobs. As such, at the request of the New York State Governor's Office, the MTA OIG, together with the New York State Office of the Inspector General and the New York State Department of Transportation provided quality assurance for the October 2009 Stimulus submission of 20 state agencies. Errors in the submissions were identified, corrections were made, and areas necessitating additional training for agency staff were identified. For the second round of quarterly reports, January 2010, the MTA OIG conducted quality assurance for a selected sample of 20 agencies. The review found agency reports to be comprehensive and overall agency performance and compliance to have improved.

Training

Together with the USDOT OIG and the US Department of Justice Antitrust Division, MTA OIG has conducted fraud-detection training for 330 MTA employees and is in the process of scheduling two more sessions of 75 employees each in the near future. The audience included, among others, members of MTA Audit Services, Grant Management and construction managers. The sessions cover the following fraud awareness, topics: product substitution, Buy American, embezzlement, bribery,

kickbacks, DBE fraud, testing fraud, change orders, overcharging, prevailing wages, whistle blower protection, and bid rigging and collusion. Indeed, at a recent progress meeting, a construction manager who had attended a previous training session related that he is now comparing certified payrolls with access forms to ensure the workers are being paid the correct prevailing wages.

Kickoff Meetings

MTA OIG attends construction kickoff meetings on all ARRA projects at which MTA OIG advises the contractors, in the presence of MTA staff, that making a false statement on a DBE Progress Report or certified payroll is a federal offense; that MTA OIG reviews reports and change orders; and that MTA OIG maintains a close working relationship with the USDOT OIG on these matters. To date, MTA OIG has attended 11 kickoff meetings and 55 progress meetings.

Site Visit Program

MTA OIG's Construction Fraud Unit has begun a site inspection program which involves surprise construction site visits for compliance with legal and contractual obligations including appropriate materials, safety obligations, prevailing wage compliance, use of identified subcontractors, and site security. MTA OIG also interviews workers onsite to determine the identity of their employers, whether the employers are paying the prevailing wage and whether the employees have the proper identification and track training cards. MTA OIG also examines the bills of lading to determine if materials are being shipped to the proper contractors actually hired to perform the work. Six site visits have been conducted since the issuance of the Stimulus Oversight Panel's last quarterly report.

Stimulus Reviews & Analyses

The MTA OIG conducts targeted reviews and analyses of MTA stimulus projects for fraud, waste and abuse, and performs risk assessments in order to identify areas of high risk as well as potential fraud indicators. The reports are reviewed by the OIG's Investigations and Audit Divisions where appropriate.

The MTA OIG also tracks and reviews the results of MTA's own Auditor General's Reports on stimulus expenditures and job creation, again identifying "red flags" and areas of high risk, referring appropriate matters to the OIG's investigations division for review.

Miscellaneous

MTA OIG focuses on compliance and federal requirements regarding DBE targets/goals; prevailing wages for laborers, mechanics, and truckers; transparency and accountability requirements; and, good faith effort requirements by contractors to ensure DBE's are given the opportunity to perform the work and are not used as pass-throughs.

MTA OIG has also reviewed the implementation of contractor access forms for entrance into job sites with officials of the MTA Capital Construction Corp. These contracts are critically important for both fraud and security prevention.

NEW YORK STATE OFFICE OF THE MEDICAID INSPECTOR GENERAL

The New York State Office of the Medicaid Inspector General (OMIG) identifies and investigates fraud, waste and abuse in the New York State's Medicaid program. OMIG's Division of Medicaid Investigations (DMI) works to protect the integrity of the Medicaid program by preventing instances of improper Medicaid payments before they are made, and also by recovering inappropriate payments made to providers.

Members of OMIG attend the Panel's bi-weekly meetings. During the last quarter of OMIG's participation in the Panel, OMIG identified, through the Office of the State Comptroller's (OSC) "Open Book," approximately 259 Medicaid providers who have received various forms of ARRA funding. OMIG has focused on those 259 providers who have received ARRA funds through state contracts.

OMIG-DMI, with the assistance of OMIG audit staff, will conduct onsite reviews of these targeted providers. Toward that end, OMIG has developed an onsite questionnaire to ascertain whether required reports are being filed in a timely and accurate manner, ARRA guidelines in the hiring of staff are being followed, and all ARRA funds have been properly expended.

This onsite process will also serve to increase awareness and educate employees of these providers regarding the detection of fraud, waste and abuse and the various reporting methods available to them. OMIG will supply these providers with ARRA Fraud pamphlets with contact numbers to share with their staff.

OMIG is currently focused on the funds awarded through the following state agencies for specified federal programs: New York State Department of Education, New York State Office of Temporary and Disability Assistance (OTDA), and, New York State Department of Health.

New York State Department of Education

The Department of Education administers a federal program entitled "Supported Employment" which involves paid competitive employment in an integrated setting with ongoing support for individuals with the most severe disabilities. Specifically, Supported Employment provides assistance such as job coaching, job placement, interaction with employers, onsite specialized job training, and individually tailored supervision. Stimulus funding will allow numerous agencies to expand existing programs in this area and to assist people with disabilities in obtaining and maintaining employment. OMIG has identified 197 enrolled Medicaid providers who have received funds for Supported Employment Services and each will be evaluated for onsite review.

Office of Temporary and Disability Assistance (OTDA)

OTDA administers Homeless Prevention and Rapid Re-Housing (HPRP) grants which include: short term or medium term rental assistance, housing relocation and stabilization services, mediation, credit counseling, utility payments, moving costs assistance, case management or other appropriate activities for homeless prevention for persons who have become homeless or who are at risk of losing their housing. OTDA oversees family and single shelters for the homeless operated by local social services districts and not-for-profit organizations. Of those shelters and organizations, OMIG has identified 17 enrolled Medicaid providers and is evaluating each for review.

NYS Department of Health

The Department of Health administers Disproportionate Share Funds (DSH) payments which involve payments to provide additional help to those hospitals and nursing homes that serve a significantly disproportionate number of low-income patients. Eligible hospitals and nursing homes are referred to as DSH hospitals. States receive an annual DSH allotment of federal funds to cover costs of DSH hospitals that provide care to low-income patients that are not paid by other payers, such as Medicaid, Medicare, the children's health program (CHIP), or other health insurance. This annual allotment is based upon a statutory formula and includes requirements to ensure that the DSH payments are not higher than actual uncompensated costs. The purpose of the additional stimulus funds to DSH allotments is to enable hospitals to continue providing care to the indigent population they serve and to minimize job cuts that would otherwise be necessary in this economic downturn. OMIG has identified 45 hospitals and nursing homes that receive DSH funds and will evaluate payments to nursing homes to ensure the disbursement of DSH funds were appropriate.

OMIG has set June 1, 2010, as the date for the start of the inspection of these sites.