OFFICE OF
INSPECTOR GENERAL

November 12, 2026

OIG-27-024

MEMORANDUM FOR **JEFFREY W. STOUT, ACTING CHIEF PROGRAM OFFICER, OFFICE OF CAPITAL ACCESS, DEPARTMENT OF THE TREASURY**

FROM: Pauletta P. Battle /s/
Assistant Inspector General for Audit

SUBJECT: Desk Review of New Stuyahok Village, Alaska's Use of Coronavirus Relief Fund Proceeds

On March 31, 2022, we initiated a desk review of New Stuyahok Village, Alaska's (New Stuyahok) use of Coronavirus Relief Fund (CRF) proceeds, authorized under Title VI of the Social Security Act, as amended by Title V Division A of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act).[1] This work was initiated in response to New Stuyahok's failure to submit required quarterly data in the GrantSolutions[2] portal for cycles 1 through 8.[3] The objective of our desk review was to evaluate New Stuyahok's documentation supporting its uses of CRF proceeds as reported in GrantSolutions and the alternative format of reporting,[4] and to assess the risk of unallowable use of funds. The scope of our desk review covered New Stuyahok's obligation and expenditure data for the period March 1, 2020, through December 31, 2022,[5] as reported in GrantSolutions and the alternative format of reporting.

---

1 P.L. 116-136 (March 27, 2020)

2 GrantSolutions, a grant and program management Federal shared service provider under the U.S. Department of Health and Human Services, developed a customized and user-friendly reporting solution to capture the use of CRF payments from recipients.

3 Department of the Treasury Office of Inspector General's quarterly reporting timeline for prime recipients included 14 cycles with cycle 1 ending June 30, 2020, and cycle 14 ending September 30, 2023. Tribal government recipients were able to incur eligible costs through December 31, 2022. Recipients were expected to have completed all expenditures of CRF awards by March 31, 2023. Closeout of CRF awards was due in GrantSolutions no later than July 10, 2023.

4 The alternative format of reporting was a means of submitting quarterly reporting in paper form. This allowed tribes that were having connectivity issues with the GrantSolutions portal a means to comply with the quarterly reporting requirements.

5 New Stuyahok's final Financial Progress Report was submitted in cycle 11 for the period ending December 31, 2022.

As part of our desk review, we performed the following:

1) reviewed New Stuyahok's quarterly Financial Progress Reports (FPRs) submitted in GrantSolutions and alternative format of reporting through December 31, 2022;
2) reviewed the *Department of the Treasury's (Treasury) Coronavirus Relief Fund Guidance* (Guidance) as published in the Federal Register on January 15, 2021;[6]
3) reviewed Treasury Office of Inspector General's (OIG) *Coronavirus Relief Fund Frequently Asked Questions Related to Reporting and Recordkeeping;*[7]
4) reviewed Treasury OIG's *Coronavirus Relief Fund Reporting and Record Retention Requirements;*
5) reviewed other audit reports issued, such as Single Audit Act reports, and those issued by the Government Accountability Office and other applicable Federal agency OIGs for internal control or other deficiencies that may pose risk or impact New Stuyahok's use of CRF proceeds;
6) reviewed Treasury OIG Office of Investigations, the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Pandemic Response Accountability Committee (PRAC),[8] and Treasury OIG Office of Counsel input on issues that may pose risk or impact New Stuyahok's use of CRF proceeds;
7) interviewed key personnel responsible for preparing and certifying New Stuyahok's quarterly FPR submissions, as well as officials responsible for obligating and expending CRF proceeds;
8) made a non-statistical selection of Direct Payments greater than or equal to $50,000, Aggregate Direct Payments less than $50,000,[9] and Aggregate Payments to Individuals[10] data identified through GrantSolutions and the alternative format of reporting; and

---

[6] CRF Guidance as published in the Federal Register (January 15, 2021) https://home.treasury.gov/system/files/136/CRF-Guidance-Federal-Register_2021-00827.pdf

[7] Treasury OIG, *Coronavirus Relief Fund Frequently Asked Questions Related to Reporting and Recordkeeping*, OIG-20-028R (March 2, 2021)

[8] Section 15010 of P.L. 116-136 established the PRAC within CIGIE to promote transparency and conduct and support oversight of covered funds (see Footnote 12 for a definition of covered funds) and the coronavirus response to (1) prevent and detect fraud, waste, abuse, and mismanagement; and (2) mitigate major risks that cut across program and agency boundaries.

[9] Prime recipients were required to report CRF transactions greater than or equal to $50,000 in detail in the GrantSolutions portal. Transactions less than $50,000 could be reported as an aggregate lump-sum amount by type (contracts, grants, loans, direct payments, and transfers to other government entities).

[10] Obligations and expenditures for payments made to individuals, regardless of amount, were required to be reported in the aggregate in the GrantSolutions portal to prevent inappropriate disclosure of personally identifiable information.

9) evaluated documentation and records used to support New Stuyahok's quarterly FPRs.

Based on our review of New Stuyahok's documentation supporting the uses of its CRF proceeds as reported in the FPRs, we determined that the expenditures were incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID–19) and were incurred during the period that began March 1, 2020, and ended on December 31, 2022, as described in the CARES Act and Treasury's Guidance.

New Stuyahok did not have a budget as of March 27, 2020. Because a budget did not exist, we were unable to assess compliance with the CARES Act criterion requiring that costs must not be accounted for in the budget most recently approved as of that date. Despite this limitation, we proceeded with assessing New Stuyahok's expenditures against the two CARES Act criteria that could be evaluated: (1) whether the expenditures were necessary due to the COVID-19 public health emergency, and (2) whether the expenditures were incurred during the covered period.

Based on our assessment of their expenditures, we determined that New Stuyahok's risk of unallowable use of funds is low. Accordingly, we will not be conducting an audit.

Non-Statistical Transaction Selection Methodology

Treasury issued a total of $1,760,968 in CRF payments to New Stuyahok. As of December 31, 2022, New Stuyahok expended all its CRF proceeds. We made a non-statistical selection of 41 transactions from the Direct Payments greater than or equal to $50,000, Aggregate Direct Payments less than $50,000, and Aggregate Payments to Individuals payment types. We made selections using auditor judgment based on total CRF award amount, amounts claimed within each payment type, and our overall risk assessment of New Stuyahok.

Background

The CARES Act appropriated $150 billion to establish the CRF. Under the CRF, Treasury made payments for specified uses to States and certain local governments; the District of Columbia and U.S. Territories, including the Commonwealth of Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands; and Tribal governments (collectively referred to as "prime recipients"). Treasury issued a total of $1,760,968 in CRF payments to New Stuyahok. The CARES Act stipulates that a prime recipient may only use the funds to cover costs that were:

(1) necessary expenditures incurred due to the public health emergency with respect to the coronavirus disease 2019 (COVID-19);
(2) not accounted for in the budget most recently approved as of March 27, 2020; and
(3) incurred during the period that began on March 1, 2020, and ended on December 31, 2021, for states, local governments, and territories. In the case of tribal governments, were incurred during the period that began on March 1, 2020, and ended on December 31, 2022 (covered period).

New Stuyahok did not have a budget as of March 27, 2020. As a result, compliance with criterion (2) could not be assessed during our review.

Section 15011 of the CARES Act required each covered recipient[11] to submit to Treasury and the PRAC, no later than 10 days after the end of each calendar quarter, a report that contained (1) the total amount of large covered funds[12,13] received from Treasury; (2) the amount of large covered funds received that were expended or obligated for each project or activity; (3) a detailed list of all projects or activities for which large covered funds were expended or obligated; and (4) detailed information on any level of subcontracts or subgrants awarded by the covered recipient or its subrecipients.

The CARES Act assigned Treasury OIG the responsibility for compliance monitoring and oversight of the receipt, disbursement, and use of CRF proceeds. Treasury OIG was also assigned the authority to recoup funds in the event it is determined a prime recipient failed to comply with requirements of subsection 601(d) of the Social Security Act, as amended, (42 U.S.C. 801(d)).

Desk Review Results

We reviewed the GrantSolutions portal and found that New Stuyahok did not timely file quarterly FPRs as required under Treasury OIG's Guidance, *Coronavirus Relief Fund Reporting and Record Retention Requirements.* New Stuyahok failed to file quarterly FPRs in cycles 1 through 8. New Stuyahok submitted quarterly

[11] Section 15011 of P.L. 116-136 defined a covered recipient as any entity that received large, covered funds and included any State, the District of Columbia, and any territory or possession of the United States.
[12] Section 15010 of P.L. 116-136 defined covered funds as any funds, including loans, that were made available in any form to any non-Federal entity, not including an individual, under Public Laws 116-123, 127, and 136, as well as any other law which primarily made appropriations for Coronavirus response and related activities.
[13] Section 15011 of P.L. 116-136 defined large, covered funds as covered funds that amounted to more than $150,000.

FPRs in cycles 9, 10, and 11,[14] and marked its cycle 11 FPR submission as final within the GrantSolutions portal.

We found that the transactions tested in the Direct Payments greater than or equal to $50,000, Aggregate Direct Payments less than $50,000, and Aggregate Payments to Individuals payment types were: (1) necessary expenditures incurred due to the public health emergency with respect to COVID–19 and (2) were incurred during the covered period. Because New Stuyahok did not have a budget as of March 27, 2020, we could not assess whether or not these expenditures were accounted for in the budget most recently approved.

The transactions selected for testing were not selected statistically, and therefore results cannot be extrapolated to the total universe of transactions. Table 1 shows a summary of expenditure totals and the results of our testing.

Table 1. Summary of Non-Statistical Testing

Payment Type	Cumulative Expenditure Population Amount	Cumulative Expenditure Tested Amount	Number of Transactions Tested	Unsupported Questioned Costs	Ineligible Questioned Costs	Total Questioned Costs
Direct Payments >= $50,000	$848,627	$484,696	16	$ -	$ -	$ -
Aggregate Direct Payments < $50,000	$190,273	$89,052	10	$ -	$ -	$ -
Aggregate Payments to Individuals (in any amount)	$722,068	$79,781	15	$ -	$ -	$ -
Totals	**$1,760,968**	**$653,529**	41	$ -	$ -	$ -

Source: Treasury OIG

Direct Payments Greater Than or Equal to $50,000

We tested 16 transactions totaling $484,696 without exception. Transactions tested included utility payments made directly to vendors in the form of tribal member assistance, the purchase of an ambulance, and the purchase of a water truck. The ambulance was purchased for the local clinic to use in response to the COVID-19 pandemic. The water truck was used to pump septic tanks and deliver clean water, as many homes in rural Alaska do not have a fresh water supply or public sewer access built into their homes.

[14] New Stuyahok submitted FPRs via the alternative format for reporting for cycles 9 and 10.

Aggregate Direct Payments Less Than $50,000

We tested 10 transactions totaling $89,052 without exception. Transactions tested included utility payments made directly to vendors in the form of tribal member assistance payments, office, medical, and building supplies. New Stuyahok purchased two all-terrain vehicles for COVID-19 enforcement, and to deliver supplies to residents in the village. In addition, New Stuyahok rented a bulldozer to clear the road to the local runway during the COVID-19 pandemic for medevac emergencies.

Aggregate Payments to Individuals

We tested 15 transactions totaling $79,781 without exception. The transactions tested included tribal member assistance payments made to service providers, and payroll costs. The payments to service providers were for rental assistance and childcare costs. Payroll costs were for non-public health and safety personnel who were substantially dedicated to mitigating or responding to the COVID-19 public health emergency.

Conclusion

We determined that New Stuyahok's expenditures, as tested, were necessary due to the COVID-19 public health emergency and were incurred during the covered period from March 1, 2020, through December 31, 2022. Because New Stuyahok did not have a budget as of March 27, 2020, we were unable to assess compliance with the CARES Act requirement that costs must not be accounted for in the budget most recently approved as of that date.

Based on our review of their expenditures, we determined that New Stuyahok's risk of unallowable use of funds is low. As a result, we will not be conducting an audit.

New Stuyahok's Response

As part of our reporting process, we provided New Stuyahok with a draft of this desk review memorandum for review and comment. However, no response was received.

* * * * * *

All work completed complies with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Federal Offices of Inspectors General, which requires that the work adheres to the professional standards of

independence, due professional care, and quality assurance to ensure the accuracy of the information presented.[15] We appreciate the courtesy and cooperation provided to our staff during the desk review. If you have any questions or require further information, please contact me at (202) 927-5400, or a member of your staff may contact Virginia Shirley, Acting Deputy Assistant Inspector General for Audit, at (202) 246-0362.

cc: Michelle A. Dickerman, Deputy Assistant General Counsel,
Department of the Treasury
Thao P. Tran, Acting Chief Operating Officer, Office of Capital Access,
Department of the Treasury
Lilian R. Lowrey, Supervisory Grants Management Specialist,
Department of Treasury
Mary Olympic, Tribal Administrator, New Stuyahok Village

[15] https://www.ignet.gov/sites/default/files/files/Silver%20Book%20Revision%20-%208-20-12r.pdf