



# Audit Report



OIG-25-011

## CORONAVIRUS DISEASE 2019 PANDEMIC RELIEF PROGRAMS

### Audit of Air Carrier Worker Support Certifications - AerSale, Inc.

November 19, 2024

Office of Inspector General  
Department of the Treasury

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OFFICE OF  
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

November 19, 2024

**MEMORANDUM FOR JESSICA MILANO  
CHIEF PROGRAM OFFICER**

**FROM:** Deborah L. Harker /s/  
Assistant Inspector General for Audit

**SUBJECT:** Audit of Air Carrier Worker Support Certifications – AerSale, Inc.

Attached is our audit report for the *Audit of Air Carrier Worker Support Certification – AerSale, Inc.* (AerSale) (OIG-25-011); dated November 19, 2024. Under a contract monitored by our office, Saggar & Rosenberg, P.C. (S&R), a certified independent public accounting firm, performed the audit. The objective of this audit was to assess the accuracy, completeness, and sufficiency of AerSale’s sworn financial statement or other data used to certify the wages, salaries, benefits, and other compensation amounts submitted and approved by the Department of the Treasury (Treasury) for the Air Carrier Payroll Support Program (PSP1). This audit was mandated by Title IV, Subtitle B, *Air Carrier Worker Support*, of the *Coronavirus Aid, Relief, and Economic Security Act* (CARES Act).<sup>1</sup> The scope of this audit covered the period from April 1, 2019 through September 30, 2019, and included the certified PSP1 Application, sworn financial statement, tax returns, and other documentation submitted to Treasury.

In its audit report, S&R found that AerSale incorrectly compiled data used for the Awardable Amounts section of the PSP1 Application. Specifically, the:

- Inclusion of unsupported life insurance benefit amounts, resulted in an overstatement of [REDACTED].

However, the overstatements were entirely offset by:

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<sup>1</sup> P.L. 116–136 (March 27, 2020).

- Differences between actual healthcare benefits paid and the application figures compiled using actuarial estimates,<sup>2</sup> resulting in an understatement of \$235,593; and
- Exclusion of non-aviation leased employees' compensation, resulting in an understatement of [REDACTED].

Overall, AerSale understated its requested amount by \$559,783 and did not over-request PSP1 financial assistance despite partial non-compliance with application requirements.

Our contract required that the audit be performed in accordance with generally accepted government auditing standards. In connection with the contract, we reviewed S&R's report and related documentation and inquired of its representatives. Our review, as differentiated from an audit performed in accordance with generally accepted government auditing standards, was not intended to enable us to express an opinion on AerSale's compliance with Treasury's PSP1 policies and procedures. S&R is responsible for the attached auditor's report and the conclusions expressed therein. Our review found no instances in which S&R did not comply, in all material respects, with generally accepted government auditing standards.

We appreciate the courtesies and cooperation provided to S&R and our staff during the audit. If you have any questions or require further information, please contact me at (202) 486-1420, or a member of your staff may contact Lisa DeAngelis, Audit Director, at (202) 487-8371.

#### Attachment

cc: Gregory Till, Chief Operating Officer, Office of Capital Access, Department of the Treasury  
Danielle Christensen, Deputy Chief Program Officer, Office of Capital Access, Department of the Treasury  
Jason Morrow, Senior Counsel, Department of the Treasury  
Jeff Davis, Partner, Saggar & Rosenberg, P.C.

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<sup>2</sup> An actuarial estimate is a mathematical model used to forecast uncertain variables or events for the purposes of calculating insurance premiums or benefits.

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## Abbreviations

|            |   |
|------------|---|
| AerSale    | AerSale, Inc.   |
| CARES Act  | Coronavirus Aid, Relief, and Economic Security Act  |
| COVID-19   | Coronavirus Disease 2019  |
| DOT        | Department of Transportation  |
| GAO        | Government Accountability Office  |
| Guidelines | Guidelines and Application Procedures for Payroll Support to Air Carriers and Contractors |
| IRS        | Internal Revenue Service  |
| OIG        | Treasury Office of Inspector General  |
| PSP1       | Payroll Support Program, CARES Act  |
| PSP2       | Payroll Support Program Extension, Consolidated Appropriations Act, 2021                  |
| PSP3       | Payroll Support Program 3, American Rescue Plan Act of 2021                               |
| S&R        | Saggar & Rosenberg, P.C.  |
| SOC 1      | System and Organizational Controls  |
| Treasury   | Department of the Treasury  |

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November 19, 2024

Jessica Milano  
Chief Program Officer  
Department of the Treasury

This report presents the results of our audit of AerSale, Inc.'s (AerSale) certifications made to the Department of the Treasury (Treasury) as part of its participation in the Air Carrier Payroll Support Program (PSP1). This audit was mandated by Title IV, Subtitle B, *Air Carrier Worker Support*, of the *Coronavirus Aid, Relief, and Economic Security Act* (CARES Act).<sup>1</sup> Under the CARES Act, Treasury was to provide \$32 billion in financial assistance to passenger air carriers, cargo air carriers, and certain contractors to be exclusively used for the continuation of payment of employee wages, salaries, and benefits, in response to the economic impact of the Coronavirus Disease 2019 (COVID-19).<sup>2</sup> Furthermore, the Treasury Office of Inspector General (OIG) is required to audit certifications made by passenger and cargo air carriers that do not report salaries and benefits to the Department of Transportation (DOT) (hereinafter referred to as non-241 air carriers)<sup>3</sup> and contractors.

Under a contract with OIG, Saggat & Rosenberg, P.C. (S&R) conducted this audit. Our audit objective was to assess the accuracy, completeness, and sufficiency of AerSale's sworn financial statement or other data used to certify the wages, salaries, benefits, and other compensation amounts submitted and approved by Treasury for PSP1. The scope of our audit covered the period from April 1, 2019 through September 30, 2019, and included the certified PSP1 Application, sworn financial statement,

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<sup>1</sup> P.L. 116–136 (March 27, 2020).

<sup>2</sup> The financial assistance provided under the CARES Act was split between Passenger Air Carriers (\$25 billion), Cargo Air Carriers (\$4 billion), and Contractors (\$3 billion).

<sup>3</sup> Passenger and cargo air carriers that are not required to report salaries and wages to DOT under 14 CFR, Part 241, "Uniform System of Accounts and Reports for Large Certificated Air Carriers".

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tax returns, and other documentation submitted to Treasury on April 10, 2020.<sup>4</sup>

To accomplish the objective, we reviewed applicable laws, regulations, and Treasury’s policies and procedures, including but not limited to, Title IV, Subtitle B, *Air Carrier Worker Support* of the CARES Act; *Guidelines and Application Procedures for Payroll Support to Air Carriers and Contractors* (Guidelines); PSP1 Agreement; and *Frequently Asked Questions: Application Procedures for Payroll Support to Air Carriers and Contractors*. We interviewed key personnel from AerSale, Treasury, and contracted consultants engaged by Treasury to evaluate certified company applications. We conducted our fieldwork from August 2023 through June 2024. Appendix 1 contains a more detailed description of our objective, scope, and methodology.

## Results in Brief

In brief, S&R found that AerSale, a contractor, reported correct information for three of the four sections reviewed on its PSP1 Application.<sup>5</sup> These sections are: (1) Applicant Information, (2) Applicant Type, and (3) Certification. For the Awardable Amounts section, we found that AerSale was unable to provide sufficient supporting documentation to demonstrate that [REDACTED] requested for life insurance benefits were eligible for PSP1. However, the unsupported life insurance benefit amounts were entirely offset by (1) differences between actual healthcare benefits paid and the application figures compiled using actuarial estimates,<sup>6</sup> resulting in an understatement of \$235,593; and (2) exclusion of non-aviation leased employees’ compensation, resulting in an understatement of [REDACTED]. Overall, AerSale understated its requested amount by \$559,783 and did not

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<sup>4</sup> AerSale submitted its initial PSP1 Application and related support documentation totaling [REDACTED] on April 10, 2020. AerSale later revised its awardable amount to [REDACTED] on May 20, 2020.

<sup>5</sup> The PSP1 Application is comprised of eight sections. Four sections - Financial Institution Information, Employment Levels, Taxpayer Protection, and Additional Information, were not subject to audit procedures. Details regarding the sections not reviewed can be found in appendix 1.

<sup>6</sup> An actuarial estimate is a mathematical model used to forecast uncertain variables or events for the purposes of calculating insurance premiums or benefits.



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over-request PSP1 financial assistance despite partial non-compliance with application requirements.

As part of our reporting process, we provided Aersale management with an opportunity to comment on a draft of this report. In a written response, Aersale management stated it does not dispute that substantiation was not provided for life insurance expenses. The company also noted it did not pursue additional support in the interest of time, as well as consideration of the offsetting understatements that greatly exceeded this amount. Aersale management's response, in its entirety, is included as appendix 2 of this report.

In a written response, Treasury management stated the draft report describes work performed by OIG's contractor to determine whether the recipient's requested awardable amount complied with Treasury's program requirements. The draft report notes the extensive fieldwork conducted for this review between August 2023 and June 2024, including interviewing AerSale's management and reviewing a wide range of the company's financial records and corporate documents. In relation to AerSale, Treasury management noted that OIG's contractor found no amounts were overpaid. Treasury management appreciates the OIG's work on this engagement and looks forward to working with the OIG to protect the integrity of the PSP and other recovery programs. Treasury management's response, in its entirety, is included as appendix 3 of this report.

## Background

Title IV, Subtitle B, of the CARES Act, *Air Carrier Worker Support*, requires Treasury to provide financial assistance to air carriers and contractors that must exclusively be used for the continuation of payments of employees' wages, salaries, and benefits. Financial assistance is to be provided to:

- (1) passenger air carriers, in an aggregate amount up to \$25 billion;
- (2) cargo air carriers, in an aggregate amount up to \$4 billion;  
and
- (3) contractors, in an aggregate amount up to \$3 billion.

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According to the CARES Act, Treasury is required to provide financial assistance to air carriers that report salaries and benefits to DOT (referred to as 241 air carriers),<sup>7</sup> in an amount equal to the salaries and benefits reported to DOT for the period April 1, 2019 through September 30, 2019. For air carriers that do not report such data to DOT (referred to as non-241 carriers), and contractors, financial assistance is required to be in an amount that the air carrier or contractor certifies using sworn financial statements or other appropriate data as the amount of wages, salaries, benefits, and other compensation paid to employees during the period of April 1, 2019 through September 30, 2019. The amounts submitted on the application to Treasury were considered sworn financial statements. To be eligible for payments, air carriers and contractors must enter into agreements with Treasury certifying that they meet certain required assurances, terms, and conditions.

On March 30, 2020, Treasury posted on its website the Guidelines, which included the PSP1 Application. The PSP1 Application is comprised of eight sections:

1. Applicant Information — (1) applicant name; (2) taxpayer identification number and address; and (3) contact person's name, title, phone number, and email address.
2. Applicant Type — selection of applicant type whether it is passenger air carrier, cargo air carrier, or contractor. Additionally, if the applicant is a contractor, this section would identify the contractor's service functions and the name of the air carrier or airport to which services are provided. Finally, this section includes affiliate and parent company information.
3. Financial Institution Information — (1) the applicant's account number and routing number; and (2) the financial institution's name, address, and telephone number.

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<sup>7</sup> 14 CFR, Part 241 "Uniform System of Accounts and Reports for Large Certificated Air Carriers" defines "Air carrier, large certificated" as an air carrier holding a certificate issued under 49 U.S.C. 41102, as amended, that: (1) operates aircraft designed to have a maximum passenger capacity of more than 18,000 pounds; or (2) conducts operations where one or both terminals of a flight stage are outside the 50 states of the United States, the District of Columbia, the Commonwealth of Puerto Rico, and the U.S. Virgin Islands. These air carriers are required to report financial information to DOT. AerSale is not a Large Certificated Air Carrier.

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4. Employment Levels — applicant’s average number of employees for 2019 and involuntary reductions after March 1, 2020.
  5. Awardable Amounts — applicant’s sworn financial statement consisting of salaries, wages, benefits, and other compensation for the period April 1, 2019 through September 30, 2019.
  6. Taxpayer Protection — a table that outlines in detail the proposed financial instrument to be issued to Treasury.
  7. Additional Information — applicant’s verification of submitting its Internal Revenue Service (IRS) Form 941, *Employer’s Quarterly Federal Tax Return*,<sup>8</sup> covering the period April 1, 2019 through September 30, 2019, along with the PSP1 Application submitted to Treasury.
  8. Certification — names, titles, and signatures of two certifying officials<sup>9</sup> and the applicant’s name and application submission date.

On April 18, 2020, Treasury published a sample PSP1 Agreement on its website, which provided definitions, terms, and conditions for participation in PSP1, and required applicants to submit completed applications by April 27, 2020. After Treasury reviewed and approved an application, both parties were required to sign the PSP1 Agreement.

### Treasury Disbursement Processes

To disburse PSP1 payments to contractor applicants as quickly as possible and prior to the application deadline of April 27, 2020, Treasury applied an initial estimated pro-rata rate of 69.7 percent to the awardable amount because not all applications had been submitted at the time. After the application deadline, Treasury determined the total amount requested by all contractors was approximately \$4.1 billion, which exceeded the \$3 billion available

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<sup>8</sup> IRS Form 941 is a tax form that businesses file quarterly to report income taxes, Social Security taxes, and Medicare taxes they withheld from employees’ paychecks.

<sup>9</sup> The certifying officials attested under penalty of perjury that the information and certifications provided in the application and its attachments are true and correct.

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financial assistance. Because its initial estimated pro-rata rate was low, Treasury calculated an additional 20.3 percent, the top-off amount, for contractors making the final pro-rata rate 90 percent. Treasury explained that 17 contractors did not accept the top-off amount; as such, the final awardable amount for those contractors was 69.7 percent.

Treasury disbursed an initial lump sum payment of one-third of the awardable amount, followed by four equal subsequent payments to ensure it provided sufficient and timely financial assistance corresponding to the applicants' payroll schedule. In instances where Treasury needed to perform additional follow-up with contractors or needed additional time to approve applications, Treasury compressed the payment schedule on a case-by-case basis. Generally, Treasury disbursed the top-off amounts for contractors in February 2021.

### PSP1 Interim Audit Report

In a prior audit report,<sup>10</sup> OIG identified two systemic issues affecting the payment amounts administered to all PSP1 recipients for non-241 air carriers and contractors. Specifically, some of the recipients audited included unallowable employer-side payroll taxes and/or corporate officer compensation in their calculation of the awardable amounts on their PSP1 applications. Treasury management acknowledged these issues and agreed to: (1) review payments issued under PSP1 to ensure awarded amounts are allowable per the CARES Act and Treasury guidance; and (2) remedy the incorrect amounts awarded under PSP1. Based on our recommendations, in March 2022 Treasury implemented a PSP1 recertification process whereby recipients had to certify whether they excluded employer-side payroll taxes and corporate officer compensation in their calculation of the awardable amounts on their PSP1 applications. Treasury's goal was to determine if overpayments were made to recipients based on inaccurate information included in PSP1 applications.

Treasury officials told us that if recoupment was necessary for an applicant's inclusion of unallowable expenses, such as corporate

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<sup>10</sup> OIG-21-025, *Interim Audit Update – Air Carrier and Contractor Certifications for Payroll Support Program (Interim Audit)*, March 31, 2021.

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officer compensation and employer-side payroll taxes in the application, the recoupment method was dependent on timing. Any overpayment was first offset against the approved top-off payment. If an overpayment remained, or the overpayment was identified after all PSP1 disbursements were made, and the recipient was entitled to PSP2 or PSP3 funding, the overpayment was offset against the PSP2 and/or PSP3 awards prior to issuance. All remaining PSP1 overpayments not previously collected where the recipient did not qualify for, or apply for, PSP2 and PSP3 funding, were required to be repaid to Treasury.

### AerSale, Inc.

Headquartered in Doral, Florida, AerSale is a contractor that provides a variety of services to commercial airlines including, but not limited to, aircraft and component maintenance, repair and overhaul, aircraft and engine sales and leasing, and used serviceable material sales and parts exchange.

AerSale submitted its initial PSP1 Application totaling [REDACTED] on April 10, 2020. AerSale later revised its awardable amount to [REDACTED] on May 20, 2020, during Treasury's application review process. The company accepted the contractor top-off for a total award amount of \$16,389,428, or 90 percent of the company's requested amount. Treasury's disbursements to AerSale were as follows:

- June 10, 2020: \$6,346,351
- July 1, 2020: \$2,115,450
- August 3, 2020: \$2,115,450
- September 1, 2020: \$2,115,450
- February 22, 2021: \$3,696,727

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In addition to PSP1, Treasury awarded AerSale \$5,535,985 under the Payroll Support Program Extension (PSP2)<sup>11</sup> authorized by the Consolidated Appropriations Act, 2021 and \$5,535,985 under the Payroll Support Program 3 (PSP3)<sup>12</sup> authorized by the American Rescue Plan Act of 2021. PSP2 and PSP3 were not the subject of this audit.

## Audit Results

We found that AerSale reported correct information for three of the four sections reviewed on its PSP1 Application. These sections are: (1) Applicant Information, (2) Applicant Type, and (3) Certification. We compared information provided in each section of the PSP1 Application to supporting documentation including general ledger data, company sworn financial statement, IRS Form 941, executive-level business charts, payroll registers, and third-party benefit claims and invoices.

For the Awardable Amounts section, we found that AerSale was unable to provide sufficient supporting documentation to demonstrate that ██████ requested for life insurance benefits were eligible for PSP1. However, the unsupported life insurance benefit amounts were entirely offset by (1) differences between actual healthcare benefits paid and the application figures compiled using actuarial estimates, resulting in an understatement of \$235,593; and (2) exclusion of non-aviation leased employees' compensation, resulting in an understatement of ██████. Overall, AerSale understated its requested amount by \$559,783 and did not over-request PSP1 financial assistance despite partial non-compliance with application requirements.

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<sup>11</sup> The Consolidated Appropriations Act, 2021 (P.L. 116–260), enacted on December 27, 2020, created the *Airline Worker Support Extension* for passenger air carriers and certain contractors. Treasury referred to this as Payroll Support Program Extension (PSP2).

<sup>12</sup> The American Rescue Plan of 2021 (P.L. 117–2), enacted on March 11, 2021, created the *Air Transportation Payroll Support Program Extension* authorizing Treasury to provide additional assistance to passenger air carriers and contractors that received financial assistance under PSP2. Treasury referred to this as Payroll Support Program 3 (PSP3).

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## Finding 1

### **AerSale Did Not Over-Request PSP1 Financial Assistance Despite Partial Non-Compliance with Application Requirements**

Both the CARES Act and Treasury's Guidelines define "employee" as "an individual, other than a corporate officer, who is employed by an air carrier or contractor in the United States (including its territories and possessions)."

Treasury's Guidelines define wages, salaries, benefits, and other compensation as:

remuneration paid by the applicant to its employees for personal services and includes salaries, wages, overtime pay, cost-of-living differentials, and other similar compensation, as distinguished from per diem allowances or reimbursement for expenses incurred by personnel for the benefit of the applicant.

In addition, the Guidelines define Awardable Amounts as:

an amount that such contractor certifies, using sworn financial statements or other appropriate data, as the amount of wages, salaries, benefits, and other compensation that such contractor paid its employees during the time period.

AerSale did not provide sufficient supporting documentation to demonstrate that [REDACTED] of the amounts requested for life insurance benefits were eligible for PSP1. The company was unable to provide life insurance invoices, itemized at the employee-level, to quantify the amounts associated with ineligible corporate officer's benefits.

However, the [REDACTED] unsupported benefits overstatement was entirely offset by differences between actual healthcare benefits paid and the application figures compiled using actuarial estimates, totaling \$235,593. This resulted in a total benefits understatement of [REDACTED]. Additionally, AerSale understated its salaries and wages by not claiming amounts paid for non-aviation leased employees, totaling [REDACTED], resulting in an aggregate understatement of \$559,783.

For healthcare benefits, AerSale management stated that it used actuarial estimates, as opposed to actual payments, to exercise

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conservatism. Further, AerSale management elected not to pursue additional efforts to obtain itemized life insurance supporting documentation, as there was already a sufficient understatement in amounts requested.

For “Salaries and Wages”, AerSale management stated that its interpretation of the CARES Act was that only employees who supported aviation operations would be eligible for PSP1 and therefore excluded non-aviation leased employees.

To remedy the findings listed in the prior OIG audit report,<sup>13</sup> Treasury required PSP2 applicants to recertify their PSP1 awardable amounts. AerSale certified to Treasury under PSP2, that its PSP1 Application did not include corporate officer compensation or employer-side payroll taxes. Although AerSale was unable to provide sufficient documentation to support the exclusion of corporate officers’ life insurance benefits from the requested amount, the company did not over-request PSP1 financial assistance because the actual compensation incurred exceeded the requested amount.

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We appreciate the courtesies and cooperation provided to our staff during the audit. A distribution list for this report is provided as appendix 4.

Saggar & Rosenberg, P.C. /s/

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<sup>13</sup> OIG-21-025, *Interim Audit Update – Air Carrier and Contractor Certifications for Payroll Support Program (Interim Audit)*, March 31, 2021.



## Appendix 1: Objective, Scope, and Methodology

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Our objective was to assess the accuracy, completeness, and sufficiency of AerSale, Inc.'s (AerSale) sworn financial statement or other data used to certify the wages, salaries, benefits, and other compensation amounts submitted and approved by the Department of the Treasury (Treasury).

The scope of our audit covered the period from April 1, 2019 through September 30, 2019, and included the certified Payroll Support Program (PSP1) Application, sworn financial statement, tax returns, and other documentation submitted to Treasury on April 10, 2020.<sup>14</sup>

To accomplish this objective, Saggart & Rosenberg, P.C. (S&R) performed the following activities during audit fieldwork from August 2023 through June 2024:

- Reviewed applicable laws and regulations, including:
  - Title IV, Subtitle B, *Air Carrier Worker Support*, of the *Coronavirus Aid, Relief, and Economic Security Act* (CARES Act);<sup>15</sup> and
  - 14 CFR, Part 241,<sup>16</sup> *Uniform System of Accounts and Reports for Large Certificated Air Carriers*, December 28, 2023.
- Reviewed Treasury's policies and procedures related to PSP1:
  - *Guidelines and Application Procedures for Payroll Support to Air Carriers and Contractors* (Guidelines), which included the PSP1 Application, March 30, 2020;
  - PSP1 Agreement;

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<sup>14</sup> AerSale submitted its initial PSP1 Application and related support documentation totaling [REDACTED] on April 10, 2020. AerSale later revised its awardable amount request to [REDACTED] on May 20, 2020.

<sup>15</sup> P.L. 116–136 (March 27, 2020).

<sup>16</sup> 14 CFR, Part 241 "Uniform System of Accounts and Reports for Large Certificated Air Carriers" defines "Air carrier, large certificated" as an air carrier holding a certificate issued under 49 U.S.C. 41102, as amended, that: (1) operates aircraft designed to have a maximum passenger capacity of more than 18,000 pounds; or (2) conducts operations where one or both terminals of a flight stage are outside the 50 states of the United States, the District of Columbia, the Commonwealth of Puerto Rico, and the U.S. Virgin Islands. These air carriers are required to report financial information to the Department of Transportation. AerSale is not a Large Certificated Air Carrier.

## Appendix 1: Objective, Scope, and Methodology

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- *Question and Answer: Payroll Support to Air Carriers and Contractors*, (April 2, 2020, April 3, 2020 and April 20, 2020 versions); and
- *Frequently Asked Questions: Application Procedures for Payroll Support to Air Carriers and Contractors*, April 3, 2020.
- Performed 100 percent testing for four of the eight sections of the PSP1 Application—specifically, the Applicant Information, Applicant Type, Awardable Amounts, and Certification sections. The other four sections were not reviewed because the Taxpayer Protection section generally applied to 241 air carriers, with exceptions; the Employment Levels, Financial Institution Information, and Additional Information sections had no impact on Treasury’s determination of recipients’ award amounts.
- Interviewed key Treasury personnel and contracted consultant personnel engaged by Treasury to aid in its evaluation of the air carriers’ and the contractors’ certified applications and other data.
- Interviewed AerSale management responsible for the completion and submission of the sworn financial statement in the Awardable Amounts section of the PSP1 Application.
- Reviewed sworn financial statement and documents to support the requested payroll support amount. The documentation included general ledger data, company pay registers, benefit claim information, Internal Revenue Service (IRS) Form 941, *Employer’s Quarterly Federal Tax Return*<sup>17</sup> filings, and organizational hierarchy information.
- Reviewed Government Accountability Office’s (GAO) *Standards for Internal Control in the Federal Government*<sup>18</sup> to identify the components of internal control that are significant to the audit objective. Understanding internal control within the context of an entity’s internal control framework can help auditors determine whether internal control deficiencies exist. We concluded that one of the five internal control components, Control Activities, as related to AerSale’s payroll system, was

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<sup>17</sup> IRS Form 941 is a tax form that businesses file quarterly to report income taxes, Social Security taxes, and Medicare taxes they withheld from employees’ paychecks.

<sup>18</sup> GAO-14-704G (September 2014).

## Appendix 1: Objective, Scope, and Methodology

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significant to the audit objective.<sup>19</sup> This component states that control activities are the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system, which includes the entity's information system. To assess the controls over AerSale's payroll and accounting system, we examined AerSale's response to Data Supplier Questionnaires,<sup>20</sup> reviewed a System and Organizational Controls 1 (SOC 1),<sup>21</sup> and interviewed AerSale's management responsible for generating and using the data. Additional details regarding our assessment of the reliability of the data is reported in the section below.

- Reviewed GAO's *Assessing Data Reliability*<sup>22</sup> guidance, which states that a data reliability determination does not involve attesting to the overall reliability of the data or database. For this audit, the audit team has only determined the reliability of the specific data sources needed to support the findings, conclusions, or recommendations in the context of the audit objective. AerSale prepared the PSP1 Application using payroll and benefit compensation from April 2019 through September 2019, which included information developed from AerSale's payroll and financial accounting systems. We compared details generated from payroll registers at the individual employee level, as well as third-party benefit data from April 2019 through September 2019 to the amounts presented in the Awardable Amounts section of the PSP1 Application.

To assess data reliability of these sources, we examined the Data Supplier Questionnaires for the payroll and financial accounting systems, reviewed the SOC 1 report for the payroll system, and interviewed AerSale's management responsible for generating and using the data. Based on our assessment, we determined that the data was sufficiently reliable to support the findings and conclusions to answer the objective of this audit.

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<sup>19</sup> The five components of internal control are Control Environment, Risk Assessment, Control Activities, Information and Communication, and Monitoring.

<sup>20</sup> A Data Reliability Assessment is completed to assess the reliability of data originating from a system to determine if it is reliable for the purposes of the audit. The Data Supplier Questionnaire would be one of the tools used during the Data Reliability Assessment.

<sup>21</sup> SOC 1 report addresses a company's internal control over financial reporting, which pertains to the application of checks-and-limits. Essentially, it is the audit of a third-party vendor's accounting and financial controls.

<sup>22</sup> GAO-20-283G (December 2019).

## Appendix 1: Objective, Scope, and Methodology

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

## Appendix 2: AerSale Management Response



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November 14, 2024

Office of Capital Access, Department of the Treasury

*Audit of Air Carrier Worker Support Certifications Findings Response*

In relation to the audit performed by the Department on Treasury, S&R had the findings below:

- 1) Inclusion of unsupported life insurance benefit amounts resulted in an overstatement of [REDACTED]
- 2) Differences between actual healthcare benefits paid and the application figures compiled using actuarial estimates, resulting in an understatement of \$235,593; and
- 3) Exclusion of non-aviation leased employees' compensation, resulting in an understatement of [REDACTED]

In response to these findings, AerSale does not dispute that substantiation was not provided for life insurance benefits in the amount of [REDACTED]. Although AerSale followed a diligent process in determining these amounts and believes the amounts were factually supported, in the interest of time of the company and the auditors, and considering the offsetting findings of understatements that greatly exceeded this amount, the Company did not pursue the additional support that would have required third party supporting documentation.

We thank the Treasury and SRPC for their efforts in ensuring proper compliance of this essential grant during the COVID pandemic; and agree with the findings of this report.

AERSALE CORPORATION

[REDACTED]

Martin Garmendia, Chief Financial Officer and Treasurer

## Appendix 3: Treasury Management Response

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DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

November 4, 2024

Deborah L. Harker  
Assistant Inspector General for Audit  
U.S. Department of the Treasury – Office of Inspector General  
1500 Pennsylvania Avenue, N.W.  
Washington, D.C. 20220

Dear Ms. Harker:

I write regarding the Office of Inspector General's (OIG) draft *Audit of Air Carrier Worker Support Certifications* (Draft Report), regarding AerSale, Inc. (the Recipient), a recipient of funds under Treasury's Payroll Support Program (PSP). The U.S. Department of the Treasury (Treasury) appreciates OIG's efforts.

### Background on the Payroll Support Program

PSP was part of an effort to provide emergency assistance in response to the unprecedented challenges presented by the COVID-19 public health emergency and had three iterations:

- The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was enacted on March 27, 2020, and established the Payroll Support Program (PSP1) to provide financial assistance to America's passenger air carriers, cargo air carriers, and certain aviation contractors. Treasury disbursed more than \$28 billion to over 600 businesses in PSP1, directly supporting more than 600,000 American jobs.
- In December 2020, the Consolidated Appropriations Act, 2021, created the Payroll Support Program Extension (PSP2) for eligible passenger air carriers and certain aviation contractors. Treasury disbursed over \$15 billion to over 480 passenger air carriers and contractors under PSP2.
- In March 2021, the American Rescue Plan Act of 2021 provided an additional \$15 billion for Treasury to make further payroll support payments to entities that participated in PSP2 (PSP3). Treasury disbursed over \$14.5 billion to over 480 passenger air carriers and contractors under PSP3.

The CARES Act set forth two different methodologies for calculating awardable amounts for the largest carriers and for smaller air carriers and aviation contractors. For the largest air carriers, which received approximately 89% of the total PSP assistance, PSP1 amounts were based on reports the carriers had filed with the U.S. Department of Transportation under 14 C.F.R. part 241. In contrast, the statute required Treasury to provide financial assistance to smaller air carriers and aviation contractors in an amount that the applicants certified, using sworn financial statements or other appropriate data, as the amount of wages, salaries, and benefits that they paid to their employees during the time period from April 1, 2019, through September 30, 2019.

## Appendix 3: Treasury Management Response

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For awards to the smaller companies, the PSP1 application and Treasury's guidelines made clear that the awardable amounts should not include, inter alia, (1) any employer-side payroll taxes, which are not paid to employees, and (2) compensation paid to corporate officers and non-employee contractors. Before accepting PSP2 applications, Treasury published additional guidance further emphasizing that such amounts should not be included in the companies' awardable amount calculations.<sup>1</sup> In both PSP1 and PSP2, Treasury required two officials of each applicant, including at least one corporate officer, to certify that the information provided in the application was correct and did not contain any materially false or fraudulent statements.

In April 2020, OIG began a series of audits of PSP1 recipients to determine whether they had properly calculated their requested awardable amounts. In March 2021, OIG issued an Interim Audit Update, notifying Treasury that a number of recipients being audited had impermissibly included, in their PSP1 applications, employer-side payroll taxes or corporate officer compensation in the calculation of the awardable amount, which may have resulted in an overstatement of the amount of PSP1 funds requested. In response, Treasury promptly took a series of remedial actions, including requiring that all PSP1 applicants receiving awards on the basis of self-certification re-certify whether their awardable amounts included employer-side payroll taxes or corporate officer compensation. Where a company informed Treasury that it had improperly included those amounts in its application, Treasury either withheld future PSP1 disbursements or began pursuing debt recoupment. Through this process, Treasury has successfully recouped more than \$147 million of PSP overpayments.

### OIG's Finding

The Draft Report describes the work performed by OIG's contractor to determine whether the Recipient's requested awardable amount complied with the guidelines provided by Treasury. The Draft Report notes the extensive fieldwork conducted for this review between August 2023 and June 2024 to determine the accuracy of the information in the Recipient's PSP1 application submitted to Treasury, including interviewing the Recipient's management and collecting and reviewing a wide range of the company's financial records and corporate documents. OIG found that the Recipient lacked sufficient supporting documentation to demonstrate that certain benefits were eligible for PSP1. However, OIG also found that the overstatement was offset because the Recipient incurred more total actual compensation than it requested in its PSP1 application. Overall, therefore, the Recipient did not receive any overpayment for PSP1.

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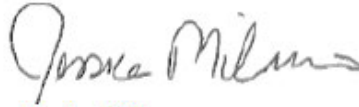
<sup>1</sup> Because awardable amounts in PSP3 were calculated as a percentage of each company's PSP2 award, companies were not required to calculate awardable amounts for PSP3.

## Appendix 3: Treasury Management Response

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Again, Treasury appreciates OIG's work on these engagements. We look forward to working with you to protect the integrity of the PSP and other recovery programs.

Sincerely,

A handwritten signature in black ink that reads "Jessica Milano". The signature is written in a cursive, flowing style.

Jessica Milano  
Chief Program Officer



## **Appendix 4: Report Distribution**

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