



OFFICE OF  
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

December 4, 2025

OIG-CA-26-006

**MEMORANDUM FOR JEFFREY STOUT**  
**ACTING CHIEF PROGRAM OFFICER**  
**OFFICE OF CAPITAL ACCESS**

**From:** Pauletta P. Battle /s/  
Acting Assistant Inspector General for Audit

**Subject:** Termination Memorandum – Audits of the Department of the Treasury’s Implementation of Pandemic Programs (Job Codes: A-FA-20-039, A-FA-20-040, A-ER-21-039, A-HA-21-045, A-SL-22-079, A-SL-22-002, A-SL-22-078, A-SL-22-081)

In response to the Coronavirus Disease 2019 pandemic, Congress established several programs assisting the public- and private-sectors to support recovery and navigate the pandemic. Specifically, the *Coronavirus Aid, Relief, and Economic Security Act* (CARES)<sup>1</sup> designated funding for the Coronavirus Relief Fund (CRF) and Air Carrier Worker Support (PSP);<sup>2</sup> the *Consolidated Appropriations Act, 2021*<sup>3</sup> designated funding for Emergency Rental Assistance (ERA)<sup>4</sup> and Coronavirus Economic Relief for Transportation Services (CERTS); and the *American Rescue Plan Act of 2021*<sup>5</sup> designated funding for the Homeowner Assistance Fund (HAF), Coronavirus State and Local Fiscal Recovery Funds (SLFRF), Capital Projects Fund (CPF), and Local Assistance and Tribal Consistency Fund (LATCF). These programs, created under the Department of the Treasury (Treasury), provided assistance for public health emergencies and housing; enabling work, education, and health monitoring; maintaining vital public services; promoting long-term growth; and strengthening the national economy, among other purposes.

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

<sup>2</sup> The PSP program was extended twice under the Consolidated Appropriations Act, 2021, and the American Rescue Plan Act of 2021. The PSP implementation audit focused on Treasury’s administration of PSP under the CARES Act.

<sup>3</sup> P.L. 116-260 (December 27, 2020)

<sup>4</sup> The American Rescue Plan Act of 2021 established a second ERA program. The ERA implementation audit focused on Treasury’s administration of ERA under the Consolidated Appropriations Act, 2021.

<sup>5</sup> P.L. 117-2 (March 11, 2021)

Between March 2020 and July 2022, the Treasury Office of Inspector General initiated eight audits related to pandemic programs: CRF, PSP, ERA, CERTS, HAF, SLFRF, CPF, and LATCF. The overall objective of these audits was to assess Treasury's implementation activities to establish the pandemic programs, to include policies, procedures, and relevant terms and conditions for providing assistance under the programs. The scope of our audits included Treasury's activities to implement the pandemic programs.

To accomplish the overall objective of the audits, we (1) reviewed applicable laws, regulations, and Treasury policies, procedures, guidance and instructions, (2) interviewed key Treasury personnel and contractors involved with the various pandemic programs, (3) conducted walkthroughs of Treasury systems to assess Treasury's administration of awards and payments, and/or (4) assessed internal controls to determine whether programs were properly designed and implemented.

We found that Treasury established all eight pandemic programs and generally met the statutory deadlines for distributing funds. Treasury also developed program-related policies and procedures, but they were not always sufficient and complete. For example, while Treasury developed compliance monitoring procedures, for ERA, HAF, and SLFRF, those procedures were incomplete throughout most of the programs' periods of performance.<sup>6, 7</sup> In addition, we identified concerns with the processes for evaluating application submissions to provide awards or distributions of funds for the PSP, ERA, and CERTS programs.

During audit fieldwork, we communicated our concerns and preliminary observations with appropriate Treasury personnel.<sup>8</sup> We also noted concerns related to the pandemic programs in our annual management and performance challenges letters issued to Treasury.<sup>9</sup>

We are terminating these audits because Treasury's pandemic programs have reached or are approaching the end of their periods of performance. We have also experienced resource constraints that prevent us from continuing this work.

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<sup>6</sup> Treasury provided updated policies and procedures covering compliance monitoring in November 2024, when the periods of performance for most of the programs had ended.

<sup>7</sup> The CARES Act assigned Treasury's Office of Inspector General with the responsibility for monitoring; oversight of the receipt, disbursement, and use; and recoupment authority over the Coronavirus Relief Funds.

<sup>8</sup> We did not identify any concerns related to the implementation of the Local Assistance and Tribal Consistency Fund and the Capital Projects Fund.

<sup>9</sup> Treasury OIG, Management and Performance Challenges Facing the Department of the Treasury, OIG-CA-21-006 (October 29, 2020); OIG-CA-22-002 (October 14, 2021); OIG-CA-23-002 (October 14, 2022); OIG-CA-24-001 (October 10, 2023); and OIG-CA-25-003 (October 15, 2024).

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Although we are terminating the eight implementation audits, the concerns identified in this memorandum and previously communicated to Treasury are noteworthy and should be considered when establishing programs in the future. We may follow up on the programs discussed in this memorandum. Please note that the subject job codes will be removed from our Monthly Status Report.

We appreciate the courtesies and assistance provided by your staff. Should you have any questions, please contact me at (202) 927-5400 or Julie Wong, Acting Deputy Assistant Inspector General for Audit, at (202) 439-6354.

cc: Michelle Dickerman, Deputy Assistant General Counsel, Treasury Office of the General Counsel