

# Blueprint for Enhanced Program Integrity

## Chapter 3: Fraud Prevention and Detection

December 2024



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# Chapter 3: Fraud Prevention and Detection

## Executive Summary:

In this chapter **focused on the oversight community and policymakers**, we highlight key reports, guidance, and recommendations issued by federal and state oversight organizations that provide leading practices for how to better design and implement emergency programs to prevent and detect fraud in government benefit programs. We also compiled lessons learned from these reports and interviews with key stakeholders, with a focus on the importance of pre-award and post-award monitoring.

These best practices and lessons learned highlight key themes, including establishing and performing fraud risk assessments; sharing resources, information and data across agencies; verifying recipient eligibility and identity; providing training and clear guidance to staff; and coordinating oversight by program and oversight officials.

## How We Developed Chapter 3

We took the following steps to identify leading practices and lessons learned:

- Reviewed federal and state Offices of Inspectors General (OIGs) reports and congressional testimonies issued between March 2020 and August 2024 to identify key recommendations and successful methods for preventing and detecting fraud.
- Reviewed published reports, guidance, and memoranda from the U.S. Government Accountability Office (GAO) and the Office of Management and Budget (OMB).
- Conducted listening sessions with OIGs, state comptrollers and auditors, and GAO to incorporate their knowledge and expertise.

For the full methodology, see Appendix 3-A.

In the following sections, we highlight key themes with citations from supporting documents.



# Section 1: Preventing Fraud

Federal agencies can improve fraud risk management and prevent fraud at the outset of emergency benefit programs in several ways: assess fraud risks, designate a dedicated entity to lead fraud risk management, design and implement an antifraud strategy, and use data analytics. Beyond eroding public trust in government, fraud significantly diminishes each agency's ability to deliver critical programs to the communities they are intended to serve.

## Plan Now

One of the most effective ways to prevent fraud in emergency programs is to first develop plans for assessing and addressing the risks for fraud and weaknesses in internal controls prior to program design and implementation.

### Assess Fraud Risks and Internal Control Weaknesses.

- Conduct Gold Standard meetings among staff from the agency, OIG, OMB, and other oversight bodies to reduce the risks of fraud and improper payments, as recommended in [OMB Memorandum M-22-12](#), pertaining to implementation of the Infrastructure Investment and Jobs Act.
- [GAO 22-105051, Additional Actions Needed to Improve Accountability and Program Effectiveness of Federal Response](#) (p. 1, Recommendation 4)



**REC 4:** Designate a dedicated entity and document its responsibilities for managing the process of assessing fraud risks to the unemployment insurance program, consistent with leading practices as provided in our [Fraud Risk Framework](#). This entity

should have, among other things, clearly defined and documented responsibilities and authority for managing fraud risk assessments and for facilitating communication among stakeholders regarding fraud-related issues.

#### What are Gold Standard meetings?

Following a leading practice initiated for pandemic programs under the American Rescue Plan, [OMB Memo M-22-12](#) directed agencies to engage with OMB and the agency's IG in a joint meeting during the program design phase to discuss risk mitigation strategies, financial controls, data, and reporting.

"This process of engagement by senior Executive Branch and agency officials with Inspectors General and the PRAC has become a model for how to manage large-scale emergency spending initiatives and balance the need for robust independent oversight with timely program administration." Statement of Michael E. Horowitz, Chair, Pandemic Response Accountability Committee, before the U.S. House of Representatives Select Subcommittee on the Coronavirus Crisis, June 14, 2022.

- [GAO 150593SP, A Framework for Managing Fraud Risks in Federal Programs](#)

The Framework encompasses control activities to prevent, detect, and respond to fraud, with an emphasis on prevention, as well as structures and environmental factors that influence or help managers achieve their objective to mitigate fraud risks. In addition, it highlights the importance of monitoring and incorporating feedback. There is a presumptive requirement (as outlined in [OMB Circular No. A-11 \(2024\)](#), based on statutory provisions in the [Payment Integrity Information Act](#)) for programs to adhere to the practices outlined in the Fraud Risk Framework.

- [Program Integrity: The Anti-Fraud Playbook](#)

The playbook provides a four-phased approach with 16 plays drawn from successful practices from the federal government and private sector to help combat the risk of fraud. For example:

- Adopt strong fraud-risk assessments to include establishing a dedicated entity to lead fraud-risk management activities.
- Design and implement strategies or plans for how to identify, assess and mitigate fraud risk and vulnerabilities in program internal controls.

- [GAO 22-105397, Current and Future Federal Preparedness Requires Fixes to Improve Health Data and Address Improper Payments](#) (pp. 2-3, Recommendations 2, 7, and 8)



**REC 2:** [T]ake action to identify the causes of the gaps in internal controls and design and implement additional control activities, where needed, to prevent and detect improper payments and potential fraud.



**REC 7:** [D]ocument a comprehensive plan that includes timely and sufficient policies and procedures for monitoring recipients [...] to provide assurance that funds are being used in compliance with laws, regulations, agency guidance, and award terms and conditions, including ensuring that funds are being used for allowable purposes.



**REC 8:** [D]evelop and implement written procedures to monitor programs and uses of funds for compliance with program requirements and improper payments.

- [GAO 22-105051, Additional Actions Needed to Improve Accountability and Program Effectiveness of Federal Response](#) (p. 1, Recommendations 5 and 6)



**REC 5:** Identify inherent fraud risks facing the unemployment insurance program.



**REC 6:** Assess the likelihood and impact of inherent fraud risks facing the unemployment insurance program.

- [GAO 21-104542 Additional Risk Assessment Actions Could Improve HUD Oversight of CARES Act Funds](#) (p. 49, Recommendation 1)



**REC 1:** The Office of the Chief Financial Officer and the HUD CARES Act Compliance Response Team should work with relevant program offices for each of the six CARES Act programs that meet HUD's front-end risk assessment criteria to reassess the need to either (1) conduct a full front-end risk assessment, or (2) take and document additional risk

assessment steps to align with key aspects of the front-end risk assessment process, such as ranking risks and developing plans to mitigate identified risks.

- [DHS OIG-22-69, FEMA Did Not Implement Controls to Prevent More than \\$3.7 Billion in Improper Payments from the Lost Wages Assistance Program](#) (p. 11, Recommendations 1 and 2)



**REC 1:** Develop and implement a standard risk assessment process before initiating new federal grant programs. This risk assessment should focus on identifying and evaluating program risks that may affect FEMA's ability to prevent waste, fraud, and abuse in its programs and mitigating those external risks to the extent practical.



**REC 2:** Develop a process to assess the program controls and identify risk to the extent practical.

- [National Security Agency \(NSA\) OIG AU-20-0008, Audit of the Implementation of the CARES Act, Section 3610](#) (pp. 16-17, Recommendations 3 and 4)



**REC 3:** Perform a risk assessment of all invoices and processes to determine, at a minimum, the nature and extent of testing required to sufficiently identify unsupported payments.



**REC 4:** Perform a review of invoices to ensure accuracy of hours, billing rates, and contractor COVID-19 status, and, if necessary, recover costs from inaccurate billing.

- [GAO 23-105199, SBA Could Improve Communications and Fraud Risk Monitoring for Its Arts and Entertainment Venues Grant Program](#) (p. 38, Recommendation 2)



**REC 2:** The Associate Administrator of SBA's Office of Disaster Assistance should ensure that its post-award monitoring procedures [...] specifically address the risks the agency has assessed, including fraud risks, and clearly link them to monitoring activities. As a part of this effort, SBA should document its tolerance for the risks it has identified.

- [GAO 23-105523, Unemployment Insurance: Data Indicate Substantial Levels of Fraud during the Pandemic; DOL Should Implement an Antifraud Strategy](#) (p. 42, Recommendation 1)



**REC 1:** Design and implement an antifraud strategy for Unemployment Insurance (UI) based on a fraud risk profile consistent with leading practices as provided in the [Fraud Risk Framework](#).

- [GAO 22-105051, COVID-19 Additional Actions Needed to Improve Accountability and Program Effectiveness of Federal Response](#) (p.1, Recommendation 8)



**REC 8:** Examine the suitability of existing fraud controls in the UI program and prioritize residual fraud risks.

- [SBA OIG 21-07, Inspection of SBA'S Implementation of the Paycheck Protection Program](#) (p. 9, Recommendation 2)



**REC 2:** Assess vulnerabilities in internal controls and strengthen or implement necessary internal controls to address ineligible loans and potential fraud.

- [SBA OIG 21-09, Flash Report: Duplicate Loans Made Under the Paycheck Protection Program](#) (p. 8, Recommendations 3 and 4)



**REC 3:** Strengthen E-Tran [SBA electronic loan application system] controls for future Paycheck Protection Program (PPP)-type programs, which includes keeping E-Tran controls that align with program requirements on at all times.



**REC 4:** Review the issues that SBA identified involving the actions of lenders, such as providing incorrectly formatted data and submitting the same application through multiple platforms, and determine how to strengthen controls and guidance as appropriate to ensure lenders meet program requirements for future PPP-type programs.

- [Statement of Rebecca Shea, Director, Forensic Audits and Investigative Service, before the U.S. Senate Subcommittee on Emerging Threats and Spending Oversight, Committee on Homeland Security and Governmental Affairs, on “Insights and Actions for Fraud Prevention.”](#) (p. 3)

“Understanding fraud schemes that emerged during the pandemic can provide opportunities for program managers to identify internal controls that had been circumvented and respond to mitigate the related risks.”

- [SBA OIG 22-19, Covid-19 And Disaster Assistance Information Systems Security Controls](#) (p. 7, Recommendation 4)



**REC 4:** Enforce the requirement to establish and implement internal controls to ensure appropriate program officials perform and document contract reviews to ensure that information security is appropriately addressed in the contracting language, as required by [OMB Circular A-130](#) [...]

- [GAO 21-191, COVID 19: Urgent Actions Needed to Better Ensure an Effective Federal Response](#) (p. 3, Recommendation 11)



**REC 11:** The Secretary of the Treasury should finish developing and implement a compliance monitoring plan that identifies and responds to risks in the Payroll Support Program to ensure program integrity and address potential fraud, including the use of funds for purposes other than for the continuation of employee wages, salaries, and benefits.

- [DOL OIG 19-23-016-03-391, COVID-19: The Employment and Training Administration Needs to Improve Oversight of Grants Awarded in New Jersey](#) (p. 16, Recommendation 3)



**REC 3:** Develop and implement guidance to specifically identify the high risk associated with low enrollment levels in combination with the high burn rate of grant funds.

- [DOT OIG ST2023001, FTA Can Enhance Its Controls to Mitigate COVID-19 Relief Funding Risks](#) (p. 22, Recommendation 1)



**REC 1:** Design or redesign control activities for the four risks:

- Risk of fraud or abuse.
- Recipients may attempt to use funding for a non-operating expense even though they have furloughed staff.

- Private sector operators are now eligible to become subrecipients.
- Limited capacity of current oversight contracts.

- [DHS OIG 22-73, More than \\$2.6 Million in Potentially Fraudulent LWA Payments Were Linked to DHS Employees' Identities](#) (p. 19, Recommendation 1)



**REC 1:** Develop and implement a standard risk assessment process before initiating new federal grant programs. This risk assessment should focus on identifying and evaluating program risks that may affect FEMA's ability to prevent waste, fraud, and abuse in its programs and mitigating those external risks to the extent practical.

- [FDIC OIG EVAL-23-001, FDIC Examinations of Government-Guaranteed Loans](#) (p. 38, Recommendation 5)



**REC 5:** Issue and implement guidance to require that examination staff conduct a fraud-risk assessment on future government-guaranteed loan programs involving FDIC-insured and FDIC-supervised financial institutions to inform policy decisions.

- [PRAC 2023-02, FRAUD ALERT: PRAC Identifies \\$5.4 Billion in Potentially Fraudulent Pandemic Loans Obtained Using Over 69,000 Questionable Social Security Numbers](#) (p. 5, Next Step 1)



**Next Step 1:** Given the potential negative impacts on individuals who may be victims of identity fraud [...]: Assess lessons learned across COVID-19 EIDL [Economic Injury Disaster Loan] and PPP policies, procedures, and internal controls to help improve program integrity and prevent identity fraud.

- [DOL OIG 19-23-012-03-315, Alert Memorandum: ETA Needs to Incorporate Data Analytics Capability to Improve Oversight of the Unemployment Insurance Program](#) (p. 10, Recommendation 3)



**REC 3:** Establish effective controls, in collaboration with state workforce agencies, to mitigate fraud and other improper payments to ineligible claimants in high-risk age categories.

- [HHS OIG A-02-21-01013, HRSA Made Covid-19 Uninsured Program Payments to Providers on Behalf of Individuals Who Had Health Insurance Coverage and for Services Unrelated to Covid-19](#) (p. 13, Recommendation 3)



**REC 3:** [S]trengthen [...] procedures that may apply to future programs of a similar nature to: Expand insurance verifications using additional data fields on each patient for whom an SSN [Social Security number] is not submitted as part of a prepayment check or postpayment review process to identify potential exact matches for health insurance coverage.

- [DHS OIG 22-69, FEMA Did Not Implement Controls to Prevent More than \\$3.7 Billion in Improper Payments from the Lost Wages Assistance Program](#) (p. 11, Recommendation 3)



**REC 3:** FEMA Administrator update the State Administrative Plan template to incorporate a requirement for grantees to include a description of the steps to prevent improper payments.



- [HUD OIG 2022-FO-0801, Fraud Risk Inventory for the CDBG and ESG CARES Act Funds](#) (p. 10, Recommendation 1F)



**REC 1F:** Develop and implement a fraud analytics strategy using available data, including but not limited to data and information collected during the grantee risk assessment and monitoring processes, to begin conducting data analyses to identify potential fraud risks for further review.

- [DHS OIG-22-73, More than \\$2.6 Million in Potentially Fraudulent LWA Payments Were Linked to DHS Employees' Identities](#) (p. 20, Recommendation 6)



**REC 6:** We recommend the FEMA Administrator develop and implement a process to review state administrative plans for consistency and ensure they include fraud prevention and mitigation strategies.

### Additional Key Insights from Listening Sessions

Key federal and state stakeholders told us that there should be strong collaboration between program administrators and their OIGs beginning on day one of any new or enhanced emergency benefit programs. Enabling greater engagement by OIGs on the front-end introduces a new model of oversight that is better equipped to rapidly respond to evolving risks and prevent fraudulent payments, rather than continuing to rely on a back-end pay-and-chase model. These gold standard meetings should be held prior to major changes to existing programs or launches of new programs.

Stakeholders also noted the benefits of evaluating fraud risks and implementing anti-fraud controls during the design phase of the program, continuously monitoring for fraud and improving anti-fraud controls in response to emerging trends, and leveraging all data sources to improve fraud prevention and detection.

### Share Information From Fraud Risk and Internal Control Assessments

Communicating information from fraud risks and internal controls strengthens program integrity and better protects taxpayer funds.

- [GAO-15-593SP, A Framework for Managing Fraud Risks in Federal Programs](#) (p. 17)

Establish collaborative relationships with internal and external stakeholders, including other offices within the agency; federal, state, and local agencies; private-sector partners; law-enforcement entities; and entities responsible for control activities to, among other things:

- Share information on fraud risks and emerging fraud schemes,
- Share lessons learned related to fraud control activities, and
- Collaborate and communicate with the OIG to improve understanding of fraud risks and align efforts to address fraud.

- [SBA OIG 23-09, COVID-19 Pandemic EIDL and PPP Loan Fraud Landscape](#)

The white paper identifies common fraud indicators and possible corrective actions to fix internal control weaknesses in SBA's pandemic programs.

- [GAO 24-10722, Key Elements of Fraud Schemes and Actions to Better Prevent Fraud](#) (p. 19, Open Matter for Congressional Consideration)

Congress should amend the Payment Integrity Information Act of 2019 to reinstate the requirement that agencies report on their antifraud controls and fraud risk management efforts in their annual financial reports.

- [FDIC OIG EVAL-23-001, FDIC Examinations of Government-Guaranteed Loans](#) (p. 52, Recommendations 15, 16, and 18)



**REC 15:** Develop and implement processes and procedures for the routine sharing, receipt, and storage of confidential information with federal agencies that administer government-guaranteed loan programs.



**REC 16:** Develop and implement guidance to provide instruction to FDIC bank examination staff requiring communication and information sharing with federal agencies that administer government-guaranteed loan programs to ensure FDIC staff and the federal agencies are aware of any emerging risks.



**REC 18:** Develop and implement guidance to ensure relevant risk information exchanged with federal government agencies that administer government-guaranteed loan programs is shared internally within the FDIC on an ongoing basis with the appropriate FDIC employees.

- [SBA OIG 22-17, COVID-19 Economic Injury Disaster Loan Applications Submitted From Foreign IP Addresses](#) (p. 14, Recommendation 2)



**REC 2:** Examine controls related to foreign IP addresses and ensure these controls are more effective in future disaster processing systems.

- [Statement by Hannibal “Mike” Ware, Inspector General, Small Business Administration, on “Stolen Taxpayer Funds: Reviewing The SBA And OIG Reports Of Fraud In Pandemic Lending Programs.” before the United States House of Representatives Committee on Small Business, July 13, 2023](#) (p. 5)

“Our office knew from the onset of pandemic relief that SBA would face a delicate balancing act of preventing widespread fraud while ensuring timely disbursement of relief funds to Americans in immediate need. The biggest concern for our office was SBA’s quick delivery of capital to qualifying small businesses without first establishing the internal controls necessary to decrease the risk of fraud. This is why we issued two reports prior to the first PPP loan, or EIDL, being disbursed, stressing the importance of upfront program controls to mitigate the risk of fraud.

“We proactively recommended internal control measures to SBA and policymakers in real time to address the allure of easy money that created the golden opportunity for even otherwise law-abiding citizens to commit fraud. [...]

“In conducting the fraud landscape review, our office unleashed the power of data analytics in our oversight function. Fueled by the expertise and experience of our criminal investigators, auditors, and analysts, the report identifies 11 fraud indicators that we use to signal potential fraud. I have offered additional insights on the various fraud indicators from the report in my written statement.”

## Assess Recipient Eligibility Prior to Award

Prior to providing a recipient funding, program staff should verify the identity of the recipient through photo identification and other identity validation tools. Staff should also verify that the recipient is eligible for the program benefits by checking the Treasury's Do Not Pay list and death records and verifying tax information and business registration.

### Verify Recipient Identity and Eligibility

- [Memorandum from Hannibal “Mike” Ware, Key Recommendations Based on Lessons Learned from Prior COVID-19 Economic Injury Disaster and Paycheck Protection Program Loan Programs](#) (p. 2)

“Strengthen or establish controls to ensure multiple loans are provided only to eligible applicants and prevent the erroneous duplication of loans. At a minimum:

- Obtain a photo ID of the applicant to verify their identity.
  - Verify that the applicant is not on Treasury's Do Not Pay list for delinquent child support and has not been suspended or debarred.
  - Verify the applicant is a legitimate business through tax returns, incorporation, not-for-profit records with secretary of state offices, or another method.
  - Institute a 'rule of two' requiring two people to approve each loan application and eliminate the batch approval process.
  - Require human contact with applicants who submit multiple applications from the same IP addresses, email addresses, physical addresses, or bank account number to verify these applicants are legitimate.
  - Ensure the system promptly identified all risk factors (fraud, duplicate applications, and information flags) and require full mitigation of those issues before approval.”
- [DOL OIG 19-23-016-03-391, COVID-19: The Employment and Training Administration Needs to Improve Oversight of Grants Awarded in New Jersey](#) (p. 16, Recommendation 5)



**REC 5:** Establish and implement a plan to improve monitoring activities to ensure grantees and sub-recipients are properly documenting eligibility.

- [Treasury Inspector General for Tax Administration \(TIGTA\) OIG, 2022-47-030, American Rescue Plan Act: Implementation of Advance Recovery Rebate Credit Payments](#) (p. 7, Recommendation 2)



**REC 2:** If Congress enacts additional stimulus payments, the Commissioner, Wage and Investment Division, should consider additional programming changes to prevent ineligible individuals from receiving advance payments, including individuals claimed as dependents or dependents claimed on multiple returns, nonresident individuals, individuals who had a filing status or filing partner change, deceased individuals, and individuals affected by the mentioned related programming errors.

- [SBA OIG 21-06, Management Alert, Paycheck Protection Program Loan Recipients on the Department of Treasury’s Do Not Pay List](#) (p. 5, Recommendation 3)



**REC 3:** Review prepayment and pre-award procedures and work with Treasury to formulate a technical approach to use Treasury’s DNP portal to determine loan applicant eligibility and prevent improper payments before the release of any federal funds.

- [PRAC, Fraud Alert Follow-Up: Improved Sharing of Death Records and Use of the Do Not Pay System Would Strengthen Program Integrity and Better Protect the Public](#) (pp. 2-3)

Verifying borrower information, including SSN and the date of death, helps prevent identity fraud and ensures government benefits are paid only to those who are eligible. The DNP system helps government program administrators identify and prevent improper payments by allowing agencies to check a variety of data sources to verify an applicant’s eligibility to receive federal funds.

- [DOI OIG 2021-ER-015, The Bureaus of Indian Affairs and Indian Education Have the Opportunity to Implement Additional Controls to Prevent or Detect Multi-dipping of Pandemic Response Funds](#) (p. 7, Recommendation 1)



**REC 1:** Develop and implement policies, procedures, or guidance designed to prevent or detect multi-dipping [receiving funding from more than one federal program is sometimes referred to as “multi-dipping”]. The practice is not unusual and is not necessarily an indication of fraud.

### Additional Key Insights from Listening Sessions

Stakeholders told us that verifying recipient eligibility is not only a vital internal control for federal agencies but also for states. Several states are using tools to verify unemployment insurance eligibility, including documentation of wages or income and cross-matching data with the Social Security Administration, Department of Motor Vehicles, or other identity databases.

## Do Not Rely Only on Self-Certification for Eligibility Requirements

- [Statement by Gene Dodaro, Comptroller General of the United States, before the House of Representative Committee on Ways and Means, on “The Greatest Theft of Taxpayer Dollars: Unchecked Unemployment Fraud,” February 8, 2023](#) (p. 5)

“[T]he urgent need to get the money out led to trade-offs that limited the ability of the government and the states to achieve the accountability and transparency objectives of the legislation Congress intended. [...] As a result of these trade-offs, self-certification in particular, these programs were more susceptible to fraud than they would have been otherwise during the program.”

- [Statement by Larry Turner, Inspector General of the U.S. Department of Labor, before the House of Representative Committee on Ways and Means, on “The Greatest Theft of Taxpayer Dollars: Unchecked Unemployment Fraud,” February 8, 2023](#) (p. 39)

“[S]tates were not prepared to process the historic volume of claims, resulting in significant delays. And this reliance on claimant self-certification rendered the PUA [Pandemic Unemployment Assistance] program extremely susceptible to fraud, and the unprecedented infusion of federal funds gave fraudsters a high-value target to exploit. That, combined with the ease of identity theft and system weaknesses previously identified by the OIG, allowed criminals to defraud the program.”



## Section 2: Detecting Fraud

Fraud risk indicators and data analytics are essential for detecting potential fraud. In addition, increasing managers' and employees' awareness of potential fraud schemes through training and education can serve a preventive purpose by helping to create a culture of integrity and compliance within programs. Moreover, GAO has reported that increasing fraud awareness can help prevent and deter fraud.

### Build Necessary Infrastructure

Federal and state agencies need up-to-date IT tools, core administrative systems, and structures such as data analytics capabilities in place to effectively scale up and manage emergency relief programs to meet a crisis.

### Assess and Develop Information Technology Upgrades

- [DOL OIG 19-21-004-03-315, COVID-19: States Struggled to Implement CARES Act Unemployment Insurance](#) (p. 20, Recommendations 1 and 2)



**REC 1:** Conduct a study to assess the technological needs of the [...] programs to determine the capabilities that need to be upgraded or replaced; the features necessary to effectively respond to rapid changes in the volume of claims in times of emergency or high unemployment; the capabilities needed to ensure effective and equitable delivery of benefits; and the capabilities to minimize fraudulent activities.



**REC 2:** Develop, operate, and maintain a modular set of technological capabilities to modernize the delivery of [...] benefits that is sufficient to manage and process sudden spikes in claims volume during emergencies or high unemployment.

### What was the role of identity theft in pandemic fraud?

Key stakeholders indicated that a significant portion of the pandemic fraud occurred due to identify theft from:

- Stolen Social Security numbers purchased from the dark web and used to fraudulently claim benefits across multiple states.
- Programs with minimal verification requirements allowing fraudsters to claim identities with little to no checks.
- Transnational organized crime groups and insiders having access to personal data.
- Fraudsters managing hundreds of applications from a single IP address, overwhelming systems without adequate controls.

- [DOL OIG, Alert Memorandum: ETA Needs to Incorporate Data Analytics Capability to Improve Oversight of the Unemployment Insurance Program](#) (p. 10, Recommendation 2)



**REC 2:** Create an integrity program that incorporates a data analytics capability and regularly monitors state unemployment insurance claims data to detect and prevent improper payments, including fraudulent payments, and to identify trends and emerging issues that could negatively impact the unemployment insurance program.

- [GAO 23-105331, Fraud Schemes and Indicators in SBA Pandemic Programs](#) (p. 80, Recommendations 1 and 2)



**REC 1:** The Administrator of SBA, in coordination with the Fraud Risk Management Board, should ensure that SBA has mechanisms in place and utilizes them to facilitate cross-program data analytics.



**REC 2:** The Administrator of SBA, in coordination with the Fraud Risk Management Board, should ensure that SBA has identified external sources of data that can facilitate the verification of applicant information and the detection of potential fraud across its programs. It should then develop a plan for obtaining access to those sources, which may involve pursuing statutory authority or entering into data-sharing agreement to obtain such access.

- [Written testimony, Charles P. Rettig, Commissioner, Internal Revenue Service, before the House Oversight Committee and Reform Committee Subcommittee on Government Operations on the Filing Season and IRS Operations, April 21, 2022](#)

“Limited IT resources preclude us from building adequate solutions for efficiently matching or reconciling data from multiple sources. As a result, we are often left with manual processes to analyze reporting information we receive. Such is the case with data from the Foreign Account Tax Compliance Act (FATCA). Congress enacted FATCA in 2010, but we have yet to be appropriated any significant funding for its implementation. This situation is compounded by the fact that when we do detect potential non-compliance or fraudulent behavior through manually generated FATCA reports, we seldom have sufficient funding to pursue the information and ensure proper compliance.”

- [Statement by Michael Horowitz, Hearing on “The Greatest Theft of Taxpayer Dollars: Unchecked Unemployment Fraud,” before The Committee on Ways and Means House of Representatives One Hundred Eighteenth Congress, February 8, 2023](#) (p. 69)

“Fourth, states experienced challenges verifying eligibility because of outdated IT systems and the mass influx of claims. [...] Among the best practices that we believe should be replicated are increased use of cross-matching of data between state agencies; improved coordination between SWAs [state workforce agencies] and state and federal law enforcement, local IGs, and state auditors; more effective use of enterprise risk management; increased IT modernization efforts; and the use of advanced data analytics to build multi-layer fraud defenses, including identity verification tools.”

## Provide Training, Guidance, and Instruction to Program and Oversight Staff

- [USAID OIG 4-000-24-001-P, COVID-19: Enhanced Controls Could Strengthen USAID's Management of Expedited Procurement Procedures](#) (p. 12, Recommendation 3)



**REC 3:** Implement procedures to strengthen training on use of noncompetitive action codes in the Global Acquisition and Assistance System to ensure consistent reporting of use of other than full and open competition for new and modified awards in the Global Acquisition and Assistance System and the Federal Procurement Data System, and track use of the Expedited Procedures Package for Infectious Disease Outbreaks.

- [SBA OIG 22-13, SBA's Handling of Potentially Fraudulent Paycheck Protection Loans](#) (pp. 7, 10, Recommendations 1 and 2)



**REC 1:** Establish clearly defined and detailed roles, responsibilities, and processes [...] for managing and handling potentially fraudulent PPP loans to reduce the risk of ineligible applicants receiving PPP forgiveness and the risk of fraud and financial loss when implementing similar future programs.



**REC 2:** Provide lenders formal guidance to effectively and consistently handle potentially fraudulent PPP loans and ensure lenders have sufficient guidance when implementing similar future programs.

- [FDIC OIG EVAL-23-001, FDIC Examinations of Government-Guaranteed Loans](#) (p. 43, Recommendation 10)



**REC 10:** Develop and implement a training plan to ensure examination staff are trained on the requirements and risks of government-guaranteed loan programs.

- [DHS OIG, 22-28, Management Alert – Reporting Suspected Fraud of Lost Wages Assistance](#) (p. 2, Recommendations 1 and 2)



**REC 1:** Direct state workforce agencies participating in its Lost Wages Assistance program to report suspected, alleged, and identified fraud to DHS OIG's Office of Investigations.



**REC 2:** Follow up with state workforce agencies in its Lost Wages Assistance program to reinforce reporting of suspected, alleged, and identified fraud to DHS OIG's Office of Investigations.

- [GAO 23-105199, SBA Could Improve Communications and Fraud Risk Monitoring for Its Arts and Entertainment Venues Grant Program](#) (p. 37, Recommendation 1)



**REC 1:** The Associate Administrator of SBA's Office of Disaster Assistance should develop a comprehensive strategy for communicating with potential and actual grant program applicants in the event of a disaster or other emergency. Such a strategy should provide guidelines for how to communicate information in a timely and effective manner during nationwide emergencies (such as pandemics) and for doing so for any future industry-specific emergency assistance programs.



- [SBA OIG 24-06, Evaluation of SBA’s Eligibility and Forgiveness Reviews of Paycheck Protection Program Loans Made to Borrowers with Treasury’s Do Not Pay Data Matches](#) (p. 10, Recommendation 5)



**REC 5:** Develop and implement clear guidance requiring responsible officials to maintain documentary evidence used to support loan decisions in the loan files.

- [DOL OIG 19-23-016-03-391, COVID-19: The Employment and Training Administration Needs to Improve Oversight of Grants Awarded in New Jersey](#) (p. 16, Recommendation 6)



**REC 6:** Establish and implement a plan to increase the level of technical assistance and monitoring for grantees and sub-recipients to ensure they properly administer contracts and reimburse on-the-job training costs.

- [SBA OIG 21-03, EVALUATION OF CARES ACT DEBT RELIEF TO 7\(A\) BORROWERS](#) (p. 9, Recommendation 2)



**REC 2:** Establish post-payment audit procedures, using a risk-based approach, to verify the accuracy and completeness of all subsidy payments to lenders and include reviews of payments made to loans that changed from liquidation status to regular servicing status, and remedy improper payments in accordance with the Payment Integrity Act of 2019.

- [DOL OIG 19-23-014-03-315, COVID-19: Pandemic Unemployment Assistance for Non-Traditional Claimants Weakened by Billions in Overpayments, Including Fraud](#) (p. 23, Recommendations 1 and 2)



**REC 1:** Develop a document that captures lessons learned from the implementation of the pandemic-related UI programs that can be used to provide legislative technical assistance and operational guidance to Congress and states on any future emergency UI programs, including an assessment of fraud and fraud prevention methods in programs that allow for self-certification.



**REC 2:** Provide guidance to states regarding the criminal statute of limitations, which could impact the ability to criminally charge individuals that engaged in pandemic-related UI fraud. Guidance should recommend that states identify and promptly refer pandemic-related UI fraud cases for criminal investigation. This directive should also emphasize the importance of cooperation between states and law enforcement agencies, making specific reference to Unemployment Insurance Program Letter 04-17.

- [HUD OIG 2022-FO-0801, Fraud Risk Inventory for the CDBG and ESG CARES Act Funds](#) (p. 9, Recommendation 1D)



**REC 1D:** Implement efforts to increase the awareness of fraud at all levels (headquarters, field offices, grantees, subrecipients, etc.), including but not limited to regularly publishing articles on known fraud schemes and identified instances of fraud [...], providing recurring fraud risk trainings.

## Institute Federal to Federal, State to State, Federal to State Data Sharing

- [DOL OIG 19-22-006-03-315, COVID-19: ETA and States Did Not Protect Pandemic-Related UI Funds from Improper Payments Including Fraud or from Payment Delays](#) (p. 26, Recommendation 4)



**REC 4:** Work with National Association of State Workforce Agencies to ensure the Integrity Data Hub cross-matches are effective at preventing the types of fraud that were detected during the pandemic and regularly update using the results of state fraud investigations.

- [DOL OIG 19-23-011-03-315, COVID-19 – ETA Can Improve its Oversight to Ensure Integrity over CARES Act UI Programs](#) (p. 7, Recommendation 3)



**REC 3:** Determine the best threshold for flagging multistate claims in conjunction with the National Association of State Workforce Agencies (NASWA).

- [GAO 21-191, COVID 19: Urgent Actions Needed to Better Ensure an Effective Federal Response](#) (p. 2, Recommendation 8)



**REC 8:** The Secretary of Labor should ensure the Office of Unemployment Insurance pursues options to report the actual number of distinct individuals claiming benefits, such as by collecting these already available data from states, starting from January 2020 onward.

- [DOL OIG 19-23-012-03-315, Alert Memorandum: ETA Needs to Incorporate Data Analytics Capability to Improve Oversight of the Unemployment Insurance Program](#) (p. 10, Recommendation 1)



**REC 1:** Obtain direct access to unemployment insurance claims data from all state workforce agencies.

- [DOL OIG 19-21-004-03-315, COVID-19: States Struggled to Implement CARES Act Unemployment Insurance](#) (p. 21, Recommendation 3)



**REC 3:** Assist states with claims, overpayment, and fraud reporting to create clear and accurate information. Then use the overpayment and fraud reporting to prioritize and assist states with fraud detection and recovery.

- [DOJ OIG 22-109, Audit of the Management and Coordination of Pandemic-Related Fraud Allegations and Referrals Between the Criminal Division and Executive Office for U.S. Attorneys](#) (pp. 22-23, Recommendations 1 and 6)



**REC 1:** Implement a system to ensure regular and uniform communication for pandemic-related updates, to include informing USAO [U.S. Attorney Office] districts on information shared within national coordinating bodies.



**REC 6:** Work with the Executive Office for U.S. Attorneys to implement methods to share pandemic fraud case information, particularly regarding PPP-related matters, for reference in possible overlap with USAO-led UI matters.

- [DOL OIG 19-23-014-03-315, COVID-19: Pandemic Unemployment Assistance for Non-Traditional Claimants Weakened by Billions in Overpayments, Including Fraud](#) (p. 23, Recommendation 2)



**REC 2:** Provide guidance to states regarding the criminal statute of limitations, which could impact the ability to criminally charge individuals that engaged in pandemic-related UI fraud. Guidance should recommend that states identify and promptly refer pandemic-related UI fraud cases for criminal investigation. This directive should also emphasize the importance of cooperation between states and law enforcement agencies, making specific reference to Unemployment Insurance Program Letter 04-17, Change 1 - Attachment I, concerning activity that must be reported to the OIG.

### Ensure Data Accuracy and Integrity

- [SBA OIG 21-02, Inspection of Small Business Administration’s Initial Disaster Assistance Response to the Coronavirus Pandemic](#) (p. 28, Recommendation 6)



**REC 6:** Strengthen data integrity to make it possible to determine if the inaccurate information allowed loans to be made to ineligible entities and to strengthen SBA’s ability to service loans appropriately.

- [DHS OIG, 23-42, Ineffective Controls Over COVID-19 Funeral Assistance Leave the Program Susceptible to Waste and Abuse](#) (p. 20, Recommendation 4a)



**REC 4a:** Design internal controls that distinguish between legitimate sources of potential program duplications, such as program applications that share decedents’ names or Social Security numbers, from system-generated potential duplications that arise due to using re-purposed data processing systems.

- [Statement of David Smith, Assistant Director, Office of Investigations, U.S. Secret Service, before the House of Representatives Committee on Oversight and Accountability, on “Federal Pandemic Spending: A Prescription for Waste, Fraud, and Abuse.”](#) February 1, 2023 (p. 80)

“What we were doing was sharing indicators of compromise with those entities, such as if an individual was using an IP address that was from an overseas originating point, or if a financial institution saw, if you happen to see an account being opened fairly recently and that account was being used to move a substantial amount of money in a short period of time, that would be something you would flag.”



# Section 3: Responding to Fraud

In addition to attempting to prevent and detect fraud at the outset, the government can stop suspicious payments, put fraudsters in prison, and recover illegally obtained funds. These actions require that federal agencies have policies in place to suspend payments, efficiently recover funds, and retain data necessary to investigate loans and prosecute individuals who fraudulently received benefits.

## Stop Payments and Recover Funds

When fraud does occur, it is important that federal agencies take action to minimize the funding that bad actors are able to access. This can be done by stopping all payments once fraud is suspected and recovering funds where possible. In addition, agencies can take administrative actions against those committing fraud through suspension and debarment.

### Suspend Potential Improper or Fraudulent Payments

- [SBA OIG 22-17, COVID-19 Economic Injury Disaster Loan Applications Submitted From Foreign IP Addresses](#) (p. 14, Recommendation 1)



**REC 1:** Thoroughly review each grant and advance application submitted from foreign IP addresses that were approved and funded and verify eligibility. If ineligibility or evidence of potential fraud is found, SBA should stop any further or future disbursements, recover any disbursed funds, and refer fraudulent loans to OIG for investigation.

- [SBA OIG 21-02, Inspection of Small Business Administration's Initial Disaster Assistance Response to the Coronavirus Pandemic](#) (pp. 18, 28, 30, Recommendations 1, 3, and 7)



**REC 1:** Review all loans that had a bank account number changed from that shown on the original application to determine if the changes were legitimate or fraudulent. If not legitimate, work to recover the funds, de-obligate any undisbursed funds, and refer to the OIG.



**REC 3:** Review duplicate loans to IP addresses, email addresses, business addresses, and bank accounts to determine if there are undisbursed funds that should be suspended until the duplicate loans are assessed for eligibility.



**REC 7:** Review the applicants with approved loans to determine if there are undisbursed funds remaining that should be suspended until the business start date is verified and the applicant is deemed eligible based on the CARES Act eligibility requirements. If the applicant is deemed ineligible, recover any disbursed funds, de-obligate any undisbursed funds, and flag the application as ineligible.

- [SBA OIG 23-08, Serious Concerns Regarding the Return of PPP Funds](#) (p. 5, Recommendation 4)



**REC 4:** Provide detailed guidance to financial institutions that receive PPP fund deposits for borrowers regarding how to return PPP funds if there is suspected fraud or other issues that would warrant returning funds.

- [SBA OIG 23-10, SBA's Administrative Process to Address Potentially Fraudulent Restaurant Revitalization Fund Awards](#) (p. 8, Recommendation 1)



**REC 1:** Prioritize and complete the review of [...] awards that were flagged by the point-of-sale partner as having unsupported gross sales and take appropriate administrative actions to recover improper payments, which includes 110 awards that were suspected of fraud.

## Mandate Data and Record Retention

- [SBA OIG 23-15, SBA's Oversight of Restaurant Revitalization Fund Recipients](#) (p. 13, Recommendation 3)



**REC 3:** Extend the record retention period and notify all RRF award recipients in writing in accordance with 2 CFR 200.334.

- [SBA OIG 24-06, Evaluation of SBA's Eligibility and Forgiveness Reviews of Paycheck Protection Program Loans Made to Borrowers with Treasury's Do Not Pay Data Matches](#) (p. 10, Recommendation 5)



**REC 5:** Develop and implement clear guidance requiring responsible officials to maintain documentary evidence used to support loan decisions in the loan files.

## Recover Funds Obtained Fraudulently or Improperly

- [DHS OIG 22-69, FEMA Did Not Implement Controls to Prevent More than \\$3.7 Billion in Improper Payments from the Lost Wages Assistance Program](#) (p. 11, Recommendation 7)



**REC 7:** FEMA Administrator de-obligate and recover any monies determined to have been obtained fraudulently or other improper payments through Lost Wages Assistance from the state workforce agencies.

- [SBA OIG 21-02, Inspection of Small Business Administration's Initial Disaster Assistance Response to the Coronavirus Pandemic](#) (p. 18, Recommendation 1)



**REC 1:** Review all loans that had a bank account number changed from that shown on the original application to determine if the changes were legitimate or fraudulent. If not legitimate, work to recover the funds, de-obligate any undisbursed funds, and refer to the OIG.

- [SBA OIG 21-06, Management Alert, Paycheck Protection Program Loan Recipients on the Department of Treasury's Do Not Pay List](#) (p. 5, Recommendation 2)



**REC 2:** Strengthen [...] controls to ensure that loans to ineligible recipients are not forgiven.

- [SBA OIG 21-09, Flash Report: Duplicate Loans Made Under the Paycheck Protection Program](#) (p. 8, Recommendation 2)



**REC 2:** Review SBA controls related to all PPP loan reviews to ensure that duplicate loans are not forgiven and not subject to an SBA guaranty, as appropriate.

- [SBA OIG 24-02, SBA's Internal Controls to Prevent Shuttered Venue Operators Grants to Ineligible Applicants](#) (p. 16, Recommendation 2)



**REC 2:** Implement additional controls to ensure that, during the monitoring, auditing, and compliance phases, awards are carefully screened to verify eligibility and to recover grant funds from ineligible entities.

- [SBA OIG 21-15, SBA's Handling of Identity Theft in the COVID-19 Economic Injury Disaster Loan Program](#) (p. 9, Recommendation 5)



**REC 5:** Review returned billing statements and resolve any that involve identity theft, then refer fraudulent loans to OIG.

- [SBA OIG 23-08, Serious Concerns Regarding the Return of PPP Funds](#) (p. 5, Recommendation 1)



**REC 1:** Provide detailed guidance to borrowers on returning PPP funds to lenders if the loan was forgiven or guaranty purchased.

- [SBA OIG 23-10, SBA's Administrative Process to Address Potentially Fraudulent Restaurant Revitalization Fund Awards](#) (p. 8, Recommendation 1)



**REC 1:** Prioritize and complete the review of [...] awards that were flagged by the point-of-sale partner as having unsupported gross sales and take appropriate administrative actions to recover improper payments, which includes 110 awards that were suspected of fraud.

- [SBA OIG 23-15, SBA's Oversight of Restaurant Revitalization Fund Recipients](#) (pp. 13, 15, Recommendations 4 and 6)



**REC 4:** Assess the post-award review process and manpower requirements to ensure post award reviews are conducted in a prompt manner. Use the results of the assessment to improve processing times to ensure reviews are completed before the statute of limitations expire.



**REC 6:** Establish and implement procedures to recover unused funds or recover funds paid to ineligible recipients and prioritize this effort.

- [SBA OIG 21-06, Management Alert, Paycheck Protection Program Loan Recipients on the Department of Treasury's Do Not Pay List](#) (p. 5, Recommendation 2)



**REC 2:** Strengthen SBA controls to ensure that loans to ineligible recipients are not forgiven.

- [SBA OIG 24-06, Evaluation of SBA's Eligibility and Forgiveness Reviews of Paycheck Protection Program Loans Made to Borrowers with Treasury's Do Not Pay Data Matches](#) (pp. 6, 10, Recommendations 1 and 3)



**REC 1:** Review [...] PPP loans [...] that matched a DNP data source, to ensure eligibility requirements were met and seek remedy or repayment of all loans deemed ineligible.



**REC 3:** Conduct a review of PPP loans, in which the DNP hold-codes were cleared to identify (1) those cleared using pre-decisional memos and (2) those cleared without sufficient evidence to support the reviewer's loan decision and seek remedy or repayment of loans deemed ineligible.

- [GAO -20-625, Covid-19 Opportunities to Improve Federal Response and Recovery Efforts](#) (p. 2, Recommendation 2)



**REC 2:** The Commissioner of Internal Revenue should consider cost-effective options for notifying ineligible recipients on how to return payments.

- [PRAC, FRAUD ALERT: PRAC Identifies \\$5.4 Billion in Potentially Fraudulent Pandemic Loans Obtained Using Over 69,000 Questionable Social Security Numbers](#) (p. 5, Next Step 2)



**Next Step 2:** Further examine the potential identity fraud we have identified using collaborative verification methods to determine which instances are likely fraud, with SBA taking appropriate action to recover fraudulently obtained funds.

- [United States Department of Agriculture \(USDA\) OIG Inspection Number 03801-0001-31, COVID-19 – Coronavirus Food Assistance Program – Direct Support](#) (p.5, Recommendation 1)



**REC 1:** Review and recover the questioned Coronavirus Food Assistance Program payments of \$1,286,786 resulting from inaccurate and/or unsupported producer certifications.

- [DOL OIG 19-23-015-03-315, Covid-19: ETA Needs a Plan to Reconcile and Return to the U.S. Treasury Nearly \\$5 Billion Unused by States for a Temporary Unemployment Insurance Program](#) (p. 20, Recommendation 1)



**REC 1:** Work with Oregon, Louisiana, Delaware, and Mississippi to ensure the appropriate return of approximately \$105.1 million in TFFF [Temporary Full Federal Funding] reimbursements for first-week regular UI compensation paid that were associated with ineligible weeks.

- [TIGTA 2022-47-030, American Rescue Plan Act: Implementation of Advance Recovery Rebate Credit Payments](#) (p. 5, Recommendation 1)



**REC 1:** The Commissioner, Large Business and International Division, should coordinate with the territories to share information that will enable the territories to recover duplicate payments that the territories have issued, to the extent permitted under the relevant territory's domestic law.

- [Statement of Gene L. Dodaro, Comptroller General of the United States, before the House of Representatives Select Subcommittee on the Coronavirus Crisis, Committee on Oversight and Government Reform, on “COVID-19 Opportunities to Improve Federal Response and Recovery Efforts,” June 26, 2020](#)

GAO identified challenges with the federal response to the crisis, including:

“Economic impact payments. The Internal Revenue Service and the Department of the Treasury faced difficulties delivering payments to some individuals, and made some payments to ineligible individuals, such as decedents. GAO recommends that IRS should consider cost-effective options for notifying ineligible recipients how to return payments.”



## APPENDIX 3-A:

# Objective, Scope, and Methodology

The objective of Chapter 3 was to compile leading practices, resources, and lessons learned from reports and recommendations issued by the oversight community related to detecting and preventing fraud in pandemic programs.

The goal was to provide solutions for the design and implementation of future programs that can be adopted by federal and state agencies prior to or at the outset of an emergency.

Our review period was January 2020 through August 2024. We reviewed reports from the oversight community to identify recommendations applicable to Chapter 3. In addition, we reviewed all of the Pandemic Response Accountability Committee's (PRAC) Semiannual Reports to Congress and reports published by federal OIGs. To ensure we identified an accurate and complete list of reports and recommendations, we compared our document review with reports posted on Oversight.gov.

We also reviewed published reports from the Government Accountability Office and guidance memoranda from the Office of Management and Budget. We held listening sessions with key stakeholders, OIG officials, state officials, and national associations. During each listening session, we asked the stakeholders to identify reports, key takeaways, lessons learned, and best practices from their experiences during the pandemic that could be used in the future. We do not consider the reports used in this product to be an exhaustive list.

Based on the foundational work above, we identified key themes in the recommendations and added links to supporting reports. Stakeholders across the federal oversight community reviewed a draft of this report prior to publication. This work was completed between March and October 2024.

# Contributing Partners

With our thanks to the following stakeholders for sharing key recommendations, leading practices, and lessons learned, which are incorporated throughout Chapter 3 of the Blueprint:

## **Pandemic Response Accountability Committee Members**

Inspector General Sandra D. Bruce, Department of Education  
Inspector General Joseph Cuffari, Department of Homeland Security  
Inspector General Rae Oliver Davis, Department of Housing and Urban Development  
Deputy Acting Inspector General Richard Delmar, Department of the Treasury  
Inspector General Jennifer L. Fain, Federal Deposit Insurance Corporation  
Inspector General Phyllis K. Fong, Department of Agriculture  
Inspector General Mark Lee Greenblatt, Department of the Interior  
Inspector General Christi A. Grimm, Department of Health & Human Services  
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Inspector General Michael J. Missal, Department of Veterans Affairs  
Inspector General Eric J. Soskin, Department of Transportation  
Inspector General Robert P. Storch, Department of Defense  
Inspector General Larry D. Turner, Department of Labor  
Inspector General Hannibal “Mike” Ware, Small Business Administration

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## Visit us at:

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## Follow us at:



## Report Fraud, Waste, Abuse, or Misconduct:

To report allegations of fraud, waste, abuse, or misconduct regarding pandemic relief funds or programs please go to the PRAC website at

[PandemicOversight.gov](https://PandemicOversight.gov).



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Council of the Inspectors General  
on Integrity and Efficiency