Audit Report

OIG-23-029

CORONAVIRUS DISEASE 2019 PANDEMIC RELIEF PROGRAMS

Audit of Air Carrier Worker Support Certifications - Bird Acquisition, LLC

June 13, 2023

Office of Inspector General
Department of the Treasury

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DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF
INSPECTOR GENERAL

June 13, 2023

MEMORANDUM FOR JESSICA MILANO
ACTING CHIEF RECOVERY OFFICER

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

SUBJECT: Audit of Air Carrier Worker Support Certifications – Bird Acquisition, LLC

Attached is our audit report for the *Audit of Air Carrier Worker Support Certifications – Bird Acquisition, LLC* (Bird Acquisition) (OIG-23-029; dated June 13, 2023). 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 Bird Acquisition'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). The scope of this audit covered the period from April 1, 2019 through September 30, 2019 and included the certified PSP1 Application, sworn financial statements, tax returns, and other documentation submitted to Treasury.

In its audit report, S&R found Bird Acquisition incorrectly compiled data used for the Awardable Amounts section of the PSP1 Application, resulting in a $128,473 overstatement. Specifically, the:

- Inclusion of unallowable corporate officer compensation, resulted in a $[redacted] overstatement;
- Inclusion of member-paid Consolidated Omnibus Budget Reconciliation Act[1] (COBRA) benefits, resulted in a $[redacted] overstatement;
- Reporting incorrect data for benefits, resulted in a $[redacted] understatement; and

[1] P.L. 99-272 (April 7, 1986).

- Excluding eligible gross pay from the awardable amount resulted in a $[redacted] understatement.

Treasury's awards to contractors under PSP1 included a 90 percent pro rata distribution of application amounts. Applying this formula, Bird Acquisition received an $115,626 overpayment from Treasury.

Accordingly, S&R recommends that Treasury's Chief Recovery Officer:

- Seek reimbursement of the $115,626 overpayment for PSP1 financial assistance; and

- Review Bird Acquisition's requested amount for unallowable expenses, under the Payroll Support Program Extension (PSP2)[2] authorized by the Consolidated Appropriations Act, 2021 and the Payroll Support Program 3 (PSP3)[3] authorized by the American Rescue Plan Act of 2021, and seek reimbursement for the overpayment, if applicable.

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 Bird Acquisition'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, Deputy Assistant Inspector General for Audit, at (202) 487-8371.

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[2] 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).

[3] 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).

Attachment

cc: Victoria Collin, Chief Compliance and Finance Officer, Office of Recovery Programs, Department of the Treasury
Jason Morrow, Attorney Advisor, Department of the Treasury
Jeff Davis, Partner, Saggar & Rosenberg, P.C.

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Abbreviations

Bird Acquisition	Bird Acquisition, LLC
CARES Act	Coronavirus Aid, Relief, and Economic Security Act
COBRA	Consolidated Omnibus Budget Reconciliation 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
SOC 1	System and Organizational Controls
S&R	Saggar & Rosenberg, P.C.
Treasury	Department of the Treasury

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SAGGAR & ROSENBERG, P.C.
Assurance • Tax • Consulting

June 13, 2023

Jessica Milano
Acting Chief Recovery Officer
Department of the Treasury

This report presents the results of our audit of Bird Acquisition, LLC's (Bird Acquisition) 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).[4] 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).[5] 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)[6] and contractors.

Under a contract with OIG, Saggar & Rosenberg, P.C. (S&R) conducted this audit. Our audit objective was to assess the accuracy, completeness, and sufficiency of Bird Acquisition'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

[4] P.L. 116-136 (March 27, 2020).
[5] 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).
[6] 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".

statements, tax returns, and other documentation submitted to Treasury on April 3, 2020.[7]

To accomplish the objective, we reviewed applicable laws and regulations; and Treasury's policies and procedures, including but not limited to, the 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 Bird Acquisition, Treasury, and contracted consultants engaged by Treasury to evaluate certified company applications. We conducted our fieldwork from September 2021 through February 2022. Appendix 1 contains a more detailed description of our objective, scope, and methodology.

Results in Brief

In brief, S&R found that Bird Acquisition, a contractor, reported correct information for three of the four sections reviewed on its PSP1 Application.[8] These sections are: (1) Applicant Information, (2) Applicant Type, and (3) Certification. We also found that Bird Acquisition incorrectly compiled data used for the Awardable Amounts section, resulting in a $128,473 overstatement. Specifically, we found (1) the inclusion of unallowable corporate officer compensation, resulting in a $[redacted] overstatement, (2) inclusion of member-paid Consolidated Omnibus Budget Reconciliation Act (COBRA)[9] benefits, resulting in a $[redacted] overstatement, (3) reporting incorrect data for benefits, resulting in a $[redacted] understatement, and (4) excluding eligible gross pay from the awardable amount, resulting in a $[redacted] understatement. Treasury's awards to contractors under PSP1 included a 90 percent pro rata distribution of application amounts. Applying

[7] Bird Acquisition submitted the PSP1 Application and related supporting documentation on April 3, 2020. However, the Awardable Amounts section of the PSP1 Application was revised on June 2, 2020.

[8] 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.

[9] P.L. 99-272 (April 7, 1986).

this formula, we found that Bird Acquisition received an $115,626 overpayment from Treasury. As a result, we question the costs totaling $115,626 and recommend that the Treasury Chief Recovery Officer seek reimbursement of the $115,626 overpayment to Bird Acquisition for PSP1. Additionally, we recommend that Treasury review Bird Acquisition's requested amount for unallowable expenses, under the Payroll Support Program Extension (PSP2)[10] authorized by the Consolidated Appropriations Act, 2021 and the Payroll Support Program 3 (PSP3)[11] authorized by the American Rescue Plan Act of 2021, and seek reimbursement for overpayment, if applicable.

Appendix 2 contains more details on questioned costs.

As part of our reporting process, we provided Bird Acquisition management an opportunity to comment on a draft of this report. Bird Acquisition management contested that the report (1) inconsistently applies the definition of a corporate officer regarding the Chief Instructor/Vice President of Domestic Flight Program and (2) fails to consider the actual duties and responsibilities of the Vice President of International Business Development[12] in determining whether that position was an "officer."

Bird Acquisition management stated that the Chief Instructor/Vice President of Domestic Flight Program did not have a policy making function and only worked with approximately 30 percent of the students during the audit scope period, while the curriculum oversight of the remaining students was performed by another employee. Also, the Vice President of International Business Development did not supervise any employees, was not the only employee charged with sales responsibilities, was compensated based on the employee's own sales performance, and had no

[10] 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).

[11] 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).

[12] Bird Acquisition management refers to this position as Vice President of International Sales, although the official position title documented in the employee offer letter is Vice President of International Development.

responsibility over areas that Bird Acquisition considered its largest sales markets.

We disagree with Bird Acquisition management's statement that the definition of corporate officer was applied in a manner inconsistent with the full definition as defined by the PSP1 Agreement. The PSP1 Agreement defines a corporate officer as, *"with respect to the Recipient, its president; any vice president in charge of a principal business unit, division, or function (such as sales, administration or finance); any other officer who performs a policy-making function; or any other person who performs similar policy making functions for the Recipient."* The PSP1 Agreement did not provide a threshold for the percentage of operations that corporate officers needed to oversee, did not require them to supervise employees, and did not specify how they should be compensated. Bird Acquisition management's response, in its entirety, is included as appendix 3 of this report.

In a written response, Treasury management concurred with our recommendations and agreed that any overpayments of PSP funds should be recouped. Treasury stated it would review the findings, consider any response from the recipient, and seek recoupment of any amounts that Treasury determines have been overpaid. In addition, Treasury will review awardable amounts requested under PSP2 and PSP3 and seek recoupment where appropriate. Treasury management will need to record an estimated completion date for these actions in the Joint Audit Management Enterprise System (JAMES). Management's planned corrective actions meet the intent of our recommendations. Treasury management's response, in its entirety, is included as appendix 4 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.

According to the CARES Act, Treasury is required to provide financial assistance to air carriers that report salaries and benefits to the DOT (referred to as 241 carriers),[13] 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 air 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

[13] 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. Bird Acquisition is not a Large Certificated Air Carrier.

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.

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 — 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*[14] 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[15] and the applicant 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

In an effort to disburse PSP1 payments to contractor applicants as quickly as possible and prior to the application deadline of

[14] IRS Form 941 is a tax form that businesses file quarterly to report income taxes, Social Security taxes, and Medicare taxes they withheld from employee paychecks.

[15] The certifying officials attested under penalty of perjury that the information and certifications provided in the application and it attachments are true and correct.

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 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 these 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. Treasury officials told us that if recoupment was necessary for an applicant's inclusion of unallowable expenses such as corporate officer compensation and employer-side payroll taxes in the application, the recoupment method was dependent on timing. If the need for recoupment was known prior to the top-off distribution then the recoupment was offset from the top-off payment. For recoupment amounts not known until after the top-off payment, Treasury has not made a decision how those funds will be collected and whether those funds will be reallocated at a later date.

PSP1 Interim Audit Report

In a prior audit report,[16] OIG identified two recurring issues affecting the payment amounts administered to all PSP1 recipients for non-241 air carriers and contractors. Specifically, employer-side payroll taxes and corporate officer compensation were included in the awardable amounts for some recipients. Treasury management acknowledged that the recipients audited included unallowable employer-side payroll taxes or corporate officer compensation in

[16] OIG-21-025, *Interim Audit Update – Air Carrier and Contractor Certifications for Payroll Support Program (Interim Audit)*, March 31, 2021.

their calculation of the "awardable amount" on their PSP1 applications 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.

Bird Acquisition, LLC

Headquartered in Phoenix, Arizona, Bird Acquisition[17] is a contractor that offers pilot training programs that can be catered to individuals of many different backgrounds and experience levels. Among other things, Bird Acquisition offers a partnership with a commercial passenger airline, where individuals can become cadets upon the completion of the training curriculum.

Bird Acquisition submitted its PSP1 Application totaling $[redacted][18] on April 3, 2020, and revised the awardable amount to $[redacted] on June 2, 2020.[19] Bird Acquisition received the contractor top-off for a total award of $5,939,385, or 90 percent of the company's requested amount. Treasury's disbursements to Bird Acquisition were as follows:

- May 28, 2020 – $1,721,817.92
- June 4, 2020 – $860,908.96
- July 7, 2020 – $672,332.16
- August 6, 2020 – $672,332.16
- September 4, 2020 – $672,332.16
- February 16, 2021 – $1,339,661.18

In addition to PSP1, Treasury awarded Bird Acquisition $2,006,192 under PSP2 and $2,006,192 under PSP3. PSP2 and PSP3 were not the subject of this audit.

[17] Bird Acquisition conducts business using its registered Trademark name, Aeroguard Flight Training Center, which is registration number 5444685 with the United Stated Patent and Trademark Office.
[18] Compensation related to a Bird Acquisition affiliate was not included in the PSP1 Application.
[19] Bird Acquisition revised the initial PSP1 Application based on discussions with Treasury.

Audit Results

We found that Bird Acquisition 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 Bird Acquisition's partnership contract with the commercial passenger airline, general ledger data, company sworn financial statements, IRS Form 941, executive-level business charts, payroll registers, and third-party benefit invoices.

We also found that Bird Acquisition reported incorrect information in the Awardable Amounts section. The company included (1) unallowable corporate officer compensation, resulting in an overstatement of $[redacted]; and (2) member-paid COBRA benefits, resulting in an overstatement of $[redacted]. However, the overstatement was partially offset by data errors and the company's exclusion of PSP1 eligible gross pay from the awardable amount totaling $[redacted], resulting in a net overstatement of $128,473. Table 1 illustrates a monthly breakdown of Bird Acquisition's overstated amounts.

Table 1: Aggregate Overstatement by Month

Month	PSP1 Application	Awardable Amount Re-Calculated by S&R	Variance
April 2019	$[redacted]	$[redacted]	$[redacted]
May 2019	$[redacted]	$[redacted]	$[redacted]
June 2019	$[redacted]	$[redacted]	$[redacted]
July 2019	$[redacted]	$[redacted]	$[redacted])
August 2019	$[redacted]	$[redacted]	$[redacted]
September 2019	$[redacted]	$[redacted]	$[redacted]
TOTAL	$[redacted]	$[redacted]	**$(128,473)**

Source: S&R Calculation of Awardable Amount

Since Treasury disbursed PSP1 funds pro rata for contractors at 90 percent of the requested awardable amount, Bird Acquisition received an overpayment of $115,626.

Finding 1 Inaccurate Compilation of the PSP1 Application Awardable Amount

Corporate Officer Compensation

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).*" In addition, the signed PSP1 Agreement, effective date May 26, 2020, subsequently defines a corporate officer as, "*with respect to the Recipient, its president; any vice president in charge of a principal business unit, division, or function (such as sales, administration or finance); any other officer who performs a policy-making function; or any other person who performs similar policy making functions for the Recipient. Executive officers of subsidiaries or parents of the Recipient may be deemed Corporate Officers of the Recipient if they perform such policy-making functions for the Recipient.*"

We identified eight Bird Acquisition executives through discussions with management and review of the company's 2019 organizational chart. Six of those executives met the definition of a corporate officer per the PSP1 Agreement. Bird Acquisition included unallowable corporate officer compensation paid to three of its six corporate officers, resulting in an overstatement of $[redacted]. The three executives were the Chief Marketing Officer, Vice President of Domestic Flight Program, and Vice President of International Business Development. However, Bird Acquisition properly excluded compensation paid to its Chief Executive Officer, Vice President of Supply Chain and Maintenance, and Chief Financial Officer. Table 2 illustrates a monthly breakdown of Bird Acquisition's overstated awardable amounts for corporate officer compensation.

Table 2. Corporate Officer Inclusion

Month	Unallowable Corporate Officer Compensation in the PSP1 Application
April 2019	$[redacted]
May 2019	$[redacted]
June 2019	$[redacted]
July 2019	$[redacted]
August 2019	$[redacted]
September 2019	$[redacted]
TOTAL OVERSTATEMENT	$[redacted]

Source: S&R Calculation of Awardable Amount

Bird Acquisition management stated that they believe that the definition of corporate officer was applied in a manner inconsistent with the full definition as defined by the PSP1 Agreement. Management further stated that it did not consider the Vice President of Domestic Flight Program, prior to his joining the management committee in July 2019,[20] and the Vice President of International Business Development, as corporate officers. Management noted these individuals were not policy makers and did not have authority over any business units.

COBRA Benefits

Treasury's Guidelines defines 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*

[20] The Vice President of Domestic Flight Program became an equity stakeholder in Bird Acquisition on July 1, 2019. Compensation paid to the individual from July 1, 2019 through September 30, 2019 was properly excluded from the PSP1 Application.

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."

Bird Acquisition included benefit premium amounts related to continued health coverage provided under COBRA that were paid by the insured member, not Bird Acquisition, in the awardable amount table of the PSP1 Application for "Benefits". These individuals appear on company benefit invoices, but Bird Acquisition is reimbursed for these COBRA premium costs. We found that Bird Acquisition requested $[redacted] for COBRA medical coverage, and $[redacted] for COBRA dental coverage in the awardable amount table. Table 3 illustrates a monthly breakdown of Bird Acquisition's overstated awardable amounts for COBRA benefit inclusion.

Table 3. COBRA Benefit Inclusion

Month	COBRA Benefits in the PSP1 Application
April 2019	$[redacted]
May 2019	$[redacted]
June 2019	$[redacted]
July 2019	$[redacted]
August 2019	$[redacted]
September 2019	$[redacted]
TOTAL OVERSTATEMENT	$[redacted]

Source: S&R Calculation of Awardable Amount

Bird Acquisition management stated that it believed COBRA insurance premiums had been excluded from the PSP1 Application for benefits and that inclusion of such amounts stemmed from unintentional oversight during the application process.

Data Errors for Benefit Compensation

Bird Acquisition made several errors in the application process that reduced the overall requested amount. These errors were a combination of (1) errors calculating the awardable amount reduction for Bird Acquisition's affiliate; (2) unallowable bill payment discrepancies; and (3) unidentified data compilation errors, as detailed below in Table 4.

Table 4. Data Errors

Category	Amount	Description
Bird Acquisition Affiliate	[redacted]	(1) Bird Acquisition double counted the necessary reduction for six affiliate employees totaling $[redacted], resulting in an understatement. These employees were included in Medical, Dental, and Vision benefit premiums that were excluded from the awardable amount for September 2019; and (2) Bird Acquisition failed to exclude two affiliate employees from the Dental portion of the June 2019 and July 2019 benefit request. The claimed amount of these premiums in the awardable amount was $[redacted], resulting in an overstatement.
Prior Month Billing	$[redacted]	Bird Acquisition included bill payment discrepancies from prior month Dental benefit premiums in the awardable amount for the April 2019 and June 2019 benefit request, resulting in an overstatement.
Unknown	$[redacted]	Bird Acquisition was unable to identify variances between the PSP Application and benefit supporting documentation for Health Insurance (May 2019 and July 2019) and Life Insurance (July 2019, August 2019, and September 2019), resulting in an overstatement.
TOTAL	**$[redacted]**	**Net Understatement**

Source: S&R Calculation of Awardable Amount and Benefit Reconciliation provided by Bird Acquisition, LLC

Bird Acquisition management stated that data compilation errors stemmed from unintentional oversight during the application process.

Voluntary Deductions to Gross Pay for Salaries and Wages

Treasury's 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."* The PSP1 Agreement goes on to define Benefits as *"without duplication of any amounts counted as Salary or Wages, pension expenses in respect of Employees, all expenses for accident, sickness, hospital, and death benefits to Employees, and the cost of insurance to provide such benefits…; and any other similar expenses paid by the Recipient for the benefit of Employees, including any other fringe benefit expense described in lines 10 and 11 of Financial Reporting Schedule P-6, Form 41, as published by the Department of Transportation."*

We found that Bird Acquisition reduced the PSP1 awardable amount related to (1) employee voluntary deductions that were not claimed under benefits on the PSP1 Application; and (2) eligible communications expenses.

Employee Voluntary Deductions

Bird Acquisition excluded $[redacted] on the PSP1 Application. This amount represents voluntary deductions[21] for (1) Dependent Care, (2) Flex Savings Account, and (3) Health Savings Account, from gross pay that were withheld from employees' paychecks. These amounts are eligible for PSP1 financial assistance, but not claimed on the PSP1 Application. Table 5 illustrates a breakdown of each type of withholding.

[21] Employees may choose to have more money taken out of their paycheck to cover the cost of various benefits. These are known as voluntary payroll deductions and they can be withheld on a pretax basis (if allowed under Section 125 of the Internal Revenue Code) or post-tax basis.

Table 5. Voluntary Withholdings

Deduction	Amount
Dependent Care	$[redacted]
Flex Savings Account	$[redacted]
Health Savings Account	$[redacted]
TOTAL UNDERSTATEMENT	$[redacted]

Source: Bird Acquisition Payroll Registers

Eligible Communications Expenses

Bird Acquisition excluded compensation paid to company employees to offset the cost of monthly cellular phone expenses, a valid fringe benefit under the PSP1 Agreement as related to DOT's Schedule P-6, Form 41, Line 10.[22] Treasury's Guidelines do not prohibit the inclusion of communication expenses in the awardable amount of the PSP1 Application. Specifically, communications compensation of $[redacted] for PSP1 eligible employees was excluded from the awardable amount on the PSP1 Application.

In total, Bird Acquisition understated the awardable amount on the PSP1 Application by $[redacted] due to these categorical gross pay deductions of eligible PSP1 compensation. Bird Acquisition management stated that it did not request these amounts on its PSP1 Application in order to closely align its request with the "Wages, tips, and other compensation" amounts from the IRS Form 941.

Although the inclusion of corporate officer compensation and member-paid COBRA benefits resulted in an overstatement of $[redacted] in requested amounts, the net impact of this overstatement was offset by an understatement of $[redacted] due to data errors and company's exclusion of PSP1 eligible gross pay. As a result, the residual net overstatement is $128,473, as illustrated in Table 6 below.

[22] Schedule P-6, Form 41 includes items such as salaries, benefits, materials purchased, services purchased, depreciation, amortization, food, and other operating expenses. Line 10 of the form is for personnel expenses.

Table 6: Aggregate Overstatement

Description	Salaries/Wages	Benefits	Total
PSP1 Application	$[redacted]	$[redacted]	$[redacted]
Less: Corporate Officers **(Table 2)**	$[redacted]	$[redacted]	$[redacted]
Less: COBRA Benefits **(Table 3)**	-	$[redacted]	$[redacted]
Add: Data Errors **(Table 4)**	-	$[redacted]	$[redacted]
Add: Voluntary Withholdings **(Table 5)**	-	$[redacted]	$[redacted]
Add: Communications Expenses	-	$[redacted]	$[redacted]
Allowable Compensation	$[redacted]	$[redacted]	$[redacted]
Net Overstatement	$[redacted]	$[redacted]	**$(128,473)**

Sources: S&R Calculation of Awardable Amount; Table 2; Table 3; Table 4; and Table 5.

Since Treasury disbursed PSP1 funds pro rata for contractors at 90 percent of the requested amount, Bird Acquisition received an overpayment of $115,626.

To remedy the findings listed in the prior OIG audit report,[23] Treasury required PSP2 applicants to re-certify their PSP1 awardable amounts. Bird Acquisition certified to Treasury under PSP2, that its PSP1 Application did not include corporate officer compensation. Treasury stated it relies on applicants' certifications that they did not include unallowable expenses (i.e. corporate officer compensation and employer-side payroll taxes) and no further validation checks were performed; as a result, the company likely included corporate officer compensation in its PSP2 and PSP3 financial assistance request.

[23] OIG-21-025, *Interim Audit Update – Air Carrier and Contractor Certifications for Payroll Support Program (Interim Audit)*, March 31, 2021.

Recommendations

S&R recommends that Treasury's Chief Recovery Officer:

1. Seek reimbursement of the $115,626 overpayment of PSP1 financial assistance.

   Management Response

   Treasury will review the findings, consider any response from the recipient, and seek recoupment of any amounts that Treasury determines have been overpaid.

   S&R Comment

   Management's planned corrective actions meet the intent of our recommendation. Treasury management will need to record an estimated completion date for these actions in JAMES.

2. Review Bird Acquisition's requested amount for unallowable expenses, under PSP2 and PSP3, and seek reimbursement for the overpayment, if applicable.

   Management Response

   Treasury will review awardable amounts requested under PSP2 and PSP3 and seek recoupment where appropriate.

   S&R Comment

   Management's planned corrective actions meet the intent of our recommendation. Treasury management will need to record an estimated completion date for these actions in JAMES.

* * * * * *

We appreciate the courtesies and cooperation provided to our staff during the audit. A distribution list for this report is provided as appendix 5.

Saggar & Rosenberg, P.C. /s/

Appendix 1: Objective, Scope, and Methodology

Our objective was to assess the accuracy, completeness, and sufficiency of Bird Acquisition, LLC's (Bird Acquisition) 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 statements, tax returns, and other documentation submitted to Treasury on April 3, 2020.[24]

To accomplish this objective, Saggar & Rosenberg, P.C. (S&R) performed the following activities during audit fieldwork conducted remotely, due to the Coronavirus Disease 2019 (COVID-19) pandemic from September 2021 through February 2022:

- Reviewed applicable Federal laws, regulations, and guidance, including:
    - Title IV, Subtitle B, *Air Carrier Worker Support,* of the *Coronavirus Aid, Relief, and Economic Security Act* (CARES Act);[25] and
    - 14 CFR, Part 241,[26] *Uniform System of Accounts and Reports for Large Certificated Air Carriers*, August 12, 2022.
- Reviewed Treasury's policies, procedures, and guidance related to PSP1:
    - *Guidelines and Application Procedures for Payroll Support to Air Carriers and Contractors*, which included the PSP1 Application, March 30, 2020;

[24] Bird Acquisition submitted the PSP1 Application and related supporting documentation on April 3, 2020. The sworn Awardable Amounts section was later revised on June 2, 2020.

[25] P.L. 116-136 (March 27, 2020).

[26] 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 Department of Transportation. Bird Acquisition is not a Large Certified Air Carrier.

  - PSP1 Agreement;
  - *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 Amount, 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 Bird Acquisition representatives responsible for the completion and submission of the sworn financial statements in the Awardable Amounts section of the PSP1 Application.
- Reviewed sworn financial statements and documents to support the requested payroll support amount. The documentation included general ledger data, company pay registers, benefit invoices, Internal Revenue Service (IRS) Form 941 – *Employer's Quarterly Federal Tax Return*[27] filings, and organizational hierarchy.
- Reviewed Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government*[28] 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

[27] IRS Form 941 is a tax form that businesses file quarterly to report income taxes, Social Security taxes, and Medicare taxes they withheld from employee paychecks.
[28] GAO-14-704G (September 2014).

concluded that one of the five internal control components, Control Activities, as related to Bird Acquisition's payroll system, was significant to the audit objective.[29] 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 Bird Acquisition's payroll system, we reviewed a System and Organizational Controls 1 (SOC 1) report[30] and interviewed Bird Acquisition'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*[31] 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. Bird Acquisition prepared the PSP1 Application using gross pay, less certain non-taxable amounts that would reduce the "Wages, tips, and other compensation" amounts from the Employer's Quarterly Federal Tax Return from April 2019 through September 2019, which included information developed from Bird Acquisition's payroll system. We compared details generated from payroll registers at the individual employee level, as well as third-party vendor benefit invoices 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 reviewed the payroll system SOC 1 report and interviewed Bird Acquisition'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.

[29] The five components of internal control are Control Environment, Risk Assessment, Control Activities, Information and Communication, and Monitoring.

[30] 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.

[31] GAO-20-283G (December 2019).

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: Schedule of Monetary Benefits

According to the Code of Federal Regulations,[32] a questioned cost is a cost that is questioned by the auditor because of an audit finding:

(a) which resulted from a violation or possible violation of a statute, regulation, or the terms and conditions of a Federal award, including for funds used to match Federal funds;

(b) where the costs, at the time of the audit, are not supported by adequate documentation; or

(c) where the costs incurred appear unreasonable and do not reflect the actions a prudent person would take in the circumstances.

Questioned costs are to be recorded in the Department of the Treasury's (Treasury) Joint Audit Management Enterprise System. The amount will also be included in the Office of Inspector General (OIG) Semiannual Report to Congress. It is Treasury management's responsibility to report to Congress on the status of the agreed to recommendations with monetary benefits in accordance with Section 5(b) of the Inspector General Act of 1978, as amended.

Recommendation	Questioned Costs
Recommendation No. 1	$115,626

The questioned cost represents amounts provided by Treasury under the Payroll Support Program (PSP1). As discussed in Finding 1, Bird Acquisition, LLC overstated its PSP1 Application by $128,473 due to (1) the inclusion of corporate officer compensation; (2) the inclusion of member-paid Consolidated Omnibus Budget Reconciliation Act (COBRA)[33] benefits; (3) the inclusion of incorrect data for benefits; and (4) exclusion of PSP1 eligible gross pay from the awardable amount. However, since Treasury disbursed PSP1 funds pro rata for contractors at 90 percent of the requested amount, the questioned cost related to the overstated PSP1 Application is $115,626.

[32] 2 CFR § 200.84 – Questioned Cost.
[33] P.L. 99-272 (April 7, 1986).

Appendix 3: Bird Acquisition Management Response

AeroGuard
FLIGHT TRAINING CENTER

Setting a Higher Standard
Safety. Quality. Success.

Thank you for the opportunity to provide a formal management response to your May 12, 2023 formal draft audit for the *Audit of Air Carrier Worker Support Certifications – Bird Acquisition, LLC*.

As you indicate in your cover email, much of what we set out below is well known to you from our conversations over the past several months. Nevertheless, we appreciate your attention to the details and your continued consideration of our position. We believe the findings and conclusions of the audit report are flawed in two respects: a) the inconsistent application of the definition of corporate officer regarding the Chief Instructor/Vice President of Domestic Flight Program, and b) the failure of the audit to consider the actual duties and responsibilities of the Vice President of International Sales in determining whether that position was an "officer."

Chief Instructor/Vice President of Domestic Flight Program

By way of background and as the audit team was aware, Bird Acquisition ("Bird") trained Chinese, Korean and domestic pilots, although the way in which the students made their way to Bird followed different paths. Bird was a party to contracts with several Chinese airlines, under which an airline sends student pilots to Bird for training. Once the pilots have completed the training, they return to the airline that sent them. Korean students come to Bird either individually or through Bird's agreement with Korean Aeronautical University, a customer of Bird. Finally, domestic students come to Bird individually, almost always through Bird's Enrollment Advisors.

Chinese students were distinctly the largest group of students at Bird, making up 68% of the total in July 2019. Korean and other international students made up 9% and domestic students made up 21%. Before Mr. [redacted] joined the management committee of the company on July 1, 2019 as Vice President of Domestic Flight Programs, the makeup of the student population dictated that both Mr. [redacted] and Mr. [redacted] occupied the position of Chief Instructor. Prior to July 2019, the Vice President of Domestic Flight Programs was not in charge of a business unit, did not have a policy making function and only worked with approximately 30% of the students trained by Bird Acquisition during the audit scope period. The curriculum oversight of the remaining (Chinese) students was performed by the other Chief Instructor, Mr. [redacted].

Mr. [redacted] acted in much more of a subject matter expert capacity than Mr. [redacted] did. For instance, his key responsibilities included:

- Traveling to satellite campuses to audit operational and regulatory compliance, and ensure that appropriate processes and procedures were being followed;
- Development of internal processes to improve operational efficiency;
- Development of internal procedures to streamline instructor onboarding;Development of internal procedures to streamline and maximize stage check scheduling; and
- Mentoring satellite campus directors to improve proficiency.

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The relevant definition of corporate officer as set out in the May 26, 2020 signed PSP1 Agreement is central in this analysis:

"[W]ith respect to the Recipient, its president; any vice president in charge of a principal business unit, division, or function (such as sales, administration or finance); any other officer who performs a policy-making function; or any other person who performs similar policy making functions for the Recipient. Executive officers of subsidiaries or parents of the Recipient may be deemed Corporate Officers of the Recipient if they perform such policy-making functions for the Recipient."

Bird believes that the duties and responsibilities of Mr. [redacted] job were distinctly different than those of an officer charged with leading a principal business unit and engaged in policy making functions for the company. The descriptions of his job functions make clear that he did not function in a traditional way one with a vice president title does and distinctly different from the relevant definition.

The VP of International Sales

Bird likewise disagrees with the audit's conclusion that the Vice President of International Sales functioned or acted as an officer of the company because her function was so far short of the relevant definition. This was evident from information provided to the auditors by Bird in several respects.

First, the VP's only job was to generate international contracts (similar to the Korean Aeronautical University contract). Bird employed several persons as Enrollment Advisors who marketed to domestic students and potential students for Bird. The VP's job, on the other hand, involved meeting with Japanese, Korean and Chinese airlines to sell them on Bird's pilot training and safety programs. Indeed, as explained to the auditors, the title of Vice President was conferred to enhance contacts with and presentations to potential customers.

Second, the VP supervised no one and no Bird employees reported to her. Notably, she had no responsibility or accountability for domestic sales and reported only on her own behalf to Mr. Davidson and, in 2019, to Mr. Constable. By way of illustration, Bird provided to the auditors the VP's 2018 Annual Performance Review which, among other things, assesses in two places the VP's supervision of staff, staff accountability and staff development. Both are marked "N/A" because the position did not supervise or oversee anyone but herself.

Third, the position was never conceived to align with the relevant definition. In fact, in the VP's offer letter, also provided to the auditors, specifies that compensation for the position was only compensated based on the VP's own sales performance, not on the performance of others or of a sales division as would be the case for one who is "in charge of a principal business unit, division of function." The offer letter also specifically excluded the U.S., China, Hong Kong and Taiwan markets (the largest markets) from responsibility.

We believe there is little if any support for the auditors' determination that an employee who supervises no one, reports to a supervisor and is but a part of a principal business unit (sales) fits the relevant definition of

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officer. The information we have provided shows the actual contours of her job as opposed to the title she maintained, and shows that the VP's function in sales does not translate to her oversight of it.

Again, thank you for your consideration.

Sincerely,

Steven Kruczek
CFO

Appendix 4: Treasury Management Response

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

June 8, 2023

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* regarding Bird Acquisition, LLC (the Recipient), a recipient of funds under Treasury's Payroll Support Program (Draft Report). The U.S. Department of the Treasury (Treasury) appreciates OIG's efforts.

Background on the Payroll Support Program

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was enacted on March 27, 2020, to provide emergency assistance in response to the unprecedented challenges presented by the COVID-19 public health emergency. The CARES Act established the Payroll Support Program (PSP1) to provide financial assistance to America's passenger air carriers, cargo air carriers, and certain aviation contractors. Treasury has 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 has 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 has 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 under PSP1. For the largest air carriers, which received approximately 89% of the total PSP assistance, the 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. For these 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

1

published additional guidance further emphasizing that such amounts should not be included in the companies' awardable amount calculations.[1] 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.

OIG's Findings and Recommendations

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 September 2021 and February 2022, 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 overstated its requested awardable amounts due to the improper inclusion of corporate officer compensation and member-paid Consolidated Omnibus Budget Reconciliation Act (COBRA) benefits. OIG recommends that Treasury (1) seek reimbursement of $115,626 of overpayments of PSP1 assistance, and (2) review any requested amounts from the Recipient for PSP2 and PSP3 assistance to determine whether overpayments occurred.

Treasury agrees with OIG that any overpayments of PSP funds should be reimbursed. Treasury will review OIG's findings, consider any response from the Recipient, and seek recoupment of any amounts that Treasury determines have been overpaid. Treasury will also review awardable amounts requested under PSP2 and PSP3 and seek recoupment where appropriate.

* * *

[1] 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.

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,

Jessica Milano
Chief Program Officer

Appendix 5: Report Distribution

Department of the Treasury

Treasury Secretary
Deputy Secretary
Treasury Audit Liaison
Office of Strategic Planning and Performance Improvement
Office of the Deputy Chief Financial Officer, Risk and Control Group

Bird Acquisition, LLC

Chief Executive Officer
Chief Financial Officer

Office of Management and Budget

OIG Budget Examiner

United States Senate

Committee on Homeland Security and Governmental Affairs
Committee on Finance
Committee on Banking, Housing, and Urban Affairs
Committee on Commerce, Science, and Transportation
Committee on Appropriations
Committee on the Budget

United States House of Representatives

Committee on Oversight and Reform
Committee on Financial Services
Committee on the Budget
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