

U.S. SMALL BUSINESS ADMINISTRATION

OFFICE OF INSPECTOR GENERAL

Office of Inspector General

Open Recommendations as of December 31, 2024



Report 25-09

March 3, 2025



Make a Difference

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NOTICE:

Pursuant to the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Public Law 117-263, Section 5274, any nongovernmental organizations and business entities identified in this report have the opportunity to submit a written response for the purpose of clarifying or providing additional context as it relates to any specific reference contained herein. Comments must be submitted to AIGA@sba.gov within 30 days of the final report issuance date. We request that any comments be no longer than two pages, Section 508 compliant, and free from any proprietary or otherwise sensitive information. The comments may be appended to this report and posted on our public website.

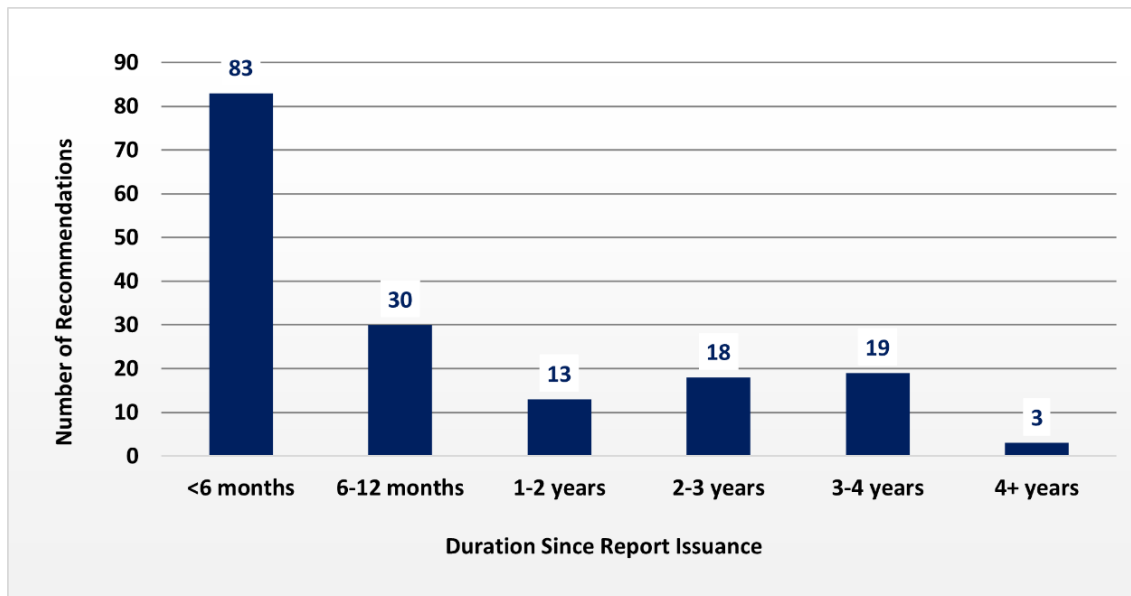
Background

This report contains the recommendations from U.S. Small Business Administration (SBA) Office of Inspector General (OIG) reports that remained open as of December 31, 2024. The status of each recommendation is subject to change as we independently review SBA’s ongoing implementation.

Specifically, a recommendation identified as open as of December 31, 2024 may be subsequently closed because of actions taken after that date. Although SBA may have taken steps to implement a recommendation listed in this report, such as by partially remedying the associated questioned costs, a recommendation is not considered closed until it has been fully implemented. OIG considers a recommendation closed when management provides sufficient evidence that corrective actions have been taken to address the recommendation. Note that SBA has provided updates for certain recommendations prior to the date of this report which may still be under review by OIG.

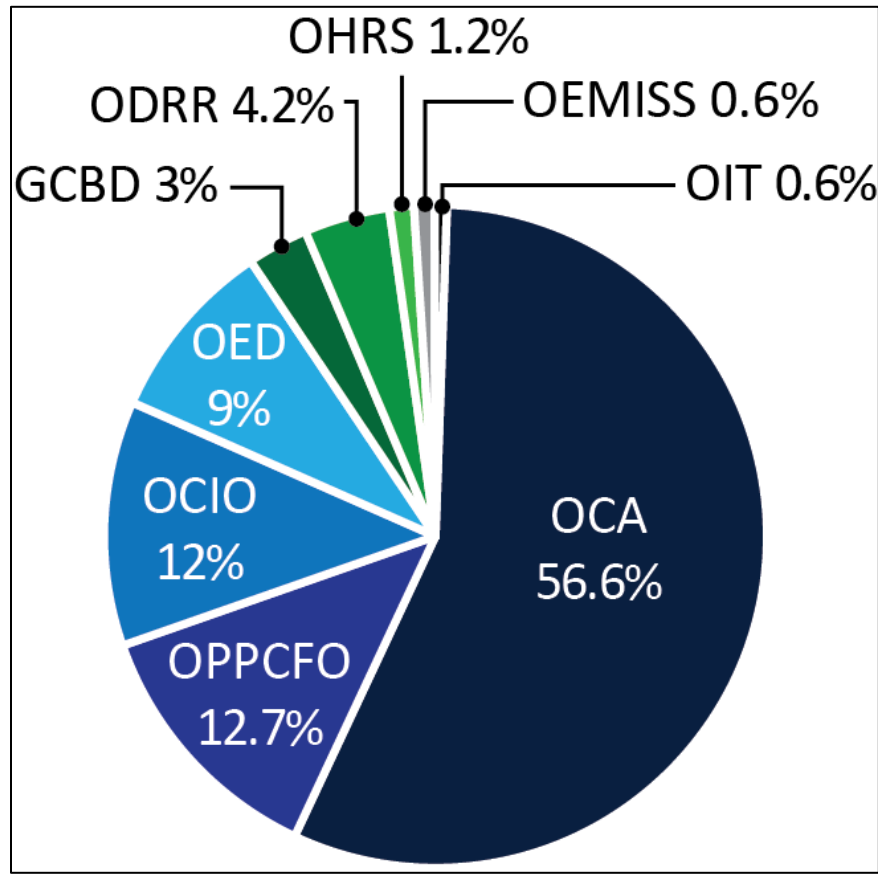
As of December 31, 2024, there were 166 open OIG recommendations. Figure 1 shows the number of open recommendations by the duration of time elapsed since report issuance. Figure 2 shows the percentage of open recommendations by responsible SBA program office. Table 1 lists all 166 open recommendations.

Figure 1: How Long OIG Recommendations Have Remained Open as of December 31, 2024



Source: OIG generated from SBA Integrity data

Figure 2: Open OIG Recommendations by SBA Program Office as of December 31, 2024



Source: OIG generated from SBA Integrity data. Due to rounding, numbers may not add up to exactly 100 percent

SBA Office Acronyms:

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|--------|---|
| OCA | Office of Capital Access |
| OPPCFO | Office of Performance, Planning, and the Chief Financial Officer |
| OCIO | Office of Chief Information Officer |
| OED | Office of Entrepreneurial Development |
| GCBD | Office of Government Contracting and Business Development |
| ODRR | Office of Disaster Recovery and Resilience |
| OHRS | Office of Human Resources Solutions |
| OEMISS | Office of Executive Management, Installations, and Support Services |
| OIT | Office of International Trade |

Table 1: Open OIG Recommendations as of December 31, 2024

| Number | Report Number & Title | Issue Date | Report Recommendation Number | Recommendation | Responsible Program Office |
|--------|---|------------|------------------------------|---|----------------------------|
| 1 | 20-03, Audit of SBA's Oversight of High-Risk Lenders | 11/12/2019 | 1 | Develop and implement policies and procedures to document OCRM's justification for 1) not conducting planned reviews and 2) identifying and prioritizing additional lenders for review. | OCA |
| 2 | 20-03, Audit of SBA's Oversight of High-Risk Lenders | 11/12/2019 | 2 | Develop and implement a comprehensive database to manage its oversight of high-risk lenders to ensure performance of all planned reviews, implementation of risk mitigation actions, and identification of noncompliant lender and systemic material loan deficiencies. | OCA |
| 3 | 20-03, Audit of SBA's Oversight of High-Risk Lenders | 11/12/2019 | 5 | Develop and implement policies and procedures that require OCRM to communicate systemic lender issues and material loan deficiencies to the appropriate SBA loan approval and purchase centers to facilitate proactive portfolio management and to mitigate the risk of improper guaranty purchases in the event of default. | OCA |
| 4 | 20-20, Audit of SBA's Compliance with the Debt Collection Improvement Act, as Amended | 9/30/2020 | 1 | Review all loans assigned to the resolution center that are 180 days or more delinquent and classified with code 66 (Lien or Mortgage/Refer to Treasury Offset Program Only) and 00 (Clear Existing Status Code) and transfer the loans to Treasury Cross-Servicing, unless verified as exempt when the temporary suspension of debt collection activities because of the pandemic is lifted. | OCA |

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| 5 | 20-20, Audit of SBA's Compliance with the Debt Collection Improvement Act, as Amended | 9/30/2020 | 3 | Revise SOP 50 52 2 to clearly communicate that all debts 180 days delinquent must be transferred to Treasury Cross-Servicing unless the debt meets a valid transfer exemption. | OCA |
| 6 | 20-20, Audit of SBA's Compliance with the Debt Collection Improvement Act, as Amended | 9/30/2020 | 5 | Ensure that information used to monitor compliance with the Debt Collection Improvement Act includes all loans assigned to the resolution center as identified in the Capital Access Financial System. | OCA |
| 7 | 20-20, Audit of SBA's Compliance with the Debt Collection Improvement Act, as Amended | 9/30/2020 | 7 | Review all loans currently assigned to the Center and designated as exempt from Treasury Cross-Servicing that are 180 days or more delinquent and verify that each of the obligors is exempt from transfer to Treasury Cross-Servicing, and if not, transfer the debt to Treasury Cross-Servicing, as required when the temporary suspension of debt collection activities due to COVID-19 is lifted. | OCA |
| 8 | 20-20, Audit of SBA's Compliance with the Debt Collection Improvement Act, as Amended | 9/30/2020 | 8 | Establish policies and procedures to require routine follow-up on delinquent loans to ensure full compliance with the Debt Collection Improvement Act. | OCA |
| 9 | 20-20, Audit of SBA's Compliance with the Debt Collection Improvement Act, as Amended | 9/30/2020 | 10 | Perform a cost benefit analysis to determine if SBA should begin assessing fees to offset the cost of processing and handling delinquent disaster loans. | OCA |
| 10 | 21-07, Inspection of SBA's Implementation of the Paycheck Protection Program | 1/14/2021 | 1 | Review the loans identified as potentially ineligible to determine if the businesses met eligibility requirements. If not, take appropriate action related to loan guaranty and forgiveness. | OCA |

| Number | Report Number & Title | Issue Date | Report Recommendation Number | Recommendation | Responsible Program Office |
|---------------|---|-------------------|-------------------------------------|--|-----------------------------------|
| 11 | 21-08, SBA's Use of Vendors Without Contracts | 2/3/2021 | 1 | Require responsible personnel to execute a contract for foreclosure and real estate services to ensure the procurement of services are obtained and authorized in accordance with the Federal Acquisition Regulation requirements. | OCA |
| 12 | 21-08, SBA's Use of Vendors Without Contracts | 2/3/2021 | 3 | Ratify the over \$10.8 million in payments in accordance with the FAR and 48 C.F.R. § 1.602-3. | OCA |
| 13 | 21-09, Duplicate Loans Made Under the Paycheck Protection Program | 3/15/2021 | 1 | Review the OIG identified potential duplicate disbursements for eligibility and take action to recover any improper payments as applicable. | OCA |
| 14 | 21-14, Audit of SBA's Oversight of Women's Business Centers' Compliance with Cooperative Agreement Financial Requirements | 5/4/2021 | 1 | Implement financial oversight procedures for the WBC program that ensure the program office enforces WBC cooperative agreement requirements. Program officials should ensure WBCs use federal funds only for allowable, allocable, and reasonable expenses, adhere to contract award procedures, and separate project costs by funding source. | OED |
| 15 | 21-14, Audit of SBA's Oversight of Women's Business Centers' Compliance with Cooperative Agreement Financial Requirements | 5/4/2021 | 2 | Remedy \$523,790 in unsupported matching funds, unsupported program income, and the resulting portion of federal funds reimbursed for the unmet match, and \$186,537 in unsupported expenses. | OED |
| 16 | 21-14, Audit of SBA's Oversight of Women's Business Centers' Compliance with Cooperative Agreement Financial Requirements | 5/4/2021 | 3 | Recover \$31,215 for improperly awarded contracts and \$31,424 in unallowable or unallocable expenses. | OED |

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| 17 | 21-14, Audit of SBA's Oversight of Women's Business Centers' Compliance with Cooperative Agreement Financial Requirements | 5/4/2021 | 4 | Implement policies and procedures for conducting thorough financial compliance reviews and coordinate with the Office of Field Operations to train field office personnel responsible for semiannual sites visits. | OED |
| 18 | 21-14, Audit of SBA's Oversight of Women's Business Centers' Compliance with Cooperative Agreement Financial Requirements | 5/4/2021 | 5 | Establish policies holding program officials accountable for promptly following up on financial examination results and enforcing cooperative agreement requirements. | OED |
| 19 | 21-14, Audit of SBA's Oversight of Women's Business Centers' Compliance with Cooperative Agreement Financial Requirements | 5/4/2021 | 6 | Require higher-level reviewers to clearly justify and document approving or denying disbursement of funds if the decisions differ from the recommendations of lower-level reviewers; justification documentation should be kept in the official cooperative agreement file. | OED |
| 20 | 21-14, Audit of SBA's Oversight of Women's Business Centers' Compliance with Cooperative Agreement Financial Requirements | 5/4/2021 | 7 | Review expenses for the \$28,089 reallocation of budget expenses we detailed in this report to ensure these costs are allowable and document the rationale for the reallocation or recover costs that are unallowable. | OED |
| 21 | 21-14, Audit of SBA's Oversight of Women's Business Centers' Compliance with Cooperative Agreement Financial Requirements | 5/4/2021 | 8 | Require program officials to enforce the cooperative agreement terms and conditions and de-obligate or withhold payments if WBCs do not submit accurate financial reports on time. | OED |

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|---------------|---|-------------------|-------------------------------------|--|-----------------------------------|
| 22 | 22-01, SBA's Emergency Economic Injury Disaster Loan Grants to Sole Proprietors and Independent Contractors | 10/7/2021 | 1 | Review the applications of sole proprietors and independent contractors that included numbers of employees but no Employer Identification Number; and remedy the \$3.5 billion disbursed to sole proprietors and \$1 billion disbursed to independent contractors that exceeded the amount allowed by SBA's policy. | OCA |
| 23 | 22-07, SBA's Oversight of the Grant Recipient's Implementation of the CARES Act Resource Partners Training Portal | 1/18/2022 | 3 | Evaluate whether the contract costs for web development services and media services are reasonable and remedy any violations. | OED |
| 24 | 22-07, SBA's Oversight of the Grant Recipient's Implementation of the CARES Act Resource Partners Training Portal | 1/18/2022 | 5 | Recover the \$100,000 paid for unallowable pre-award project management expenses. | OED |
| 25 | 22-08, SBA's Business Development Assistance to 8(a) Program Participants | 2/14/2022 | 5 | Implement a process to ensure the systematic collection of accurate and complete data on program results and operations to make sure all program reporting requirements are met, in accordance with section 7(j)(16)(A) of the Small Business Act and Standards for Internal Control in the Federal Government Principles for Information and Communication. | GCBD |
| 26 | 22-08, SBA's Business Development Assistance to 8(a) Program Participants | 2/14/2022 | 6 | Implement requirements for management to monitor that Business Opportunity Specialists consistently assess program participant's development needs, counsel participants, conduct annual field visits, and maintain required documentation, as required by standard operating procedures. | GCBD |

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| 27 | 22-11, Fiscal Year 2021 Federal Information Security Modernization Act Review | 4/28/2022 | 2 | Ensure the continuity of operations plan is tested annually, as required by Federal Continuity Directive 1. | OEMISS |
| 28 | 22-17, COVID-19 Economic Injury Disaster Loan Applications Submitted from Foreign IP Addresses | 9/12/2022 | 1 | Thoroughly review each COVID-19 EIDL, 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. | OCA |
| 29 | 22-19, COVID-19 and Disaster Assistance Information Systems Security Controls | 9/27/2022 | 1 | Ensure the existing SBA System Development Methodology is updated to include supply chain risk-management practices as required by OMB Circular A-130 and high-value asset system designation guidance. Also, ensure high-value asset system risks are incorporated into the enterprise risk management framework, as recommended by OMB M-19-03 and SBA SOP 90 47 6. | OCIO |
| 30 | 22-19, COVID-19 and Disaster Assistance Information Systems Security Controls | 9/27/2022 | 2 | Communicate and enforce the SBA System Development Methodology in which a traceability matrix is used to ensure that system requirements can be tested and demonstrated in the operational system. Ensure all requirements are aligned with the contractual acceptance criteria. | OCIO |

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| 31 | 22-19, COVID-19 and Disaster Assistance Information Systems Security Controls | 9/27/2022 | 5 | In conjunction with the Enterprise Risk Management Board, implement enterprise-wide privacy risk mitigation practices that can be assimilated into new and existing system program designs. | OCIO |
| 32 | 22-19, COVID-19 and Disaster Assistance Information Systems Security Controls | 9/27/2022 | 7 | Transition information systems and common controls to an ongoing authorization process (when eligible for such a process) with the formal approval of the respective authorizing officials or reauthorize information systems and common controls as needed, on a time or event-driven basis in accordance with agency risk tolerance, as required by OMB Circular No. A-130 and SOP 90 47 6. | OCIO |
| 33 | 22-19, COVID-19 and Disaster Assistance Information Systems Security Controls | 9/27/2022 | 8 | Review and update POA&Ms at least quarterly as required by SOP 90 47 6. | OCIO |
| 34 | 22-19, COVID-19 and Disaster Assistance Information Systems Security Controls | 9/27/2022 | 10 | Implement an automated process to document and monitor system changes as recommended by NIST SP 800-53 Rev. 5. | OCIO |
| 35 | 22-21, Paycheck Protection Program Eligibility for Nonprofit Organizations | 9/26/2022 | 1 | Review the 179 PPP loans, totaling approximately \$684 million, for compliance with affiliation and size standards to ensure eligibility requirements were met and seek remedy or repayment for all loans deemed ineligible. | OCA |
| 36 | 22-25, SBA's Guaranty Purchases for Paycheck Protection Program Loans | 9/30/2022 | 2 | Explore alternative means of collections for PPP loans with an outstanding balance of \$100,000 or less. | OCA |

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| 37 | 22-25, SBA's Guaranty Purchases for Paycheck Protection Program Loans | 9/30/2022 | 3 | Conduct an initial and periodic cost benefit analysis on PPP purchase guarantees with comprehensive estimates to sufficiently assess whether the cost of collecting loans of \$100,000 or less is more than the recovery amount and pursue collections based on results of the analysis. | OCA |
| 38 | 23-03, Fiscal Year 2022 Federal Information Security Modernization Act Review | 12/13/2022 | 2 | Implement a process to ensure SBA reviews its external service providers for supply chain risks and ensure all assessments of supply chain risks are documented as outlined in NIST 800-53. | OCIO |
| 39 | 23-03, Fiscal Year 2022 Federal Information Security Modernization Act Review | 12/13/2022 | 3 | Communicate and reinforce to program offices the requirement to review and remove system and user accounts in accordance with SOP 90 47 6. | OCIO |
| 40 | 23-03, Fiscal Year 2022 Federal Information Security Modernization Act Review | 12/13/2022 | 5 | Develop, document, and implement a process that requires management review of information security data and report information security threats. | OCIO |
| 41 | 23-10, SBA's Administrative Process to Address Potentially Fraudulent Restaurant Revitalization Fund Awards | 7/5/2023 | 1 | Prioritize and complete the review of the 2,172 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. | OCA |

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| 42 | 23-11, SBA's Awards for Staffing Support for COVID-19 Economic Relief Loan Programs | 7/26/2023 | 1 | Establish and implement policies and procedures on how to use appropriate analysis techniques when determining prices are fair and reasonable when GSA scheduled list prices and rates are adjusted, in accordance with FAR part 8. | OPPCFO |
| 43 | 23-12, SBA's Corrective Action to Improve the Oversight of SCORE | 9/21/2023 | 1 | Implement procedures to review and reconcile SCORE's achievements reported in its quarterly performance reports to the performance results in the Entrepreneurial Development Management Information System (EDMIS) to ensure performance results are accurate and complete. | OED |
| 44 | 23-15, SBA's Oversight of Restaurant Revitalization Fund Recipients | 9/29/2023 | 1 | Follow-up with recipients who did not submit their final annual report as required by April 30, 2023, and take action to recover funds. | OCA |
| 45 | 23-15, SBA's Oversight of Restaurant Revitalization Fund Recipients | 9/29/2023 | 2 | Review the 210 award recipients currently marked in the PPP loan data as potentially fraudulent or ineligible that were not selected for post award review. | OCA |
| 46 | 23-15, SBA's Oversight of Restaurant Revitalization Fund Recipients | 9/29/2023 | 3 | Extend the record retention period and notify all RRF award recipients in writing in accordance with 2 CFR 200.334. | OCA |
| 47 | 23-15, SBA's Oversight of Restaurant Revitalization Fund Recipients | 9/29/2023 | 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. | OCA |

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| 48 | 23-15, SBA's Oversight of Restaurant Revitalization Fund Recipients | 9/29/2023 | 5 | Take immediate administrative actions to recover improper payments from the 5 hotels and 18 recipients found to be ineligible, for a total of 23 ineligible award recipients identified totaling \$39 million. | OCA |
| 49 | 23-15, SBA's Oversight of Restaurant Revitalization Fund Recipients | 9/29/2023 | 6 | Establish and implement procedures to recover unused funds or recover funds paid to ineligible recipients and prioritize this effort. | OCA |
| 50 | 23-16, Ending Active Collections on Delinquent COVID-19 Economic Injury Disaster Loans Management Advisory | 9/29/2023 | 3 | Ensure SBA does not end active collections pursuant to the April 27, 2022, decision on any COVID-19 EIDL of \$100,000 or less made to borrowers who received multiple COVID-19 EIDL loans that, when combined, exceed \$100,000. | OCA |
| 51 | 23-16, Ending Active Collections on Delinquent COVID-19 Economic Injury Disaster Loans Management Advisory | 9/29/2023 | 5 | Evaluate the COVID-19 EIDL loan portfolio, in collaboration with Treasury, to determine if selling the portfolio, including delinquent loans of \$100,000 or less, is in the best interest of the government. | OCA |
| 52 | 24-02, SBA's Internal Controls to Prevent Shuttered Venue Operators Grants to Ineligible Applicants | 10/25/2023 | 1 | Reevaluate eligibility for the 47 applicants we questioned and recover grant funds from ineligible applicants. | ODRR |
| 53 | 24-02, SBA's Internal Controls to Prevent Shuttered Venue Operators Grants to Ineligible Applicants | 10/25/2023 | 2 | Implement additional controls to ensure that during the monitoring, auditing, and compliance phases, awards are carefully screened to verify eligibility and recover grant funds from ineligible entities. | ODRR |
| 54 | 24-06, SBA's Eligibility and Forgiveness Review of PPP Loans Made to Borrowers with Treasury's DNP Matches | 2/22/2024 | 1 | Review the 1,799 PPP loans totaling over \$89 million that matched a DNP data source to ensure eligibility requirements were met and seek remedy or repayment of all loans deemed ineligible. | OCA |

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| 55 | 24-06, SBA's Eligibility and Forgiveness Review of PPP Loans Made to Borrowers with Treasury's DNP Matches | 2/22/2024 | 2 | Review the 49 PPP loans totaling approximately \$3.5 million and the 43 loans totaling approximately \$7.2 million to ensure borrowers met eligibility requirements and seek remedy or repayment of loans deemed ineligible. | OCA |
| 56 | 24-06, SBA's Eligibility and Forgiveness Review of PPP Loans Made to Borrowers with Treasury's DNP Matches | 2/22/2024 | 3 | Conduct a review of PPP loans, in which the DNP hold codes were cleared to 1) identify 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. | OCA |
| 57 | 24-06, SBA's Eligibility and Forgiveness Review of PPP Loans Made to Borrowers with Treasury's DNP Matches | 2/22/2024 | 4 | Develop and implement controls, such as supervisory reviews, to ensure PPP loans and loans for future stimulus programs with DNP matches receive manual reviews, as required. The reviews should ensure that pre-decisional memos are not used to clear DNP hold codes and that the loan files contain relevant and appropriate documentary evidence to support the loan review decisions. | OCA |
| 58 | 24-06, SBA's Eligibility and Forgiveness Review of PPP Loans Made to Borrowers with Treasury's DNP Matches | 2/22/2024 | 5 | Develop and implement clear guidance requiring responsible officials to maintain documentary evidence used to support loan decisions in the loan files. | OCA |
| 59 | 24-06, SBA's Eligibility and Forgiveness Review of PPP Loans Made to Borrowers with Treasury's DNP Matches | 2/22/2024 | 6 | Review the 59,893 PPP applications that matched a DNP data source to ensure borrowers met eligibility requirements and seek remedy or repayment of loans deemed ineligible. | OCA |

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| 60 | 24-06, SBA's Eligibility and Forgiveness Review of PPP Loans Made to Borrowers with Treasury's DNP Matches | 2/22/2024 | 7 | Review the additional 47,940 PPP loans totaling over \$1.7 billion, identified through the DNP data match, to ensure borrowers met the eligibility requirements and seek remedy or repayment of loans deemed ineligible. | OCA |
| 61 | 24-07, Fiscal Year 2023 Federal Information Security Modernization Act | 3/7/2024 | 5 | Develop a strategy to ensure that products, system components, systems, and services of external providers are consistent with the organization's cybersecurity and supply chain requirements. | OCIO |
| 62 | 24-07, Fiscal Year 2023 Federal Information Security Modernization Act | 3/7/2024 | 6 | Define timeframe and remediation requirements for baseline and configuration weaknesses. | OCIO |
| 63 | 24-07, Fiscal Year 2023 Federal Information Security Modernization Act | 3/7/2024 | 7 | Properly update and remediate vulnerabilities and configuration weaknesses throughout the SBA environment. | OCIO |
| 64 | 24-07, Fiscal Year 2023 Federal Information Security Modernization Act | 3/7/2024 | 9 | Ensure the Implementation Procedures for Data Loss Prevention is updated at least on a biannual basis to reflect new processes and new requirements. | OCIO |
| 65 | 24-07, Fiscal Year 2023 Federal Information Security Modernization Act | 3/7/2024 | 10 | Update existing procedures that identify the roles of individuals with significant IT responsibilities who require role-based training and ensure such training is provided and tracked. | OCIO |
| 66 | 24-07, Fiscal Year 2023 Federal Information Security Modernization Act | 3/7/2024 | 11 | Provide training to individuals with contingency planning roles and responsibilities. | OCIO |

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| 67 | 24-09, SBA's Restaurant Revitalization Fund Program Award Practices | 3/26/2024 | 1 | Develop a plan for future similar programs to leverage applicable existing SBA data sources when determining eligibility and monitoring awards. The plan should include requirements to evaluate effectiveness of the use of the data as controls to reduce risk of improper payments. | OPPCFO |
| 68 | 24-09, SBA's Restaurant Revitalization Fund Program Award Practices | 3/26/2024 | 2 | Validate historical sales for 47,565 awards designated or treated as Tier 2 that failed or did not receive IRS validation. Recover any excess funds paid that are attributable to unverified historical sales data. | OCA |
| 69 | 24-09, SBA's Restaurant Revitalization Fund Program Award Practices | 3/26/2024 | 3 | Review the 3,443 applicants awarded funds totaling \$376,583,100 that self-certified as a brewery or inn, to determine if they met the 33 percent onsite sales eligibility requirement and recover any funds from applicants that did not meet the requirement. | OCA |
| 70 | 24-09, SBA's Restaurant Revitalization Fund Program Award Practices | 3/26/2024 | 4 | In accordance with Public Law 117-2, § 5003(a)(4)(A)(i) take immediate action to review and recover improper payments from the 14 affiliated business groups disclosed by RRF applicants for a total of \$55,067,326 in excess funds paid, beyond the \$10 million limit per affiliated group. | OCA |
| 71 | 24-09, SBA's Restaurant Revitalization Fund Program Award Practices | 3/26/2024 | 5 | Review the 16,345 applicants that disclosed having an affiliated business to determine if the amounts collectively awarded to the applicant and affiliates exceeded the \$10 million maximum and recover any excess awards. | OCA |

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| 72 | 24-10, SBA's IT Investment Governance Framework | 3/29/2024 | 2 | Ensure the architecture review board reviews new investments to confirm compatibility with agency systems and ensure the Business Technology Investment Council approves new investments prior to purchase, as required by SOPs 90 52 1 and 90 44. | OCIO |
| 73 | 24-10, SBA's IT Investment Governance Framework | 3/29/2024 | 4 | Update procedures to provide specific guidance to agency investment managers on how to utilize earned value principles to measure investment progress against both the current approved baseline and the original baseline for all major investments as required by SOP 90 52 1 and OMB A-130. | OCIO |
| 74 | 24-10, SBA's IT Investment Governance Framework | 3/29/2024 | 6 | Perform oversight procedures as required in OMB Circular A-11 and SOP 90 44. Specifically, ensure that post-implementation reviews, business case closeouts, TechStat sessions, operational analyses, and lessons learned are completed. | OCIO |
| 75 | 24-16, Independent Auditors' Report on SBA's Fiscal Year 2023 Compliance with PIIA Act of 2019 | 5/15/2024 | 3 | Enhance existing procedures using the framework in the Government Accountability Office's Green Book to design and implement robust internal and quality control processes to ensure complete and accurate reporting of annual improper payment results and formalized risk assessment processes to ensure all programs and activities are considered sufficiently to meet PIIA reporting objectives. | OPPCFO |

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| 76 | 24-16, Independent Auditors' Report on SBA's Fiscal Year 2023 Compliance with PIIA Act of 2019 | 5/15/2024 | 4 | Design and implement enforceable actions and controls to hold lenders accountable for not providing all documentation requested for loan samples in a timely manner. | OCA |
| 77 | 24-16, Independent Auditors' Report on SBA's Fiscal Year 2023 Compliance with PIIA Act of 2019 | 5/15/2024 | 5 | Formally document and implement additional preventative and monitoring controls to determine the eligibility of loans prior to loan approval and payments and loan guaranty purchases. | OCA |
| 78 | 24-16, Independent Auditors' Report on SBA's Fiscal Year 2023 Compliance with PIIA Act of 2019 | 5/15/2024 | 6 | Collaborate with the responsible staff involved in the payment integrity reporting process to ensure timely and complete reconciliations are performed on the populations subject to sampling for improper payment reviews. | OCA |
| 79 | 24-16, Independent Auditors' Report on SBA's Fiscal Year 2023 Compliance with PIIA Act of 2019 | 5/15/2024 | 7 | Exercise effective management review controls over the statistician's work product by verifying that the documentation of the sampling and estimation methodology plans comprehensively outlines the details of the implemented sampling and extrapolation methodology, while maintaining statistical validity. | OCA |
| 80 | 24-16, Independent Auditors' Report on SBA's Fiscal Year 2023 Compliance with PIIA Act of 2019 | 5/15/2024 | 8 | Design and implement effective communication and review processes with responsible staff involved in the payment integrity reporting process to ensure compliance for the reporting of new programs and activities. | OCA |
| 81 | 24-16, Independent Auditors' Report on SBA's Fiscal Year 2023 Compliance with PIIA Act of 2019 | 5/15/2024 | 9 | Design and document adequate review procedures to ensure that the results of the sample meet the PIIA objectives. | OCA |

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| 82 | 24-16, Independent Auditors' Report on SBA's Fiscal Year 2023 Compliance with PIIA Act of 2019 | 5/15/2024 | 10 | Design and implement a formal review process to ensure corrective actions plans developed, implemented, and published are adequately addressing the true root causes of improper and unknown payments. | OCA |
| 83 | 24-17, 7(a) Loan Approval for Borrowers with Unresolved COVID-19 Pandemic Loan Compliance Issues | 5/21/2024 | 1 | Review and appropriately resolve hold codes related to the 5,044 7(a) loans to determine impact on 7(a) eligibility and seek remedy or repayment of all 7(a) loans deemed ineligible. | OCA |
| 84 | 24-18, Evaluation of COVID-19 EIDL Applicants on the U.S. Department of the Treasury's Do Not Pay List | 6/4/2024 | 1 | Review each of the 3,643 potential improper payments made to COVID-19 EIDL recipients we identified in the finding as also being on Treasury's Do Not Pay List and determine if the applicants can rectify the disqualifying information; if not, recover the funds. | OCA |
| 85 | 24-19, Verification Inspection of SBA's State Trade Expansion Program | 6/11/2024 | 3 | Increase oversight of cooperative agreement recipients and establish and implement a risk-based approach to monitor recipients that are not meeting their quarterly milestone goals. | OIT |
| 86 | 24-20, SBA's Guaranty Purchases for Paycheck Protection Program Loans | 7/9/2024 | 1 | Review charged-off PPP loans to ensure all eligible loans are reported to commercial credit reporting agencies, as required. | OCA |
| 87 | 24-20, SBA's Guaranty Purchases for Paycheck Protection Program Loans | 7/9/2024 | 2 | Require personnel to conduct periodic monitoring and reviews of SBA's automated processes for PPP and future stimulus loan programs to ensure all eligible loans are reported to commercial credit reporting agencies, as required. | OCA |

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| 88 | 24-20, SBA's Guaranty Purchases for Paycheck Protection Program Loans | 7/9/2024 | 3 | Identify the credit reporting agencies to whom SBA must report current and delinquent loans for PPP and future stimulus loan programs. | OCA |
| 89 | 24-20, SBA's Guaranty Purchases for Paycheck Protection Program Loans | 7/9/2024 | 4 | Review charged-off PPP loans to ensure that all eligible loans are referred to Treasury, as required. | OCA |
| 90 | 24-20, SBA's Guaranty Purchases for Paycheck Protection Program Loans | 7/9/2024 | 5 | Require personnel to conduct periodic reviews of its automated Treasury referral process for PPP and future stimulus loan programs to ensure all eligible loans are referred to Treasury, as required. | OCA |
| 91 | 24-20, SBA's Guaranty Purchases for Paycheck Protection Program Loans | 7/9/2024 | 6 | Conduct lender reviews to ensure lenders complied with their communication, servicing, and debt collection activity requirements. If not, require the lender to bring the loan into compliance or seek recovery of the guaranty paid by SBA as appropriate. | OCA |
| 92 | 24-20, SBA's Guaranty Purchases for Paycheck Protection Program Loans | 7/9/2024 | 7 | Require lenders to submit evidence of communication, servicing, and debt collection activities with the borrower prior to guaranty purchase for PPP and future similar programs to foster and maintain program integrity. | OCA |
| 93 | 24-21, Improvements Needed in SBA's Shuttered Venue Operators Grant Post-Award Review Process | 7/10/2024 | 1 | Take immediate action to review 1,818 SVOG awards that we identified as potentially ineligible and recover any funds from recipients who did not meet the requirements. | ODRR |

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| 94 | 24-23, SBA's Oversight of HUBZone Program Participants' Continuing Eligibility | 8/15/2024 | 1 | Revise regulations to require documents that can be verified to ensure firms complied with 13 CFR § 126.200(d)(3), that a legacy employee resided in a HUBZone for at least 180 days following the most recent certification (or recertification). | GCBD |
| 95 | 24-23, SBA's Oversight of HUBZone Program Participants' Continuing Eligibility | 8/15/2024 | 2 | Update and implement standard operating procedures to request documents, as permitted under 13 CFR 126.304(b)(1), to verify during program examinations that firms meet size standards in the North American Industry Classification System code in which they perform on HUBZone contracts. | GCBD |
| 96 | 24-23, SBA's Oversight of HUBZone Program Participants' Continuing Eligibility | 8/15/2024 | 3 | Improve the HCTS system notification module to ensure recertification notifications are sent timely and consistently to all HUBZone firms. | GCBD |
| 97 | 24-25, SBA's Oversight of the Community Navigator Pilot Program Performance | 9/24/2024 | 1 | Should the Navigator program continue, establish a performance target to assess recipient's progress towards assisting an established number of underserved small business owners and entrepreneurs. | OED |
| 98 | 24-25, SBA's Oversight of the Community Navigator Pilot Program Performance | 9/24/2024 | 2 | Should the Navigator program continue, establish guidance for grant recipients to use acceptable methods to collect client information and improve the quality of the information reported to program officials. | OED |

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| 99 | 24-25, SBA's Oversight of the Community Navigator Pilot Program Performance | 9/24/2024 | 3 | Enhance the data validation procedures to ensure program officials check for accuracy and completeness of the performance data grant recipients upload to the system. | OED |
| 100 | 24-25, SBA's Oversight of the Community Navigator Pilot Program Performance | 9/24/2024 | 4 | Establish and implement a process to compare performance results for Navigator program grant recipients and partner organizations that are also SBA resource partners to ensure performance is separate and discrete. | OED |
| 101 | 25-03, Approved Disaster Assistance Loans Matching COVID-19 EIDLs and PPP Loans with Fraud Hold Codes | 11/5/2024 | 1 | Review the 187 loans that matched to a related COVID-19 EIDL or PPP loan with a fraud hold code for legitimacy and eligibility. If any of the 187 loans are found to be illegitimate, ineligible, or fraudulent, take appropriate action to 1) prevent disbursement of funds, 2) recover the funds, and 3) refer potentially fraudulent loans to OIG. | OCA |
| 102 | 25-04, SBA's Oversight of Non-Bank Lenders and Third-Party Service Providers Associated with PPP Loans | 11/13/2024 | 1 | Ensure that future application review processes for non-bank PPP lenders (including fintechs) requesting to participate in traditional SBA loan programs include conducting reviews of the lender's compliance with PPP requirements. | OCA |
| 103 | 25-04, SBA's Oversight of Non-Bank Lenders and Third-Party Service Providers Associated with PPP Loans | 11/13/2024 | 2 | Enhance existing risk-based oversight plans to ensure adequate oversight of high-risk non-bank lenders, including fintechs. | OCA |

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| 104 | 25-04, SBA's Oversight of Non-Bank Lenders and Third-Party Service Providers Associated with PPP Loans | 11/13/2024 | 3 | Ensure internal controls designed to restrict access to only lender service providers with accepted agreements to submit loan applications remain in place to promote program integrity in all lending programs. | OCA |
| 105 | 25-04, SBA's Oversight of Non-Bank Lenders and Third-Party Service Providers Associated with PPP Loans | 11/13/2024 | 4 | Improve monitoring of lender/service provider relationships to better determine the extent of services being performed by service providers to ensure compliance with SBA requirements. | OCA |
| 106 | 25-04, SBA's Oversight of Non-Bank Lenders and Third-Party Service Providers Associated with PPP Loans | 11/13/2024 | 5 | Reinforce existing guidance to lenders on reporting lender service provider relationships to SBA to ensure only accepted lender service providers are participating in and benefiting from SBA programs. | OCA |
| 107 | 25-04, SBA's Oversight of Non-Bank Lenders and Third-Party Service Providers Associated with PPP Loans | 11/13/2024 | 6 | Update guidance on lender requirements for managing risks associated with lender service provider relationships to align with 2023 Interagency Guidance. | OCA |
| 108 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 1 | Perform and update the program's internal control risk assessment to identify and respond to changes to risks that may require updates to the design and implementation of effective monitoring controls over the review of the COVID-19 EIDLs portfolio. | OCA |

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| 109 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 2 | Design and implement sufficient controls to identify COVID-19 EIDLs disbursed to ineligible recipients and implement an effective funds recovery plan to ensure COVID-19 EIDLs funds disbursed to ineligible recipients are recovered and reported accurately and in a timely manner. The plan should include an effective process to provide the information necessary to the Office of Planning, Performance, and the Chief Financial Officer to record any required accounting adjustments for accurate and timely financial reporting. | OCA |
| 110 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 3 | Identify all COVID-19 EIDLs with an incorrect status. Research and update the status of the identified COVID-19 EIDLs within the applicable systems of record for loan accounting. | OCA |
| 111 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 4 | Review and update the design, implementation, and operating effectiveness of controls over information technology program changes within the applicable systems of record for loan accounting to ensure changes are appropriate and function as intended. | OCA |

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| 112 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 5 | Update existing process and controls documentation over the servicing and review of COVID-19 EIDLs to ensure they are relevant, reliable, and based on implemented policies and procedures. Perform a regular review of implemented processes and controls to ensure they are in line with documented policies and procedures. | OCA |
| 113 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 6 | Perform a thorough review of the outstanding PPP loan guarantees to determine the impact on the outstanding guarantee and eligibility for forgiveness of loans identified to not be in conformance with the related legislation and program's terms. | OCA |
| 114 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 7 | Design, implement, and document an effective PPP forgiveness review process for loan guarantees that were forgiven that addresses both the eligibility and the accuracy of the loan approval and forgiveness amounts. | OCA |
| 115 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 8 | Design and implement an effective funds recovery plan to ensure PPP funds disbursed on behalf of ineligible recipients are recovered and reported accurately in a timely manner. The plan should include an effective process to provide the information necessary to the Office of Performance, Planning, and the Chief Financial Officer to record any required accounting adjustments. | OCA |

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| 116 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 9 | Identify the root cause of the erroneous adjustment and design and implement a control to remediate the deficiency. | OCA |
| 117 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 10 | Document, design, and implement an effective process and controls to update the outstanding principal balance for PPP loan guarantees subsequent to forgiveness. | OCA |
| 118 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 11 | Perform a thorough and complete analysis of all requirements communicated to lenders for the PPP program and determine whether lenders met the requirements prior to disbursing a PPP loan. The analysis should include evidence to support the adequacy of management's review process when determining which purchase requests will require additional review. | OCA |
| 119 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 12 | Develop and implement an effective process to review purchase requests for outstanding PPP loan guarantees and for loans that were previously purchased that address whether the lender met their requirements in accordance with the program requirements. | OCA |

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| 120 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 13 | Develop and implement an effective funds recovery plan to ensure funds related to PPP purchases disbursed to ineligible recipients are recovered and reported accurately in a timely manner. The plan should include an effective process to provide the information necessary to the Office of Performance, Planning, and the Chief Financial Officer to record any required accounting adjustments. | OCA |
| 121 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 14 | Continue to perform and update the program's internal control assessment to identify changes to risks that may require the design and implementation of effective monitoring controls and review processes of RRF awards to identify recipients that may not have been eligible to receive awards or that may have spent awards on ineligible expenses in accordance with the program's terms. | OCA |
| 122 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 15 | Design and implement effective follow-up procedures for RRF award recipients that are not complying with the program's terms and to ensure complete, accurate, and timely reporting for the use of the award. | OCA |

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| 123 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 16 | Design and implement an effective funds recovery plan and controls to ensure RRF awards disbursed to ineligible recipients or spent on ineligible expenses are recovered and reported accurately and in a timely manner. In conjunction with the Office of Planning, Performance, and the Chief Financial Officer, design and implement an effective process to provide the information necessary to record any required accounting adjustments. | OCA |
| 124 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 17 | Continue to implement effective monitoring controls and review processes of SVOG awards to identify recipients that may not have been eligible to receive awards or that may have spent awards on ineligible expenses in accordance with the program's terms. | ODRR |
| 125 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 18 | Design and implement effective follow-up procedures for SVOG award recipients that are not complying with the program's terms and to ensure complete, accurate, and timely reporting for the use of the award. | ODRR |

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| 126 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 19 | Design and implement an effective funds recovery plan and controls to ensure SVOG awards disbursed to ineligible recipients or spent on ineligible expenses are recovered and reported accurately and in a timely manner. In conjunction with the Office of Planning, Performance, and the Chief Financial Officer, design and implement an effective process to provide the information necessary to record any required accounting adjustments. | ODRR |
| 127 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 20 | Develop, document, and implement the accounting policies and procedures for the recovery of funds, the accounts receivable, and the allowance for estimated uncollectible amounts related to the programs created or expanded by the CARES Act and related legislation. | OPPCFO |
| 128 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 21 | Inquire and continue to obtain guidance from standard setting bodies to confirm the appropriate accounting treatment for COVID-19 EIDLs and the PPP loans that have been improperly forgiven or charged-off and for which recovery has been initiated. Memorialize the response by updating management's documented policies and procedures including the respective accounting entries under generally accepted accounting principles for all applicable scenarios. | OPPCFO |

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| 129 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 22 | Design and implement effective controls and communication processes to timely obtain the information necessary from program offices to record any required accounting adjustments for programs created or expanded by the CARES Act and related legislation. | OPPCFO |
| 130 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 23 | Continue implementing review controls in collaboration with relevant program offices for the PPP and COVID-19 EIDLs portfolios to accumulate relevant, complete, and accurate data on which to base the subsidy reestimate. | OPPCFO |
| 131 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 24 | Design and implement adequate review and approval controls over the reestimate for the PPP and COVID-19 EIDLs portfolios by appropriate levels of management, and to coordinate with relevant program offices to assess the integrity of relevant data inputs used in the development of assumptions, and reasonableness for the selected assumptions used and the resulting estimates. | OPPCFO |
| 132 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 25 | Refine existing review and approval controls to ensure the documentation of the impact of significant program changes is adequate. | OPPCFO |

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| 133 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 26 | Inquire and continue to obtain guidance from standard setting bodies to confirm the appropriate accounting and financial reporting treatment for projected cash flows of charged-off loans in the reestimates. Memorialize the responses as part of a documented policy. | OPPCFO |
| 134 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 27 | <p>Assess the risk posed by the service organizations' control environments and obtain sufficient assurance over the operating effectiveness of relevant and significant controls to ensure the integrity of transactions processed on behalf of and recorded by management. To achieve this, consider obtaining and assessing SOC 1 reports for the relevant control environments at the service organizations to determine that:</p> <ul style="list-style-type: none"> • SOC 1 reports are sufficiently scoped to address transaction processing and related control activities performed by the service organizations on behalf of management. • All exceptions noted in the SOC 1 reports – not just those described in the independent service auditor's report – are evaluated to determine applicability to management's internal controls over financial reporting, the potential impact to management's financial statements, and mitigating controls considerations made during their risk assessment. | OCA |

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| 134 (cont.) | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 27 | <ul style="list-style-type: none"> • All complementary user entity controls described in the SOC 1 reports are evaluated using current information and with consideration to their applicability to SBA's internal controls over financial reporting. • Evaluation of controls to document the results that include an assessment about whether all relevant complementary user entity controls and other management-performed controls were tested on a frequency determined by management and found operating effectively and, if they are not, assess the impact of such deficiencies on management's internal controls over financial reporting. • All complementary subservice organization controls described in SOC 1 reports are evaluated to determine whether they provided services and performed controls considered relevant to management's internal controls over financial reporting and, if relevant subservice organizations were identified, an evaluation is performed to obtain an understanding of the subservice organization(s) and their controls. • SOC 1 reports are evaluated to determine whether their reporting periods and corresponding gap letters provide sufficient coverage to assess impacts on management's internal controls over financial reporting and include matters requiring additional follow up by management. | OCA |

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| 135 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 28 | <p>Assess the risk posed by the service organizations' and subservice organizations' control environments to determine which subservice organization controls are relevant to SBA and obtain sufficient assurance over the operating effectiveness to determine the integrity of SVOG program transactions processed on behalf of and recorded by SBA. To achieve this, obtain a SOC 1 report for the relevant control environments at the service organizations, and perform and document the following:</p> <ul style="list-style-type: none"> • Verify that the SOC 1 report is sufficiently scoped to cover transaction processing and related control activities performed by the service organizations on behalf of SBA. • Evaluate all exceptions noted in the SOC 1 report – not just those described in the independent service auditor's report – to determine applicability to SBA's internal controls over financial reporting, the potential impact to SBA's financial statements, and mitigating controls considerations made during their risk assessment. • Evaluate all complementary user entity controls described in the SOC 1 reports using current information and with consideration to their applicability to SBA's internal controls over financial reporting. | ODRR |

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| 135 (cont.) | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 28 | <ul style="list-style-type: none"> • Evaluate controls and clearly document the results that include an assessment over whether all complementary user entity controls and other SBA-performed controls were tested on a frequency determined by SBA and operating effectively. Assess the impact of such deficiencies on SBA's internal controls over financial reporting. • Evaluate all complementary subservice organization controls described in SOC 1 reports to determine whether they provided services and performed controls considered relevant to SBA's internal controls over financial reporting and, if relevant subservice organizations were identified, an evaluation is performed to obtain an understanding of the subservice organization(s) and their controls. • Verify that the SOC 1 reports cover the appropriate period or corresponding gap letters provide sufficient coverage to assess impacts on SBA's internal controls over financial reporting. | ODRR |
| 136 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 29 | Assess the risk posed by the service organization's control environments to identify the relevant significant controls, including determining the relevant of any subservice organizations. | OHRS |

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| 137 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 30 | Implement procedures to review the SOC 1 report for the service organization's control environment in accordance with management's standard operating procedures. Additionally, evaluate the effectiveness of complementary user entity controls to determine the reliability of controls and reports provided by the service organization. | OHRS |
| 138 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 31 | In conjunction with the Office of the Chief Financial Officer, review and evaluate the completed internal control risk assessments for programs that have a material impact on the financial statements at a process level. Develop a plan to respond in a timely manner, including the consideration of whether entity level controls, manual controls, general information technology controls, and system application controls are designed, implemented, and are operating at a sufficient precision level in accordance with management's materiality threshold and will be sufficient for financial reporting purposes. | OCA |
| 139 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 32 | Design, implement, and monitor the operating effectiveness of key controls that respond to significant risks of material misstatements and compliance with relevant laws and regulations. | OCA |
| 140 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 33 | Implement procedures to validate that SBA network access for separated users, per the authoritative source listings, is removed within the required timeframes. | OCA |

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| 141 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 34 | Establish a plan to implement multi-factor authentication for non-privileged users. | OCA |
| 142 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 35 | Implement a process to track compliance with the plan to implement multi-factor authentication requirements. | OCA |
| 143 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 36 | Document within the system security plan the control implementation for all tools and layers within the authorization boundary. | OPPCFO |
| 144 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 37 | Develop and provide training to the control operators to reinforce the existing policies and procedures for requesting, approving, and provisioning new or modified user access. | OPPCFO |
| 145 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 38 | Establish a backup for the individual responsible for operating system account management to remove single points of failure. | OPPCFO |
| 146 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 39 | Revise the account recertification script so data is retrieved from the correct fields. | OPPCFO |
| 147 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 40 | Update the account review and recertification procedures to include quality control steps to validate that complete and accurate account listings are used for all user accounts within the authorization boundary, including the operating system servers. | OCIO |

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| 148 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 41 | Update the user access review control to include an attribute to ensure that the reviewer has the knowledge, authority, and independence to conduct the review. Additionally, formalize these procedures within the existing account management policies and procedures. | OCIO |
| 149 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 42 | Improve controls over personnel actions to ensure timely separation of employees and removal of system access privileges. | OPPCFO |
| 150 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 43 | Provide training to control operators to reinforce the existing policies and procedures for requesting and approving user access for employees dependent upon their employment status (e.g. temporary employee, full-time employee and contractor). | OPPCFO |
| 151 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 44 | Implement separation of duties between roles and functions within the organization to prevent circumvention of controls. | OPPCFO |
| 152 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 45 | Design and implement controls that require oversight over contractors, including maintenance of documentation, that provides evidence over the adequate review and validation of the contractor's work product. | OCA |
| 153 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 46 | Perform and document a thorough risk assessment of the payments for covered loans under the Debt Relief Program. | OCA |

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| 154 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 47 | Design and implement the appropriate review controls to identify payments that may have been improper or inaccurate. Implement an effective funds recovery plan that includes an effective process to provide the information necessary to record any required accounting adjustments for accurate and timely financial reporting based on the results of the risk assessment. | OCA |
| 155 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 48 | Design and implement effective communication processes with the Office of General Counsel to obtain relevant and complete information to ensure complete, accurate, and timely recognition and disclosure of contingencies. | OCA |
| 156 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 49 | Update the new materiality policy to specify the application criteria and design and implement controls to ensure that the application of the policy is effective and documented. | OCA |
| 157 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 50 | Perform a regular review and risk assessment of the implemented policies to ensure they are responding to relevant risks of noncompliance for the current fiscal year. | OCA |
| 158 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 51 | Design, implement, and document appropriate monitoring controls to address compliance with DCIA. | OCA |

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| 159 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 52 | Reevaluate the operational infrastructure and system controls to address relevant risks of noncompliance and ensure that borrowers are notified timely of delinquency, and if applicable, subsequently referred to Treasury timely. | OCA |
| 160 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 53 | In conjunction with relevant program offices, perform and document a comprehensive internal control evaluation over all programs. This should include entity level controls, manual controls, general information technology controls, and system application controls covering key financial statement line items and risks. | OPPCFO |
| 161 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 54 | Work with relevant program office management to communicate and respond to control testing results and update corrective action plans to remediate control deficiencies identified. | OPPCFO |
| 162 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 55 | Update the existing policy and implement adequate controls to ensure that the statement of assurances provided by the program offices are adequately documented and reviewed for completeness and accuracy to provide a sufficient basis to support the Administrator's statement of assurance. | OPPCFO |

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|--------|---|------------|------------------------------|--|----------------------------|
| 163 | 25-05, SBA's Oversight of FY 2024 Financial Statements Audit | 11/15/2024 | 56 | Address the control deficiencies over transactions arising from the implementation of the CARES Act and related legislation by working with the Office of Capital Access and the Office of Disaster Recovery and Resilience to implement the recommendations in Appendix I – Material Weaknesses. | OPPCFO |
| 164 | 25-06, COVID-19: Data Sharing Projects Finds Billions Paid to Same Likely Fraudsters Under Both the Unemployment Insurance and Economic Injury Disaster Loan Programs | 12/5/2024 | 1 | Evaluate its authority to share data and develop fraud prevention resources and controls with other federal entities, including SBA, that include data sharing mechanisms to detect and mitigate fraud. | OCA |
| 165 | 25-06, COVID-19: Data Sharing Projects Finds Billions Paid to Same Likely Fraudsters Under Both the Unemployment Insurance and Economic Injury Disaster Loan Programs | 12/5/2024 | 2 | Collaborate with SBA to conduct a joint study to assess and identify the UI claim data elements that should be shared for data matching with disaster program data elements for the purpose of detecting potentially fraudulent activities under both the UI and SBA disaster assistance programs. | OCA |
| 166 | 25-06, COVID-19: Data Sharing Projects Finds Billions Paid to Same Likely Fraudsters Under Both the Unemployment Insurance and Economic Injury Disaster Loan Programs | 12/5/2024 | 3 | Reevaluate eligibility for the 10,971 potentially fraudulent EIDLs and recover funds from ineligible recipients. | OCA |