



OFFICE OF  
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

OIG-CA-26-037  
May 20, 2026

## **Emergency Rental Assistance (ERA1) Program Notice of Recoupment – Riverside County**

### Summary

The ERA1 statute codified at 15 USC § 9058a directs the Department of the Treasury (Treasury) to make allocations and payments to eligible grantees such as States and local governments, who in-turn, make funding available in the form of rental assistance to eligible households. The statute also directs the Treasury Office of Inspector General (OIG) to conduct monitoring and oversight of the receipt, disbursement, and use of funds made available to grantees. As part of this oversight authority, if OIG determines that a grantee failed to comply with the use of funds requirements in the statute, the amount equal to the amount of funds used in violation shall be booked as a debt of such entity owed to the Federal Government.

In July 2023, January 2024, and April 2024, we received reports from Inland Southern California 211 (ISC211), a subrecipient of Riverside County, California, about 14 cases of ineligible payments made from Riverside County's ERA1 financial assistance award. Based on the information provided, we determined that Riverside County, through its subrecipient, ISC211, failed to comply with the use of funds requirements in the ERA1 statute (15 U.S.C. § 9058a(c)) when it paid ERA1 award funds totaling \$41,410 to ineligible households. On May 19, 2026, Treasury's Bureau of the Fiscal Service issued a demand letter for \$41,410 to Riverside County establishing a debt to the Federal Government.

The following document is OIG's Notice of Recoupment (Notice) that established this debt. We provided Riverside County an opportunity to comment on a draft of this Notice and its written response and our evaluation of that response is also included in the Notice.

We conducted our review from July 2023 to January 2026. We inquired of the grantee and other relevant parties, reviewed related documentation, and performed other appropriate procedures. We believe the evidence obtained is sufficient and appropriate to provide a reasonable basis for our determination in this Notice.

In conducting our review, we followed the OIG's system of quality management for ensuring that the information in this report is accurate. We also followed the Council of the Inspectors General on Integrity and Efficiency (CIGIE) *Quality Standards for Federal Offices of Inspector General* which require that our work adheres to its general standards for integrity to include objectivity, independence, professional judgment, and confidentiality as well as its general standard for receiving and reviewing allegations.

### Distribution

#### Department of the Treasury

Jeffrey W. Stout, Acting Chief Operating Officer, Office of Capital Access

Danielle Christensen, Deputy Chief Program Officer for State & Local Programs, Office of Capital Access

Kendra N. Young-Freeman, Director, Housing Programs, Office of Capital Access

Michelle Dickerman, Deputy Assistant General Counsel, Office of the General Counsel

Carolyn Appel, Attorney-Advisor, Office of the General Counsel

Blossom Butcher-Sumner, Attorney-Advisor, Office of the General Counsel

#### Riverside County

Inland Southern California 211



OFFICE OF  
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

## Notice of Recoupment

### Emergency Rental Assistance

**Division N, Title V, Subtitle A, § 501 of the Consolidated Appropriations Act, 2021  
(Pub. L. No. 116-260), Dec. 27, 2020, and codified at 15 USC § 9058a (ERA1)**

May 20, 2026

Grantee: Riverside County, California

Points of Contact: Michael Walsh, Assistant Director

(b) (6)

Megan Gomez, Deputy Director

(b) (6)

Mailing Address: 4080 Lemon St, 11<sup>th</sup> Floor, Riverside, CA 92501

Federal Award Identification Number: ERA0413

Recoupment Amount: \$41,410

#### Background/Legal Authority

Under the ERA1 statute at 15 U.S.C. § 9058a(c), Use of Funds, an eligible grantee shall only use ERA1 award funds to provide financial assistance and housing stability services to eligible households. The financial assistance includes: the payment of rent; rent arrears; utilities and home energy costs; utilities and home energy costs arrears; and other expenses related to housing incurred due, directly or indirectly, to the COVID-19 outbreak, as defined by the Secretary of the Department of the Treasury (Treasury). Such assistance shall be provided for a period not to exceed 12 months except that grantees may provide assistance for an additional 3 months to ensure housing stability (subject to availability of funds). The ERA1 statute at 15 U.S.C. § 9058a(c)(2)(B)(i) allows for up to 3 months (with exceptions) for prospective rent payments within the 12 or 15 month total assistance limitation.

The ERA1 statute at 15 U.S.C. § 9058a(k)(3)(A) defines eligible household as a household of one or more individuals who are obligated to pay rent on a residential dwelling and with respect to which the eligible grantee involved determines: (1) that one or more individuals within the household has (a) qualified for unemployment benefits or (b) experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak, which the applicant shall attest in writing; (2) that one or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability, which may include (a) a past due utility or rent notice or eviction notice; (b) unsafe or unhealthy living conditions; or (c) any other evidence of such risk, as determined by the eligible grantee involved; and (3) the household has a household income that is not more than 80 percent of the area median income for the household.

In accordance with the ERA1 statute at 15 U.S.C. § 9058a(k)(3)(B), the grantee must also ensure that, to the extent feasible, any rental assistance provided to an eligible household is not duplicative of any other federally funded rental assistance provided to such household.

Pursuant to the ERA1 statute at 15 U.S.C. § 9058a(e)(2), the last day of the period of performance for grantees that received ERA1 reallocated funds was December 29, 2022.

The ERA1 statute at 15 U.S.C. § 9058a(i) Inspector General Oversight; Recoupment, directed that Treasury's Office of Inspector General (OIG) conduct monitoring and oversight of the receipt, disbursement, and use of funds made available under the ERA1 program. As part of this authority, if OIG determines that a grantee failed to comply with the use of funds requirements in ERA1 statute (15 U.S.C. § 9058a(c)), the amount equal to the amount of funds used in violation of 15 U.S.C. § 9058a(c) shall be booked as a debt of such grantee owed to the Federal Government. Amounts recovered shall be deposited into the general fund of the Treasury.

### Facts and Analysis

In July 2023, January 2024, and April 2024, we received reports from Inland Southern California 211 (ISC211), a subrecipient of Riverside County, California, about 14 cases of ineligible payments made from Riverside County's ERA1 financial assistance award.<sup>1</sup> ISC211 explained they detected the ineligible payments when performing secondary (post-payment) reviews. While ISC211 initially identified 14 cases to be ineligible payments, we agreed with ISC211's

---

<sup>1</sup> Pursuant to 2 CFR § 200.113, Mandatory disclosures, under the Uniform Administrative Requirements, Cost Principles, and Audit Requirements, grantees must disclose, in a timely manner, in writing to the Federal awarding agency all violations of Federal criminal law involving fraud potentially affecting the Federal award.

determination on 2 of them. Of the other 12 cases, ISC211 considered 3 cases ineligible due to familial relationships between the landlord and tenant. The ERA1 statute at 15 U.S.C. § 9058a(k)(3) does not specifically exclude such familial relationships in the definition of an eligible household; therefore, we do not challenge payments made in these cases if the payments otherwise met ERA1 eligibility requirements. Accordingly, we determined that these three cases did meet eligibility requirements. In another case, ISC211 detected fraud; therefore, a payment was not issued for this case. Upon inquiry, ISC211 provided additional documentation that demonstrated that the other eight cases resulted in eligible payments.

We agreed with ISC211's conclusions on 2 of 14 cases, as follows:

1. Application #**(b) (6)**: ISC211 determined that the tenant submitted altered identification and income documents. ISC211 paid ERA1 assistance based on an application that lacked valid documentation to establish eligibility; therefore, ISC211 cannot establish an eligible use of funds. Accordingly, we determined that the ERA1 rent and rental arrears paid, in the amount of \$24,610, are an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.
2. Application #**(b) (6)**: ISC211 determined that the applicant submitted altered income, deed, and tax documents. ISC211 paid ERA1 assistance based on an application that lacked valid documentation to establish eligibility; therefore, ISC211 cannot establish an eligible use of funds. Accordingly, we determined that the ERA1 rental arrears paid, in the amount of \$16,800, are an ineligible ERA1 expenditure that failed to comply with the requirements of the ERA1 statute.

Based on the information provided, we determined that Riverside County, through its subrecipient, ISC211, failed to comply with the use of funds requirements in the ERA1 statute (15 U.S.C. § 9058a(c)) when it paid ERA1 award funds totaling \$41,410 to ineligible households. Accordingly, these funds are required to be returned to the Federal Government.

#### Grantee Response

We provided Riverside County with an opportunity to respond to our Proposed Notice of Recoupment. On March 19, 2026, the Director, Housing and Workforce Solutions, Riverside County, provided written response by email, stating they concurred with OIG's conclusions. See Appendix I for the response in its entirety.

#### OIG Evaluation

Riverside County's response and planned action to return \$41,410 to the Federal Government addresses our notice.

Grantee Response



**HWS** HOUSING AND  
WORKFORCE  
SOLUTIONS  
ENGAGE. ENCOURAGE. EQUIP.

March 19, 2026

Randall K Williams, MPA, Audit Manager  
Department of the Treasury, Office of Inspector General  
875 15<sup>th</sup> Street NW, Washington, DC 20005

(b) (6)

Office: (b) (6)

RE: Notice of Recoupment

Mr. Williams,

County of Riverside Housing and Workforce Solutions (HWS) is in receipt of the draft Notice of Recoupment for Federal Award ERA0413. This notice identifies \$41,410 in required recoupment of funding and provides background information on the two cases resulting in the total recoupment amount.

Below is our official Grantee Response to this notice:

*County of Riverside Housing and Workforce Solutions (HWS) concurs with the above conclusions, and the identified recoupment of funds totaling \$41,410 will be returned to the Federal Government.*

Instructions for processing the recoupment payment can be sent to:

County of Riverside, Housing and Workforce Solutions  
Attn: Megan Gómez, Deputy Director of Finance & Administration  
3403 10<sup>th</sup> Street, Suite 310, Riverside, CA 92501  
[HWS-Fiscal@rivco.org](mailto:HWS-Fiscal@rivco.org)

We appreciate the thorough and diligent work of your office in conducting this audit, and for your courtesy and professionalism in working with our staff and funding subrecipients.

Thank you,

(b) (6)

Heidi Marshall  
HWS Director

---

3403 Tenth Street, Suite 300 | Riverside, CA 92501 | FAX: (951) 374-3098 | Phone: (951) 955-1161