



U.S. Department of Education
Office of Inspector General

Coronavirus Relief Oversight Plan

On March 27, 2020, the President signed into law the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). Among its provisions, the CARES Act provided the U.S. Department of Education (Department) with more than \$30 billion to assist States, K–12 schools, school districts, and institutions of higher education in meeting the needs of students impacted by the pandemic. The law also provides the Office of Inspector General (OIG) with \$7 million to carry out its oversight activities related to these funds. The OIG has begun planning for its CARES Act funding work, which will include auditing Department and grantee management and spending of these funds; examining the effectiveness of the relief programs; and investigating misuse, theft, and other criminal activity involving these funds.

The following is an overview of potential subject areas that may be included in the OIG's body of work.

Audits and Reviews

Through the OIG's Audit Services component, OIG auditors anticipate performing a series of audits and reviews of programs, grants, requirements, and flexibilities established under the CARES Act. OIG staff are actively coordinating with the Government Accountability Office to avoid duplication of effort and ensure the broadest possible level of oversight. Please note: final audit subject areas may be impacted by additional work performed by the Government Accountability Office.

State and Local Programs

Department Focus

- Challenges faced by the Department during implementation of the American Recovery and Reinvestment Act of 2009 and its oversight and monitoring of other Federal education funds that should be considered in carrying out requirements under the CARES Act
- Process for awarding and monitoring Education Stabilization Fund Discretionary Grants
- Process for awarding and monitoring Project SERV Grants
- Implementation of national emergency educational waivers authority
- Oversight of States' continued compliance with certain requirements under the Individuals with Disabilities Education Act and the Rehabilitation Act

External Focus (i.e., States, State educational agencies, local educational agencies, schools)

- Use of Elementary and Secondary School Emergency Relief Fund
- Processes for awarding and monitoring Governor's Emergency Education Relief Fund

Student Financial Assistance and Higher Education Programs

Department Focus

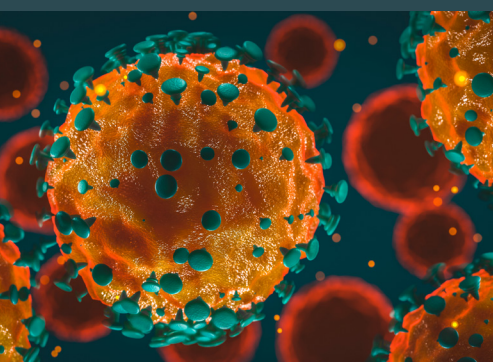
- Federal Student Aid's (FSA) implementation of the suspension of involuntary collections on defaulted student loans

ED OIG will help oversee more than

\$30 billion

awarded to the U.S. Department of Education for the following.

- \$16.8 billion for State and local educational agencies
- \$13.9 billion for higher education
- \$100 million for Project SERV
- \$62 million for HBCU Capital Financing
- \$40 million for Student Aid Administration
- \$13 million for Howard University
- \$8 million for ED Program Administration
- \$7 million for Gallaudet University





- Department's processes to implement flexibilities to Teacher Education Assistance for College and Higher Education (TEACH) Grant service obligations
- Department's implementation of teacher loan forgiveness waivers
- Department's implementation of waivers of the requirements for schools and students to return Title IV funds for students who withdraw as a result of a qualifying emergency
- Department's process to cancel the borrower obligations to repay loans made under Title IV part D associated with a period where the student withdrew as a result of a qualifying emergency
- Department's implementation of requirements to adjust subsidized loan and Pell Grant usage for periods that students do not complete due to a qualifying emergency
- Department's process to monitor the Higher Education Emergency Relief Fund, including ensuring that schools use at least 50 percent for awards to students

External Focus (i.e., schools)

- Review the extent of schools' use of the CARES Act's flexibilities for the campus-based programs
 - Reallocation of Federal Work Study to Federal Supplemental Educational Opportunity Grant
 - Emergency grants from Federal Supplemental Educational Opportunity Grant funds
 - Payments to affected Federal Work Study students who are unable to fulfill all or part of their work study obligation
- Review schools' use of the Higher Education Emergency Relief Fund, particularly the obligation to use 50 percent of funds for grants to students

Departmental Operations

- Department's administrative capability given staffing level reductions and increased responsibilities and FSA's use of the \$40 million made available for Student Aid Administration
- Department's continued oversight of Title IV participants while implementing CARES Act related requirements
- Department's ongoing oversight of early learning, elementary, and secondary education grant programs while implementing CARES Act programs and requirements
- Department's use of authority to compensate contractors to pay employees assigned to Federal contracts who could not work because of the COVID-19 pandemic



Criminal and Civil Investigations

Through the OIG Investigation Services component, OIG criminal investigators are already working to identify and stop those who seek to steal CARES Act funding in this time of crises. We have initiated a fraud awareness campaign to inform and educate stakeholders and the general public in raising awareness of fraud involving education-related CARES Act funding. This includes information on public corruption, contract and procurement fraud, embezzlement, distance education fraud rings, violations of the incentive compensation ban, and consumer fraud schemes like student debt relief. OIG criminal investigators are also working with their law enforcement colleagues across the country, including the Department of Justice Procurement Fraud Task Force and Federal-State task forces led by U.S. Attorneys' Offices. These task forces are working to quickly address fraud complaints and to identify, investigate, and prosecute fraud related to the pandemic. They are looking into unlawful hoarding, price gouging, and a series of scams already preying on our nation's citizens—vaccine scams, supply scams, charity scams, phishing, malware apps, and investment scams.

Through the OIG's Information Technology Audits and Computer Crime Investigations (ITACCI) component, in addition to providing data analytic and computer forensic support to OIG audit and investigative work, ITACCI's Technology Crimes Division is proactively working with their OIG Investigation Services counterparts and law enforcement partners to pursue entities who are taking advantage of the COVID-19 pandemic. These entities preying on unsuspecting students and student loan account holders by targeting them with fraudulent CARES Act or loan consolidation schemes. ITACCI's Technology Crimes Division is working to ensure that these bad actors are not gaining unauthorized access to Department and FSA information technology resources or accounts.

Pandemic Response Accountability Committee

The OIG will also be involved with the Pandemic Response Accountability Committee (PRAC). The CARES Act established the PRAC, which is composed of inspectors general from across the Federal government. The PRAC is tasked with conducting, coordinating, and supporting inspectors general in overseeing more than \$2 trillion in emergency Federal spending to address the economic impacts of the coronavirus pandemic. The CARES Act names nine specific agency inspectors general to the PRAC, including ED. Acting Inspector General Sandra D. Bruce is representing the OIG on the PRAC and is leading the PRAC committee focused on State and local oversight efforts.