

CINDY STUART



Clerk of Court & Comptroller
13th Judicial Circuit

CARES ACT – R3 PROGRAMS
COMPILED MONITORING RESULTS

COUNTY AUDIT DEPARTMENT
REPORT # 400
October 1, 2021

The Honorable Pat Kemp, Chair
The Honorable Harry Cohen
The Honorable Ken Hagan
The Honorable Gwen Myers
The Honorable Kimberly Overman
The Honorable Mariella Smith
The Honorable Stacy R. White



Dear Commissioners:

October 1, 2021

The County Audit Department has completed its monitoring of the County's assistance programs funded by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Report # 400, dated October, 2021. These programs provided relief payments to assist those who were adversely affected by the COVID-19 coronavirus.

Each month, the Audit Team reviewed assistance payment transactions for compliance with the CARES Act, the U. S. Treasury guidance, and the County's eligibility requirements. Management memorandums were issued each month to inform department directors and the Executive Team of County Audit's sample selections, testing criteria, and results.

Although the Audit Team exercised due professional care in the performance of this monitoring review, this should not be construed to mean that unreported noncompliance or irregularities do not exist. The deterrence of fraud and/or employee abuse is the responsibility of management. Monitoring and testing procedures alone, even when carried out with professional care, do not guarantee that fraud or abuse will be detected.

The Audit Team greatly appreciates the cooperation and responsiveness of numerous County departments during the course of this review.

Sincerely,

Heidi Pinner

Together, we will get to YES!

Heidi Pinner, CIA CISA CFE CRMA
Chief Audit Executive, County Audit
Clerk of Court & Comptroller

CC: Bonnie Wise, County Administrator
Tom Fesler, Chief Financial Administrator
Carl Harness, Chief Human Services Administrator
Ron Barton, Assistant County Administrator, Economic Prosperity
Tom Fass, Assistant County Administrator, Asset Management & Knowledge Commons
Audrey Ziegler, Director, Social Services
Lindsey Kimball, Director, Economic Development
Cheryl Howell, Director, Affordable Housing Services
Felicia Crosby-Rucker, Director, Homeless Services
John Muller, Director of Facilities Management
Debbie Benavidez, Director, Enterprise Solutions & Quality Assurance
Tim Simon, Chief Financial Officer, Clerk of Court & Comptroller

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EXECUTIVE SUMMARY

BACKGROUND INFORMATION

During March of 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was passed by the United States Congress and signed into law by the President, which included funding that was paid to numerous state and municipal governments throughout the U.S. Hillsborough County received a payment of approximately \$257 million to be used for purposes related to the coronavirus pandemic known as COVID-19. The U.S. Department of the Treasury published further guidance regarding how the funds may be spent, including an initial requirement that any funds not expended by December 30, 2020 must be returned.

Based on this initial guidance, the County quickly established multiple programs collectively known as the *Rapid Response Recovery Assistance Program (R3)* intended to assist citizens, businesses, and not-for-profit organizations in Hillsborough County who experienced economic hardships caused by the pandemic. Each of these County programs provided assistance payments to qualified recipients based on specific eligibility requirements developed by the County. These R3 programs were delivered in multiple phases which allowed the County to quickly adjust eligibility requirements, payment amounts and program offerings based on the evolving circumstances and guidance.

The R3 programs included assistance related to past-due rent, mortgage, and utilities, as well as payments to assist small businesses and not-for-profits with COVID-19 related costs such as disinfectant supplies, equipment, physical safety modifications, teleworking, retaining employees, and re-hiring workers after furloughs or layoffs.

OBJECTIVE

The County Audit Department performed periodic and ongoing monitoring of expenditures made for the various R3 programs. The general objective of the Audit Team's monitoring was to determine whether or not the County's programs were in compliance with the CARES Act and U.S. Treasury guidance, and whether or not the applicants met the eligibility requirements based on the supporting documentation and questionnaires filed with their applications. County Audit issued twenty-two (22) result memos informing department directors as to the results of the monitoring reviews performed. This Report is intended to furnish the Board of County Commissioners (BOCC) with a combined summary of the overall results communicated in those memos.

AUDIT COMMENTS & RECOMMENDATIONS

SOCIAL SERVICES

RENT & UTILITIES ASSISTANCE

Social Services designed and implemented effective controls to deliver assistance payments for past-due rent, mortgage, and utility bills to qualified applicants.

5,235
RECIPIENTS

\$31.9 M
ASSISTANCE

472
TESTED

2
EXCEPTIONS

CRITERIA

A portion of the CARES Act dollars was used to assist Hillsborough County residents who suffered a reduction or loss of employment due to the COVID-19 pandemic. Hillsborough County developed the housing and utility financial assistance program to prevent recipients from experiencing further financial hardship or consequences resulting from past-due rent, mortgage, and/or utility bills. The program consisted of several phases, however the eligibility criteria generally required applicants to:

- Be a resident of Hillsborough County.
- Meet certain income limit requirements.
- Experience a reduction or loss of job wages due to COVID-19.
- Provide supporting documentation.

The Audit Team selected samples of payments each month and reviewed the supporting documentation to determine whether or not:

- Payments complied with the CARES Act (incurred during March 1 – December 31, 2020 and were a necessary expenditure due to COVID-19).
- Payments had appropriate supporting documentation.
- The expenditure had an appropriate approval prior to payment.
- Rent and mortgage payment amounts were appropriate.
- A residential property physically existed at the address, based on a Google Map street view.

RESULTS

For each periodic sample of payments selected, the Audit Team issued management memos (MMs) with the following results:

Period Reviewed	MM	Rent / Mortgage	Utility	Total Tested	Exceptions	Observations
May 2020	MM84	12	10	22	1	1
June / July 2020	MM86	65	35	100	0	4
August 2020	MM91	25	25	50	0	1
September 2020	MM92 MM95	50	50	100	0	1
October 2020	MM97	25	25	50	0	1
November 2020	MM98 MM101	50	50	100	0	0
December, 2020	MM109	45	5	50	1	0
TOTALS:		272	200	472	2	8

Exceptions included:

- A payment with no approval e-mail in the backup documents.
- A payment made for an address not within Hillsborough County. This item was then reissued to a Polk County location via an address correction after the first check was returned. Applicants are required to reside in Hillsborough County to be eligible. This transaction had other application inconsistencies and was referred to management for follow-up.

Minor observations which did not ultimately affect eligibility were also communicated to management for consideration. These included:

- A utility payment which may have had a past-due amount incurred prior to the allowable date of 3/1/2020.
- A payment that had no W-9 form included in the backup documentation (only required during Phase I).
- Six (6) landlord verification forms that had no date.
- A landlord verification form that was illegible.
- A utility bill had an address different than the landlord verification form.
- A tax return that had a slightly different apartment # than the lease & utility bill.
- A transaction which had 5 checks issued/reissued in order to correct address errors.
- Three (3) KickStart Small Business payments were charged to the Social Services' Cost Center in error.

Overall, based on the relatively low number of exceptions and observations found, the Audit Team concluded that the program to administer past-due rent, mortgage, and/or utility assistance appeared to have effective controls.

ECONOMIC DEVELOPMENT

SMALL BUSINESS ASSISTANCE

Economic Development designed and implemented effective controls to issue assistance payments for local businesses impacted by the COVID-19 pandemic.

5,659

RECIPIENTS

\$93.5M

ASSISTANCE

276

TESTED

3

EXCEPTIONS

CRITERIA

The County’s Rapid Response Recovery Assistance Program (R3) includes the Economic Recovery Financial Assistance program to support Hillsborough County businesses that were economically injured due to the COVID-19 pandemic.

Originally, there were three separate programs designed to assist small businesses in Hillsborough County in coping with the pandemic:

- Kickstart Small Business - Payments to assist businesses that suffered loss of revenue or were forced to close because of COVID-19.
- Back-To-Work - Incentive payments for businesses to hire workers with the award amounts determined based on how many net-new employees are hired.
- Safe-At-Work - Amounts awarded to businesses to help cover workplace safety reconfiguration costs, Personal Protective Equipment (PPE), air purification, installing physical barriers, teleworking equipment, and other pandemic-related safety measures.

During the early phases, the Back-To-Work and Safe-At-Work programs proved to be overly complex and time-consuming to verify eligibility and calculate the award amounts. Therefore, those programs were discontinued and converted into one overall Kickstart Small Business program. Award amounts were later increased and supplemental payments were issued to earlier awardees.

Although some requirements were modified during each phase, the general eligibility criteria for a business to qualify was that they must be a for-profit business primarily located in Hillsborough County with annual revenues under a certain dollar amount and were either forced to close at some point or suffered a demonstrable economic injury due to COVID-19. The applicant must have been currently open for business, be legally registered, fully licensed, up-to-date on tax filings, not publicly traded, and in operation since March 1, 2019.

RESULTS

The Audit Team selected a sample of payments each month and reviewed the supporting backup documentation to determine whether or not:

- The payment complied with the CARES Act (incurred between March 1 – December 30, 2020 and was a necessary expenditure due to COVID-19).
- The business that received financial assistance met the qualifying criteria.
- The business was awarded the proper amount based on the program’s award amount methodology.
- There was adequate supporting documentation with consistent information.
- The expenditure had an appropriate approval prior to payment.
- An appropriate business property physically existed at the address, based on a Google Map street view.

For each sample of payments selected, the Audit Team issued management memos (MMs). The results included on those memos is summarized below:

Period Reviewed	MM	Items Tested	Exceptions	Observations
Through July 2020	MM85	20	0	2
August 2020	MM89	52	0	0
September 2020	MM93 MM96	54	2	0
October 2020	MM99	50	0	0
November 2020	MM102	50	0	0
December 2020	MM106	50	1	0
	TOTALS:	276	3	2

Exceptions included:

- The application processing portal (FASTER) triggered a duplicate payment after an address change because the system restarted the review and approval process upon update. This system issue was corrected quickly once identified. The duplicate check was discovered and voided by staff before it could be cashed and management took action to identify and/or correct any similar instances.
- Four (4) Back-To-Work payments had net-new employee calculations that did not reconcile to supporting payroll records, causing the businesses to be initially paid an incorrect amount (award amount calculations were a complex process which is why Back-To-Work and Safe-At-Work were ended and converted into the Kickstart program after only a few applications). Management authorized supplemental payments as applicable to provide the appropriate amounts to the businesses.

- A business was underpaid due to an incorrect number of employees entered by external staff from the FASTER portal provider. County management subsequently authorized a supplemental payment upon notification of the exception.

Minor observations which did not ultimately affect eligibility were also communicated to management for consideration, these included:

- An instance where a non-county employee was listed on the downloaded application as the County Approver. This appeared to be a timing issue, where the supporting documentation was compiled prior to the final approval. This caused the download to be inconsistent with the actual approvals in the system. The Audit Team was able to determine the actual approvals were appropriate and recorded within the transaction's audit trail in the FASTER application.
- An unrelated P-Card charge was charged to the CARES Act fund in the general ledger in error. This issue was later corrected.

Based on the relatively low number of exceptions and observations, the program to administer assistance to Hillsborough County businesses appeared to have effective controls in place to process applications and issue payments.

AFFORDABLE HOUSING

DAY CARE ASSISTANCE

The Affordable Housing department designed and implemented effective controls to issue assistance payments to Hillsborough County day care providers impacted by COVID-19.

116
RECIPIENTS

\$2.05 M
ASSISTANCE

32
TESTED

1
EXCEPTION

CRITERIA

As part of the County’s Rapid Response Recovery Assistance Program (R3), the Affordable Housing Services Department administered a program which provided relief payments to non-profit and in-home day care facilities or agencies. Recipient facilities were required to be licensed by Hillsborough County and are subject to approval based on the following pre-established program criteria:

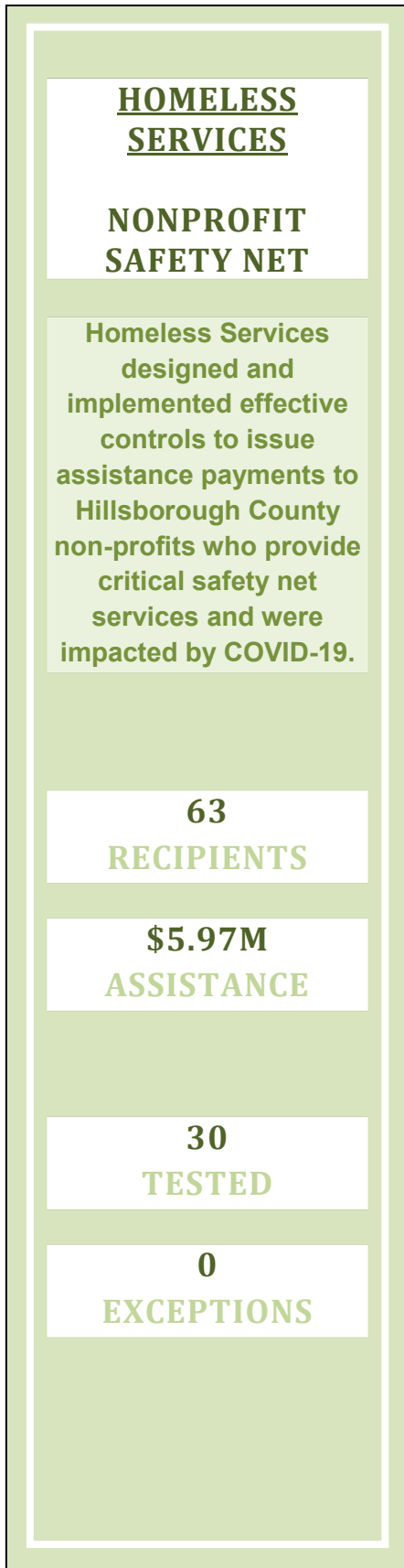
- The day care facility was an eligible facility type.
- The facility was in operation for at least one year.
- The applicant was legally registered, fully licensed, and up to date on tax filings.
- The agency/facility was adversely impacted due to the COVID-19 pandemic.
- The payment was properly authorized and consistent with program limits.
- The applicant did not receive more than the \$250,000 maximum allowed total combined from all County CARES Act programs.

Some facilities were non-profit organizations and others were in-home day care providers. There were also two (2) larger organizations with multiple locations that each submitted a consolidated application for all their locations.

RESULTS

There were 116 assistance payments totaling \$2,050,000 made utilizing CARES Act funds as of December 31, 2020. The Audit Team selected a random sample of 32 transactions (20 Non-Profit; 10 In-Home; and 2 Consolidated Payment transactions) totaling \$670,000.00 for testing. Overall, the program appeared to be operating consistent with the established framework and in compliance with the program criteria. The County Audit Department issued one management memo MM104 on March 18, 2021 for this program with the following results.

Exception Noted: One in-home day care service provider had annual revenue which exceeded the maximum amount allowed to be considered eligible for an assistance payment. This item was referred to management for follow-up.



CRITERIA

The Homeless Services Non-Profit Safety Net Program was designed to provide financial support (facility, operational, and/or working capital costs) to nonprofit agencies physically located in Hillsborough County that have been affected by the COVID-19 pandemic and that are actively providing critical services to the citizens of Hillsborough County, City of Tampa, City of Plant City, or City of Temple Terrace. The eligibility criteria to qualify for this assistance included:

- Suffered a demonstrable economic impact as a result of COVID-19.
- Has contracted with the County, City of Tampa, City of Plant City, City of Temple Terrace, Hillsborough County Housing Finance Authority, or the Tampa Hillsborough Homeless Initiative within the last three years.
- Is open for business in some capacity and in operation since March 1, 2015.
- Is legally registered, fully licensed (as required by applicable law), and up to date on business tax payments/filings.
- Is principally located within the boundaries of Hillsborough County (main physical location).
- Provides essential safety net services in the areas of housing, homeless assistance, health, dependency, food, employment services, household/financial counseling, or related areas.

RESULTS

There were a total of 63 Safety Net payments totaling \$5,970,000 made utilizing CARES Act funds as of November 23, 2020. The Audit Team selected a random sample of 30 payments totaling \$2,555,000.00 and identified no exceptions. Other observations included:

- Three agencies tested had not utilized 100% of the awarded amount by December 30, 2020, but were granted an extension through March 31, 2021.
- Two agencies’ main physical locations were not located within the boundaries of Hillsborough County. However, the agencies provided statements certifying that if awarded, the funding would be used for their facilities located within the boundaries of Hillsborough County.

**FACILITIES
MANAGEMENT**

**COMMUNITY
VENUE PROGRAM**

Facilities Management designed and implemented effective controls to issue assistance payments for nonprofits providing community and youth programming.

**17
RECIPIENTS**

**\$2.88M
ASSISTANCE**

**17
TESTED**

**0
EXCEPTIONS**

CRITERIA

The Facilities Management & Real Estate Services department administered a program called the Nonprofit Community Venue Program which provided CARES Act funds to qualified nonprofits on a reimbursement basis. Eight nonprofit organizations with high tourism were initially deemed eligible to apply for reimbursement of expenses related to COVID-19 mitigation and modifications. In addition, nonprofit community venues which provide onsite, in-venue youth programming were eligible. Improvements made at the facilities were required to be based on guidelines from the Center for Disease Control (CDC) and to assist with reopening efforts.

RESULTS

There were a total of 17 venues that were reimbursed a total of \$2,881,752.44 as of December 31, 2020. The Audit Team reviewed 100% of the reimbursements made for reasonableness and to determine whether or not:

- The venue paid for public safety measures to protect its employees and/or the public from the COVID-19 pandemic.
- The facility was physically within the boundaries of Hillsborough County, appeared to be an appropriate facility on a Google Map street view, and offered youth programming services to the community.
- Purchases were made for appropriate items including but not limited to, Personal Protective Equipment (PPE), temperature screening equipment, and improvements to air handling equipment to reduce the spread of infectious diseases.
- The venue is legally registered as a nonprofit 501(c)(3) and is up to date on business tax payments/filings.
- As applicable, the venues provided a valid IRS Form 990.
- Total payments were under the applicable maximum award limit.

The Nonprofit Community Venue Program appears to have been sufficiently designed to ensure that reimbursements

were appropriate and in compliance with CARES Act requirements. No exceptions were noted and several controls were observed, such as:

- Specific categories were identified and communicated to detail what expenses were eligible for reimbursement.
- All invoices and other supporting documentation were available.
- The total reimbursements were consistent with the Board approved funding levels for the program.
- No venue received CARES Act funding in excess of the amount requested and supported by invoices.
- All program expenditures appeared to be appropriate and in compliance with the CARES Act eligibility requirements.

**COMMUNITY
FOUNDATION OF
TAMPA BAY, INC.**
(as administrator)

**LOCAL
NONPROFIT
ASSISTANCE**

Community Foundation of Tampa Bay appears to have administered the Local Non-Profit assistance program consistent with CARES eligibility and County defined criteria.

**67
RECIPIENTS**

**\$1.75M
ASSISTANCE**

**67
TESTED**

**0
EXCEPTIONS**

CRITERIA

In addition to other non-profit assistance programs, the County entered into specific agreements with individual non-profit agencies to reimburse costs associated with providing essential safety net services. One of these agreements was with an organization called the Community Foundation of Tampa Bay, Inc. (CFTB). The CFTB raises funds and then provides financial assistance to other Hillsborough County non-profits who provide various charitable or philanthropic services. The County’s agreement was to reimburse the CFTB for payments made from the CFTB to its selected non-profits.

The CFTB pays funds to various non-profits and then the County reimburses the CFTB for making those payments based on certain criteria requirements in the agreement. The County Audit Department performed monitoring of these payments for compliance with the CARES Act, the U. S. Treasury guidance, and the County’s eligibility criteria.

RESULTS

The Audit Team reviewed the County payments made to the Community Foundation in November 2020, which consisted of four (4) consolidated payments totaling \$1,745,000. These 4 payments reimbursed the Foundation for payments it made to 67 non-profit agencies deemed eligible. The Audit Team tested all 67 payments and reviewed the supporting documentation to ensure that the amounts paid to the Community Foundation were appropriate and that the nonprofit recipients:

- Were based in Hillsborough County.
- Were active, open and operating, either in-person or virtually.
- Provide essential safety net services to Hillsborough County residents.
- Are legally registered/fully licensed as a not-for-profit.
- Were up to date on tax payments/filings.
- Demonstrated that they were adversely affected due to the COVID-19 pandemic.

-
- Incurred COVID-19 response expenses during the period of March 1, 2020 through December 30, 2020.
 - Did not receive funding under Phase 1 of the Non-Profit Safety Net Program or the Non-Profit Child Care Operator Program.
 - Demonstrated revenues above \$100,000.

The agreement with CFTB appears to have been administered consistent with the established criteria and in compliance with the CARES Act and available guidance. No material exceptions were identified.

Other Observations

The program criteria defined by the County states that: *“A nonprofit recipient must demonstrate that they were adversely affected due to the COVID-19 pandemic in one of the following manners:*

- *Suffered demonstrable economic injury due to COVID-19;*
- *Forced to increase/decrease services or labor;*
- *Modified the facility and/or operations due to COVID-19; or*
- *Complied with safety and health standards.”*

The Department of Treasury guidance dated August 2020, states that *“The prime recipient <The County> is responsible for determining the level and detail of documentation needed from the sub-recipient of Small Business Assistance to satisfy these <CARES ACT> requirements, however, there would need to be some proof that the small business was impacted by the public health emergency and was thus eligible for the CRF funds.”*

The County relied on attestations in lieu of evidence of eligibility for several criteria. This means that recipients were able to qualify by certifying ‘Yes’ for a series of questions on the application form. Examples of these attestations included whether or not: the agency suffered an economic impact from COVID, was open and operating, and provided essential safety net services.

In general, attestation statements are a soft control which have a potential risk of error, omission or fraud. Management discussed these risks with the Audit Team during program design and throughout testing. Ultimately, management determined that attestation statements were a sufficient level of documentation and proof to comply with Treasury guidance and that they posed an acceptable level of risk. Management’s determination was based on several factors, including:

- Requiring qualifying documentation or additional support would have made the program significantly more difficult and time-consuming.
- There was an immediate need to deliver economic relief to the community in an efficient and expedited fashion.
- The use of attestations would allow the County to maintain compliance while also prioritizing the community need.

COUNTY FINANCE

RE-ISSUED AND RETURNED CHECK PROCESSING

353

VOIDED/REISSUED CHECKS

When checks are lost, returned, or go uncashed, it can impact the timeliness of assistance.

OPPORTUNITY

A quicker follow-up process for voided checks could benefit future time sensitive payment circumstances.

CRITERIA

During all the monitoring reviews performed, the Audit Team noticed that at times a check mailed to a recipient was lost, returned by the Post Office due to an incorrect address, or not cashed. Checks issued by County Finance expire if they are not cashed before 180 days, which is known as a stale-dated check. When a check is lost, returned, or stale-dated, the original check is voided and County staff attempts to contact the recipient to issue a replacement check.

The Audit Team noticed an increased number of check voids related to CARES Act payments toward the end of calendar year 2020. Testing was devised to review samples of voided checks and examine the cause of the void and how it was handled to determine root causes and identify any potential control opportunities.

RESULTS

The Audit Team obtained data for all CARES Act check payments made through February 1, 2021 and identified a total of 353 voided checks (233 Social Services and 120 Economic Development). A random sample of 50 voided checks was selected for testing. The Audit Team reviewed the supporting documentation for the original transactions and determined the reason for the void, whether the transaction appeared appropriate, and whether or not there was a follow-up and resolution.

In general, the 50 transactions reviewed were voided because they were either stale-dated or had been returned by the Post Office as undeliverable. The Audit Team observed the following for the 50 items tested:

- All of the transactions appeared appropriate for their respective programs and no documentation anomalies were noted.
- Twelve (12) items had an extended period of time (several months) before any follow-up or resolution was completed.

When a check is stale-dated or returned, the follow-up process generally consists of the department being notified by County Finance that a check was voided/returned. The department then attempts to contact the recipient to confirm the mailing address or obtain an alternate mailing address.

The Audit Team observed delays both in the notification to the departments and the follow-up performed by the departments. For many of the 12 items in the sample, no follow up had been performed prior to the Audit Team's inquiry. For example:

- A rental assistance payment issued on 5/15/2020 went stale-dated in December, 2020. The landlord was contacted on 3/4/2021 and stated the check should be voided because the tenant's rent was paid in full while waiting for the assistance payment and that the tenant had already moved out.
- An original and supplemental payment issued on 8/10/2020 & 8/27/2020, respectively, involving a small business applicant appeared to have an incorrect address provided on the application. Both checks were returned, and the department contacted the applicant who signed two affidavits with a slightly corrected address. This new address looked very similar to the first address and the change went unnoticed. The replacement checks were sent to the original address and were returned again. Then a fifth and sixth check were issued to an updated address on 9/28/2020 and 10/19/2020, respectively.

The Audit Team acknowledges that processing returned and stale-dated checks is a time-consuming process and that workloads must be prioritized based on available resources. This prioritization can cause delays in the review and follow-up of returned/stale checks, which is of course, not the intent of the rapid assistance programs. In many instances, the recipient themselves can function as the mitigating control by notifying the department of a payment not received. When contact is not initiated by the recipient, attempts to contact them may also cause further delays. The Audit Team observed that for many items, it was an error by the applicant on the initial application that caused the check to be undeliverable.

Ultimately, management may want to consider reviewing the follow up process for returned and/or stale dated checks to improve timeliness, especially for grant, assistance, or emergency related payments.

ECONOMIC DEVELOPMENT

DUPLICATE PAYMENT TESTING

Controls were in place to detect and correct potential duplicate payments.

72 TESTED

1 EXCEPTION

CRITERIA

The Audit Team ran an analysis on all CARES Act check payment data and identified any instances of more than one check being mailed to the same address. Many of these were supplemental payments or checks that were voided and re-issued after being lost. The Audit Team judgmentally selected 62 samples that did not appear to be voids or supplemental payments and also selected an additional 10 random samples for a total of 72 potential duplicate payments. The Audit Team researched each sample based on supporting application documents, internet searches, Google street map views, and inquiries with Economic Development to determine whether or not multiple payments to the same address appeared appropriate.

RESULTS

One duplicate payment for \$10,000 dated 10/2/2020 was determined to be a result of a system anomaly within the application portal. This anomaly placed an application file into an approved for payment status after it had already been paid. Controls were in place to detect and prevent the duplicate payment from being mailed. County Audit reported on a similar instance of this anomaly within Management Memo MM93, issued November 25, 2020. Both payments were stopped prior to payment.

The remaining 71 instances of potential duplicate payments were tested and were determined to be a result of legitimate and allowable circumstances, including:

- A single address location which houses multiple businesses (plazas and multi-tenant office buildings).
- Leased spaces with one suite number occupied by numerous companies.
- Companies with multiple franchise locations that requested payments be sent to headquarters.
- A person or persons owning multiple businesses based in a single location.