



# CARES Act Fund Distributions for Small Business Recovery and Housing Relief

## CARES Act

Coronavirus Aid,  
Relief, and Economic  
Security Act



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**September 29, 2021**

# CARES Act Fund Distributions for Small Business Recovery and Housing Relief - Executive Summary

## Purpose

This audit was conducted to evaluate the City's use of Coronavirus Aid, Relief and Economic Security Act (CARES Act) funds designated for City Council approved small business recovery and housing relief programs.

## Background

In May 2020, the City of Charlotte accepted \$154 million in CARES Act funding to address the economic fallout of the COVID-19 pandemic in the United States. City Council approved the allocation of \$70 million, later increased to \$78 million, from those funds for housing relief and small business recovery programs.

Community Recovery Task Forces appointed by Charlotte's Mayor advised city staff on spending the stimulus money and forming strategies to address the pandemic's impact locally.

Implementation of the programs is assigned to Economic Development for small business recovery and to Housing & Neighborhood Services for housing relief.

## Conclusion

Community relief programs were adequately designed to address the economic impact from the pandemic. Controls over the distribution and monitoring of some community recovery programs should be improved to prevent and detect misappropriations. Emergency relief programs can benefit from the lessons learned during these COVID-19 responses.

## Highlights

### *Compliance with Federal Guidelines (Permissible Use of Funds) (Page 6)*

***The City designed multiple programs and distributed funds in compliance with Federal guidelines for the CARES Act.***

- The Finance and Strategy & Budget Departments ensured programs' objectives met requirements for permitted uses, based on federal guidelines and Council-approved actions.

### *Access to Capital Grant Programs (Page 6)*

***The Access to Capital grant programs were reasonably designed to meet City Council's guidelines. Reliance on self-certification increased the risk of ineligible applicants receiving a grant.***

- In the future, Economic Development should obtain documentation that allows verification of all eligibility requirements and if necessary, request additional documentation from the applicant prior to distribution of funds.

***Exceptions were noted in program implementation and verification of participant eligibility.***

- Funds should be recovered from ineligible applicants. The City recovered \$10,000 each from two businesses. Economic Development has approved a repayment plan with the third business.
- FFTC augmented its application review process to include a quality control review of all applications.

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## CARES Act Funds Distribution for Small Business Recovery and Housing Relief - Executive Summary – continued

***Eligibility criteria for the Hotel and the Food Service Recovery Grant Programs were adequately designed.***

- When establishing eligibility criteria for future programs, the City should consider accessibility of information from external sources such as Mecklenburg County.

### ***Other Small Business and Workforce Grant Programs and Initiatives (Page 12)***

***Minor exceptions were noted in the implementation of some other small business and workforce grant programs.***

- Economic Development should ensure that subrecipients establish adequate controls to manage the distribution of assets.
- Exceptions to grant eligibility requirements should be documented.

***Actions Taken:*** Economic Development informed training partners that prior approval must be obtained from the City before purchase of any gift cards. Training partners were provided with the City policy regarding safe keeping of assets and on-going inventory maintenance.

### ***Housing Relief Grant Programs (Page 15)***

***Housing & Neighborhood Services should improve its monitoring procedures.***

- A robust monitoring process should be developed.
- Housing & Neighborhood Services should ensure DreamKey reconciles all individual grant payments.
- Housing & Neighborhood Services should ensure applicant eligibility is supported by required documentation.

***Actions Taken:*** The new grant management system Salesforce, implemented by DreamKey in February 2021, is expected to have more robust reporting features that will allow for better monitoring of program activity and ongoing reconciliation of payments. In April 2021, DreamKey submitted to Housing & Neighborhood Services a reconciliation of past disbursements made by Socialserve.

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## Objective

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This audit was conducted to evaluate the City's use of Coronavirus Aid, Relief and Economic Security Act (CARES Act) funds designated for City Council approved small business recovery and housing relief programs.

## Background

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On January 31, 2020, the Federal Health and Human Services Secretary declared a public health emergency in response to the outbreak of the coronavirus (COVID-19) in the United States. In March 2020, the U.S. Congress passed a \$2.2 trillion economic stimulus package, the Coronavirus Aid, Relief and Economic Security Act (CARES Act). The CARES Act established the Coronavirus Relief Fund (CRF) to provide \$150 billion in assistance to state, local, and tribal governments navigating the impact of the COVID-19 outbreak. The CARES Act requires that payments from the CRF only be used to cover expenses that are:

1. Necessary expenditures incurred due to the COVID-19 public health emergency,
2. Costs not accounted for in the most recently approved budget as of March 27, 2020, and
3. Costs incurred between March 1, 2020, and December 30, 2020. (On December 21, 2020, Congress passed the Consolidated Appropriations Act, 2021 which extended the deadline for CRF expenditures to December 31, 2021.)

In May 2020, the City received \$366 million in CARES Act funds. These funds included \$154 million for the City's COVID-19 related operational expenses and economic recovery response, \$135 million for the Airport, \$57 million for CATS operations, \$18 million for the Community Development Block Grant and Economic Solution Grant programs, and \$2 million for the Justice Assistance Grant. Charlotte's Mayor appointed a Community Recovery Task Force comprised of council members and local public sector leaders to advise City staff regarding strategies to address the pandemic's local impact. Of the \$154 million designated for the City, City Council approved Task Force recommendations to allocate \$58 million for small business and workforce recovery programs and \$20 million for housing relief programs as detailed in Appendix A.

The City's Economic Development Department contracted with the Foundation For The Carolinas (FFTC) to administer the Access to Capital programs, and with Schermbeck Consulting LLC (SchermCo) to provide program management consultant services for the RENEW small business program. Housing & Neighborhood Services contracted with DreamKey Partners (DreamKey), formerly Charlotte-Mecklenburg Housing Partnership, to administer the housing relief programs. DreamKey subcontracted with Socialserve to facilitate rent relief and utility assistance disbursements.

## Scope, Methodology, and Compliance

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### Scope

The audit focused on the \$78 million designated by City Council for small business and workforce recovery (\$58 million) and housing relief (\$20 million).

### Methodology

To achieve the audit objectives, auditors performed the following:

- Reviewed City Council adopted budget ordinances, federal laws, regulations and city department procedures related to CARES Act funds.
- Interviewed relevant Finance, Strategy & Budget, Economic Development, and Housing & Neighborhood Services staff.
- Reviewed city contracts and related expenditures with FFTC, DreamKey, Urban League, Goodwill and SchermCo.
- Interviewed relevant staff from FFTC, DreamKey and SchermCo.
- Evaluated CARES Act funds distribution and monitoring controls.
- Used statistical and judgmental sampling, and data analytics to review program expenditures.
- Reviewed project funding requests to determine COVID-19 relief programs budget allocations were appropriately approved and expenditures were tracked.

### Compliance

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Findings and Recommendations

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Audit findings and recommendations are organized into four sections, as follows:

- A. Compliance with Federal Guidelines (Permissible Use of Funds)
- B. Access to Capital Grant Programs
- C. Other Small Business and Workforce Grant Programs and Initiatives
- D. Housing Relief Grant Programs

**Note:** Compliance with Federal guidelines is addressed in Section A. Compliance with Council guidelines/direction is addressed in sections B, C and D.

## A. Compliance with Federal Guidelines (Permissible Use of Funds)

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### Finding A

#### ***The City designed multiple programs and distributed funds in compliance with Federal guidelines for the CARES Act.***

In June 2020, the U.S. Department of the Treasury issued guidance to local governments for permissible uses of CRF funds. Funds could be used to respond to “second-order effects of the emergency, such as by providing economic support to those suffering from employment or business interruptions due to COVID-19 related business closures.” Examples of eligible expenditures included:

- The provision of grants to small businesses to reimburse the costs of business interruption caused by required closures.
- Expenses for care for homeless populations provided to mitigate COVID-19 effects and enable compliance with COVID-19 public health precautions.
- Emergency financial assistance, such as overdue rent or mortgage payments to avoid eviction or foreclosure, to individuals and families directly impacted by a loss of income due to the COVID-19 public health emergency.

The Finance and Strategy & Budget Departments ensured programs’ objectives met requirements for permitted uses, based on federal guidelines and Council-approved actions. Departments were required to submit a COVID-19 Project Funding Approval Request Form with an explanation for the planned use of the funds and the qualifying criteria for using CARES Act funds. All request forms were approved by the appropriate department director, the Chief Financial Officer and the Special Assistant to the City Manager before funds were made available for disbursement. CARES Act funds expenditures were recorded in the City’s MUNIS ERP system using the project ledger to aid in monitoring.

Finance maintains documentation of project eligibility and completes federal grant reporting requirements. City departments with eligible projects are responsible for maintaining appropriate documentation related to project expenditures and ensuring other federal grant requirements are met. In addition, the CRF federal award is subject to external auditor review under the U.S. Office of Management and Budget Single Audit Act.

## B. Access to Capital Grant Programs

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Of the \$58 million in CARES Act funds designated for small business recovery, \$47 million was earmarked for Access to Capital grants. Following input from special Council committees appointed by the Mayor for this purpose, the City developed 13 grant programs. Economic

Development staff worked with the Foundation For The Carolinas (FFTC) to design the grant program using recommendations from the City's Community Small Business Recovery Task Force and approved by City Council on May 26, 2020.

This section of the report addresses the three small business grant programs designated as "Access to Capital."

1. Small Business Recovery Grant Program (\$34 million);
2. Food Service Recovery Grant Program (\$7 million); and
3. Hotel Recovery Grant Program (\$6 million).

The remaining \$11 million was used for ten other small business and workforce grant programs and recovery initiatives as detailed in Section C.

The Foundation for the Carolinas (FFTC) received fees of \$3.4 million to administer all three programs. FFTC subcontracted with nine YMCA sites to provide in-person assistance to nearly 200 applicants. FFTC reviewed applications to identify eligible participants and provided that information to Economic Development who worked with the City of Charlotte Finance Department to process payments.

The first Small Business Access to Capital grants were distributed approximately five weeks after Council approval. The full distribution schedule is detailed as follows:

Round	Issued Date	# of Grants	Total \$ of Grants
Round 1	6/29/2020	79	\$880,000
Round 2	7/10/2020	116	\$1,280,000
Round 3	7/24/2020	196	\$2,080,000
Round 4	8/7/2020	362	\$3,785,000
Round 5	8/21/2020	372	\$4,575,000
Round 6	9/4/2020	306	\$4,185,000
Round 7	9/18/2020	393	\$5,070,000
Round 8	10/2/2020	282	\$3,675,000
Round 9	10/16/2020	359	\$4,460,000
Round 10	11/13/2020	35	\$350,000
Round 11	12/14/2020	41	\$410,000
<b>Total</b>		<b>2,541</b>	<b>\$30,075,000</b>



### **Finding B1**

***The Access to Capital grant programs were reasonably designed to meet City Council's guidelines. Reliance on self-certification increased the risk of ineligible applicants receiving a grant.***

The City Council's stated goal was to provide funding to financially struggling business owners as quickly as possible. Programs were streamlined to promote quick application processes with few barriers. Grant programs were designed with transparency in eligibility criteria and in distribution of awards.

Auditors reviewed funds distributed during the first four rounds. As of August 7, 2020, 753 Access to Capital grants totaling \$8,025,000 had been approved. Using statistical random sampling, auditors reviewed 55 grants (7%) totaling \$700,000 (9%) of the grants issued at that point, to verify that eligibility was supported.

An applicant's business was required to meet all eligibility criteria as detailed on the application (see Appendix B), supported by required documentation. Applicants also attested to their eligibility and acknowledged that knowingly making false statements, or intentionally misrepresenting or omitting information, may constitute fraud for which the applicant could be liable to civil or criminal action. The applicant agreed to provide any additional information required to verify eligibility.

The FFTC administered the application process on behalf of the City's Economic Development Department. The application required three documents from a pre-approved list. FFTC's application review process included verification of the business name and address from at least one of the provided documents. Of the 55 grants reviewed, 27 (49%) relied on applicant self-certification for one or more eligibility criteria including:

- number of employees,
- business established prior to Jan. 1, 2020,
- gross sales for 2019, and
- nature of the business.

While these applicants complied with the requirements by submitting three documents from the approved list, the FFTC/City needed to rely upon self-attestation regarding the accuracy of some information. That is, the required documents (alone) did not always provide full proof for some eligibility requirements.

The program design was adequate to achieve the Council's direction. However, the over-reliance upon self-attestation increased the risk of distributing grants to unintended recipients. The FFTC increased its oversight efforts in response to audit concerns raised during our review. As noted

at Finding B2 below, there were exceptions which required correction, i.e., recovery of grants and additional follow up.

***Recommendation B1:*** In the future, Economic Development should obtain documentation that allows verification of all eligibility requirements and if necessary, request additional documentation from the applicant prior to distribution of funds.

***Economic Development Response:*** The Economic Development Department agrees with the data in this finding. The department worked with the FFTC team to address the concerns noted by Audit and put in place new review processes to address concerns. If a program such as this is requested by City Council in the future, no self-attesting will be permitted and required documentation will provide evidence any grant program criteria has been met.

### **Finding B2**

#### ***Exceptions were noted in program implementation and verification of participant eligibility.***

Internal Audit performed an analysis of applicant addresses for all 2,541 grants and identified 111 with duplicate addresses. Duplicate addresses do not necessarily indicate eligibility issues, as multiple businesses could operate from the same physical location. However, three of the 111 were submitted by ineligible applicants. Each received a \$10,000 grant. One applicant was not headquartered within the city limits, as required. Two applicants provided documentation that was created in 2020, a direct violation of the eligibility requirement that businesses be active prior to January 1, 2020. The City recovered \$10,000 each from two businesses. Economic Development has approved a repayment plan with the third business.

Beginning with the seventh round of grants in September 2020, FFTC augmented its application review process to include a quality control review of all applications. Program requirements were updated as follows: (1) no longer accepting IRS Form W9 as validation of business address, (2) ensuring lease documents were signed, and (3) ensuring any financial documents detailed an acceptable revenue range per program guidelines. FFTC also began referencing the North Carolina Secretary of State website for registered businesses. Only certain types of business are required to register with the NC Secretary of State's Office prior to conducting business in North Carolina. Therefore, not all businesses will be registered.

In addition, FFTC reexamined all 1,431 grants previously issued in rounds one through six using the updated quality controls measures and determined that 62 grants needed additional documentation to support participant eligibility. FFTC requested the additional documentation. Of the 62 grantees contacted, FFTC deemed 43 were eligible to receive a grant. The remaining 19 requests for additional information were not resolved at the end of the grant program. This

included three grants, totaling \$45,000, that FFTC determined were ineligible and requested the return of the funds.

Auditors randomly selected a sample of 23 of the 43 grantees (53.5%) who responded to FFTC's request for additional documentation and determined one grant previously cleared by FFTC required additional follow up. Auditors also reviewed application documentation for the 19 unresolved grants and determined that additional follow up was warranted for 16. Internal Audit contacted the 17 grantees identified and requested additional documentation to verify eligibility. Three respondents provided adequate documentation to confirm eligibility. The eligibility of the remaining 14 participants could not be confirmed.

***Recommendation B2:*** Funds should be recovered from ineligible applicants.

***Economic Development Response:*** The Economic Development Department will complete a review of Internal Audit's findings of ineligibility and follow up with Internal Audit on any additional clarifications they would like to address. For grantees the department concurs are ineligible, Economic Development will work with the City Attorney's Office and Finance Department to begin the repayment process.

### ***Finding B3***

***Eligibility criteria for the Hotel and the Food Service Recovery Grant Programs were adequately designed.***

#### ***Hotel***

The Hotel Recovery Grant Program was open to all hotels, motels, and bed and breakfasts within the city limits that had experienced at least a 25% decline in revenue between 2019 and 2020. If a hotel grant recipient had previously received funding through the Small Business Access to Capital Program, the hotel grant was to be reduced by that amount. Eligibility guidelines also required that the hotel must have opened prior to January 1, 2019 and submission of appropriate Mecklenburg County Tax Return – Room Occupancy Tax forms to support income reduction. Applicants with identified nuisance problems, evidenced by documentation of service calls to Charlotte Mecklenburg Police Department (CMPD), could be deemed ineligible to receive grant funds. Economic Development worked with CMPD to develop a method to identify such applicants. From over 100 applicants, four were denied due to the nuisance criteria.

The program was designed to award grants based on the total participant room count of 16,078. The number of rooms reported by applicants was verified by FFTC using the Star Report, described by the local Hospitality and Tourism Association as the most comprehensive and accurate reporting of rooms in Charlotte hotels. In the event the number of rooms on the

applications differed from the number of rooms on the Star Report, FFTC sought a third verification. This resulted in four hotels receiving a reduced grant amount.

Grant amounts were calculated using an award rate determined by Economic Development based on the total participant room count (16,078). Initial program funding of \$6 million was later reduced to \$5.95 million after deducting \$50,000 for two small business grants of \$25,000 each, previously received by two approved hotel applicants. The award rate was determined to be \$370.07 by dividing the available funding (\$5.95 million) by total participant room count (16,078). Approved applicants received a grant in the amount of the award rate times the number of rooms in the hotel.

As of December 10, 2020, 104 grants totaling \$5.87 million had been approved. Using statistical sampling, auditors reviewed 33 grants (32%) totaling \$1.6 million (27%) to verify participant eligibility and calculation of grants amounts. No exceptions were noted.

#### Food Service

The Food Service Recovery Access to Capital program was designed to provide economic relief to eligible local businesses in the food and beverage industry impacted by COVID-19. Grants were distributed on a first-come, first-served basis. Businesses who had previously received a small business grant were ineligible. Businesses with up to 5 employees were eligible to receive a grant of \$10,000 while those with 6 or more employees were eligible for \$25,000. Requirements for businesses to participate in this program included:

- headquartered within Charlotte city limits,
- established prior to January 1, 2020,
- impacted by COVID-19, and
- registered and current on tax payments with the Mecklenburg County Tax Assessor's Office (Tax Assessor).

Applicants with identified nuisance problems, supported by documentation of service calls to CMPD, could be deemed ineligible to receive grant funds. Ineligibility could also be based on nature of business activity, such as entities engaged in adult entertainment. Reviewers intended to use information from the Tax Assessor to verify that grant applicants were "active" on the tax database. However, the County office would not provide current tax status information for applicants, citing N.C. state statutes (§153A-148.1 and §105-259) that prohibited disclosing sales or other tax information.

Similar to the hotel nuisance criteria noted above, food service businesses were reviewed for such issues. None were deemed ineligible for this reason. Due to the Tax Assessor's unwillingness to verify the City's requests, these businesses could not be evaluated for tax compliance.

As of December 9, 2020, 340 grants totaling \$7 million had been approved. Using statistical random sampling, auditors reviewed 42 grants (12%) totaling \$885,000 (13%) and verified participant eligibility. No exceptions were noted.

**Recommendation B3:** When establishing eligibility criteria for future programs, the City should consider accessibility of information from external sources such as Mecklenburg County.

**Economic Development Response:** In programs such as this, the Economic Development Department will consider the accessibility of information from external sources such as Mecklenburg County.

## C. Other Small Business and Workforce Grant Programs and Initiatives

\$11 million in CARES Act funding was used for additional small business grant programs, business resources and training. See Appendix A for a detailed description of these programs and initiatives.

Using statistical sampling, auditors reviewed documentation to verify that eligibility requirements were met, grants were properly approved, and amounts were accurately calculated for other small business grant programs.

Other Small Business and Workforce Grant Programs	Budget	Grants Issued		Grants Reviewed		% Reviewed	
	\$	#	\$	#	\$	#	\$
Thrive Workforce Partner Support	\$3,500,000	34	\$3,500,000	20	\$2,938,413	59%	84%
Small Business Partner Support	\$1,999,600	12	\$1,996,393	7	\$1,232,865	58%	62%
Innovation Small Business Grants	\$1,500,000	45	\$1,409,400	23	\$649,400	51%	46%
Music Venue Relief	\$747,174	11	\$732,485	11	\$732,485	100%	100%
Thrive Hiring Grants	\$460,000	5	\$188,000	5	\$188,000	100%	100%
<b>Total</b>	<b>\$8,206,774</b>				<b>\$5,741,163</b>		

Auditors also reviewed all invoices processed as of January 31, 2021 related to other initiatives that provided small business resources and training.

Other Small Business and Workforce Initiatives	Budget	\$ Invoices Reviewed	% of Budget Reviewed
Open for Business Platform	\$1,250,000	\$884,149	71%
RENEW Program (Survive Workforce Partner Support & Intensive Career Experience)	\$553,519	\$476,662	86%
StreetEats Program	\$400,000	\$328,858	82%
Resilient ReUp Program	\$248,500	\$248,500	100%
<b>Total</b>	<b>\$2,452,019</b>	<b>\$1,938,169</b>	<b>79%</b>

The small business recovery programs and initiatives identified above were adequately designed to provide funds rapidly for community relief. Significant program design components included:

- participation limited to small businesses headquartered within the City limits or to citizens of Charlotte, depending on program,
- utilization of existing partnerships to promote retraining and immediate job placement, and
- independent evaluation of grant applications for innovative methods businesses could use to pivot making them more resilient in a pandemic environment.

Minor exceptions were noted in the implementation of some programs and initiatives as detailed below.

### **Finding C1**

#### ***Economic Development should ensure that subrecipients implement inventory controls over assets purchased with CARES Act funds.***

The RENEW programs provided \$553,519 to Urban League of Central Carolinas (Urban League) and Goodwill Industries of the Southern Piedmont (Goodwill) for certified training programs. These programs included work-based learning opportunities and skilled trades training. Program participants were given stipends.

In addition to providing participant stipends, training partners distributed gift cards and laptops to students. Urban League purchased 60 gift cards (total value \$7,500) and 60 Dell Chromebook laptops (total cost \$15,958) and Goodwill purchased 68 gas cards (total value \$1,360). Per

Economic Development, participants in these types of programs often require supportive services for work clothing, transportation, and technology. The training partners' existing processes did not include adequate controls for the distribution of gift cards and laptops.

Good internal controls are essential to safeguard assets against loss from theft, accidental destruction and errors. Without proper controls to govern the purchase, inventory maintenance and distribution of items easily convertible to cash, the risk of funds being improperly used is increased.

**Recommendation C1:** Economic Development should ensure that subrecipients establish adequate controls to manage the distribution of assets. If the distribution of gift cards and laptops is essential to program success, strong monitoring controls should be implemented for inventory and distribution of such items.

**Actions Taken:** Economic Development informed training partners that prior approval must be obtained from the City before purchase of any gift cards. Training partners were provided with the City policy regarding safe keeping of assets and on-going inventory maintenance.

**Economic Development Response:** Moving forward, Economic Development will require future subrecipients to share a description of internal controls for the safe keeping of assets and acknowledge receipt of the City's policy prior to approval granted to purchase such assets.

## **Finding C2**

### ***Exceptions to grant eligibility requirements should be documented.***

The \$3.5 million Thrive Workforce Partner Grant program was designed to provide grants to Charlotte-based non-profit, education and for-profit organizations that provide direct services in workforce development or education to Charlotte residents. Program eligibility included providing the following documentation:

- proof the organization had been in operation for at least 2 years,
- a list of the current Board of Directors/Advisory Board, and
- the most recently approved audited financial statements.

Using a statistical random sample, auditors reviewed 20 grants (59%) totaling \$2.9 million (84%). One grant recipient did not submit audited financial statements. The organization expressed concerns about its financial statements becoming public information, as plans were underway to become a publicly traded company. Economic Development staff approved a grant in the second round of funding after discussions with the Chief Executive Officer and Controller. However, the rationale for granting the approval was not documented.



**Recommendation C2:** Economic Development should obtain all required eligibility documentation from applicants as detailed in the Thrive Workforce Partner Grant program design. Exceptions to any requirements should be documented.

**Economic Development Response:** The Economic Development Department agrees with the data in this finding. Moving forward, any exceptions to the eligibility requirements will be properly documented.

## **D. Housing Relief Grant Programs**

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The City designated \$20 million of CARES Act funds for housing relief. The Housing & Neighborhood Services Department (HNS) was responsible for rapidly designing, implementing and monitoring housing relief initiatives. The first housing and rent relief grants were distributed approximately five weeks after Council approval.

In July 2020, the City executed a contract with the Charlotte-Mecklenburg Housing Partnership (CMHP), now operating as DreamKey, to serve as a subrecipient of \$8 million in CARES Act funding for mortgage and rent assistance programs. Subsequent contract amendments increased the total funding to \$17.5 million and expanded the scope of the contract to include a utility relief program. The contract included program administration fees for DreamKey totaling \$1.5 million. HNS is responsible for the oversight of these programs and the DreamKey contract. The terms of the DreamKey contract include requirements for monthly reporting of relief activities.

### **Finding D1**

***Housing & Neighborhood Services should improve its monitoring procedures.***

#### **D1a. Reporting**

DreamKey began processing payments in July 2020. The contract between HNS and DreamKey requires submission of monthly reports to the City documenting mortgage and rent relief activities. The reports must include a summary sheet of clients assisted, copies of payment documentation including verification of payments made, and client packets for all new clients. DreamKey provided HNS with a spreadsheet detailing individual applicant information. However, the spreadsheet design did not have input controls that would ensure consistent data entry necessary to produce adequate financial reports.

The lack of adequate and timely reporting hindered HNS' ability to monitor program activity. HNS conducted limited monitoring by randomly selecting a sample of approved applications each month and requesting any supporting documentation missing from the report. The U.S. Office of Management and Budget issued a CRF Compliance Supplement in August 2020 establishing



subrecipient monitoring requirements. Monitoring of the subrecipient includes reviewing financial and program performance reports as well as following up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies noted.

#### ***D1b. Reconciliations***

DreamKey subcontracted with Socialserve to assist with program disbursements related to rent and utility relief programs. DreamKey provided \$500,000 to Socialserve to establish a fund for making grant payments as applications were approved. Socialserve made grant payments directly to landlords and utility providers on behalf of tenants. Weekly, Socialserve requested reimbursement to replenish the fund balance of \$500,000.

As of March 9, 2021, DreamKey had not reconciled grant payments to funds disbursed to Socialserve. The lack of timely reconciliations increases the risk that improper payments would be undetected.

***Recommendation D1a:*** A robust monitoring process should be developed to ensure DreamKey is adhering to contract performance provisions and meeting federal reporting requirements. HNS should ensure that monthly reports are submitted timely and contain the required documentation.

***Housing & Neighborhood Services Response:*** HNS staff agrees that a robust monitoring process should be developed and implemented to ensure DreamKey's adherence to federal reporting requirements and such a monitoring process has been designed by the Department of Treasury and is currently being followed. Both monthly and quarterly programmatic reports are being submitted to the Department of Treasury via a reporting portal. It should be noted that Treasury did not roll out the reporting protocol until well after funds were disbursed by them.

***Recommendation D1b:*** DreamKey should reconcile all individual grant payments previously issued by Socialserve. HNS should ensure that DreamKey is performing timely reconciliations of individual grant payments to total funds disbursed.

***Housing & Neighborhood Services Response:*** HNS facilitated several meetings with DreamKey and Internal Audit to discuss the reconciliation of payments previously made by Socialserve. While challenges were noted, steps were taken by both DreamKey and Socialserve to address the challenges. The implementation of a new reporting system called Salesforce by DreamKey, as well as more engaging coordination with DreamKey's Chief Financial Officer, has resulted in better program monitoring.

***Action Taken and Planned:*** In April 2021, DreamKey submitted a reconciliation of past disbursements made by Socialserve. The new grant management system Salesforce,

implemented by DreamKey in February 2021, is expected to have more robust reporting features that will allow for better monitoring of program activity and ongoing reconciliation of payments.

## **Finding D2**

### ***Controls to ensure eligibility were not consistently followed.***

Eligibility requirements for housing relief (mortgage and rental assistance) grants included limiting participation to households having an income  $\leq 80\%$  of the Area Median Income (AMI). The AMI calculation included income for all household members over age 18 and required the following supporting documentation:

- 30-days of pay stubs for all household members over age 18,
- verification of job loss or income reduction,
- a copy of a lease or mortgage payment statement, and
- proof of residency (e.g. utility bill).

In addition, the rental assistance program required proof of identification and a late notice or ledger statement from the landlord or property management company.

Using statistical random sampling, auditors reviewed grants to determine if applicant eligibility was verified. The table below indicates the number of grants for which documentation was reviewed and exceptions noted.

Housing Relief Grant Programs	Grants Reviewed		Total Grants		% Reviewed		Documentation Exceptions
	#	\$	#	\$	#	\$	#
Mortgage Assistance*	25	\$57,404	44	\$125,266	57%	46%	35
Rental Assistance*	47	\$144,413	1,901	\$6,044,278	2%	2%	2
Hotel Assistance*	15	\$32,791	21	\$45,985	71%	71%	6
Utility Assistance**	45	\$27,728	691	\$421,931	7%	7%	4

\*The Mortgage, Rental, and Hotel Assistance grants were disbursed from July 1, 2020, through October 30, 2020.

\*\*The Utility Assistance grants were disbursed from October 8, 2020, through December 21, 2020.

For all programs, there was missing supporting documentation for grant awards, with some awards having multiple exceptions. The lack of documentation included:

- the methodology used for calculating payment amounts,
- income verification or reduction,
- late notices,
- proof of residency,
- hardship/need,
- proof of payment, and
- self-certification forms for verification of income loss.

The application process allowed for self-reporting of household income without providing individual details of all household members over age 18. Applicants were also allowed to self-report loss of job and income reduction.

DreamKey stated that access to certain documentation such as emails of former contracted staff, which may have been the basis for approval, was no longer available.

**Recommendation D2:** HNS should ensure all applicant documentation supports eligibility requirements and is properly maintained and accessible. Income of all household members over age 18 should be documented for determination of AMI eligibility.

**Action Planned:** In February 2021, DreamKey implemented a new grant management system, Salesforce, to be used for the rent and utility relief grant programs. The system includes more robust reporting and data analytic capabilities, and requires submission of supporting documentation, before an application is accepted. Required documentation also includes how grant amounts were calculated. All applicant documentation will be stored in one central system. HNS participated in testing and provided feedback to DreamKey on reporting needs. This system will be utilized with the next round of federal stimulus money.

**Housing & Neighborhood Services Response:** HNS staff recognizes that to balance the dire need to deploy assistance as quickly as possible, with the requirement to obtain the appropriate household income verification, such verification was not always conducted. Once examples of this oversight were pointed out to DreamKey and Socialserve, corrective actions were taken. One of the key actions taken has been the implementation of the Salesforce reporting system.

## Conclusion

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Community relief programs were adequately designed to address the economic impact from the pandemic. Controls over the distribution and monitoring of some community recovery programs should be improved to prevent and detect misappropriations. Emergency relief programs can benefit from the lessons learned during these COVID-19 responses.

## Distribution of Report

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This report is intended for the use of the City Manager's Office, City Council, Economic Development, and Housing & Neighborhood Services. Following issuance, audit reports are sent to City Council via the Council Memo and subsequently posted to the [Internal Audit website](#).

## Appendix A – CARES Act Funds Small Business Recovery and Housing Relief Program Recap

CARES Act Funds Small Business Recovery Programs			
Allocation	Final Program Budget	Description	Status
<b><i>Access to Capital Small Businesses</i></b>	\$34,147,600	Grants of \$10,000 or \$25,000 (based on number of employees) to small businesses headquartered within Charlotte city limits. Includes administrative fee to FFTC for all 3 Access to Capital programs (small business, hotel, food service).	2,541 grants totaling \$30.750 million were approved with \$3.4 million expended in administrative fees.
<b><i>Access to Capital - Hotels</i></b>	\$5,865,000	Grants to hotels within Charlotte city limits that experienced $\geq 25\%$ reduction in revenue due to COVID-19 with grants based on two days of the Average Daily Rate for the number of rooms in the hotel. Program administered by FFTC.	103 grants totaling \$5.8 million
<b><i>Access to Capital – Food &amp; Beverage</i></b>	\$7,335,000	Grants of \$10,000 or \$25,000 (based on number of employees) targeted to restaurants, bars, food trucks, caterers, and music venues headquartered within Charlotte city limits. Program administered by FFTC.	347 grants totaling \$7.3 million
<b><i>Thrive Workforce Partner Support</i></b>	\$3,500,000	Increase capacity of local workforce development programs to serve larger population seeking career resources and job placement services as a result of COVID-19.	34 grants totaling \$3.5 million
<b><i>Small Business Partner Support</i></b>	\$1,999,600	Grants up to \$250,000 to small business ecosystem partners focused on providing COVID-19 impact relief to the local small business community for services the City does not currently provide.	12 businesses received total of \$1.996 million

## Appendix A

CARES Act Funds Small Business Recovery Programs			
Allocation	Final Program Budget	Description	Status
<b><i>Innovation Small Business Grants</i></b>	\$1,500,000	Grants up to \$40k to companies with innovative ideas on how to pivot their storefront businesses to make them more resilient in a COVID-19 economy. Administered by Charlotte Center City Partner (CCCP) as an expansion of existing Honeywell program.	Fully expended to CCCP who approved 45 grants
<b><i>Music Venue Relief Grants</i></b>	\$747,174	Grants to eligible music venues for 9-month subsidy towards rent or mortgage assistance.	11 grants totaling \$732k
<b><i>Thrive Hiring Grants</i></b>	\$460,000	Incentives to mid-sized Charlotte businesses to boost job creation.	5 grants totaling \$188k
<b><i>Open for Business Website</i></b>	\$1,250,000	A web-based platform connecting local small businesses with the resources needed to secure financial support, safely reopen, and reposition their offerings with the support of the broader business community.	\$1.1 million expended as of 5/10/2021
<b><i>RENEW Program-Survive Workforce Partner Support †</i></b>	\$295,000	Provide funding to RENEW Workforce Training Pathway to pay for training subsidies and support immediate placement in employment opportunities following program completion.	Expended \$280k as of 5/10/2021
<b><i>RENEW Program - Career Cohort Expansion †</i></b>	\$258,519	Provide funding to RENEW Workforce Training Pathway to pay for training subsidies and support immediate placement in employment opportunities following program completion.	Fully expended

## Appendix A

CARES Act Funds Small Business Recovery Programs			
Allocation	Final Program Budget	Description	Status
<b><i>StreetEats Program</i></b>	<i>\$400,000</i>	Support to assist restaurants with temporary outdoor dining conversion.	\$399k expended
<b><i>Resilient ReUp Program</i></b>	<i>\$248,500</i>	Small business resiliency training to prepare for and recover from business disruptions.	Fully expended
<b>Total Small Business Recovery:</b>	<b><i>\$58,006,393</i></b>	<i>Note: Budget overage was acknowledged by Finance and Economic Development with anticipation of decreased expenditures in other CARES Act funded programs to offset.</i>	

† *RENEW Program budget = \$553,519 from combination of Survive Workforce Partner Support and RENEW Career Cohort Expansion*

## Appendix A

CARES Act Funds Housing Relief Programs			
Allocation	Final Program Budget	Description	Status
<b>Housing Relief:</b>			
<i>Mortgage &amp; Rent Assistance</i>	<i>\$15,700,00</i>	Funding for qualifying mortgage and rent payments based on income eligibility; payments made only to landlords/mortgage holders who register for program and similar in structure to \$1.8m in ESG* and \$3.5m in CDBG**. DreamKey received \$1.5 million in administrative fees for mortgage, rent and utility assistance programs.	5,049 grants totaling \$15.330 million approved as of 4/20/2021
<i>Supportive Housing</i>	<i>\$2,000,000</i>	Provide supportive housing in order to prevent homelessness associated with COVID-19 and promote social distancing in homeless shelter(s).	Fully expended
<i>Homeless Shelter Support</i>	<i>\$500,000</i>	Assist with expansion of emergency shelter related to COVID-19 for women and families seeking immediate housing with services.	Fully expended
<i>Utility Assistance</i>	<i>\$1,800,000</i>	Utility bill assistance for households adversely impacted by COVID-19.	Fully expended
<b>Total Housing Relief:</b>	<i>\$20,000,000</i>		

\*Emergency Solution Grants

\*\*Community Development Block Grants



## Appendix B – Access to Capital Small Business Recovery Program Application



### Access to Capital Small Business Recovery Program Application\*

- Instructions for Application -

Overview

The City's "Access to Capital - Small Business Recovery Program" (the "Grants Program") is funded by the Coronavirus Relief Fund which was established as part of the CARES Act. By completing this Application, the undersigned acknowledges the connection of the Grants Program to the CARES Act and agrees, individually and on behalf of the Applicant business, to comply with all applicable provisions of the CARES Act and to provide any additional information that may subsequently be required under the CARES Act.

Please note that the Grants Program has limited funding. In this regard, completing an Application does not guarantee that an Applicant will receive a grant and it is anticipated that Applications received will exceed available funding. Applications from eligible businesses that are received on time will be randomly selected (as opposed to a first come first served basis) and processed based on the parameters of the Grants Program as set forth in more detail in the information provided about the Grants Program.

### Instructions

Applications can be completed online by visiting [www.ffc.org/CLTcitygrant](http://www.ffc.org/CLTcitygrant). If you wish to provide a hardcopy application, print and complete this document. Ensure that all required documents are attached. Note if the instructions inform you that an affidavit is required, it must be notarized. A template of the document to be notarized is available for download at the above website.

Mail application to:

City Grant Application c/o Foundation For The Carolinas  
220 North Tryon Street  
Charlotte, NC 28202

(Must be postmarked no later than July 29, 2020.)

If you prefer, you may drop off applications at the Foundation For The Carolinas headquarters, located at 220 North Tryon Street during business hours – 9 a.m. – 5 p.m. weekdays. Utilize the entry located in the Hearst Plaza. Applications should be placed in a 9x12" envelope and sealed. Write "City Grant Application" on the outside of the envelope.

For additional information and answers to frequently asked questions, visit [www.ffc.org/CLTcitygrantFAQ](http://www.ffc.org/CLTcitygrantFAQ). You may also call 704-998-6499 Monday – Friday, 9 a.m. – 5 p.m. for assistance.

\* All fields are required unless marked Optional

## Appendix B

### Pre-Qualification Questions

1. Is the business headquartered within Charlotte city limits? ☐ Yes ☐ No
2. Does the business have 25 or less employees? ☐ Yes ☐ No
3. Did the business have gross sales of at least \$30,000 and less than \$2 million in 2019 (Jan-Dec)? ☐ Yes ☐ No
4. Was the business started before Jan 1, 2020? ☐ Yes ☐ No
5. Was the business impacted by COVID-19? ☐ Yes ☐ No
6. Is the business a non-profit organization, liquor store, check cashing agency, gun shop, pawn shop or adult entertainment? ☐ Yes ☐ No
7. Is the business presently involved in a bankruptcy proceeding? ☐ Yes ☐ No

If "yes" to questions 1-5 and "no" to questions 6-7, proceed ahead.

If "no" to questions 1-5 and "yes" to questions 6-7, your business does not meet the eligibility requirements for this grant program.

### Applicant Information

1. Name of Authorized Representative completing the Application  
Salutation: ☐ Rev. ☐ Dr. ☐ Mr. ☐ Miss ☐ Mrs. ☐ Ms. ☐ Mx.  
First: \_\_\_\_\_ Middle (Optional): \_\_\_\_\_ Last: \_\_\_\_\_
2. Role of Person completing the Application (Choose one option) ☐ Owner ☐ Officer ☐ LLC Manager
3. Business Phone Number: \_\_\_\_\_ 4. Cell Phone Number (Optional): \_\_\_\_\_
5. Email: \_\_\_\_\_
6. Race/ Ethnicity of Majority Owner (Choose one option)  
☐ American Indian or Alaska Native ☐ Asian ☐ Black or African American ☐ Hispanic or Latino  
☐ Native Hawaiian or Pacific Islander ☐ White ☐ Other: \_\_\_\_\_
7. Gender of Majority Owner ☐ Male ☐ Female ☐ Non-binary
8. Legal Business Name: \_\_\_\_\_
9. Doing Business As (DBA) Name (Optional): \_\_\_\_\_
10. Legal Form of Business (Choose one option)  
☐ Sole Proprietorship ☐ Partnership ☐ C Corporation ☐ S Corporation ☐ Limited Liability Company
11. Business Tax Identification Number, EIN, or SSN. (SSN only if Sole Proprietor. Must match Form VV-9.  
Format: Nine digits, no dashes): \_\_\_\_\_
12. Business Address (Headquarters)  
Address Line 1 (No PO box allowed): \_\_\_\_\_  
Address Line 2 (Optional): \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
City District: \_\_\_\_\_ (<https://charlottenc.gov/CityCouncil/Documents/AllDistricts.pdf>)
13. Business Website (Optional): \_\_\_\_\_

## Appendix B

14. Business Location (Choose one option): ☐ Owned ☐ Rented ☐ Leased
15. Number of Years in Business (Choose one option): ☐ Less than 1 Year ☐ 1-3 Years ☐ 4-7 Years ☐ 8+ Years
16. 2019 Annual Gross Sales: \_\_\_\_\_
17. Is the business a City of Charlotte Small/ Minority/ Women Enterprise certified business? ☐ Yes ☐ No
18. How did you hear about the Small Business Recovery Program? (Choose one option)
- ☐ a. Newspaper or magazine advertisement
  - ☐ b. Billboard
  - ☐ c. Digital advertisement
  - ☐ d. Search engine
  - ☐ e. Radio advertisement
  - ☐ f. Newspaper or magazine article
  - ☐ g. Television news
  - ☐ h. Email from an association or church
  - ☐ i. Social media
  - ☐ j. Word of mouth
  - ☐ k. Webinar
  - ☐ l. City of Charlotte communications
  - ☐ m. Other: \_\_\_\_\_

### Grant Information

1. If the business was included in the Governor's NC Executive Order 120, then check the box below to indicate the type of business: (to view the executive order, visit [governor.nc.gov/documents/executive-order-no-120](https://governor.nc.gov/documents/executive-order-no-120))
- ☐ a. Entertainment facility (e.g. live performance venues, moving theaters, skating rinks)
  - ☐ b. Indoor exercise facility (e.g. gyms, yoga studios, indoor trampoline, rock climbing facilities)
  - ☐ c. Personal care and grooming business (e.g. beauty salons, barber shops, massage therapists, tanning salons, nail salons)
  - ☐ d. Restaurants
  - ☐ e. The business was not included in the Governor's Order
2. **If you selected "e" for the above:** If the business does not fall within NC Executive Order 120, check the appropriate business industry below. Please note, you will also be required to download, complete and submit a notarized affidavit describing how the business was impacted by COVID-19.
- ☐ a. Architectural, engineering and surveying
  - ☐ b. Goods and Supplies
  - ☐ c. Construction Related
  - ☐ d. Professional Services
  - ☐ e. Other Services
3. COVID-19 Impact on Business
- ☐ a. Temporary Business Closure
  - ☐ b. Reduced Hours of Operation
  - ☐ c. Employee Layoffs
  - ☐ d. Revenue Decline
  - ☐ e. Increased Operating Costs (e.g. employee paid leave, new health/safety protocols)
  - ☐ f. Inability to Respond to Home-Delivery Requests
  - ☐ g. Interrupted Supply/ Delivery
  - ☐ h. Inability to Serve Customers
  - ☐ i. Decreased Customers

## Appendix B

4. Number of Full or Part-Time Employees as of December 31, 2019 (Choose one option)
- ☐ a. 0 - 5 Employees (Eligible for \$10,000 grant)
- ☐ b. 6 - 25 Employees (Eligible for \$25,000 grant)
5. How will the business use the grant amount of \$10,000 or \$25,000 based on the number of employees selected above? (Make sure that the total below is equal to the eligible grant amount)

Budget	Amount
Rent/ Mortgage	
Utility	
Employee Salary and Benefits	
Supplies/ Restocking	
<b>Total:</b>	

6. Did the business receive COVID-19 related federal or state funding (e.g. Federal Paycheck Protection Program (PPP) or Golden Leaf programs)? ☐ Yes ☐ No
7. Has the business or any owner of the business previously been awarded funds from the City's Micro Business Relief Fund? ☐ Yes ☐ No
8. If you receive a grant, would you be willing to share the story of how this program will help your small business for social media and/or other purposes? If Yes, a member of the Foundation For The Carolinas team may contact you for details ☐ Yes ☐ No
9. Please attach and submit a total of three of the following documents - at least one of which must be from Group A.

### Group A

- IRS letter with business name and EIN
- Bank statement with business name, dated from 2020
- Utility bill with business name, dated from 2020
- Mortgage statement with business name, dated from 2020
- 2020 Sales and Use Tax Report for Mecklenburg County with business name
- Currently active certificate of insurance with business name

### Group B

- Signed and executed lease agreement with business name. Lease agreement must be currently active, or includes recent payment statement, covering the last three months of payments
- Form 1040, Schedule C for Sole proprietor. Must be from 2018 or 2019 tax years.
- Page 1 of most recent Form 1065 for Partnerships/ LLCs. Must be from 2018 or 2019 tax years.
- Page 1 of most recent Form 1120 for C Corporations. Must be from 2018 or 2019 tax years.
- Page 1 of most recent Form 1120S for S Corporations. Must be from 2018 or 2019 tax years.
- Profit & Loss Statement from 2019 tax year
- Balance Sheet from 2019 tax year

10. Businesses with six or more employees will need to submit 2019 IRS Form W-3
11. IRS Form W-9 must be completed, attached and submitted for the business (Note: For guidance on how to complete IRS Form W-9, please visit [www.ffc.org/sites/default/files/2020-07/IRS\\_Form\\_W-9\\_with\\_key.pdf](http://www.ffc.org/sites/default/files/2020-07/IRS_Form_W-9_with_key.pdf) to view a sample copy with the required fields highlighted in yellow. For additional guidance, please visit the "Application Process" section of the Access to Capital - Small Business Recovery Program FAQs. ([www.ffc.org/CLTcitygrantFAQ](http://www.ffc.org/CLTcitygrantFAQ)))



## Appendix B

### Acknowledgments and Signatures

#### Certification and Authorization

The Authorized Representative of the Applicant must certify to each of the statements below by checking the box next to each one and acknowledge the Terms of the Application by signing below (must check all boxes):

- ☐ The Authorized Representative has read the statements included in this Application and understands them.
- ☐ The Authorized Representative has the authority and legal right to complete and submit this Application on behalf of the Applicant.
- ☐ The Applicant will use any grant awarded by the Grant Program in the manner specifically set forth in the "Grant Budget and Funding" section of this Application.
- ☐ The Applicant has not applied for grant on behalf of another business (i.e. Applicant may not apply for multiple businesses).
- ☐ The Applicant complies with all applicable federal, state and local laws, including applicable nondiscrimination laws, and further agrees to comply with any provisions of the CARES Act applicable to this Grants Program.
- ☐ To the best of the Authorized Representative's knowledge, the information included in this Application and the information provided in all supporting documents is true and accurate as of the date of this Application.
- ☐ The Authorized Representative understands that
  - i. Knowingly making a false statement, any intentional misrepresentation or omission of information contained in this Application or any supporting documents will result in forfeiting this Application now and in the future, and
  - ii. Any such action may constitute fraud, for which the Authorized Representative may be liable via civil or criminal action.

#### Terms of Application

By completing the Application, the Authorized Representative, individually and on behalf of the Applicant, authorizes and consents to the disclosure, review and storage by the City of Charlotte (the "City"), Foundation For The Carolinas ("FFTC") and any of their affiliates of any and all information and documents submitted in connection with this Application. The Authorized Representative understands and acknowledges that the funding for the Grants Program is limited and that the Applicant is not legally entitled to receive a grant from the Grants Program. In this regard, and as a condition of submitting this Application, the Authorized Representative, individually and on behalf of the Applicant, agrees that none of the City, FFTC or any of their affiliates shall be liable to the Authorized Representative, the Applicant or any third party affiliated with the Applicant (including, but not limited to any owner or employee), and hereby releases the City, FFTC and their affiliates from, any and all costs, expenses, damages, claims, or loss of any kind as may be incurred in connection with the grant requested in this Application or for anything they may do or refrain from doing, including, without limitation, any action or inaction relating to grant application requirements, grant criteria, application review and processing, grant approval or disapproval, grant payment amount, and all communications relating to any of the foregoing requirements, processes or actions.

The Authorized Representative further acknowledges and agrees that:

1. The City, FFTC and any of their affiliates have the right to request supporting documentation regarding this Application and the use of the grant monies provided by the Grant Program and the Applicant agrees to provide such documentation;
2. The City, FFTC and any of their affiliates reserve the right to conduct an audit of this Application and a verification of any information provided herein;
3. The Applicant will provide the City, FFTC and any of their affiliates with reasonable cooperation and any documents requested pursuant to any such audit and verification; and
4. As a condition of submitting this Application, the Applicant shall participate in a survey that will be sent out later in the year.
5. The City, FFTC and any of their affiliates may publish the name of your business as part of a listing of grant award recipients.

- ☐ I confirm I have attached at least one required document from Group A and three documents total listed in item # 9
- ☐ If a business with 6+ employees, I confirm I have attached IRS Form W-3
- ☐ I confirm I have attached IRS Form W-9
- ☐ If a business not covered in Executive Order 120, I confirm I have attached the notarized affidavit

Signature:

Date:

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