Do Not Pay Best Practices
November 10, 2021
WELCOME!
**Agenda**

**Do Not Pay Best Practices:**
- Unique Entity Identifier Transition from DUNS Number
- DNP Analytics Services
- Introduction of Application Programming Interface (API)

**Wednesday, November 10, 2021**
**11:00 a.m. - 1:00 p.m. EST**

<table>
<thead>
<tr>
<th>Time</th>
<th>Topic</th>
<th>Presenters</th>
</tr>
</thead>
<tbody>
<tr>
<td>10:50 – 11:05</td>
<td>Open Teams for Attendees to Join</td>
<td></td>
</tr>
<tr>
<td>11:05 – 11:10</td>
<td>Welcome and Introductions</td>
<td>Dominique McCreary</td>
</tr>
<tr>
<td>11:10 – 11:40</td>
<td>Unique Entity Identifier (UEI) Transition:</td>
<td>Lori Makle-Sellman</td>
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<tr>
<td></td>
<td>- What is the UEI?</td>
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<td></td>
<td>- Why is the change happening?</td>
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<td>- When is the change happening?</td>
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<td></td>
<td>- Standard file layout changes</td>
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<td>- Testing</td>
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<tr>
<td>11:40 – 12:00</td>
<td>Using DNP Analytics in Support of Stimulus Activity</td>
<td>Brian Hewitt</td>
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</table>
| 12:00 – 12:10 | Questions & Answers  
  Break                                                                           | All                    |
| 12:10 – 12:50 | Intro to DNP API                                                      | Hayden Gunter          |
| 12:50 – 1:00  | Questions & Closeout                                                  | Dominique McCreary     |
What is the Unique Entity Identifier (UEI)?

• Current unique entity identifier is the DUNS Number
• Complete switch to UEI by April 4, 2022
• This switch will streamline entity registration

* Because DUNS is issued by 3rd party, entities must register separately. UEI is owned by the federal government and therefore entities will receive their UEI when they register in the System for Award Management (SAM)
Why is the Change from DUNS to UEI Happening?

The federal government is streamlining the entity process and making it easier for entities to do business with the federal government.

- This change simplifies the process of registering your organization to do business with the federal government.
  - Entities will be assigned an identifier during registration; you will not need to go to a third party to obtain an identifier or to get help.
Agency Implementation Across the Federal Government

Today
Unique Entity ID (SAM) is:
✓ assigned to, and viewable for, entities registered in SAM.gov
✓ included in IAE APIs and extracts
✓ appended to all FPDS contract actions
✓ included in FPDS Atom Feeds (V1.5.2)

Q1 FY 2022
✓ Unique Entity ID (SAM) viewable across IAE systems
✓ Interfacing systems may send either the Unique Entity ID (SAM) or the DUNS Number to IAE systems
✓ Subaward recipients can apply for Unique Entity ID (SAM) on SAM.gov
   ○ Does not require complete entity registration
✓ DUNS Number remains authoritative for entity registrations and subaward reporting

We are here

Q4 FY 2021
User acceptance testing of EVS process in SAM.gov

Q1 FY 2022
Q2 FY 2022
Q3 FY 2022
April 4, 2022
Transition complete
✓ New validation process in place for Unique Entity ID (SAM) assignment at SAM.gov
✓ DUNS Number no longer appears in any IAE interface/screen

On April 4, 2022, the DUNS Number is no longer used as the entity identifier for federal awards.
How Will Entities Receive their UEI?

• Currently registered entities in SAM have automatically been assigned a UEI (viewable on SAM.gov)
• New entities will be assigned a UEI during SAM registration

* The switch to UEI is a multi-step process where both DUNS and UEI will be available during this transition period until DUNS will officially be removed on April 4, 2022
When is the UEI Changing in the DNP Portal?

- **October 2, 2021 - Release 7.4:**
  - SAM Exclusion Records Data Source to Accommodate UEI
  - Portal Online Search Updates to Display and Accommodate SAM Exclusion Records UEI

- **January 8, 2022 - Release 7.5:**
  - SAM Entity Registration Records Data Source to Accommodate UEI
  - Portal Online Search Updates to Display and Accommodate SAM Entity Registration Records UEI

- **March 5, 2022 - Release 7.6:**
  - Batch Matching and Continuous Monitoring Changes to Accommodate UEI
  - Portal User Interface Updates
  - Customer Bulk File Format Updates

- **April 4, 2022:**
  - Full Transition to UEI
Is the DUNS +4 Changing?

- Yes, the DUNS +4 is being replaced by the Electronic Funds Transfer (EFT) Indicator
- The screenshot below shows the UEI and EFT Indicator fields currently available in the Online Search functionality of the Portal for (SAM Exclusion Records Only)
Standard Input File Layout Changes (UEI Field)

- One additional field *(UEI)* will be added to the end of the standard input file layout for your DNP Batch Matching or Continuous Monitoring file.

<table>
<thead>
<tr>
<th>Column Name</th>
<th>Data Type</th>
<th>Field Size</th>
<th>Fixed Length Offset</th>
<th>FMS XML TagName</th>
<th>XML Representation</th>
<th>FMS Schema</th>
<th>Column Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Continuous Monitoring (Payee File)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UEI</td>
<td>Character</td>
<td>12</td>
<td>1333</td>
<td>UEI_ID</td>
<td>Text</td>
<td>FMS XML</td>
<td>The Unique Entity Identifier (SAM) for the entity. Each UEI consists of 12 alphanumeric characters. Example: F847A1795DE4. If a UEI is present, it must be 12 characters long or the file will be rejected. Default to a space if no data is available.</td>
</tr>
<tr>
<td><strong>Batch Matching (Payment File)</strong></td>
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<td></td>
</tr>
<tr>
<td>UEI</td>
<td>Character</td>
<td>12</td>
<td>1536</td>
<td>UEI_ID</td>
<td>Text</td>
<td>FMS XML</td>
<td>The Unique Entity Identifier (SAM) for the entity. Each UEI consists of 12 alphanumeric characters. Example: F847A1795DE4. If a UEI is present, it must be 12 characters long or the file will be rejected. Default to a space if no data is available.</td>
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</tbody>
</table>
### Standard Input File Layout Changes (DUNS Field)

- The *DUNS Number* field will remain in the input file layout, and will need to be pre-populated with the default value of “0” after the April 4\(^{th}\) transition to UEI.

<table>
<thead>
<tr>
<th>Column Name</th>
<th>Data Type</th>
<th>Field Size</th>
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<th>XML Representation</th>
<th>FMS Schema</th>
<th>Column Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>DUNS Number</td>
<td>Number</td>
<td>9</td>
<td>83</td>
<td>DUNS_Number</td>
<td>Number</td>
<td>FMS XML</td>
<td>If a DUNS Number is present, it must be 9 numeric digits long or the file will be rejected. You must include leading or trailing zeros. <em>Default to a single zero if this is an individual or no data is available.</em></td>
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</tbody>
</table>

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**Continuous Monitoring (Payee File)**

<table>
<thead>
<tr>
<th>Column Name</th>
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<th>FMS XML TagName</th>
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<tbody>
<tr>
<td>DUNS Number</td>
<td>Number</td>
<td>9</td>
<td>97</td>
<td>DUNS_Number</td>
<td>Number</td>
<td>FMS XML</td>
<td>If a DUNS Number is present, it must be 9 numeric digits long or the file will be rejected. You must include leading or trailing zeros. <em>Default to a single zero if this is an individual or no data is available.</em></td>
</tr>
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**Batch Matching (Payment File)**
File Testing Prior to UEI Transition

- File testing for DNP Batch Matching or Continuous Monitoring files will be available prior to the UEI Transition to ensure successful data transfer
- More details about file testing will be provided
Testing Schedule

• Start as early as November 18
• Targeted agency testing schedule
• All testing should be completed by February 18
• Agencies will need to cutover to the new format in production by April 4 to minimize matching impact
• Testing will take approximately a week and a half
Continuing Communication

• Today’s presentation and the standard file layout will be sent to attendees after this meeting
• We will provide testing instructions
• We will hold technical drop-in calls during the testing window to answer questions and discuss any issues that may arise
GSA Information

The Integrated Award Environment

See latest on how GSA is preparing for the federal transition at: GSA.gov/EntityID

Join us on Interact for the latest updates: interact.gsa.gov/group/integrated-awardenvironment-iae-industry-community

Join the Technical Interface Community by emailing newSAMtesting@gsa.gov

Additional Information from SAM.gov: UEI_Stakeholder_Meeting_August_12_2021
Questions

What • Who • Where • When • How • Why
Contact Information

If you are ready to test with us now, or once you are ready, please email us with the following information at: donotpay@fiscal.treasury.gov

<table>
<thead>
<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Agency/Program</td>
</tr>
<tr>
<td>Access Group</td>
</tr>
<tr>
<td>Email</td>
</tr>
<tr>
<td>Telephone Number</td>
</tr>
<tr>
<td>Preferred testing date</td>
</tr>
</tbody>
</table>
Do Not Pay Analytics

Brian Hewitt
November 10, 2021
What is Data Analytics

Data Analytics is examining raw data to draw conclusions. It involves the assessment, evaluation, interpretation, and communication of meaningful information and utilizing that information for effective decision making.
Who We Are

The DNP Analytics Team is dedicated to delivering insights and innovative data solutions that help you improve your payment integrity and meet your mission.

Our team of professionals includes analytics consultants, data scientists, and data analysts with extensive experience in improper payments & fraud/waste/abuse in the government landscape, all supported by teams with expertise in legal and privacy concerns, and customer outreach.
Data Analytics: Our Services

Consultation
As improper payments experts, we provide Consultation to help identify business problems and remediate solutions.

Through consultation we will:
• Partner to understand your business processes
• Identify areas of opportunity to meet your goals
• Design analytical solutions
• Gain stakeholder buy-in
• Regular alignment throughout execution

We do this through:
• Knowledge of landscape
• Critical thinking skills
• Years of experience and analytics expertise to design custom analytical solutions
The right payment to the right recipient at the right time for the right purpose.
Analytics Transforms Data to Insight

Example: Program X wants to know if process controls (e.g., requiring valid TIN) are effective.

- **Data**: Raw data points/facts
  - Information provided on applications, such as name, TIN, date of application, etc.

- **Information**: Describes collected facts: who/what/when/where
  - Program X awarded funds to 100,000 applicants.

- **Knowledge**: How information connects to goals
  - A single awardee (0.001% of awardees) had an invalid TIN (e.g., 9999999999).

- **Wisdom**: Applying knowledge into action
  - There is a low occurrence of awardees with invalid TINs. Thus, the process controls seem to be working as expected and currently pose a low risk to payment integrity. Program X should focus resources on other high impact opportunity areas.
Our Analytics Techniques

We employ advanced data analysis techniques.

- Data Matching
- Data Modeling
- Risk Assessment
- Advanced Algorithms
Our Access to Data Sources

<table>
<thead>
<tr>
<th>Death Data</th>
<th>Debarment Data</th>
<th>Registered Entities/Non-Profit</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Social Security Administration (SSA) Death Master File (DMF): <em>Public Data Source</em></td>
<td>• Department of Health and Human Services (HHS) List of Excluded Individuals and Entities (LEIE): <em>Public &amp; Restricted Data Source</em></td>
<td>• GSA SAM Entity Registration Records: <em>Public &amp; Restricted Data Source</em></td>
</tr>
<tr>
<td>• American InfoSource (AIS) Obituary and Probate Records: <em>Commercial Data Source</em></td>
<td>• General (GSA) System for Award Management (SAM) Exclusion Records: <em>Public &amp; Restricted Data Source</em></td>
<td>• Internal Revenue Service (IRS) Tax Exemption Lists: <em>Public Data Source</em></td>
</tr>
<tr>
<td>• Department of Defense (DOD) Death: <em>Public Data Source</em></td>
<td></td>
<td>• 990-N (e-postcard), Publication 78 (Pub78), Automatic Revocation of Exemption List (AREL)</td>
</tr>
<tr>
<td>• Department of State (DOS) Death: <em>Public Data Source</em></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Barred Foreign Entities</th>
<th>Delinquent Debtors</th>
<th>Treasury Disbursed Payments</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Department of Treasury (TREAS) Office of Foreign Asset Controls (OFAC): <em>Public Data Source</em></td>
<td>• Treasury Offset Program (TOP): <em>Restricted Data Source</em></td>
<td>• Payment Automation Manager (PAM)</td>
</tr>
<tr>
<td></td>
<td>• Credit Alert Interactive Voice Response System (CAIVRS): <em>Restricted Data Source</em></td>
<td>• Payments, Claims, and Enhanced Reconciliation (PACER)</td>
</tr>
</tbody>
</table>

*Public Data Source* refers to data that is available for general public use.
*Restricted Data Source* refers to data that is accessible to certain entities or under specific conditions.
Our Capabilities – Eligibility Verification

Helps to provide insight into if deceased, debarred, or otherwise ineligible individuals or businesses received/applied for funds.

**Data Matching**

<table>
<thead>
<tr>
<th>Priority</th>
<th>Payee</th>
<th>Payment Date</th>
<th>Date of Death</th>
<th>Date of Birth</th>
<th>Data source</th>
<th>Confidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Person C</td>
<td>3/1/2021</td>
<td>1/1/2021</td>
<td>1/1/1940</td>
<td>DMF, AIS</td>
<td>High</td>
</tr>
<tr>
<td>2</td>
<td>Person A</td>
<td>3/1/2021</td>
<td>2/1/2021</td>
<td>2/1/1940</td>
<td>DMF</td>
<td>Moderate</td>
</tr>
<tr>
<td>3</td>
<td>Person B</td>
<td>3/1/2021</td>
<td>3/15/2021</td>
<td>3/1/1940</td>
<td>DMF, AIS</td>
<td>High</td>
</tr>
</tbody>
</table>

**Benefits:**
- Flexibility to use a variety of matching algorithms to identify applicants within data sources.
- Point-in-time capability to check if applicant appears in eligibility source within a specific timeframe.
- Ability to return relevant data points from data source to assist program in case development.
- Ability to prioritize results based on confidence & impact (e.g., size/frequency/timing of payment).
Our Capabilities – Risk Assessments

Helps to answer if businesses or individuals pose risk of not meeting requirements or providing other inaccurate or misleading data.

**Data Matching**
- Flag instances of businesses that are/are not listed in data sources
- Proxy operation date relative to application date

**Network analysis**
- Barred Entity A
- Applicant Entity B
- Bank & RTN, Address

Entity shares key features, such as; name, TIN, bank account, address; with debarred entity

**Benefits:**
- Provides supporting data points/details to assist in validating applications/awards.
- Ability to highlight instances with discrepancies between applicant provided data and data sources (e.g., employee counts, address).
- Ability to prioritize results based on impact (e.g., size/frequency of payment).
Our Capabilities – Cross Government Analysis

Helps to answer if applicant receive multiple forms of assistance across programs.

**Benefits:**
- Flexibility to use variety of matching algorithms to identify applicants across programs.
- Identify instances where applicants/awardees overlap with other programs.
- Ability to prioritize results based on impact (e.g., size/frequency of payment).
Use Case of Partnership with DNP
SBA OIG received complaints of fraud regarding PPP loans

5.2M PPP loans totaling $525B issued as of 8/8/2020

Collaboration with DNP

I certify...

- No current federal debarments or suspensions
- No delinquent federal loans
- Have not defaulted on federal loans

Scope derived from self-certification requirements
SBA management and DNP discussed the matching parameters to ensure that results were consistent with PPP eligibility provisions.

**Findings**

- PPP Loan Recipients
- Delinquent Debtors (TOP Debt Check, CAIVRS)
- Debarment (SAM Exclusion)
- Death (DMF, AIS, Dept. of State, Dept. of Defense)

scape of Loans With Recipients Listed On Eligibility Sources:
- Loans With Recipients Listed On Eligibility Sources: 57,473 Loans, Valued at $3.6B
- Loans without matches valued at $280M undisbursed as of 8/8/20

- 1.1% Potentially Ineligible Loans
- 98.9% Loans without matches
Findings Continued

57,473 Potentially Ineligible Loans Valued at $3.6B

3,403 Loan Servicing Locations

10 High Risk Locations

Potentially Ineligible Loans by Service Location

- Loan Volume: 49%
- Loan Amount: 28%

0% 50% 100%

10 Locations All Other Locations
**Outcome**

Analysis enabled agency to:

### Prevent Future Improper Payments
- Direct focus to loans associated with potentially ineligible lenders that had undisbursed funds
- Direct focus to loans associated with potentially ineligible recipients during loan forgiveness review or further disbursements

### Evaluate & Strengthen Controls:
- Identified opportunity to strengthen controls in loan forgiveness process
- Identified how DNP portal can prevent improper payments prior to award or release of funds for future PPP iterations

“Treasury’s analysis of potentially ineligible recipients demonstrates the importance of front-end controls…”
## Future Data Sources

<table>
<thead>
<tr>
<th>Death Data</th>
<th>Incarceration Data</th>
<th>Veteran Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Electronic Verification of Vital Events – Fact of Death (EVE FOD)</td>
<td>• Bureau of Prisons – Incarceration Data</td>
<td>• The Beneficiary Identification Records Locator Subsystem (BIRLS)</td>
</tr>
<tr>
<td>Address Data</td>
<td>Healthcare Provider and Facility Data</td>
<td>Debarment Data</td>
</tr>
<tr>
<td>• United States Postal Service (USPS) Delivery Sequence File</td>
<td>• National Provider Index (NPI) Registry</td>
<td>• Department of Agriculture’s National Disqualified List</td>
</tr>
</tbody>
</table>
Questions
API

Introducing Do Not Pay’s Application Programming Interface

Hayden Gunter
November 10, 2021
What is an API?
What is an API?

A machine-to-machine interaction that takes place over a network, typically using the Hypertext Transfer Protocol (HTTP) used on the web.

- An API is a way for one software to access information from another software. An API takes the human aspect out of communicating between business lines and automates the process.

- The type of API offered by DNP is Representational State Transfer (REST). It defines the interface and conventions used between a web service provider and clients. REST is the most used and considered industry standard.

- In this case, your API would be the consumer of information and would be accessing information from DNP’s databases – as we would be the provider.

- Essentially, the consumer is integrating DNP data into their own system.
Process – High Level

Legal Analysis/Approval → Technical Set Up → QA Testing

Outcome Feedback ← Go Live! ← Production Verification
API vs. Do Not Pay Portal

- With the API, the consumer is integrating DNP data into their own system.
- DNP would assess the needs of your organization to help you make the decision on API vs. Portal.
  - Does the program need real time results or are daily results sufficient?
- Using the DNP Portal is a manual process of searching of DNP data sources.
- Portal requires people to log in and retrieve results.
- API does not require onboarding to portal.
- API can be an automated process.
- API returns results without you having to navigate to the appropriate functionality.
Query Options: Option 1 – Single Record

Single API call contains the search criteria of one entity to be matched against your agency’s approved data source(s). The DNP response will include data source match results(s) for that single entity.
Query Options: Option 2 – Multiple Record

Multiple API call contains the search criteria of up to 100 entities to be matched against your agency’s approved data source(s). The DNP response will include data source match result(s) for the searched entities.
## What Data Sources Can you Query?

<table>
<thead>
<tr>
<th>Payment Type</th>
<th>DNP Usage</th>
<th>AIS</th>
<th>DMF</th>
<th>DOD</th>
<th>DOS</th>
<th>ARL</th>
<th>CAIVRS</th>
<th>LEIE</th>
<th>OFAC</th>
<th>SAM Entity</th>
<th>SAM Exclusion</th>
<th>TOP Debt Check</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grant and/or Loan Payments</strong></td>
<td>Online Search</td>
<td>✅</td>
<td>✅</td>
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<td>Batch Matching/Continuous Monitoring</td>
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<td></td>
<td>Single/Multiple Query API</td>
<td>✅</td>
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<td><strong>Beneficiary Payments</strong></td>
<td>Online Search</td>
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<td><strong>Vendor and/or Contractor Payments</strong></td>
<td>Online Search</td>
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What Does DNP Do to Set Up?

- Initial meeting to discuss expectations.
- Initial Questions document and Legal Questionnaire sent to agency.
- Garner legal approval.
- Assist agency with technical questions during system buildout.
- Issue client certificates (QA and Production).
- QA Testing.
- Assist with go-live.
What Will You Do to Set Up?

- Initial Meeting to discuss expectations.
- Complete the Initial Questions document and Legal Approval forms (DNP will guide you through the process).
- Once legal approval is given, the agency will be responsible for creating their API system.
- Test with DNP.
- Go live and give feedback on decision made (functionality can be built into API).
What Will DNP Do With Your Feedback?

- The API team can meet with Agency Outreach and discuss how agencies are using API to better serve the agency.
- Technical team can watch for hiccups.
- This helps DNP uncover our ROI.
- Testimonials are good for business.
Current Partnerships

- Health and Human Services – Grants and Payments.
- Department of Justice - US Marshals
- Small Business Administration – 504 Sacramento Loan Processing Center (Single)
- Small Business Administration – EIDL
Questions
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THANK YOU!