



April 24, 2026

The Honorable James Comer Chairman, Committee on Oversight and Government Reform  
United States House of Representatives

Dear Chairman Comer and Members of the Committee:

On behalf of the Program Integrity Alliance (PIA), I write to express our strong and enthusiastic support for the package of fraud prevention and program integrity bills scheduled for markup before the Committee on Oversight and Government Reform. Taken together, this legislative package represents the most serious and comprehensive effort by Congress in a generation to modernize the legal, technological, and institutional infrastructure needed to prevent fraud and protect taxpayer dollars before they are lost.

We have studied and documented the structural failures that allow an estimated \$233 billion to \$521 billion in federal fraud and improper payments to occur annually<sup>1</sup>. Our February 2025 Integrity Blueprint laid out a comprehensive legislative reform agenda grounded in GAO recommendations, Inspector General findings, and the hard lessons of pandemic-era fraud. We are gratified to see so much of that agenda reflected in the bills before this Committee, and we commend the bipartisan leadership that has brought them to this point.

The COVID-19 pandemic made the cost of inaction impossible to ignore. Fraud rings stole tens of billions of dollars from unemployment insurance programs, PPP loans, and pandemic relief payments<sup>2</sup> not because agencies lacked diligence, but because the legal authorities, data infrastructure, and payment controls needed to stop them simply did not exist. These bills are Congress's opportunity to ensure that the next emergency is met with systems adequate to the scale of the threat. PIA is particularly encouraged that this package addresses the full lifecycle of the problem — from the legal barriers that have prevented pre-payment verification, to the absence of clear authority to pause payments when fraud is detected, to the lack of workforce training that leaves front-line staff unable to act on the tools available to them.

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1 U.S. Government Accountability Office, Fraud Risk Management: 2018–2022 Data Show Federal Government Loses an Estimated \$233 Billion to \$521 Billion Annually to Fraud, GAO-24-105833 (Apr. 2024), <https://www.gao.gov/products/gao-24-105833>.

2 U.S. Government Accountability Office, Unemployment Insurance: Estimated Amount of Fraud During Pandemic Likely Between \$100 Billion and \$135 Billion, GAO-23-106696 (June 2023), <https://www.gao.gov/products/gao-23-106696>; Pandemic Response Accountability Committee, Fraud Prevention Alert: Pre-Award Vetting Using Data Analytics Could Have Prevented Over \$79 Billion in Potentially Fraudulent Pandemic Relief Payments (Jan. 2023), <https://pandemicoversight.gov/news/articles/prac-issues-fraud-prevention-alert-pre-award-vetting-using-data-analytics-could-have-prevented-over-79-billion-in-potentially-fraudulent-pandemic-relief-payments>.

The Pre-Payment Fraud Prevention and Treasury Data Access Act addresses one of the most consequential structural failures in the current payment system: the absence of mandatory pre-payment verification against authoritative identity and eligibility data. Critically, the bill resolves a decade of administrative paralysis by declaring that Do Not Pay comparisons are not matching programs under the Computer Matching and Privacy Protection Act<sup>3</sup> — a reform that has been needed since the system was created and that will dramatically accelerate agency participation. Combined with the bill's new statutory access to the Internal Revenue Service (IRS) return information and Social Security Administration (SSA) identity data, this legislation transforms Treasury's payment infrastructure from an advisory screening tool into an active fraud prevention engine with proven return on investment. We strongly support this bill and encourage the Committee to ensure that its phased implementation framework, authorization of appropriations for Treasury's data integration work, and explicit authority for commercial bank account verification are addressed in any amendment process.

The Stopping Fraudulent Payments Act creates explicit statutory authority for an action — pausing a payment mid-process based on a fraud-risk signal — that agencies have historically been reluctant to take without clear legal backing. The segmentation provision, which authorizes agencies to release a routine payment amount while holding only the anomalous portion, is a smart and operationally sophisticated innovation that directly addresses the all-or-nothing dynamic that has deterred agencies from acting. The good-faith liability protection for certifying officials is essential to making the authority usable in practice. We would encourage the Committee to strengthen the bill's due process architecture by differentiating procedural requirements by payment type and indicator confidence level — ensuring that the authority is both constitutionally durable and operationally effective across the full range of federal payments, from need-based benefits to contractor invoices.

The Fraud Prevention and Accountability Act takes important steps toward making the PRAC's data analytics capabilities permanent and toward requiring proactive legislative recommendations on fraud architecture before major emergency spending bills are enacted. The lesson of every major emergency from Hurricane Katrina to COVID-19 is that fraud prevention infrastructure cannot be built after money starts flowing. The bill's requirement that the Treasury Secretary provide Congress with fraud-prevention architecture recommendations before major spending legislation is enacted is genuinely

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<sup>3</sup> Congressional Research Service, *Improper Payments: Ongoing Challenges and Recent Legislative Proposals*, R48296 (2025), <https://www.congress.gov/crs-product/R48296>. The CMPPA, codified at 5 U.S.C. § 552a(o), generally requires written agreements and pre-match notice before agencies may use computer matches to deny or suspend federal benefits. The bill's CMPPA carve-out resolves a decade of administrative uncertainty about whether Do Not Pay queries trigger these requirements.

novel and could materially change the political economy of emergency appropriations. We support this concept strongly and encourage the Committee to ensure the pre-legislative recommendations function is structured to operate independently of any new institutional architecture that may require additional time to establish.

The Zeroing Out Monetary Benefits Improperly Expended Act addresses the critical and often overlooked problem of improper payments that continue flowing after an individual is no longer eligible to receive them. Timely benefit cessation is as important to program integrity as accurate initial eligibility determination, and the current system's failure to stop payments promptly when eligibility ends has cost taxpayers billions of dollars that can never be recovered<sup>4</sup>. We strongly support efforts to close this gap.

The TRUE Accountability Act ensures that the next time a national emergency requires Congress to move quickly, agencies will have internal control plans ready for immediate deployment rather than building oversight infrastructure from scratch under crisis conditions. The GAO frameworks this bill incorporates<sup>5</sup> represent the best available evidence on what works in emergency program management. Pre-positioning fraud prevention capacity before emergencies occur is precisely the kind of structural reform the pandemic demonstrated was missing, and we commend the Committee for advancing this measure.

The Federal Fraud Prevention Workforce Training Act recognizes a reality that infrastructure-focused legislation sometimes overlooks: technology and legal authority are only as effective as the people who use them. Standardized, government-wide training for federal employees and state partners who administer federal funds addresses the human dimension of the fraud prevention challenge that no database or verification system can fully substitute for. The bipartisan sponsorship of this bill reflects the straightforward proposition that protecting taxpayer dollars is a shared obligation, and we are particularly pleased to see that its training framework extends to state and local government partners who administer federal funds on the front lines.

The Taxpayer Funds Oversight and Accountability Act modernizes the Chief Financial Officers Act to reflect long-standing GAO recommendations that have never been fully

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<sup>4</sup> U.S. Government Accountability Office, Payment Integrity: Significant Improvements Are Needed to Address Improper Payments and Fraud, GAO-24-107660 (Feb. 2024), <https://www.gao.gov/products/gao-24-107660>. GAO found that more than \$175 billion (74 percent) of reported improper payments in FY 2022 were overpayments, including payments to individuals no longer eligible for the relevant program.

<sup>5</sup> U.S. Government Accountability Office, Standards for Internal Control in the Federal Government (Green Book), GAO-14-704G (Sept. 2014); GAO, A Framework for Managing Fraud Risks in Federal Programs, GAO-15-593SP (July 2015).



enacted<sup>6</sup>. Strong financial management infrastructure is the foundation on which all other fraud prevention efforts rest. Agencies that cannot reliably track their own spending cannot reliably detect when that spending goes wrong, and this bill's requirements for annual internal control assessments, linked performance and cost data, and government-wide financial planning create the accountability architecture that program integrity requires.

The Timely and Accurate Benefits Act addresses a specific and persistent vulnerability: the absence of a structured, government-wide framework requiring states to verify income and financial status before disbursing federal benefit payments. The bill's planning and conditionality approach is well-suited to the diversity of state administrative capacity and creates a valuable diagnostic mechanism that has never been achieved at this scale. We would encourage the Committee to consider a tiered income verification standard that calibrates requirements to each program's eligibility determination cycle — recognizing that not all programs require real-time income data — and to build on the IRS data access provisions in the Pre-Payment Data Validation bill to provide states with a federal income verification pathway that reduces reliance on commercial data procurement.

Taken together, these eight bills address challenges that have persisted across administrations of both parties for decades. The fraud losses they are designed to prevent are well documented, recurring, and largely avoidable with the right legal authorities and infrastructure in place. PIA urges the Committee to report this package favorably and with urgency. We stand ready to support the Committee's work in any way that would be helpful, and we look forward to seeing this legislation advance to the floor.

Respectfully submitted,

Linda Miller  
President, Program Integrity Alliance

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<sup>6</sup> U.S. Government Accountability Office, Financial Audit: FY 2024 and FY 2023 Consolidated Financial Statements of the U.S. Government, GAO-25-107421 (Feb. 2025), <https://www.gao.gov/products/gao-25-107421>. GAO has identified the federal government's inability to compile reliable, complete financial statements as a material weakness in successive annual audits, and has recommended CFO Act modernization in its High Risk Series.