



OFFICE OF INSPECTOR GENERAL

Audit Report

2016-FMIC-C-009

The CFPB Should Continue to Enhance Controls for Its Government Travel Card Program

June 27, 2016

BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
CONSUMER FINANCIAL PROTECTION BUREAU

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Abbreviations

BFS ARC	Bureau of the Fiscal Service, Administrative Resource Center
CFPB	Consumer Financial Protection Bureau
Charge Card Act	Government Charge Card Abuse Prevention Act of 2012
GSA	U.S. General Services Administration
GSA SmartPay	GSA SmartPay 2
GTC	government travel card
OIG	Office of Inspector General
OMB	Office of Management and Budget
OMB guidance	Office of Management and Budget Circular A-123, Appendix B: Improving the Management of Government Charge Card Programs
<i>Policy on Travel Cards</i>	<i>Policy on Travel Cards and Temporary Duty Travel</i>



Executive Summary:

The CFPB Should Continue to Enhance Controls for Its Government Travel Card Program

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Purpose

Our objective was to determine whether the Consumer Financial Protection Bureau (CFPB) has established and maintained internal controls for its government travel card (GTC) program, including centrally billed accounts, to ensure the proper, efficient, and effective use of GTCs in accordance with the Government Charge Card Abuse Prevention Act of 2012. Specifically, we tested controls designed to prevent or identify illegal, improper, or erroneous purchases and payments.

Background

Through its GTC program, the CFPB provides its employees with an individually billed GTC account with which to arrange and pay for official travel and other travel-related expenses and receive reimbursements for authorized expenses. The CFPB's Travel Office is responsible for administering the CFPB's GTC program, and the U.S. Department of the Treasury's Bureau of the Fiscal Service, Administrative Resource Center, assists with the administration of some of the program's functions. The GTC program involves five major processes: (1) issuing GTCs, (2) training, (3) reviewing and approving travel authorizations and travel vouchers, (4) monitoring GTC usage, and (5) closing GTC accounts. The CFPB's *Policy on Travel Cards and Temporary Duty Travel* outlines the responsibilities of cardholders, supervisors, and the CFPB's Travel Office.

Findings

Although the CFPB has implemented several controls over its GTC program, we found that some controls are not designed or operating effectively to (1) prevent or identify unauthorized use of GTCs and (2) provide reasonable assurance that cards are closed out in a timely manner upon employees' separation. Specifically, we found that some CFPB cardholders were reimbursed for lodging and meals and incidental expenses incurred while on personal leave during official travel. In addition, some cardholders used their GTCs for personal use while not on official travel. Further, the Travel Office is not using an efficient process to identify improper purchases. We also found that several approving officials did not receive U.S. General Services Administration SmartPay 2 training related to the GTC and that the CFPB does not conduct mandatory, certified, agency-specific training on its GTC policies. Lastly, the GTC accounts of some separating employees were not deactivated immediately upon cardholder separation from the CFPB.

Recommendations

Our report contains recommendations designed to help ensure GTC program integrity. We recommend that the CFPB review transactions made by cardholders who received payment for unallowable expenses and seek reimbursement in accordance with CFPB policy. We also recommend that the CFPB obtain and implement data mining tools to monitor the usage of GTCs. Further, we recommend that the CFPB update the *Policy on Travel Cards and Temporary Duty Travel* to clearly define personal use and improper use of the GTC and to consolidate the policy and all addendums into one document. In addition, we recommend that the CFPB develop and conduct mandatory, certified, agency-specific training for approving officials and cardholders. Lastly, we recommend that the CFPB work with its Office of Human Capital and the Bureau of the Fiscal Service, Administrative Resource Center, to develop and implement a process to deactivate the GTCs of separating employees immediately upon their separation from the CFPB.

In his response to our draft report, the Chief Financial Officer concurred with our recommendations and outlined actions to address them.

Summary of Recommendations, OIG Report 2016-FMIC-C-009

Recommendation number	Page	Recommendation	Responsible office
1	7	Review the transactions made by the seven CFPB cardholders who were reimbursed for lodging and meals and incidental expenses incurred while on personal leave during official travel and seek reimbursement in accordance with CFPB policy.	Office of the Chief Financial Officer
2	7	Conduct an audit of the remaining 152 instances in which cardholders took eight or more hours of personal leave during official travel to determine whether cardholders claimed and received reimbursement for expenses incurred while on personal leave during official travel and require those who received reimbursement for improper claims to reimburse the CFPB for those instances in accordance with CFPB policy.	Office of the Chief Financial Officer
3	7	Revise the <i>Policy on Travel Cards and Temporary Duty Travel</i> to <ol style="list-style-type: none"> a. include clear language describing <i>personal use</i> and <i>improper use</i> of the government travel card. b. consolidate the <i>Policy on Travel Cards and Temporary Duty Travel</i> and all addendums and forms into a single policy document. c. require certified, agency-specific training on a recurring basis for approving officials and cardholders. 	Office of the Chief Financial Officer
4	7	Develop mandatory, certified, agency-specific training for approving officials and cardholders that includes, but is not limited to, <ol style="list-style-type: none"> a. detailing their roles and responsibilities. b. explaining the electronic travel system. c. providing instruction on how to document personal leave while on official travel. 	Office of the Chief Financial Officer
5	8	Evaluate the benefit of providing additional tools for each cardholder to reinforce the rules for proper use of the government travel card.	Office of the Chief Financial Officer
6	10	Enhance the monthly compliance audits of the CFPB's government travel card program by <ol style="list-style-type: none"> a. directing the Travel Office to obtain training from the government travel card provider on how to use all the available monitoring resources. b. finalizing the development of and implementing in-house data mining tools. 	Office of the Chief Financial Officer
7	11	Update the <i>Policy on Travel Cards and Temporary Duty Travel</i> to require that all approving officials receive required cardholder training.	Office of the Chief Financial Officer
8	15	Work with the Office of Human Capital and the Bureau of the Fiscal Service, Administrative Resource Center's Project Reporting Quality Assurance to develop and implement a system for timely deactivation of government travel card accounts and incorporate this process in the <i>Travel Desk Procedures</i> .	Office of the Chief Financial Officer

Recommendation number	Page	Recommendation	Responsible office
9	15	Enhance the Travel Office's process for monitoring government travel card deactivation of separated employees by establishing a target closing date for such government travel card accounts.	Office of the Chief Financial Officer



OFFICE OF INSPECTOR GENERAL

BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
CONSUMER FINANCIAL PROTECTION BUREAU

June 27, 2016

MEMORANDUM

TO: Stephen Agostini
Chief Financial Officer
Consumer Financial Protection Bureau

FROM: Melissa Heist *Melissa Heist*
Associate Inspector General for Audits and Evaluations

SUBJECT: OIG Report 2016-FMIC-C-009: *The CFPB Should Continue to Enhance Controls for Its Government Travel Card Program*

The Office of Inspector General (OIG) has completed its report on the subject audit. We conducted this audit to determine whether the Consumer Financial Protection Bureau has established and maintained internal control activities for its government travel card program, including centrally billed accounts, to ensure the proper, efficient, and effective use of government travel cards in accordance with the Government Charge Card Abuse Prevention Act of 2012.

We provided you with a draft of our report for review and comment. In your response, you outline actions that have been or will be taken to address our recommendations. We have included your response as appendix C to our report.

We appreciate the cooperation that we received from the Travel Office; the Office of Human Capital; and Bureau of the Fiscal Service, Administrative Resource Center. Please contact me if you would like to discuss this report or any related issues.

cc: Sartaj Alag, Chief Operating Officer
Jeffrey Sumberg, Chief Human Capital Officer
J. Anthony Ogden, Deputy Inspector General

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Introduction

Objective

Our objective was to determine whether the Consumer Financial Protection Bureau (CFPB) has established and maintained internal controls for its government travel card (GTC) program, including centrally billed accounts,¹ to ensure the proper, efficient, and effective use of GTCs in accordance with the Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act).² Specifically, we tested controls designed to prevent or identify illegal, improper, or erroneous purchases and payments. The scope of this audit covered controls over travel that occurred from June 1, 2014, through May 31, 2015. Details on our scope and methodology are in appendix A.

Additionally, we followed up on the remaining open recommendations made in [OIG Report 2013-AE-C-017](#), *The CFPB Should Strengthen Internal Controls for Its Government Travel Card Program to Ensure Program Integrity*, September 30, 2013.

Background

The CFPB's Government Travel Card Program

Through its GTC program, the CFPB provides its employees with an individually billed GTC account with which to arrange and pay for official travel and other travel-related expenses and receive reimbursements for authorized expenses. As of May 31, 2015, the CFPB had 1,208 cardholders. Those cardholders made 63,518 purchase transactions, totaling \$12.1 million, on individually billed GTCs from June 1, 2014, through May 31, 2015. In fiscal year 2015, the CFPB spent \$16.7 million on GTC transactions and associated fees.

The CFPB acquires GTC services through the U.S. Department of the Treasury's task order to the U.S. General Services Administration's (GSA) master contract with Citibank.³ Citibank issues GTCs to CFPB employees, and cardholders are responsible for all expenses incurred on their GTC. The U.S. Department of the Treasury's Bureau of the Fiscal Service, Administrative Resource Center (BFS ARC), provides the CFPB with GTC administration services through an interagency agreement.

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1. On its centrally billed account from June 1, 2014, through May 31, 2015, the CFPB had 1,461 purchase transactions totaling \$410,000. We reviewed the centrally billed account and did not identify any instances of misuse.
 2. Government Charge Card Abuse Prevention Act, Pub. L. No. 112-194, 126 Stat. 1445 (2012).
 3. GSA provides commercial payment services to more than 350 federal agencies, organizations, and Native American tribal governments through the GSA SmartPay program.

The CFPB's Policy on Travel Cards and Temporary Duty Travel, Internal Guidance, and Practices

The CFPB's *Policy on Travel Cards and Temporary Duty Travel (Policy on Travel Cards)*, dated May 21, 2012, outlines the responsibilities of cardholders, supervisors, and the CFPB's Travel Office. Cardholder responsibilities include, but are not limited to, the following:

- traveling on official CFPB business in accordance with the *Policy on Travel Cards* and the *Federal Travel Regulation*
- obtaining and using a GTC for official travel and adhering to GSA SmartPay 2 (GSA SmartPay) regulations on the use of the card
- submitting to their approving official for approval travel authorizations prior to travel and travel vouchers within five business days after a trip is completed
- paying statements promptly and keeping accounts current

Supervisor responsibilities include, but are not limited to, the following:

- becoming an approving official in order to sign travel forms
- ensuring that travelers have the necessary resources to travel in order to conduct CFPB business as a part of their official duties
- signing travel authorizations and travel vouchers to help ensure compliance with CFPB policies and procedures

Travel Office responsibilities include, but are not limited to, the following:

- overall management and oversight of the GTC program
- reviewing GTC applications
- authorizing the levels of access in the CFPB's electronic travel system for cardholders and approving officials
- creating and conducting training on the CFPB's travel policies and procedures for cardholders and approving officials
- administering the CFPB's centrally billed account, including authorizing charges and assisting in the reconciliation of monthly statements

In addition to the *Policy on Travel Cards*, three other documents—the *Travel Policy Addendums*, the *Travel Desk Procedures*, and a list of GTC dos and don'ts—collectively provide guidance for making travel arrangements, traveling for the CFPB, and claiming reimbursement for expenses related to official travel.

Overview of the CFPB's GTC Process

The CFPB's Travel Office, which is in the Office of the Chief Financial Officer, is responsible for administering the CFPB's GTC program, and BFS ARC assists with the administration of some of the program's functions. The GTC program involves five major processes: (1) issuing GTCs, (2) training, (3) reviewing and approving travel authorizations and travel vouchers, (4) monitoring GTC usage, and (5) closing GTC accounts. Each of these processes is described below.

Issuing GTCs

The *Policy on Travel Cards* states that a CFPB employee who travels four or more times per year is required to obtain and use a GTC. The employee must first complete the GSA SmartPay Travel Card Training online and then complete the Citibank application. The application is forwarded to the Travel Office, where it is reviewed for completeness. The Travel Office then forwards the application to BFS ARC for processing. Upon BFS ARC's review and approval of an application, Citibank mails the GTC to the Travel Office, which distributes the card to the applicant.

Training

The *Policy on Travel Cards* states that the Travel Office is responsible for developing and conducting training for cardholders and for approving officials on the CFPB's GTC policies and procedures. The Travel Office provides training during new employee orientation that covers select areas of the *Policy on Travel Cards* and gives cardholders an overview of their responsibility to travel in accordance with the *Policy on Travel Cards*. The training also provides cardholders with resources and reference tools for travel-related inquiries and instructions on using the CFPB's electronic travel system for arranging travel.

Cardholders are required to take GSA SmartPay training and submit the GSA SmartPay training certificate with their GTC application package, which they send to the Travel Office. Cardholders must complete GSA SmartPay training at least once every three years. The Travel Office is responsible for monitoring the expiration dates of cardholders' GSA SmartPay training certificates and notifying cardholders in advance of their GSA SmartPay certificate expiration date.

Reviewing and Approving Travel Authorizations and Travel Vouchers

Prior to official travel, cardholders complete a travel authorization for approval in the electronic travel system. Cardholders are required to include on their travel authorization their estimated travel expenses, including their lodging and mode of transportation. The travel authorization is submitted to the approving official for review and approval. According to the *Policy on Travel Cards*, approving officials are responsible for approving travel for their employees.

When cardholders return from a trip, they use the electronic travel system to complete a travel voucher for all actual expenses incurred and submit it for approval. The approving official reviews the voucher and approves it for payment.

If the approving official finds errors in either the travel authorization or the travel voucher, the form is returned to the cardholder for correction or amendment. After making the correction or amendment, the cardholder must resubmit the form to the approving official.

Monitoring GTC Usage

The *Travel Desk Procedures* states that the Travel Office performs a monthly review of selected cardholders' accounts for compliance with GSA SmartPay regulations. The Travel Office compares the Citibank statement to the electronic travel system to determine whether the charges are related to official travel. If the Travel Office finds errors in either the travel authorization or

the travel voucher, the Travel Office follows up with the cardholder to inquire about and resolve unusual charges or charges for non-travel-related expenses. When noncompliance has been determined, corrective action is handled on a case-by-case basis. The Travel Office notifies the relevant supervisor and the Office of Human Capital if there are recurring instances of noncompliance.

Closing GTC Accounts

The *Travel Desk Procedures* states that BFS ARC is primarily responsible for closing GTC accounts with Citibank and in the electronic travel system, but in some instances, the Travel Office may close accounts with Citibank. The Office of Human Capital is responsible for notifying BFS ARC and copying the Travel Office on the exit clearance emails that it sends to various offices when an employee separates. When the Travel Office receives an exit clearance email, a team member writes the cardholder's separation date on a notepad used to track account closures. After the separation date, the Travel Office verifies in the electronic travel system and with Citibank whether the account has been closed by BFS ARC. If the account has not been closed with Citibank, the Travel Office closes the account and inputs the closure date into the electronic *CFPB Travel Card Listing Spreadsheet*.

Applicable Federal Laws, Regulations, and Guidance

The CFPB is subject to the Charge Card Act, which requires agencies that have employees who use GTCs to establish and maintain safeguards and internal control activities to ensure the proper, efficient, and effective use of the GTC.

CFPB cardholders are required to follow GSA SmartPay program guidelines as stipulated in the GSA master contract. According to the GSA SmartPay program, GTCs are used to pay for official and local travel and other travel-related expenses. The agency reimburses employees only for authorized and allowable expenses. Any amounts charged in excess of the allowable reimbursement are to be paid for with the employees' personal funds. The GTC is to be used for official government purposes only.

The CFPB is not required to follow the Office of Management and Budget's (OMB) Circular A-123, Appendix B: Improving the Management of Government Charge Card Programs (OMB guidance). However, for the purposes of this audit, we consider OMB guidance to be the prevailing authority regarding training for GTC programs. OMB develops and issues GTC training guidance for all executive agencies. According to OMB, training is important because it is vital that approving officials and cardholders understand their roles and responsibilities in order for GTC programs to be effectively implemented. OMB states that approving officials who are not cardholders should receive the same training as cardholders. Further, training should ensure that cardholders are informed of any changes or updates to the agency's GTC program.

Finding 1: Controls Did Not Prevent or Identify Some Cardholders' Personal Use of GTCs

We found that some CFPB cardholders claimed and were reimbursed for lodging and meals and incidental expenses while on personal leave during official travel.⁴ We also found that some CFPB cardholders made potentially unauthorized personal use transactions while not on official travel. The GSA contract mandates that the GTC be used only for official travel expenses. According to the Charge Card Act, agencies are required to issue specific policies and provide appropriate training regarding GTCs. The agency must design those policies to minimize the financial risk to the federal government and ensure the integrity of cardholders. The *Policy on Travel Cards* states that cardholders are responsible for all expenses incurred while on personal leave during official travel and must not use a GTC for those expenses. The policy also requires travelers to clearly mark personal leave on their travel authorization and travel voucher. In addition, the policy requires approving officials to review travel authorizations and vouchers for compliance with CFPB policy. While the CFPB has issued policies regarding GTCs, these policies do not explicitly define personal use and are outdated. In addition, the Travel Office does not provide mandatory, certified training on internal travel guidance documents and the electronic travel system to reinforce approving officials' and cardholders' roles and responsibilities.⁵ As a result, the CFPB faces an increased risk that its employees will misuse their GTCs and that the misuse will not be identified by approving officials.

Cardholders Claimed and Received Reimbursement for Lodging and Meals and Incidental Expenses While on Personal Leave During Official Travel

We tested a judgmental sample of 42 of 194 instances of eight or more hours of personal leave taken during official travel to determine whether controls were in place to prevent and identify instances of personal use of the GTC while on personal leave during official travel. We found 14 instances in which a total of \$2,223 in lodging and \$1,575 in meals and incidental expenses were incurred while on personal leave during official travel; these amounts were claimed and reimbursed. These 14 instances were associated with seven cardholders.

The *Policy on Travel Cards* allows cardholders to take personal leave at a temporary duty location; however, the policy states that cardholders are responsible for all expenses incurred while on personal leave and must not use their GTC for those expenses. The *Policy on Travel Cards* requires cardholders to clearly denote personal leave on their travel authorization in the electronic travel system. Personal leave denoted on the travel authorization automatically zeroes out expenses for those days on the travel voucher, reducing the risk of reimbursement of unallowable expenses. The *Policy on Travel Cards* also requires supervisors who have been

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4. *Personal leave* is defined as annual leave and compensatory time.
 5. OMB guidance states that training provided to cardholders should be certified to ensure that every cardholder received the training, understands the regulations and procedures, and knows the consequences of inappropriate actions. Agencies will determine the method of certification, and copies of all training certificates must be maintained pursuant to U.S. National Archives and Records Administration requirements.

designated as approving officials to review expenses for compliance with CFPB policies and procedures.

The Travel Office stated that employees are reluctant to mark personal leave on their travel authorization due to concerns that the leave would be deducted twice from their leave balance. We believe that providing additional training to cardholders on recording personal leave on their travel authorization in the electronic travel system would assist in preventing cardholders from claiming reimbursement for lodging and meals and incidental expenses incurred while on personal leave during official travel.

In addition, approving officials' roles and responsibilities are included in various sections of the policy and in various addendums, which, in our opinion, makes it difficult for the approving officials to determine their roles and responsibilities. Further, the Travel Office has not provided the *Travel Desk Procedures* to the approving officials or trained them on how to review travel authorizations and travel vouchers and how to ensure that personal leave during travel is accounted for on the authorization and voucher.

The absence of one comprehensive guidance document and training for cardholders and approving officials on the *Policy on Travel Cards* increases the risk that cardholders will continue to be reimbursed for expenses they incurred while on personal leave during official travel.

Expenses Were Incurred While Cardholders Were Not on Official Travel

We tested a judgmental sample of 65 of 6,017 transactions incurred by 39 cardholders while not on official travel to determine whether controls were in place to prevent cardholders from using their GTC for personal use. We identified as potential misuse 36 transactions totaling \$4,530. These 36 transactions were associated with 16 cardholders. These cardholders did not submit these transactions on vouchers and thus were not reimbursed for them. Table 1 illustrates the results of our testing and the transaction categories in which potential misuse of the GTC occurred while cardholders were not on official travel.

Table 1: Breakout of Transactions Identified as Potential Misuse

Number of instances	Total value (\$)	Category
14	2,727	Cash advances
8	593	Restaurant and bar
5	192	Fuel
3	298	Transportation
2	57	Grocery and drugs
2	559	Rental car
1	29	Hotel
1	74	Dry cleaning

Source: OIG analysis of Citibank transactions and employee travel vouchers.

Although the *Policy on Travel Cards* and other internal guidance state that cardholders must not use the GTC for expenses incurred when not on official travel, they do not explicitly describe *personal use* or clarify that making personal purchases on the GTC, even when the cardholder pays the bill, is deemed improper use. Further, the policy was issued prior to the enactment of the Charge Card Act, has not been updated to reflect the requirements of the act, and contains references to an electronic travel system that is no longer used. The *Policy on Travel Cards* does not provide guidance on the appropriate use of cash advances, and training does not cover the proper use of cash advances. In addition, cardholders do not receive mandatory, certified training on specific situations that the CFPB has determined are inappropriate use of the GTC. Lastly, according to the Travel Office, cardholders have stated that in some instances, they confused their GTC with their personal card. We believe that clarifying and updating guidance; providing agency-specific training on improper use; and purchasing additional tools, such as card sleeves with a summary of cardholder responsibilities printed on them, will help ensure that CFPB cardholders and approving officials are aware of and comply with GTC requirements.

Recommendations

We recommend that the Chief Financial Officer

1. Review the transactions made by the seven CFPB cardholders who were reimbursed for lodging and meals and incidental expenses incurred while on personal leave during official travel and seek reimbursement in accordance with CFPB policy.
2. Conduct an audit of the remaining 152 instances in which cardholders took eight or more hours of personal leave during official travel to determine whether cardholders claimed and received reimbursement for expenses incurred while on personal leave during official travel and require those who received reimbursement for improper claims to reimburse the CFPB for those instances in accordance with CFPB policy.
3. Revise the *Policy on Travel Cards* to
 - a. include clear language describing *personal use* and *improper use* of the GTC.
 - b. consolidate the *Policy on Travel Cards* and all addendums and forms into a single policy document.
 - c. require certified, agency-specific training on a recurring basis for approving officials and cardholders.
4. Develop mandatory, certified, agency-specific training for approving officials and cardholders that includes, but is not limited to,
 - a. detailing their roles and responsibilities.
 - b. explaining the electronic travel system.
 - c. providing instruction on how to document personal leave while on official travel.

5. Evaluate the benefit of providing additional tools for each cardholder to reinforce the rules for proper use of the GTC.

Management's Response

In his response to our draft report, the Chief Financial Officer concurs with our recommendations. For recommendations 1 and 2, the Chief Financial Officer notes that the CFPB is developing debt collection guidelines and that the transactions identified in these recommendations will be incorporated in the debt collection process when the guidelines are finalized, as applicable. For recommendation 3, the Chief Financial Officer notes that the CFPB will draft revisions to the *Policy on Travel Cards* as recommended. For recommendation 4, the Chief Financial Officer notes that the CFPB will work to develop mandatory, certified training for cardholders. Finally, for recommendation 5, the Chief Financial Officer notes that the CFPB has begun and will continue to evaluate available tools to help prevent unauthorized use of the GTC.

OIG Comment

The actions described by the Chief Financial Officer are responsive to our recommendations. We will follow up on the CFPB's actions to ensure that the recommendations are fully addressed.

Finding 2: The Travel Office Could Increase the Efficiency and Effectiveness of Its Processes for Identifying Improper Purchases

We found that the Travel Office could increase the efficiency and effectiveness of its processes for identifying improper purchases during its monthly monitoring processes. According to the Charge Card Act, each executive agency is required to use effective systems, techniques, and technologies to identify improper purchases. The Travel Office stated that it was not aware of the available resources for identifying improper GTC purchases, such as data mining and Citibank transaction activity reports, that are offered through the Citibank contract. The use of more efficient and effective tools to identify potentially improper purchases could increase the integrity of the GTC program, thereby reducing the reputational risk to the CFPB.

The Travel Office Uses an Inefficient Process to Monitor GTC Misuse

The Travel Office performs a manual review of randomly selected cardholders' account statements each month for compliance with GSA SmartPay regulations. Over a one-year period, from June 2014 through May 2015, the Travel Office identified 23 cardholders through this manual process who misused their GTCs. At one time, the Travel Office had another process by which it monitored for leave taken while on travel to identify potential cases of unauthorized or fraudulent use; however, that process was discontinued because the Travel Office determined it was too time consuming.

The Charge Card Act requires each executive agency to use effective systems, techniques, and technologies to identify improper purchases. The Travel Office was not aware of the available monitoring resources and capabilities it could obtain from Citibank through the GSA SmartPay contract, such as the declined purchase report, the delinquency report, and data mining. The Travel Office relies on BFS ARC to relay information pertaining to the GSA SmartPay contract and the monitoring tools available under the contract. According to the Travel Office, BFS ARC did not inform the Travel Office about the monitoring capabilities offered by Citibank.

Data mining tools would allow the Travel Office to examine GTC use at the transaction level, rather than at the statement level. Data mining tools can create a larger sample universe and, through tailored parameters, one that contains only potentially improper transactions. Initially, the CFPB informed us that the CFPB's Office of Technology & Innovation did not have the resources to develop in-house data mining software to monitor GTC purchases. Implementation of effective monitoring tools could improve the Travel Office's ability to monitor GTC purchases and identify potentially improper purchases.

Management Actions Taken

As a result of our discussions with the CFPB during the course of this audit, the Travel Office continued to reach out to the Office of Technology & Innovation to develop data mining tools to identify potential misuse transactions and reconcile employee leave statements with travel dates. The Travel Office is in the early stages of developing these data mining tools with the Office of Technology & Innovation.

Recommendation

We recommend that the Chief Financial Officer

6. Enhance the monthly compliance audits of the CFPB's GTC program by
 - a. directing the Travel Office to obtain training from the GTC provider on how to use all the available monitoring resources.
 - b. finalizing the development of and implementing in-house data mining tools.

Management's Response

In his response to our draft report, the Chief Financial Officer concurs with our recommendation. The Chief Financial Officer notes that the Travel Office will continue its work with the Office of Technology & Innovation and will also work with BFS ARC to ensure that the Travel Office can use available data mining and other monitoring tools to identify potentially improper purchases.

OIG Comment

The actions described by the Chief Financial Officer are responsive to our recommendation. We will follow up on the CFPB's actions to ensure that the recommendation is fully addressed.

Finding 3: Approving Officials Who Were Not Cardholders Did Not Receive GSA SmartPay Training

We found that of the 257 approving officials at the CFPB, 15 were not cardholders and did not receive GSA SmartPay training. The Charge Card Act states that all officials with the responsibility of overseeing GTCs must receive appropriate training. In addition, the GSA contract states that training is important to help all participants, including cardholders and approving officials, understand their roles and responsibilities as well as to reduce the risk of fraud, waste, and abuse in the GTC program. Further, OMB guidance states that even if approving officials are not cardholders, they must receive the same training as cardholders to effectively implement charge card programs. The Travel Office was not aware that these 15 individuals did not receive training because it did not verify whether an employee who becomes an approving official has received the GSA SmartPay training. In addition, the Travel Office stated that it was not aware that the Charge Card Act requires approving officials to receive training. Requiring approving officials to take training will better equip them to review travel authorizations and travel vouchers for compliance with CFPB policies and procedures, thus reducing the risk of the agency reimbursing cardholders for improper purchases.

Recommendation

We recommend that the Chief Financial Officer

7. Update the *Policy on Travel Cards* to require that all approving officials receive required cardholder training.

Management's Response

In his response to our draft report, the Chief Financial Officer concurs with our recommendation. The Chief Financial Officer notes that the CFPB will update the *Policy on Travel Cards* to require that approving officials receive the GSA SmartPay training required of cardholders.

OIG Comment

The action described by the Chief Financial Officer is responsive to our recommendation. We will follow up on the CFPB's action to ensure that the recommendation is fully addressed.

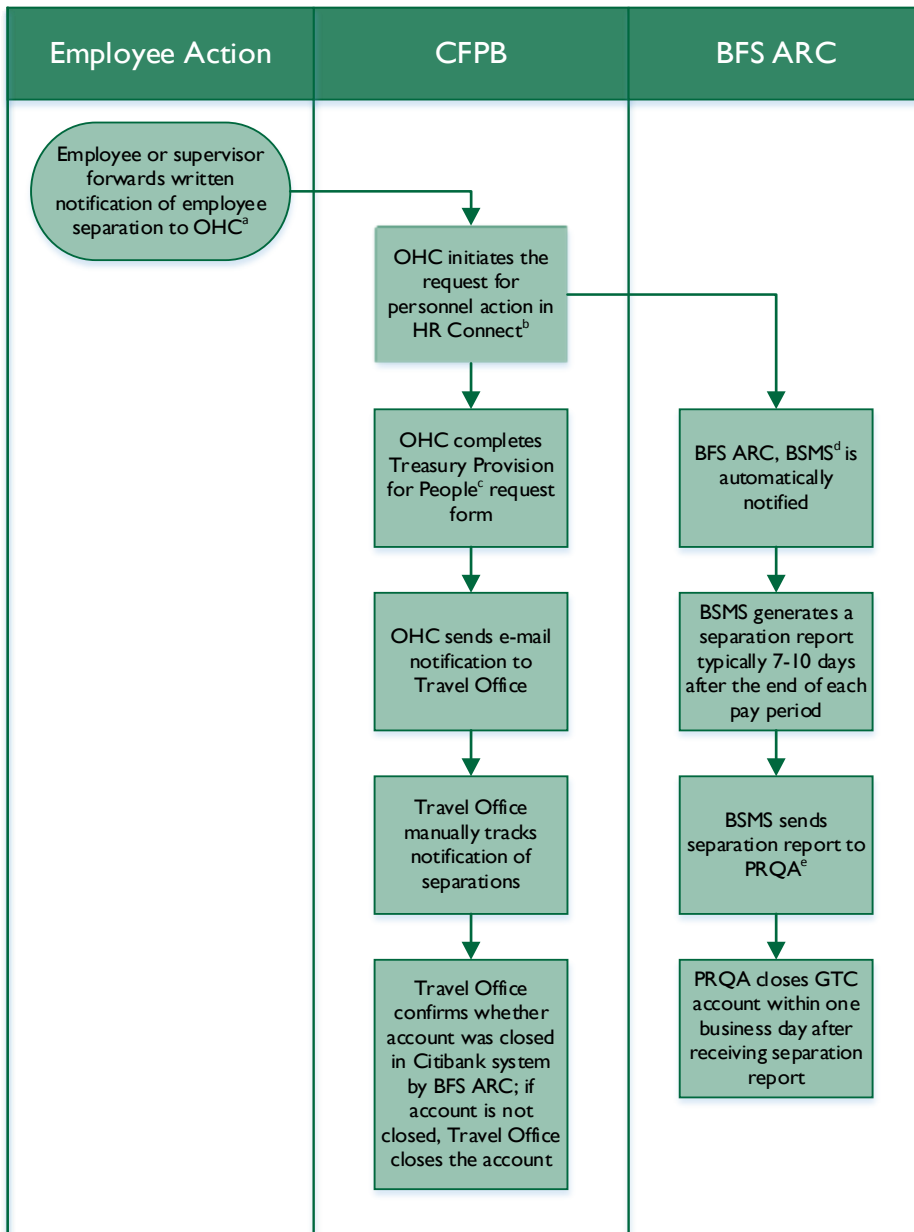
Finding 4: GTCs of Some Separated Employees Were Not Immediately Deactivated

We found that some GTCs were deactivated eight or more days after cardholders' separation from the CFPB. Although the cards were not deactivated immediately, as required by the Charge Card Act, we determined that employees did not use their cards after separation from the CFPB. The interagency agreement between BFS ARC and the CFPB states that it is the CFPB's responsibility to notify BFS ARC when a cardholder leaves the agency or no longer needs a GTC. The agreement also states that it is BFS ARC's responsibility to process changes to existing GTC accounts. Some GTCs were not immediately deactivated, however, because of process inefficiencies. The current process prevents the CFPB from fully complying with the Charge Card Act provision to deactivate GTCs immediately after an employee separates from the CFPB. It also increases the risk of unauthorized use of the card.

Processes for Deactivating GTCs for Separated Employees Are Inefficient

We found that of 92 cardholders who separated from the CFPB during the scope of our audit, 21 had accounts that were deactivated 8 or more days after the cardholders' separation. On average, it took 22 days to close these 21 GTC accounts, and one cardholder's account remained open 79 days after separation. We identified two processes that are used to deactivate GTC accounts (figure 1).

Figure 1: GTC Deactivation Process



Source: OIG summary of the deactivation process based on information provided by the Travel Office, the Office of Human Capital, and BFS ARC.

^aOffice of Human Capital

^bThe U.S. Department of the Treasury's electronic personnel system

^cA work request system the CFPB uses for both onboarding and offboarding employees

^dBusiness Systems Management Staff

^eProject Reporting Quality Assurance

The Charge Card Act requires that charge cards for all cardholders who cease to be employed by the executive agency be immediately deactivated upon employee termination. The *Travel Desk Procedures* states that BFS ARC has the primary responsibility for closing GTC accounts; however, in some instances the Travel Office closes GTC accounts. The Office of Human Capital is responsible for notifying BFS ARC and copying the Travel Office on exit clearance emails for separations. BFS ARC's Business Systems Management Staff is automatically notified of a CFPB employee separation when the Office of Human Capital initiates a request for personnel action in the HR Connect system; Business Systems Management Staff must then notify BFS ARC's Project Reporting Quality Assurance to close the account. The delay in deactivating accounts occurred because (1) the Office of Human Capital did not timely complete the separation action in HR Connect, (2) BFS ARC's Business Systems Management Staff did not timely notify BFS ARC's Project Reporting Quality Assurance, and (3) the Travel Office's process for monitoring BFS ARC's account closing activities is inconsistent.

The Office of Human Capital Did Not Timely Complete Separation Actions in HR Connect

When an employee provides the CFPB with notice of separation, the Office of Human Capital is responsible for inputting a personnel action in HR Connect upon receipt. During the scope of our audit, 92 employees who had a GTC separated from the CFPB. For 21 of the 92 employees, their accounts were deactivated 8 or more days after the cardholders' separation. For the 21 cardholders whose accounts were not deactivated 8 or more days after the cardholders' separation, we found the following:

- For 8 of the 21 cardholders, the Office of Human Capital initiated the request for separation action in HR Connect an average of 21 days after being notified.
- The Office of Human Capital did not initiate the request for separation action in HR Connect for 3 of these 8 cardholders prior to the employees' actual separation date. The delays in these 3 notifications ranged from 3 to 38 days after cardholder separation.
- These 3 instances resulted in the Office of Human Capital providing untimely notification to BFS ARC's Business Systems Management Staff.

BFS ARC's Business Systems Management Staff Did Not Provide Timely Notification of Cardholder Separations to BFS ARC's Project Reporting Quality Assurance

When Business Systems Management Staff receives notice of separation, it generates a separation report, typically 7–10 days after the end of each pay period, and sends the report to Project Reporting Quality Assurance. For the 21 cardholders whose accounts were deactivated 8 or more days after the cardholders' separation, we found the following:

- Business Systems Management Staff did not notify Project Reporting Quality Assurance timely for 15 of the 21 cardholders who separated.

- Notwithstanding the automatic 7–10 day delay, it took Business Systems Management Staff an additional 8 to 437 days to notify Project Reporting Quality Assurance to deactivate the 15 GTC accounts.
- Once Project Reporting Quality Assurance was notified, it took an average of 4 days to close accounts of separating employees.

The Travel Office’s Process for Monitoring BFS ARC Activities Is Not Consistent

The Travel Office manually tracks notifications of employee separations; however, it does not consistently monitor BFS ARC’s deactivation of GTC accounts. When verifying the status of GTC accounts for separated employees, the Travel Office deactivates accounts in the Citibank system if BFS ARC has not done so. We noted, however, that GTC accounts of separated employees have remained open 9–79 days after separation. The *Travel Desk Procedures* does not provide guidelines for the Travel Office to monitor and verify that BFS ARC has deactivated separating employees’ GTC accounts.

In addition, although the *Travel Desk Procedures* states that BFS ARC has the primary responsibility for closing accounts, we identified that the Travel Office closed 13 of the 21 cardholder accounts that were deactivated 8 or more days after the cardholders’ separation. These accounts were closed 9 to 59 days after the separation date of the cardholder.

Recommendations

We recommend that the Chief Financial Officer

8. Work with the Office of Human Capital and BFS ARC’s Project Reporting Quality Assurance to develop and implement a system for timely deactivation of GTC accounts and incorporate this process in the *Travel Desk Procedures*.
9. Enhance the Travel Office’s process for monitoring GTC deactivation of separated employees by establishing a target closing date for such GTC accounts.

Management’s Response

In his response to our draft report, the Chief Financial Officer concurs with our recommendations. He notes that the CFPB has established an internal working group to evaluate the existing offboarding process and identify opportunities for improvement. The CFPB plans to incorporate the recommendations regarding timely deactivation of GTC accounts into this process.

OIG Comment

The actions described by the Chief Financial Officer are responsive to our recommendations. We will follow up on the CFPB's actions to ensure that the recommendations are fully addressed.

Appendix A

Scope and Methodology

Our overall objective for this audit was to determine the effectiveness of the CFPB's internal controls for its GTC program. Specifically, we assessed the CFPB's compliance with the Charge Card Act. The scope of our review was June 1, 2014, through May 31, 2015.

To accomplish our objective, we selected the following requirements of the Charge Card Act, using a risk-based approach:

- Each executive agency has specific policies regarding GTCs issued and has designed those policies to minimize the financial risk to the federal government and ensure the integrity of the GTC.
- Each executive agency uses effective systems, techniques, and technologies to prevent or identify improper purchases
- Appropriate training is provided to each travel charge card holder and each official with responsibility for overseeing the use of travel charge cards issued by the executive agency.
- Each executive agency ensures that the travel charge card of each employee who ceases to be employed by the agency is invalidated immediately upon termination of the employment of the employee.

In addition, we reviewed the CFPB's *Policy on Travel Cards* and the *Travel Desk Procedures*, *Travel Policy Addendum*, and a list of GTC dos and don'ts. We also reviewed the *Federal Travel Regulation*, the Charge Card Act, and other relevant documentation pertaining to the GTC program. We interviewed the CFPB's Chief Financial Officer and the Travel Office Manager to obtain information on the program's operation and internal controls.

We obtained data from the Travel Office and the Office of Human Capital, the CFPB's electronic travel system, the Citibank system, and BFS ARC. We also reviewed the monthly BFS ARC reconciliations of the centrally billed account to determine whether improper use occurred on the account. We did not identify any misuse on the centrally billed account. For any system that we did not have direct access to, we relied on the CFPB to extract and provide us with the requested documentation. We observed Travel Office employees as they extracted the requested documentation for our sample selections. We verified the accuracy and completeness of the documentation by tracing the data to source documents. For all sample selections, our findings could not be projected to the entire population because we did not use statistical sampling.

To determine compliance with the Charge Card Act, we used data analytics to test for the following:

- **Blocked Merchant Category Codes.** We tested all transactions to determine whether the blocks on merchant category codes were operating effectively. We compared the blocked merchant category codes listing against the 79,105 transactions in Citibank that

were within our scope to determine whether any purchases in blocked merchant category codes were approved. We did not find transactions that were approved on blocked merchant category codes.

- **Use of the GTC while not on official travel.** We compared the data from the CFPB's electronic travel system with the data from the Account Activity Report in the Citibank system to determine whether transactions were made outside official travel. We added one day to the beginning trip date and the end trip date to allow for transactions that may have been posted early or been delayed, and we eliminated these transactions from the sample universe. We then selected transactions with the transaction type of Cash Advance and Purchase for our sample universe. Next, we judgmentally selected from our sample universe of 6,017 transactions a sample size of 65 transactions. We selected transactions based on merchant category code, dollar value, and date of occurrence. We then verified in the electronic travel system that the transaction occurred while the cardholder was not on official travel.
- **Use of the GTC while on leave during official travel.** We tested instances in which personal leave occurred during official travel to determine whether cardholders claimed and were reimbursed for lodging and meals and incidentals while on personal leave during official travel. We used the Office of Human Capital's personal leave data and the Account Activity Report in the Citibank system to identify any cardholders who used their GTC while on eight or more hours of personal leave during official travel. Based on these parameters, our universe consisted of 194 instances of personal leave that occurred during official travel. We then took a judgmental sample of 42 instances to determine whether the cardholder claimed lodging and meals and incidental expenses for those days on their travel voucher.
- **Closing GTC accounts immediately after separation.** We compared separation data from the CFPB against the transaction details in the Citibank system to determine whether the accounts were closed immediately upon cardholder separation from the CFPB. This resulted in a sample universe of 38 separated cardholders' accounts that were not deactivated immediately upon separation. We then determined that we would review all cards closed eight or more days after separation. We selected eight days to allow for weekends, holidays, and leave. To determine the process and timing that took place for our sample, we contacted both the Office of Human Capital and BFS ARC. We assessed the dates on which each step in the process occurred to determine the cause of the delays. We also used the Account Activity Report in the Citibank system to determine whether employees used their GTC after separation. We determined that no employees used their GTC after separation.

We also assessed the training materials provided to GTC cardholders by grading the materials against a rubric of OMB best practices to determine whether the training is appropriate. We created the rubric using the five areas OMB guidance recommends that training address: (1) general information about government travel, (2) agency policies and procedures, (3) how to use the travel card, (4) proper card use, and (5) payment of the card.

We conducted our fieldwork from October 2015 through December 2015. 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix B

Status of Open Recommendations From OIG Report 2013-AE-C-017

We completed follow-up reviews related to recommendations made in [OIG Report 2013-AE-C-017](#), *The CFPB Should Strengthen Internal Controls for Its Government Travel Card Program to Ensure Program Integrity*. Our report contained 14 recommendations designed to improve existing internal controls in the CFPB's GTC program process. We closed recommendations 2 through 4 and 7 through 14 in earlier follow-up memorandums.⁶ We acknowledge that corrective actions are in progress for the remaining 3 recommendations, which remain open.

Recommendation 1: We recommend that the Chief Financial Officer collect reimbursements from cardholders who received payments for unallowable expenses and research and collect reimbursement from the two cardholders who used credit hours as leave while on official travel and claimed reimbursement for lodging and meals and incidental expenses.

Status: Open. Implementation of the recommendation is in progress.

Recommendation 5: We recommend that the Chief Financial Officer coordinate with the Office of Human Capital to obtain personnel leave data and require the Travel Office to expand the monthly cardholder statement review to include cardholders on leave in order to identify potential cases of unauthorized or fraudulent use and incorporate this requirement in the draft internal procedure.

Status: Open. Implementation of the recommendation is in progress.

Recommendation 6: We recommend that the Chief Financial Officer update the *Travel Card* policy to include the requirements in recommendations 7 and 8.⁷

Status: Open. Implementation of the recommendation is in progress.

6. These memorandums are dated February 3, 2014; September 30, 2014; January 28, 2015; and September 30, 2015.

7. Recommendation 7: We recommend that the Chief Financial Officer require cardholders to note on the travel authorization any days of anticipated leave while on business travel and to note on the travel voucher any days of leave taken while on business travel.

Recommendation 8: We recommend that the Chief Financial Officer require cardholders' supervisors to review and approve travel authorizations and travel vouchers in GovTrip in a timely manner and, as a part of that review and approval, verify that expenses anticipated or incurred on days of leave are allowable.

Appendix C

Management's Response



1700 G Street NW, Washington, DC 20552

June 13, 2016

Ms. Melissa Heist
Associate Inspector General for Audits and Evaluations
Board of Governors of the Federal Reserve System and
Consumer Financial Protection Bureau
20th and Constitution Avenue
Washington, DC 20551

Dear Ms. Heist,

Thank you for the opportunity to review and comment on the Office of the Inspector General's draft report "*The CFPB Should Continue to Enhance Controls for Its Government Travel Card Program.*" We have reviewed the report and concur with the draft recommendations.

The Bureau is committed to ensuring the integrity of the government travel card (GTC) program. We agree with the process improvements included in your recommendations and plan to enhance our internal controls to ensure the proper, efficient, and effective use of GTCs in accordance with the Government Charge Card Abuse Prevention Act of 2012.

Thank you again for your review. We provide the following comments for each recommendation.

Sincerely,

Stephen Agostini
Chief Financial Officer

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Recommendation 1. Review the transactions made by the seven CFPB cardholders who were reimbursed for lodging and meals and incidental expenses incurred while on personal leave during official travel and seek reimbursement in accordance with CFPB policy.

Recommendation 2. Conduct an audit of the remaining 152 instances in which cardholders took eight or more hours of personal leave during official travel to determine whether cardholders claimed and received reimbursement for expenses incurred while on personal leave during official travel and require those who received reimbursement for improper claims to reimburse the CFPB for those instances in accordance with CFPB policy.

Recommendation 3. Revise the Policy on Travel Cards and Temporary Duty Travel to

- a. include clear language describing personal use and improper use of the government travel card.*
- b. consolidate the Policy on Travel Cards and Temporary Duty Travel and all addendums and forms into a single policy document.*
- c. require mandatory, certified, agency-specific training on a recurring basis for approving officials and cardholders.*

Recommendation 4. Develop mandatory, certified, agency-specific training for approving officials and cardholders that includes, but is not limited to

- a. detailing their roles and responsibilities.*
- b. Explaining the electronic travel system.*
- c. Providing instruction on how to document days of personal leave while on travel.*

Recommendation 5. Evaluate the benefit of providing additional tools for each cardholder to reinforce the rules for proper use of the government travel card.

We concur with these recommendations. The development and implementation of the Bureau's debt collection guidelines is underway and the transactions identified in Recommendations 1 and 2 will be incorporated into the process when it is finalized, as applicable. In addition, we will draft revisions to the *Policy on Travel Cards and Temporary Duty Travel* as suggested in Recommendation 3, and these revisions will be incorporated into the collective bargaining process. The Bureau will work to develop mandatory, certified training on internal travel guidance documents and the electronic travel system for all cardholders, which will also be incorporated into the collective bargaining process. We will develop mandatory, certified training for approving officials. Finally, the Bureau has begun and will continue to evaluate available tools, such as customized card sleeves, to help prevent unauthorized use of the GTC.

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Recommendation 6. Enhance the monthly compliance audits of the CFPB's GTC program by

- a. directing the Travel Office to obtain training from the GTC provider on how to use all the available monitoring resources.*
- b. finalizing the development of and implementing in-house data mining tools.*

We concur with this recommendation and appreciate your recognition of the work we have begun with the Office of Technology & Innovation (T&I) to develop data mining tools. The Travel Office will continue this work with T&I as well as work with the Bureau of the Fiscal Service, Administrative Resource Center, to ensure the Travel Office can utilize available data mining and other monitoring tools to identify potentially improper purchases.

Recommendation 7. Update the Policy on Travel Cards to require that all approving officials receive required cardholder training.

We concur with this recommendation. The Bureau will update the *Policy on Travel Cards* to require that approving officials receive the GSA SmartPay training required of cardholders, subject to the collective bargaining process.

Recommendation 8. Work with the Office of Human Capital and BFS ARC's Project Reporting Quality Assurance to develop and implement a system for timely deactivation of GTC accounts and incorporate this process in the Travel Desk Procedures.

Recommendation 9. Enhance the Travel Office's process for monitoring GTC deactivation of separated employees by establishing a target closing date for such GTC accounts.

We concur with these recommendations. The Bureau has established an internal working group to evaluate the existing offboarding processes and identify opportunities for improvement. The Bureau plans to incorporate the recommendations regarding timely deactivation of GTC accounts into this workstream.

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