



OFFICE OF  
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

September 9, 2020

**MEMORANDUM FOR MICHELE D. SHARPE,  
ACTING SENIOR PROCUREMENT EXECUTIVE**

**FROM:** Deborah L. Harker /s/  
Assistant Inspector General for Audit

**SUBJECT:** Risk Assessment of the Department of the Treasury's  
Charge Card and Convenience Check Program  
(OIG-CA-20-032)

This memorandum presents the results of our risk assessment of the Department of the Treasury's (Treasury) charge card (collectively, purchase cards, travel cards, and centrally billed accounts)<sup>1</sup> and convenience check program. The objective of our assessment was to identify and analyze the risk of illegal, improper, or erroneous purchases and payments in order to determine the scope, frequency, and number of periodic audits of charge card and/or convenience check transactions.

The scope of this risk assessment covered Treasury's charge card program for fiscal year (FY) 2019.<sup>2</sup> Among other things, we reviewed applicable laws, regulations, and Treasury's Charge Card Management Plan(s) (CCMP),<sup>3</sup> as well as, policies and procedures and evidence of training on charge card use at Departmental Offices (DO), the Alcohol, Tobacco Tax and Trade Bureau (TTB), the Bureau of Engraving and Printing (BEP), the Bureau of the Fiscal Service (BFS), the Financial Crimes Enforcement Network (FinCEN), the Office of the Comptroller of the Currency (OCC), and the United States Mint (Mint), hereinafter referred to as Treasury component entities.

As part of our risk assessment, we analyzed random statistical samples of transactions at each Treasury component entity that comprised Treasury's total universes of 32,681 purchase card transactions totaling

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<sup>1</sup> Treasury's purchase cards are centrally billed accounts. Treasury did not use integrated cards, which are combined purchase and travel cards in a single account.

<sup>2</sup> The scope of the risk assessment did not include the Internal Revenue Service, the Treasury Inspector General for Tax Administration, the Troubled Asset Relief Program, and the Office of the Special Inspector General for the Troubled Asset Relief Program. Accordingly, Treasury-wide data excluded the data of these entities.

<sup>3</sup> Treasury's CCMP includes convenience checks.

\$22,819,326 and 177,012 travel card transactions totaling \$42,570,057. We analyzed the samples for suspicious transactions that would pose a risk of potential illegal, improper, or erroneous purchases and payments. Given the small number of convenience check transactions, we reviewed all 202 transactions totaling \$176,079. See below for more detail of our objective, scope, and methodology.

In brief, we assessed the overall risk of illegal, improper, or erroneous purchases and payments in Treasury's charge card and convenience check program as low. However, at the component entity level, the risk of illegal, improper, or erroneous purchases and payments in charge card programs were assessed as moderate at BEP for its purchase card and at BFS for its convenience checks.<sup>4</sup>

## Background

Treasury uses charge cards to procure goods and services. Each Treasury component entity is responsible for maintaining internal control that reduces the risk of fraud, waste, and misuse associated with charge cards. The *Government Charge Card Abuse Prevention Act of 2012* requires all executive branch agencies to establish and maintain safeguards and internal control over charge cards and convenience checks. The act also requires Inspectors General (IG) to conduct periodic risk assessments of agencies' charge card and convenience check programs.

The Office of Management and Budget's (OMB) guidance in memorandum M-13-21, *Implementation of the Government Charge Card Abuse Prevention Act of 2012*, requires, among other things, that IG risk assessments be completed on an annual basis, which is applicable to FY 2019 assessments. OMB M-13-21 was rescinded by OMB Circular No. A-123, Appendix B Revised, *A Risk Management Framework for Government Charge Card Programs*, (effective August 27, 2019) that consolidates current government-wide charge card program management requirements and guidance issued by OMB, the General Services Administration, the Government Accountability Office, Treasury, and other Federal agencies. Although OMB Circular No. A-123 rescinded the requirement for annual IG risk assessments, among other things, we plan to continue performing annual risk assessments of Treasury's charge card and convenience check program given the number of cardholders and volume of transactions Treasury-wide.

Treasury's CCMP outlines the policies and procedures that are critical to managing its charge card and convenience check program. Treasury component

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<sup>4</sup> Future audits of BEP's purchase cards and BFS's convenience checks will be incorporated into our annual audit planning for FY 2021.

entities are required to follow Treasury's CCMP and may supplement it with their own policies and procedures.

### Treasury's Charge Card and Convenience Check Program

During FY 2019, Treasury had 492 active purchase card accounts with 32,681 reported transactions totaling \$22,819,326. During this period, there were 7,764 travel card accounts with 177,012 reported transactions totaling \$42,570,057. In addition, 60 employees had the authority to use convenience checks and issued 202 checks totaling \$176,079. **Table 1** presents the purchase card, travel card, and convenience check transactions by Treasury component entity.

**Table 1. Purchase Card, Travel Card, and Convenience Check Transactions (FY 2019)**

	Purchase Card	Travel Card	Convenience Check
	Amount (\$)	Amount (\$)	Amount (\$)
	Number of Purchase Transactions	Number of Travel Transactions	Number of Check Transactions
<b>Totals</b>	\$22,819,326	\$42,570,057	\$176,079
	32,681	177,012	202
<b>DO</b>	\$4,168,495	\$11,554,803	\$20,094
	3,885	19,513	18
<b>BEP</b>	\$4,742,692	\$1,442,966	\$9,104
	5,499	6,960	15
<b>Mint</b>	\$4,541,549	\$1,260,120	\$57,081
	7,370	7,549	34
<b>BFS</b>	\$2,921,304	\$241,200	\$29,573
	3,705	21,793	35
<b>OCC</b>	\$4,813,512	\$26,253,682	\$37,670
	8,859	112,024	54
<b>TTB</b>	\$1,227,273	\$1,390,552	\$18,231
	2,833	6,564	44
<b>FinCEN</b>	\$404,501	\$426,734	\$4,326
	530	2,609	2

Source: Citibank, N. A.

### Risk Assessment Approach

To conduct our risk assessment, we developed a risk assessment methodology based on the internal control assessment framework issued by the Committee of

Sponsoring Organizations of the Treadway Commission (COSO).<sup>5</sup> We identified key charge card and convenience check program control objectives using the criteria identified in the Charge Card Act, OMB Circular No. A-123, Appendix B, Treasury’s CCMPs, and the component entities’ policies and procedures related to their specific charge card and convenience checks. Additional criteria was identified in the Federal Travel Regulation<sup>6</sup> and Treasury Directives<sup>7</sup> for control objectives specific to travel cards.

We assigned a risk rating to each control objective based on (1) the impact that a risk event may pose to the control objectives of the charge card and convenience check program, and (2) the likelihood that the risk event may occur. The combined risks of impact and likelihood determines the overall risk to the charge card and convenience check program. **Table 2** provides the heat map of impact and likelihood levels.

**Table 2. Heat Map of Impact and Likelihood Risk Levels**

		IMPACT				
		INCIDENTAL	MINOR	MODERATE	MAJOR	EXTREME
LIKELIHOOD	ALMOST CERTAIN (90% ~ 100%)	Moderate	High	High	Very High	Very High
	LIKELY (65% ~ 90%)	Low	Moderate	High	High	Very High
	POSSIBLE (35% ~ 65%)	Low	Moderate	Moderate	High	High
	UNLIKELY (10% ~ 35%)	Low	Low	Moderate	Moderate	High
	RARE (0% ~ 10%)	Very Low	Low	Low	Low	Moderate

Source: OIG risk assessment methodology.

**Table 3** provides the definitions of risk impact and risk likelihood for the respective risk ratings.

<sup>5</sup> To develop the risk assessment methodology, we followed an industry standard presented in a research paper, which was commissioned by the Committee of Sponsoring Organizations of the Treadway Commission “Risk Assessment in Practice,” *Deloitte & Touche, LLP* (October 2012).

<sup>6</sup> *Federal Travel Regulation* (41 CFR 300-301).

<sup>7</sup> Treasury Directive 74-12, *Use of Government Contractor-Issued Travel Charge Cards* (January 28, 2015), and Treasury Directive 12-11, *Authorities of the Senior Procurement Executive* (February 3, 2017).

**Table 3: Definition of Risk Impact and Risk Likelihood**

<b>Impact Level</b>	<b>Risk Impact</b>	<b>Likelihood Level</b>	<b>Risk Likelihood</b>
<b>Extreme</b>	Impact of risk event to key control objective is severe as to require immediate management intervention	<b>Almost Certain</b>	Risk event is almost certain to occur; likelihood of occurrence is 90% up to 100%
<b>Major</b>	Impact of risk event to key control objective is major as to require immediate escalation to or intervention of management	<b>Likely</b>	Risk event is likely to occur; likelihood of occurrence is 65% up to 90%
<b>Moderate</b>	Impact of risk event to key control objective is moderate but material	<b>Possible</b>	Risk event is possible to occur; likelihood of occurrence is 35% up to 65%
<b>Minor</b>	Impact of risk event to key control objective is minor	<b>Unlikely</b>	Risk event is unlikely to occur; likelihood of occurrence is 10% up to 35%
<b>Incidental</b>	Impact of risk event to key control objective is negligible	<b>Rare</b>	Risk event is highly unlikely to occur; likelihood of occurrence is 0% < 10%

Source: OIG prepared; definitions based on COSO, "Risk Assessment in Practice," *Deloitte & Touche, LLP* (October 2012).

To assess overall risk to the charge card and convenience check program, we grouped and prioritized key control objectives by assigning greater weight to those objectives where a risk event could result in potential disruption of the charge card and convenience check program management and/or an improper payment being made if the control objective is not achieved. Treasury's overall risk rating for each control objective is based on the aggregate of the risk impact and risk likelihood of all the component entities.

## Purchase Card Results

Purchase cards are a primary procurement method for acquiring goods and services. Each Treasury purchase card has a single transaction limit (not to exceed \$10,000)<sup>8</sup> and an account credit limit that varies. Generally, purchase cards are centrally billed and the Treasury component entity pays account balances automatically. We determined the overall risk of illegal, improper, or erroneous purchases and payments for Treasury's purchase cards is low. However, the risk level was assessed as moderate for BEP's purchase cards. **Table 4** presents the overall risk levels of key control objectives for Treasury's purchase cards. Risk levels specific to Treasury component entities' purchase cards are presented as attachment 1 of this memorandum.

**Table 4. Risk Levels for Purchase Cards**

Key Control Objectives	Risk Weight	Risk Impact	Risk Likelihood	Risk Level
Policies and procedures for purchase cards existed	50%	Incidental	Rare	Very Low
Card transaction activities by bureaus were assessed regularly		Minor	Unlikely	Low
Suspicious card transactions (i.e., improper purchases) did not exist		Moderate	Possible	Moderate
Number of card transactions were not excessive		Moderate	Possible	Moderate
Inactive card accounts were not excessive		Minor	Unlikely	Low
Cardholders who were not Treasury employees did not exist		Minor	Unlikely	Low
Ratio of cardholders to approving officials was low		Minor	Unlikely	Low
Reportable card misuse requiring administrative and/or disciplinary actions did not exist		Moderate	Possible	Moderate
Corrective actions from OPE reviews were implemented	30%	Minor	Unlikely	Low
Previous audit recommendations were addressed		Minor	Unlikely	Low
Training policies existed	20%	Incidental	Rare	Very Low
Cardholders and approving officials received mandatory trainings		Major	Unlikely	Moderate

Source: OIG assessment of risks to purchase card control objectives.

<sup>8</sup> In OMB memorandum, *Implementing Statutory Changes to the Micro-Purchase and the Simplified Acquisition Thresholds for Financial Assistance* (M-18-18; June 20, 2018), OMB raised the single purchase threshold limit from \$3,500 to \$10,000. Treasury's 2019 CCMP gives component entities discretion to set their own limits below \$10,000. The single transaction limit is \$3,500 at BEP, BFS, and OCC; \$5,000 at the Mint; and \$3,000 at TTB, and \$3,500-\$10,000 at DO unless the cardholder is specifically authorized and trained to make purchases exceeding the transaction limit. .

## Travel Card Results

Treasury provides travel cards to employees who expect to incur official travel expenses such as transportation and lodging. Most travel cards are billed to individually billed accounts (IBA) and must be paid by the cardholder. All travel costs must be estimated, authorized, and obligated before an employee begins official travel. Employees then submit a voucher detailing the actual costs for reimbursement either directly to the travel card or to the traveler if travel card charges were paid by the traveler.

We determined that overall risk of illegal, improper, or erroneous purchases and payments for Treasury's travel cards is low, as the risk levels were assessed as low for all seven component entities' travel cards. **Table 5** presents the overall risk levels of key control objectives for Treasury's travel cards. Risk levels specific to Treasury component entities' travel cards are presented as attachment 2 of this memorandum.

**Table 5. Risk Levels for Travel Cards**

Key Control Objectives	Risk Weight	Risk Impact	Risk Likelihood	Risk Level
Policies and procedures for travel cards existed	50%	Incidental	Rare	Very Low
Policy for employee separation and required travel card return existed		Incidental	Rare	Very Low
Policies for travel authorization and approval existed		Incidental	Rare	Very Low
Suspicious card transactions (i.e., improper purchases) did not exist		Minor	Unlikely	Low
Number of IBA cardholders was not excessive		Minor	Unlikely	Low
Percent of IBA cards with monthly transaction limit greater than OMB's \$3,000 limit was not excessive		Moderate	Possible	Moderate
Reportable card misuse requiring administrative and/or disciplinary actions did not exist		Moderate	Possible	Moderate
Previous audit recommendations were addressed	30%	Minor	Unlikely	Low
Training policies existed	20%	Incidental	Rare	Very Low
Cardholders, approving officials, and agency/organization program coordinators (A/OPCs) received mandatory trainings		Incidental	Unlikely	Low

Source: OIG assessment of risks to travel card control objectives.

## Convenience Check Results

Convenience checks provide a method by which specially designated card holders may procure goods and services from merchants who do not accept charge cards. Because convenience checks lack many of the controls usually associated with charge cards and incur additional fees when used (usually two percent of the purchase amount), convenience checks are used only as a last resort.

For Treasury's convenience check program, we determined Treasury's overall risk of illegal, improper, or erroneous purchases and payments is low. However, the risk level was assessed as moderate for BFS' convenience checks. **Table 6** presents the overall risk levels of key control objectives for Treasury's convenience checks. Risk levels specific to Treasury component entities' convenience checks are presented as attachment 3 of this memorandum.

**Table 6. Risk Levels for Convenience Checks**

Key Control Objectives	Risk Weight	Risk Impact	Risk Likelihood	Risk Level
Policies and procedures for convenience checks existed	50%	Incidental	Rare	Very Low
Suspicious check transactions (i.e., improper purchases) did not exist		Minor	Unlikely	Low
Number of individuals authorized to write convenience checks was not excessive		Moderate	Possible	Moderate
Number of convenience checks written was not excessive		Moderate	Possible	Moderate
Number of convenience checks of amount greater than OMB's \$2,500 limit was not excessive		Minor	Unlikely	Low
Violation of check misuse did not exist		Incidental	Unlikely	Low
Previous audit recommendations were addressed	30%	Incidental	Unlikely	Low
Training policies existed	20%	Incidental	Rare	Very Low
Check writers and approving officials received mandatory trainings		Moderate	Rare	Low

Source: OIG assessment of risks to convenience check control objectives.



## OBJECTIVE, SCOPE, AND METHODOLOGY

We performed our risk assessment of the Department of the Treasury's (Treasury) charge card (collectively, purchase cards, travel cards, integrated cards, and centrally billed accounts) and convenience check program. The objective of our assessment was to identify and analyze the risk of illegal, improper, or erroneous purchases and payments in order to determine the scope, frequency, and number of periodic audits of purchase card and/or convenience check transactions.

The scope of our risk assessment was comprised of the following:

- charge card and convenience check programs at the Departmental Offices (DO) and the following Treasury component entities: the Alcohol and Tobacco Tax and Trade Bureau (TTB), the Bureau of Engraving and Printing (BEP), the Bureau of the Fiscal Service (BFS), the Financial Crimes Enforcement Network (FinCEN), the Office of the Comptroller of the Currency (OCC), and the United States Mint (Mint);
- Charge Card Management Plan(s) (CCMP) calendar years 2019;
- Fiscal year (FY) 2019 charge card and convenience check transactions:
  - 32,681 purchase card transactions totaling \$22,819,326;
  - 177,012 travel card transactions totaling \$42,570,057;
  - 202 convenience check transactions totaling \$176,079; and
- policies, procedures, and guidance governing charge card and convenience check use applicable to Treasury component entities.

To meet the objective of our risk assessment, we performed the following procedures:

- reviewed the following laws, regulations, policies, procedures, and other guidance:
  - *Government Charge Card Abuse Prevention Act of 2012*;
  - OMB Circular No. A-123, Appendix B, *A Risk Management Framework for Government Charge Card Programs* (revised August 27, 2019);
  - OMB M-13-21, *Implementation of the Government Charge Card Abuse Prevention Act of 2012*, (September 6, 2013) effective for period within scope;
  - OMB M-18-18, *Implementing Statutory Changes to the Micro-Purchase and the Simplified Acquisition Thresholds for Financial Assistance* (June 20, 2018);
  - *Department of the Treasury's Charge Card Management Plan(s)* for calendar years 2018 and 2019;
  - policies and procedures of Treasury's component entities included in the risk assessment;
- relied on OPE's review of records provided by the bureaus supporting charge card and convenience check training completion;

- reviewed Treasury's FY 2019 *Federal Managers' Financial Integrity Act of 1982* assurance statement for internal control matters involving charge card and convenience checks;
- reviewed previous audits, evaluations, and other assessments of Treasury and component bureaus/offices conducted by the Government Accountability Office related to the use of charge cards and convenience checks and any related violations and/or improper payment reporting;
- reviewed the documents and reports provided by Treasury Office of the Procurement Executive (OPE), quarterly charge card reports to OMB, and semiannual joint purchase card violations reports to OMB;
- interviewed the OPE official responsible for administering Treasury's charge card and convenience check program;
- performed data reliability procedures on the universe of purchase card and travel card transactions to determine reliability of data for selecting samples and performing analysis of transactions and identified duplicate records in Citibank data as a result of changes to Citibank's financial system; after consulting with the Citibank employee who provided the data, duplicate records were eliminated and the adjusted data sets were found reliable for the purpose of selecting transaction samples and performing analysis;
- consulted with a statistician who selected random statistical samples from FY 2019 purchase card transactions (universe of 32,681 transactions totaling \$22,819,326) and travel card transactions (universe of 177,012 transactions totaling \$42,570,057) for purpose of analyzing and identifying potential prohibited transactions (i.e. use of prohibited merchants, unauthorized cash advances, single transactions exceeding \$10,000, purchase card limits, personal use) and assessed the impact on control objectives related to suspicious and/or improper transactions. The following outlines the statistician's sampling methodology and results:
  - random statistical samples were based on each component entity's universe of purchase card transactions and universe of travel card transactions where the sample size was determined by using a 90 percent confidence level, 5 percent expected error rate, and a  $\pm 5$  percent sample precision:
    - sample size of 74 purchase card transactions at BEP, Mint, and OCC;
    - sample size of 66 purchase card transactions at DO, BFS, and TTB;
    - sample size of 62 purchase card transactions at FinCEN;
    - sample size of 74 travel card transactions at DO, BEP, BFS, Mint, and TTB;
    - sample size of 75 travel card transactions at OCC;
    - sample size of 73 travel card transactions at FinCEN;
  - the following sample analysis results were not projected to the universes of purchase card and travel card transactions:
    - identified one potential prohibited purchase card transaction from DO's sample; seven from BEP's sample; five from BFS's sample;

- five from FinCEN's sample; seven from Mint's sample; seven from TTB's sample; and none from OCC's sample;
- identified one potential prohibited travel card transaction from DO's sample related to a potential personal use; three from BEP's sample; one from FinCEN's sample; and none from the rest of the Treasury component entities;
- analyzed all 32,681 purchase card transactions totaling \$22,819,326 to identify potential split purchases made by a single cardholder on the same day with the same merchant that exceeded the component entities applicable single purchase limit as indicated below, and assessed the impact on the control objective related to existence of suspicious transactions/improper payments; the following was identified:
  - DO- \$3,500 - \$10,000 limit cardholders unless the cardholder is specifically authorized and trained to make purchases exceeding the transaction limit. - 1 of 3,885 transactions (or \$11,522 of \$4,168,495) was a potential split purchases;
  - BEP- \$3,500 limit - 28 of 5,499 transactions (or \$173,192 of \$4,742,692) were potential split purchases;
  - BFS- \$3,500 limit - 27 of 3,705 transactions (or \$154,927 of \$2,921,304) were potential split purchases;
  - FinCEN- \$3,500 limit - 1 of 530 transactions (or \$11,558 of \$404,501) was a potential split purchases;
  - Mint- \$5,000 limit - 11 of 7,370 transactions (or \$80,132 of \$4,541,549) were potential split purchases;
  - OCC- \$3,500 limit - 11 of 8,859 transactions (or \$62,389 of \$4,813,513) were potential split purchases;
  - TTB- \$3,000 limit - 7 of 2,833 transactions (or \$42,695 of \$1,227,273) were potential split purchases; and
  - did not perform additional analysis or test procedures on potential split purchases since this was not an audit but shared this information with OPE for follow-up consideration.
- analyzed all 202 convenience check transactions totaling \$176,079 given the small number of transactions to identify potential prohibited purchases (i.e. use of prohibited merchants, single transactions exceeding the \$2,500 check purchase limit, personal use transactions) and assessed the impact on the control objective related to suspicious transactions/improper purchases; the following was identified:
  - DO- 1 of 18 convenience check transactions totaling \$250 of \$20,094 was potentially prohibited;
  - BEP- 2 of 15 convenience check transactions totaling \$119 of \$9,104 were potentially prohibited;
  - BFS- 7 of 35 convenience check transactions totaling \$10,245 of \$29,573 were potentially prohibited;
  - FinCEN- 1 of 2 convenience check transactions totaling \$3,000 of \$4,326 was potentially prohibited;

- Mint– 2 of 34 convenience check transactions totaling \$9,990 of \$57,081 were potentially prohibited;
- OCC– 2 of 54 convenience check transactions totaling \$343 of \$37,670 were potentially prohibited;
- TTB– 1 of 44 convenience check transactions totaling \$104 of \$18,231 was potentially prohibited; and
- did not perform additional analysis or test procedures on potential prohibited purchases since this was not an audit but shared this information with OPE for follow-up consideration; and
- applied the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework to perform the risk assessment as follows:
  - identified key control objectives using OMB Circular No. A-123, Appendix B and component entities' policies and procedures to include, among others, the numbers of (1) card transactions, (2) cardholders, (3) inactive accounts, (4) non-Treasury cardholders, (5) suspicious improper transactions, (6) cardholders that spent high-dollar amounts, (7) reported charge card violations, (8) previous audit recommendations not addressed, and (9) cardholders who have not taken charge card training;
  - assigned a risk rating to each control objective based on (1) the impact that a risk event may pose to the control objectives of the charge card and convenience check program, and (2) the likelihood that the risk event may occur;
  - identified risk level using a risk map (or a heat map); and
- assessed all key control objectives using the risk assessment methodology to identify potential risk events and not for the purpose of concluding on the design and effectiveness of controls as this was not an audit; and as such, audit procedures such as requesting and analyzing documentation to support purchase transactions and other testing procedures were not performed.

We performed our risk assessment at the Office of Inspector General in Washington D.C. from December 2019 through April 2020.

### Risk Levels for Treasury-and Component Entities' Purchase Cards

	Treasury	DO	BEP	MINT	BFS	OCC	TTB	FinCEN
<b>Overall Risk by Component Entity</b>	Low	Low	Moderate	Low	Low	Low	Low	Very Low
<b>Key Control Objectives</b>								
Policies and procedures for purchase cards existed	Very Low	Very Low	Low	Very Low	Low	Very Low	Low	Very Low
Card transaction activities were assessed regularly	Low	Low	Moderate	Low	Low	Low	Low	Low
Suspicious card transactions (i.e., improper purchases) did not exist	Moderate	Low	High	Moderate	Moderate	Low	Moderate	Low
Number of card transactions were not excessive	Moderate	Moderate	Moderate	Moderate	Low	High	Low	Low
Inactive card accounts were not excessive	Low	Moderate	Low	Low	Moderate	Low	Low	Low
Cardholders who were not Treasury employees did not exist	Low	Low	Low	Low	Low	Low	Low	Low
Ratio of cardholders to approving officials was low	Low	Low	Low	Moderate	Low	Low	Moderate	Low
Reportable card misuse requiring administrative and/or disciplinary did not exist	Moderate	High	Moderate	Low	Moderate	Moderate	Low	Low
Corrective actions from OPE reviews were implemented	Low	Low	Moderate	Low	Low	Low	Low	Low
Previous audit recommendations were addressed	Low	Low	Low	Low	Low	Low	Low	Low
Training policies existed	Very Low	Very Low	Low	Very Low	Low	Very Low	Low	Very Low
Cardholders and approving officials received mandatory trainings	Moderate	Moderate	Moderate	Moderate	Low	Moderate	Moderate	Moderate

Source: OIG assessment of risk levels for purchase cards.

### Risk Levels for Treasury-and Component Entities' Travel Cards

	Treasury	DO	BEP	MINT	BFS	OCC	TTB	FinCEN
<b>Overall Risk by Component Entity</b>	Low	Low	Low	Low	Low	Low	Low	Low
<b>Key Control Objectives</b>								
Policies and procedures for travel cards existed	Very Low	Low	Low	Very Low	Very Low	Very Low	Low	Very Low
Policy for employee separation and required travel card return existed	Very Low	Low	Low	Very Low	Very Low	Very Low	Low	Very Low
Policies for travel authorization and approval existed	Very Low	Low	Low	Very Low	Very Low	Very Low	Low	Very Low
Suspicious card transactions ( i.e., improper purchases) did not exist	Low	Low	Low	Low	Low	Low	Low	Low
Number of IBA cardholders were not excessive	Moderate	Moderate	Low	Low	Moderate	Moderate	Low	Low
Percent of IBA cards with monthly transaction limit greater than OMB's \$3,000 limit was not excessive	Moderate	Low	Moderate	Moderate	Moderate	High	High	Moderate
Reportable card misuse requiring administrative and/or disciplinary actions did not exist	Moderate	Moderate	Low	Low	Moderate	Moderate	Low	Low
Previous audit recommendations were addressed	Low	Low	Moderate	Low	Low	Low	Low	Low
Training policies existed	Very Low	Low	Low	Very Low	Very Low	Very Low	Low	Very Low
Cardholders, approving officials & agency/organization program coordinators (A/OPCs) received mandatory trainings	Low	Low	Low	Low	Low	Low	Low	Low

Source: OIG assessment of risk levels for travel cards.

### Risk Levels for Treasury and Component Entities' Convenience Checks

	Treasury	DO	BEP	MINT	BFS	OCC	TTB	FinCEN
<b>Overall Risk by Component Entity</b>	Low	Low	Low	Low	Moderate	Low	Low	Low
<b>Key Control Objectives</b>								
Policies and procedures for convenience checks existed	Very Low	Very Low	Low	Very Low	Low	Very Low	Low	Very Low
Suspicious check transactions (i.e., improper purchases) did not exist	Low	Low	Low	Low	Moderate	Moderate	Low	Low
Number of individuals authorized to write convenience checks were not excessive	Moderate	Moderate	Low	Low	High	Low	Low	Moderate
Number of convenience checks written were not excessive	Moderate	Low	Low	Moderate	Moderate	Moderate	Moderate	Very Low
Number of convenience checks of amount greater than OMB's \$2,500 limit were not excessive	Low	Low	Low	Low	Low	Low	Low	Very Low
Violation of check misuse did not exist	Low	Low	Low	Low	Low	Low	Low	Low
Previous audit recommendations were addressed	Low	Low	Low	Low	Low	Low	Low	Low
Training policies existed	Very Low	Very Low	Low	Very Low	Low	Very Low	Low	Very Low
Check writers and approving officials received mandatory trainings	Low	Low	Low	Low	Low	Low	Low	Low

Source: OIG assessment of risk levels for convenience checks.