



OFFICE OF  
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

September 12, 2019

**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-19-024)

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) 2017 and the first quarter (Q1) of FY 2018.<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 randomly selected statistical samples of transactions at each Treasury component entity that comprised Treasury's total universes of 48,816 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.

\$27,951,627 and 258,124 travel card transactions totaling \$61,595,071. We analyzed the samples for suspicious transactions that would pose a risk of potential illegal, improper, or erroneous purchases and payments (i.e. split purchases, personal use). Given the small number of convenience check transactions, we reviewed all 415 transactions totaling \$254,752. 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 OCC for both its purchase and travel cards.<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*<sup>5</sup> (Charge Card Act) requires all executive branch agencies to establish and maintain safeguards and internal control over charge cards and convenience checks. The Charge Card Act also requires Inspectors General to conduct periodic risk assessments of agency charge card and/or convenience check programs to identify and analyze the risks of illegal, improper, or erroneous purchases and payments to determine the scope, frequency, and number of periodic audits of the programs.

Office of Management and Budget's (OMB) M-13-21, *Implementation of the Government Charge Card Abuse Prevention Act of 2012* (September 6, 2013), requires, among other things, that Inspectors General risk assessments be completed on an annual basis. OMB's Circular No. A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, Appendix B, "Improving the Management of Government Charge Card Programs" (July 15, 2016), prescribes policies and procedures for agencies to maintain internal control to reduce the risk of fraud, waste, and error in government charge card programs.

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> We initiated an audit of OCC's controls over its purchase cards on November 13, 2018.

<sup>5</sup> Public Law No. 112-194 (October 5, 2012).

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

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

During FY 2017 and Q1 2018, Treasury had 747 active purchase card accounts with 48,816 reported transactions totaling \$27,951,627. During this period, there were 8,858 travel card accounts with 258,124 reported transactions totaling \$61,595,071. In addition, 65 employees had the authority to use convenience checks and issued 415 checks totaling \$254,752. **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 2017 through Q1 FY 2018)**

	Purchase Card	Travel Card	Convenience Check
	Amount (\$)	Amount (\$)	Amount (\$)
	Number of Purchase Transactions	Number of Travel Transactions	Number of Check Transactions
<b>Totals</b>	\$27,951,627 48,816	\$61,595,071 258,124	\$254,752 415
<b>DO</b>	\$5,595,655 6,333	\$8,936,418 22,341	\$15,633 16
<b>BEP</b>	\$5,284,385 7,422	\$1,651,276 7,929	\$17,546 44
<b>Mint</b>	\$5,613,088 9,384	\$1,350,589 7,896	\$72,512 70
<b>BFS</b>	\$3,472,060 5,486	\$3,822,088 23,386	\$57,973 91
<b>OCC</b>	\$6,385,713 15,458	\$43,615,630 186,291	\$63,299 131
<b>TTB</b>	\$1,126,556 3,966	\$1,515,995 7,244	\$20,101 54
<b>FinCEN</b>	\$474,170 767	\$703,075 3,037	\$7,688 9

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>6</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 CCMP, 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>7</sup> and Treasury Directives<sup>8</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>6</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>7</sup> *Federal Travel Regulation* (41 CFR 300-301).

<sup>8</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* (June 26, 2012).

**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 probable 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 (usually \$10,000) 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 levels were assessed as moderate for certain risk objectives related to BEP's and OCC's respective 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		Incidental	Unlikely	Low
Suspicious card transactions (i.e., improper purchases) did not exist		Moderate	Possible	Moderate
Number of card transactions were not excessive		Minor	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%	Incidental	Possible	Low
Previous audit recommendations were addressed		Minor	Unlikely	Low
Training policies existed	20%	Incidental	Rare	Very Low
Cardholders and approving officials received mandatory trainings		Incidental	Unlikely	Low

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

## 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. However, the risk levels were assessed as moderate for certain control objectives related to OCC's 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 \$3,000 was not excessive		Minor	Unlikely	Low
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. **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		Moderate	Possible	Moderate
Number of individuals authorized to write convenience checks was not excessive		Minor	Unlikely	Low
Number of convenience checks written was not excessive		Minor	Unlikely	Low
Number of convenience checks of amount greater than \$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		Incidental	Unlikely	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 of 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 Plans, (CCMP) calendar years 2017 and 2018;
- all 48,816 purchase card transactions totaling \$27,951,627 made during fiscal year (FY) 2017 and first quarter (Q1), FY 2018;
- all 258,124 travel card transactions totaling \$61,595,071 made during fiscal year 2017 and first quarter, fiscal year 2018;
- all 415 convenience check transactions totaling \$254,752 made during fiscal year 2017 and first quarter, fiscal year 2018; 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 applicable laws, Office of Management and Budget (OMB) guidance, and policies and procedures for Treasury-wide and select bureaus/offices;
- reviewed Treasury's CCMPs for calendar years 2017 and 2018;
- reviewed 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* (June 26, 2012);
- reviewed evidence of training on charge card and convenience check use;
- reviewed Treasury's fiscal year 2017 *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 and Office of Inspector General 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), including the CCMPs, quarterly charge card statistics 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;
- analyzed purchase card and travel card transactions to identify potential prohibited transactions (i.e. use of prohibited merchants, unauthorized cash advances, single transactions exceeding the \$3,500 purchase card limit, personal use) and assess impact on control objectives related to suspicious and/or improper transactions (separate from split purchase transactions)<sup>9</sup> per Treasury component entity as follows:
  - selected and analyzed random statistical samples of FY 2017 and Q1 of FY 2018 purchase card transactions (48,816 comprised of \$27,951,627) and travel card transactions (258,124 comprised of \$61,595,071) at each Treasury component entity level, where the sample size was determined by using a 95 percent confidence level, 5 percent expected rate of occurrence, and a  $\pm 5$  percent sample precision; this resulted in 73 sample transactions selected for purchase cards per Treasury component entity (except for FinCEN and TTB, for which 67 and 72 transactions were selected, respectively, due to smaller universes), and 73 transactions for travel cards for each Treasury component entity as follows:
    - DO– from a universe of 6,333 purchase card transactions (or \$76,767 of \$5,595,655 and a universe of 22,341 travel card transactions (or \$33,535 of \$8,936,418);
    - BEP– from a universe of 7,422 purchase card transactions (or \$43,534 of \$5,284,385) and a universe of 7,929 travel card transactions (or \$14,755 of \$1,651,276);
    - BFS– from a universe of 5,486 purchase transactions (or \$37,904 of \$3,472,060) and a universe of 23,386 travel card transactions (or \$14,286 of \$3,822,088);
    - FinCEN– from a universe of 767 purchase card transactions (or \$38,292 of \$474,170) and a universe of 3,037 travel card transactions (or \$17,206 of \$703,075);
    - Mint– from a universe 9,384 purchase card transactions (or \$32,478 of \$5,613,088) and a universe of 7,896 travel card transactions (or \$8,468 of \$1,350,589);
    - OCC– from a universe of 15,458 purchase card transactions (or \$23,961 of \$6,385,713) and a universe of 186,291 travel card transactions (or \$19,010 of \$43,615,630);

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<sup>9</sup> Treasury’s CCMP defined split purchase as “the deliberate practice of splitting a transaction into two or more smaller transactions to keep the purchase beneath the cardholder’s single purchase limit.”

- TTB– from a universe of 3,966 purchase card transactions (or \$14,622 of \$1,126,556) and a universe of 7,244 travel card transactions (or \$16,612 of \$1,515,995);
- did not identify any potential prohibited purchase card transactions from our samples;
- identified one potential prohibited travel card transaction from BEP’s sample related to a potential personal use; and
- did not project sample results to the universes of purchase card and travel card transactions or perform additional analysis and test procedures on the sample as this was not an audit but shared this information with OPE for follow up consideration;
- analyzed 48,816 purchase card transactions totaling \$27,951,627 to identify potential split purchases made by a single cardholder on the same day with the same merchant that exceeded the \$3,500 single purchase limit, and assess the impact on the control objective related to existence of suspicious transactions/improper payments; the following was identified:
  - DO– 19 of 6,333 transactions (or \$91,252 of \$5,595,655) were potential split purchases;
  - BEP– 38 of 7,422 transactions (or \$195,426 of \$5,284,385) were potential split purchases;
  - BFS– 75 of 5,486 transactions (or \$472,419 of \$3,472,060) were potential split purchases;
  - FinCEN– 9 of 767 transactions (or \$40,434 of \$474,170) were potential split purchases;
  - Mint– 21 of 9,384 transactions (or \$151,804 of \$5,613,088) were potential split purchases;
  - OCC– 14 of 15,458 transactions (or \$61,684 of \$6,385,713) were potential split purchases;
  - TTB– 10 of 3,966 transactions (or \$47,854 of \$1,126,556) 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 415 convenience check transactions totaling \$254,752 given 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 assess the impact on the control objective related to suspicious and/or improper transactions; the following was identified as potential prohibited purchases related to amounts exceeding the \$2,500 check purchase limit:
  - DO– 0 of 16 convenience check transactions totaling \$15,633 were potentially prohibited;
  - BEP– 0 of 44 convenience check transactions totaling \$17,546 were potentially prohibited;

- BFS– 10 of 91 convenience check transactions totaling \$13,512 of \$57,973 were potentially prohibited;
- FinCEN– 2 of 9 convenience check transactions totaling \$5,605 of \$7,688 were potentially prohibited;
- Mint– 6 of 70 convenience check transactions totaling \$18,839 of \$72,512 were potentially prohibited;
- OCC– 58 of 131 convenience check transactions totaling \$30,453 of \$63,299 were potentially prohibited;
- TTB– 0 of 54 convenience check transactions totaling \$20,101 were potentially prohibited;
- 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;
- developed a risk assessment methodology based on the Committee of Sponsoring Organizations of the Treadway Commission’s (COSO) commissioned industry standard research paper, “Risk Assessment in Practice,” (Deloitte & Touche, LLP; October 2012). As part of the risk assessment methodology, key control objectives for purchase cards, travel cards, and convenience checks were grouped and assigned risk weights giving 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; 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, conducting interviews at the component entities, and other testing procedures were not performed.

We performed our risk assessment at the Office of Inspector General in Washington D.C. from March 2018 through December 2018.

**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	Moderate	Low	Low
<b>Key Control Objectives</b>								
Policies and procedures for purchase cards existed	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low
Card transaction activities were assessed regularly	Low	Low	Low	Low	Low	Low	Low	Low
Suspicious card transactions (i.e., improper purchases) did not exist	Moderate	Moderate	High	Moderate	High	Moderate	Moderate	Low
Number of card transactions were not excessive	Moderate	Low	Moderate	Moderate	Low	High	Low	Low
Inactive card accounts were not excessive	Low	Low	Low	Low	Moderate	High	Low	Low
Cardholders who were not Treasury employees did not exist	Low	Moderate	Low	Low	Low	Low	Low	Low
Ratio of cardholders to approving officials was low	Low	Low	Low	Low	Low	Moderate	Low	Low
Reportable card misuse requiring administrative and/or disciplinary did not exist	Moderate	Low	Moderate	Moderate	Low	Low	Moderate	Low
Corrective actions from OPE reviews were implemented	Low	Low	High	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	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low
Cardholders and approving officials received mandatory trainings	Low	Low	Low	Low	Low	Low	Low	Low

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	Moderate	Low	Low
<b>Key Control Objectives</b>								
Policies and procedures for travel cards existed	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low
Policy for employee separation and required travel card return existed	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low
Policies for travel authorization and approval existed	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low
Suspicious card transactions ( i.e., improper purchases) did not exist	Low	Low	Moderate	Low	Low	Low	Low	Low
Number of IBA cardholders were not excessive	Low	Low	Low	Low	Moderate	High	Low	Low
Percent of IBA cards with monthly transaction limit greater than \$3,000 was not excessive	Low	Low	Low	Low	Low	High	Low	Low
Reportable card misuse requiring administrative and/or disciplinary actions did not exist	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	Low	Low
Previous audit recommendations were addressed	Low	Low	Low	Low	Low	Low	Low	Low
Training policies existed	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very 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	Low	Low	Low	Low
<b>Key Control Objectives</b>								
Policies and procedures for convenience checks existed	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low	Very Low
Suspicious check transactions (i.e., improper purchases) did not exist	Moderate	Low	Low	Moderate	Moderate	Moderate	Low	Moderate
Number of individuals authorized to write convenience checks were not excessive	Low	Low	Low	Low	Low	Low	Low	Low
Number of convenience checks written were not excessive	Low	Low	Moderate	Low	Low	Low	Low	Low
Number of convenience checks of amount greater than \$2,500 limit were not excessive	Low	Low	Low	Low	Low	Moderate	Low	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	Very Low	Very Low	Very Low	Very Low	Very 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.