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Office of Audits

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# Information Report: Broadcasting Board of Governors 2016 Purchase Card Risk Assessment

## INFORMATION REPORT

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## Summary of Review

To assess risk associated with the purchase card program at the Broadcasting Board of Governors (BBG), OIG reviewed BBG's FY 2015 purchase card data and concluded that the risk of illegal, improper, or erroneous use in the BBG purchase card program is "very low." This conclusion is based on BBG's purchase card program size, internal controls, training, previous audits, and OIG Office of Investigations (OIG/INV) observations.

On the basis of the results of this assessment, OIG is not recommending an audit of BBG's purchase card program be included in OIG's FY 2018–FY 2019 work plan. However, OIG encourages the BBG purchase card program manager to continue prudent oversight of the purchase card program and ensure that internal controls intended to safeguard taxpayer funds are fully implemented and followed among BBG purchase cardholders.

## BACKGROUND

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The Government Charge Card Abuse Prevention Act of 2012<sup>1</sup> requires OIG to conduct periodic assessments of agency purchase and travel card programs that identify and analyze risks of illegal, improper, or erroneous purchases and payments for use in determining the scope, frequency, and number of periodic audits of these programs. The Office of Management and Budget (OMB) issued implementing guidance,<sup>2</sup> which outlined OIG risk assessment requirements,<sup>3</sup> as well as additional required internal controls for agency charge card programs. In addition, OMB previously issued guidance that prescribes the policies and procedures regarding how agencies maintain internal controls to reduce the risk of fraud, waste, and error in Government charge card programs.<sup>4</sup>

This 2016 risk assessment,<sup>5</sup> which covers FY 2015 spending data, is the third such review conducted by OIG with regard to the BBG charge card programs.<sup>6</sup> BBG officials reported that 74 purchase cardholders (72 active cards) made purchases totaling approximately \$7.6 million in FY 2015.

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<sup>1</sup> Public Law Number 112-194, October 5, 2012.

<sup>2</sup> OMB Memorandum M-13-21, "Implementation of the Government Charge Card Abuse Prevention Act of 2012," September 6, 2013.

<sup>3</sup> OMB Memorandum M-13-21 states that only travel card programs with prior year spending of more than \$10 million are required to be reviewed annually.

<sup>4</sup> OMB Circular A-123, "Management's Responsibility for Internal Control," Appendix B, "Improving the Management of Government Charge Card Programs," January 15, 2009.

<sup>5</sup> OMB Memorandum M-13-21 states that at a minimum, risk assessments should be completed on an annual basis.

<sup>6</sup> For 2016, only BBG's purchase card program was evaluated because the travel card program at BBG had less than \$10 million in spending, which is below the threshold requiring an assessment.

## PURPOSE, SCOPE, AND METHODOLOGY

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OIG's Office of Audits performed this risk assessment from November 2016 to December 2016. The objective of this assessment was to establish the risk of illegal, improper, and erroneous use of BBG's purchase card program and recommend the scope, frequency, and number of audits that should be conducted on the basis of the aforementioned risk assessment. To perform the risk assessment, OIG considered BBG's purchase card program size, internal controls, training, previous audits, and OIG/INV observations. OIG conducted the risk assessment using industry standard principles for risk management.<sup>7</sup>

The risk assessment was not an audit and therefore was not conducted in accordance with generally accepted government auditing standards. The results of the risk assessment should not be interpreted to conclude that purchase card programs with lower risk are free of illegal, improper, or erroneous use or internal control deficiencies. Conversely, a higher-risk program may not necessarily signify illegal, improper, or erroneous use—only that conditions are conducive to those activities. Regardless of the risk assessment results, if the purchase card program were to be audited, an audit team might identify such issues through independent testing of purchase card data. For example, a purchase card program may be found to be "very low risk" on the basis of documentation and other information provided by agency officials, the number of cardholders, and the total amount of purchase card expenditures. However, an audit of that purchase card program may determine that the controls outlined in an agency's policy are not being implemented appropriately and that illegal, improper, or erroneous activity is occurring. The risk assessment was designed to identify the programs in which the OIG Office of Audits should focus its limited resources.

### Assessment Criteria

To conduct the risk assessment, OIG reviewed FY 2015 charge card data, documentation, and information provided by BBG officials.<sup>8</sup> OIG then assessed BBG's purchase card program on four criteria:<sup>9</sup> internal controls, training, previous audits, and OIG/INV observations. OIG assigned a rating of "low," "medium," or "high," to identify the risk associated with each factor.

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<sup>7</sup> Committee of Sponsoring Organizations of the Treadway Commission, "Enterprise Risk Management – Integrated Framework Executive Summary," September 2004, and Deloitte & Touche LLP, "Risk Assessment in Practice," October 2012.

<sup>8</sup> In performing this risk assessment, OIG used charge card data reported by BBG without independently verifying the data for accuracy and completeness, BBG reported that purchase cardholders made purchases totaling approximately \$7.6 million in FY 2015.

<sup>9</sup> Agencies that spend more than \$10 million annually using purchase cards are required to submit annual "violation reports." Because BBG did not have more than \$10 million in purchases, it did not prepare a violation report. Therefore, OIG did not consider this factor during the BBG purchase card program risk assessment.

## Internal Controls

OIG used criteria identified in Public Law 112-194<sup>10</sup> and OMB Circular A-123<sup>11</sup> to assess internal controls associated with BBG's purchase card program. OIG assessed the purchase card program for 28 general internal controls and 29 internal controls specific to purchase card programs (a total of 57 internal controls assessed). For example, a general control would apply to both purchase card and travel card programs, such as the OMB Circular A-123 requirement that agencies perform periodic reviews of spending and transaction limits to ensure appropriateness. Purchase card-specific controls apply only to purchase card programs, such as the Public Law 112-194 requirement that agencies have policies in place to ensure that each cardholder is assigned an approving official with authority to approve or disapprove transactions. OIG assigned a rating of "low," "medium," or "high," on the basis of documented compliance with required internal controls.

## Training

OIG assigned BBG's purchase card program a rating of "low," "medium," or "high," on the basis of the availability of training and BBG's incorporation of training in its policy for the program.

## Previous Audits

OIG reviewed the results of previous audits, as well as the implementation status of associated recommendations, for BBG's purchase card program. OIG assigned a "high" rating for a program that had not been audited within 10 years. OIG assigned a "low" rating when a program had been recently audited and recommendations had been implemented. OIG assigned a "medium" rating for programs that had been audited recently but for which recommendations had not been fully implemented. The ratings were mitigated if documentation of meaningful internal reviews (conducted by the agency) was provided.

## OIG/INV Observation

OIG assigned ratings of "low," "medium," or "high" for BBG's purchase card program on the basis of input from OIG/INV forensic auditors. The Office of Audits met with OIG/INV to gain an understanding of the data mining<sup>12</sup> efforts being used to review BBG purchase card transactions. OIG/INV provided information related to the results of its analyses and interviews with BBG officials responsible for the purchase card program.

## Impact and Likelihood

Impact refers to the extent to which a risk event might affect BBG and likelihood represents the possibility that a given event might occur. OIG assigned an impact rating of "low," "medium," or "high," on the basis of dollars spent in the BBG purchase card program and assigned a likelihood

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<sup>10</sup> Public Law 112-194, "Government Charge Card Abuse Prevention Act of 2012," October 5, 2012.

<sup>11</sup> "OMB Circular A-123, "Management's Responsibility for Internal Control," Appendix B, "Improving the Management of Government Charge Card Programs," January 15, 2009.

<sup>12</sup> Data mining is the practice of searching through large amounts of computerized data to find useful patterns or trends.

rating of “low,” “medium,” or “high,” on the basis of the number of cardholders in the BBG purchase card program. The rating criteria are shown in Table 1.

**Table 1. Impact and Likelihood Ratings**

Rating	Impact	Likelihood
Low	Less than \$1 million	Fewer than 250 cardholders
Medium	\$1 million to \$10 million	250 to 500 cardholders
High	More than \$10 million	More than 500 cardholders

**Source:** OIG-generated on the basis of a review of multiple sources, including industry standard principles for risk management.

The impact and likelihood ratings were combined to determine a single “factor” that was used in the final overall risk assessment for the BBG purchase card program. OIG plotted the impact and likelihood ratings on a chart known as a “heat map,” which depicts the intersections of the ratings, to determine a rating for the impact and likelihood factor. The heat map is shown in Table 2.

**Table 2. Impact and Likelihood Factor Heat Map**

		Factor		
Impact Rating	Higher	Medium	High	Very High
	Medium	Low	Medium	High
	Lower	Very Low	Low	Medium
		Lower	Medium	Higher
		Likelihood Rating		

**Source:** OIG-generated on the basis of a review of industry standard principles for risk management.

## Final Risk Assessment

OIG combined the individual criteria ratings to form an overall combined rating and used this rating, combined with the impact and likelihood factor, to determine the final risk assessment rating for BBG’s purchase card program. Specifically, OIG used the final risk assessment heat map shown in Table 3 to arrive at the overall risk assessment rating.

**Table 3. Final Risk Assessment Heat Map**

		Final Rating		
Impact and Likelihood Factor	Very High	Medium	High	Very High
	High	Medium	High	Very High
	Medium	Low	Medium	High
	Low	Very Low	Low	Medium
	Very Low	Very Low	Low	Medium
		Low	Medium	High
		Combined Criteria Rating		

**Source:** OIG-generated on the basis of a review of industry standard principles for risk management.

## RESULTS

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### BBG Purchase Card Program Risk Assessment Results

On the basis of the results of this assessment, OIG concludes that the risk of illegal, improper, or erroneous use in BBG's purchase card program is "very low." Therefore, OIG is not recommending that an audit of BBG's purchase card program be included in OIG's FY 2018 – FY 2019 work plan.<sup>13</sup> Although an audit of the program is not planned, OIG encourages BBG officials to continue prudent oversight of the purchase card program and ensure that internal controls intended to safeguard taxpayer funds are fully implemented and followed among BBG purchase cardholders.

### Criteria Ratings

According to documentation and information provided by BBG officials, OIG determined that the purchase card program compliance with required internal controls was generally good—overall, 88 percent (50 of 57) of internal controls assessed were in compliance with criteria,<sup>14</sup> including 79 percent (23 of 29) compliance with purchase card-specific internal controls. OIG assigned BBG a rating of "low" for the internal control criterion.

The availability and incorporation of training in BBG policy were rated as "low" risk because BBG officials provided detailed documentation and policies regarding the required training for purchase card program participants.

OIG performed its most recent audit of the BBG purchase card program in 2005 (report issued in August 2006),<sup>15</sup> and all the recommendations from that report are closed. In April 2015, BBG conducted an internal review to assist the organization in evaluating certain financial and compliance activities of purchase cardholders and approving officials to ensure that they complied with established procurement management practices, operating procedures, and established purchase card controls. On the basis of the results of this internal review, as well as the fact that OIG has not audited BBG's purchase card program in more than 10 years, OIG assigned a "medium" rating for the previous audits criterion.

OIG/INV forensic auditors have not identified any significant systemic issues related to BBG purchase card data, which resulted in a "low" rating for the OIG/INV observation criterion. The individual criteria ratings and overall combined rating are shown in Table 4.

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<sup>13</sup> OIG issues a 2-year work plan. The "OIG FY 2017-FY2018 Work Plan" was issued in September 2016.

<sup>14</sup> See the Scope and Methodology section of this report for details of criteria used.

<sup>15</sup> OIG, *Review of the Broadcasting Board of Governors Purchase Card Program* (AUD/IB-06-15, August 2006).

**Table 4. 2016 Risk Rating by Criteria**

Criteria	2016 Rating
Internal Controls	Low
Training	Low
Previous Audits	Medium
OIG/INV Observation	Low
<b><i>Combined</i></b>	<b><i>Low</i></b>

**Source:** OIG generated on the basis of its analysis of purchase card program information and documentation.

### Impact and Likelihood Factor

BBG officials reported that 74 purchase cardholders (72 active cards) made purchases totaling approximately \$7.6 million in FY 2015. On the basis of the dollar value of total purchases made and the number of BBG purchase cardholders, the overall impact and likelihood factor resulted in a "low" rating, as shown in Table 5.

**Table 5. Impact and Likelihood Factor**

		Rating
Impact	\$7.6 million	Medium
Likelihood	74 cardholders	Low
<b><i>Impact and Likelihood Factor</i></b>		<b><i>Low</i></b>

**Source:** OIG-generated on the basis of its analysis of purchase card program information and documentation.

## RISK ASSESSMENT

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OIG's final determination of the risk of illegal, improper, or erroneous use in the BBG purchase card program is "very low." On the basis of this risk assessment, OIG is not recommending that an audit of BBG's purchase card program be included in OIG's FY 2018–FY 2019 work plan. Although an audit of the program is not planned, OIG encourages BBG officials to continue prudent oversight of the purchase card program and ensure that internal controls intended to safeguard taxpayer funds are fully implemented and followed among BBG purchase cardholders.

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