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Information Report: U.S. Agency for Global Media 2022 Charge Card Risk Assessment

INFORMATION REPORT

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SUMMARY OF REVIEW

The Government Charge Card Abuse Prevention Act of 2012,¹ as implemented by Office of Management and Budget (OMB) Circular A-123, Appendix B,² requires the Office of Inspector General (OIG) to conduct annual risk assessments of agency purchase and travel card programs. The assessments are conducted to 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.³

Accordingly, to assess risk associated with the purchase card program at the U.S. Agency for Global Media (USAGM),⁴ OIG reviewed USAGM's FY 2021 purchase card data and concluded that the risk of illegal, improper, or erroneous use in the USAGM purchase card program was "very low." This conclusion was based on USAGM's purchase card program size, internal controls, training, previous audits, and OIG Office of Investigations (INV) observations.

Because OIG concluded that risk to the purchase card program is "very low," OIG is not recommending that an audit of the USAGM purchase card program be included in OIG's FY 2024–FY 2025 work plan. However, OIG encourages USAGM 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 by USAGM purchase cardholders.

OBJECTIVE

OIG conducted this risk assessment to establish the risk of illegal, improper, and erroneous use of USAGM'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.

BACKGROUND

The Government Charge Card Abuse Prevention Act of 2012, as implemented by OMB Circular A-123, Appendix B, requires OIG to conduct annual periodic risk assessments of agency purchase and travel card programs. The assessments are conducted to identify and analyze risks of illegal, improper, or erroneous purchases for use in determining the scope, frequency, and number of periodic audits of these programs.⁵ In addition, OMB Circular A-123, Appendix B, outlines OIG risk assessment requirements, as well as additional required internal

¹ Public Law 112-194 (October 5, 2012).

² OMB Circular A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control" (July 15, 2016), Appendix B, "A Risk Management Framework for Government Charge Card Programs" (August 27, 2019).

³ Public Law 112-194, Sec. 2 § 1909(d)(1) and Sec. 3(h)(3).

⁴ On August 22, 2018, the Broadcasting Board of Governors changed its name to the U.S. Agency for Global Media.

⁵ Public Law 112-194, Sec. 2 § 1909(d)(1) and Sec. 3(h)(3).

controls for agency charge card programs. Furthermore, OMB issued guidance⁶ that prescribes policies and procedures regarding how agencies should maintain internal controls to reduce the risk of fraud, waste, and error in government charge card programs.⁷

The 2022 risk assessment of the USAGM purchase card program, which covers FY 2021 spending data, is the ninth risk assessment of USAGM charge card programs conducted by OIG.⁸ USAGM officials reported that in FY 2021, 45 active purchase cardholders made purchases totaling approximately \$4.1 million.

The purpose of this information report is to promptly report the results of the risk assessment and prompt timely implementation of management practices that will result in the sound stewardship of U.S. taxpayer dollars. See Appendix A for additional details of the purpose, scope, and methodology of the risk assessment.

RESULTS

Criteria Ratings

According to documentation and information provided by USAGM officials, OIG determined that USAGM generally complied with required internal controls for the purchase card program. Overall, 81 percent (63 of 78) of the internal controls assessed complied with established criteria,⁹ including 81 percent (35 of 43) compliance with internal controls specific to purchase cards. The majority (81 percent) of internal controls are categorized as low risk, a result of the revised OMB guidance. Because most internal controls assessed complied with established criteria, OIG assigned USAGM a rating of “low” for the internal control criterion.

The availability of training and the incorporation of training into USAGM policy was rated as “low” risk because USAGM officials provided detailed documentation and policies regarding the required training for purchase card program participants.

OIG performed its most recent audit of the USAGM purchase card program in 2005 (report issued in August 2006),¹⁰ and all the recommendations offered in that report have been implemented and closed. In addition, USAGM completed an internal review of its purchase card program and published the results in 2015. Therefore, OIG assigned a “medium” risk rating for the criterion relating to previous audits. Furthermore, INV forensic auditors have not identified

⁶ OMB Circular A-123, Appendix B.

⁷ On August 27, 2019, OMB revised OMB Circular A-123, Appendix B, “A Risk Management Framework for Government Charge Card Programs.”

⁸ Public Law 112-194 Sec. 2 § 1909(d)(1) and Sec. 3 (h)(3) state that an annual review is required only for travel card programs with prior-year spending of more than \$10 million. For 2021, OIG evaluated only USAGM’s purchase card program because the travel card program had less than \$10 million in spending, which is below the threshold requiring an assessment.

⁹ See Appendix A of this report for details on the criteria used.

¹⁰ OIG, *Review of the Broadcasting Board of Governors Purchase Card Program* (AUD/IB-06-15, August 2006).

any significant systemic issues related to USAGM’s purchase card data. As a result, OIG assigned a “low” rating for the INV observation criterion. The individual criterion ratings and overall combined rating are shown in Table 1.

Table 1: Risk Rating by Criterion

Criterion	2021 Rating
Internal Controls	Low
Training	Low
Previous Audits	Medium
INV Observation	Low
Combined	Low*

* Individual criterion ratings were assigned numeric values, and the total was averaged to identify an overall rating. Criteria rated as “low” risk were assigned a numeric value of 1; criteria rated as “medium” risk were assigned a numeric value of 2; and criteria rated as “high” risk would have been assigned a numeric value of 3.

Source: Generated by OIG based on its analysis of USAGM FY 2021 purchase card program information and documentation.

Impact and Likelihood Factor

USAGM officials reported that 45 active purchase cardholders made purchases totaling approximately \$4.1 million in FY 2021. Because the dollar value of total purchases made was between \$1 million and \$10 million and the number of USAGM purchase cardholders was fewer than 250, the overall impact and likelihood factor was “low,” as shown in Table 2.¹¹

Table 2: Impact and Likelihood Factor

		Rating
Impact	\$4.1 million	Medium
Likelihood	45 cardholders	Low
Impact and Likelihood Factor		Low

Source: Generated by OIG based on its analysis of USAGM purchase card program information and documentation relating to total USAGM purchases in FY 2021 and the number of purchase cardholders.

Risk Assessment

OIG determined that the risk of illegal, improper, or erroneous use in the USAGM purchase card program is “very low.” Because OIG concluded that risk to the purchase card program is “very low,” OIG is not recommending that an audit of the USAGM purchase card program be included in OIG’s FY 2024–FY 2025 work plan. However, OIG encourages USAGM 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 by USAGM purchase cardholders.

¹¹ Refer to Appendix A, Tables A.1 and A.2, for OIG’s methodology in determining the impact and likelihood factor.

APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

The Office of Inspector General (OIG) performed this risk assessment from July to August 2022. The objective of this assessment was to establish the risk of illegal, improper, and erroneous use of the U.S. Agency for Global Media (USAGM) 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 USAGM's purchase card program size, internal controls, training, previous audits, and OIG Office of Investigations (INV) observations. OIG conducted the risk assessment using industry standard principles for risk management.¹

This risk assessment was not an audit and 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 the program's 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 internal 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 on which the OIG Office of Audits should focus its limited resources.

Assessment Criteria

To conduct the risk assessment, OIG reviewed FY 2021 purchase card data and documentation as well as information provided by USAGM officials.² OIG assessed the purchase card program on the basis of four criteria:³ internal controls, training, previous audits, and INV observations.

¹ Committee of Sponsoring Organizations of the Treadway Commission, "Enterprise Risk Management – Integrated Framework Executive Summary" (September 2004); Deloitte & Touche, LLP, "Risk Assessment in Practice" (October 2012).

² In performing this risk assessment, OIG used purchase card data reported by USAGM without independently verifying the data for accuracy and completeness. USAGM reported that purchase card holders made purchases totaling approximately \$4.1 million in FY 2021.

³ Public Law 112-194 (October 5, 2012), Sec. 2 § 1909 (3)(A)(B), states that agencies with more than \$10 million in purchase card spending annually are required to submit "violation reports" on a semiannual basis. Because USAGM 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 USAGM purchase card program risk assessment.

OIG assigned a rating of “low,” “medium,” or “high” to identify the risk associated with each factor.⁴

Internal Controls

OIG used criteria identified in the Government Charge Card Abuse Prevention Act of 2012⁵ and Office of Management and Budget (OMB) Circular A-123, Appendix B,⁶ to assess internal controls associated with the USAGM purchase card program. OIG assessed the purchase card program for 35 general internal controls and 43 internal controls specific to purchase card programs (a total of 78 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.⁷ Purchase card-specific controls apply only to purchase card programs, such as the requirement that agencies have policies in place to ensure that each cardholder is assigned an approving official with authority to approve or disapprove transactions.⁸ OIG assigned a rating of “low,” “medium,” or “high” on the basis of documented compliance with required internal controls. Specifically, OIG assigned a “low” rating to programs with a high percentage (above 75 percent) of compliant internal controls. OIG assigned a “medium” rating to programs with neither a high percentage of compliant internal controls nor a high percentage of noncompliant internal controls. OIG assigned a “high” rating to programs with a high percentage (above 50 percent) of noncompliant internal controls.

Training

OIG assigned the USAGM purchase card program a rating of “low,” “medium,” or “high” based on the availability of training and incorporation of training into its policy for the program. OIG assigned a “low” rating when training was available and incorporated into policies. OIG assigned a “medium” rating when training was available but not incorporated into policies or when training was not available but was incorporated into policies. OIG assigned a “high” rating when training was not available and was not incorporated into the organization’s policies.

Previous Audits

To assess the USAGM purchase card program, OIG reviewed the results of previous audits as well as the implementation status of associated recommendations. OIG assigned a “low” rating to programs that had been audited in the last 10 years and had implemented recommendations. OIG assigned a “medium” rating to programs that had been audited in the

⁴ OIG team members used professional judgment to determine compliance with requirements in assessing risk ratings for each factor.

⁵ Public Law 112-194, Sec. 2 § 1909(a)(1)-(13), § 1909(c)(1) and (3)(A) and (B), and § 1909 (d)(1)-(3).

⁶ OMB Circular A-123, “Management’s Responsibility for Enterprise Risk Management and Internal Control” (July 15, 2016), Appendix B, “A Risk Management Framework for Government Charge Card Programs” (August 27, 2019), and Attachment 5, “Best Practices in Managing Government Charge Card Programs.”

⁷ OMB Circular A-123, Appendix B, Attachment 5.

⁸ Public Law 112-194, Sec. 2 § 1909(a)(2).

last 10 years, but for which recommendations had not been fully implemented. OIG assigned a “high” rating to programs that had not been audited within the last 10 years. The ratings were mitigated if the program provided documentation of meaningful internal reviews (conducted by the agency).

INV Observations

On the basis of guidance from INV forensic auditors, OIG assigned the USAGM purchase card program a rating of “low,” “medium,” or “high.” Office of Audits personnel met with INV personnel to gain an understanding of the data mining⁹ efforts being used to review USAGM purchase card transactions. INV provided information on the results of its data mining analyses and interviews with USAGM officials responsible for the purchase card program.

Impact and Likelihood

Impact refers to the extent to which a risk event might affect USAGM, and likelihood represents the possibility that a given event might occur. OIG assigned an impact rating of “low,” “medium,” or “high” based on the dollars spent in the USAGM purchase card program and assigned a likelihood rating of “low,” “medium,” or “high” based on the number of cardholders in the USAGM purchase card program. The rating criteria are shown in Table A.1.

Table A.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: Generated by OIG based on industry standard principles for risk management.

Using the information obtained in Table A.1, OIG plotted the impact and likelihood ratings on a chart known as a heat map, which depicts the intersections of the ratings, to determine the impact and likelihood factor. The heat map is shown in Table A.2. OIG used this single impact and likelihood combined factor in the final overall risk assessment (Table A.3) for the USAGM purchase card program.

⁹ Data mining is the practice of searching through computerized data to find useful patterns or trends.

Table A.2: Impact and Likelihood Factor Heat Map Table

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

Source: Generated by OIG based on industry standard principles for risk management.

Final Risk Assessment

OIG plotted the combined criteria rating in Table 1, along with the combined impact and likelihood factor in Table 2, to determine the final risk assessment rating for the USAGM purchase card program. Specifically, OIG used the final risk assessment heat map shown in Table A.3 to determine the overall risk assessment rating.

Table A.3: Final Risk Assessment Heat Map Table

		Final Rating		
		Medium	High	Very High
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: Generated by OIG based on industry standard principles for risk management.

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