

**UNITED STATES  
ELECTION ASSISTANCE COMMISSION  
OFFICE OF INSPECTOR GENERAL**



***Audit of the U.S. Election  
Assistance Commission's  
Purchase Card Program***



**OFFICE OF THE INSPECTOR GENERAL**  
US ELECTION ASSISTANCE COMMISSION  
633 3<sup>RD</sup> STREET, NW, SUITE 200  
WASHINGTON, DC 20001

## Memorandum

To: Mona Harrington  
Executive Director

To: Paul Repak  
Financial Director

From: *Mia Forgy*  
Mia Forgy  
Deputy Inspector General

Date: April 5, 2021

Subject: Audit of the U.S. Election Assistance Commission's Purchase Card Program

The Election Assistance Commission (EAC) Office of Inspector General (OIG) engaged Brown and Company, LLC (Brown), an independent certified public accounting firm, to audit the EAC's purchase card program in accordance with Government Auditing Standards, revised July 2018, issued by the Comptroller General of the United States. The audit was performed to fulfill the EAC OIG's requirements under the Government Charge Card Abuse Prevention Act of 2012 (Public Law 112-194).

The audit resulted in (1) finding and (1) recommendation. EAC management agreed with Brown's report recommendation and has proposed corrective action.

### **Evaluation of Brown and Company, LLC's Audit Performance**

In connection with the contract, the EAC OIG performed audit oversight of Brown's audit performance to include:

- Reviewed Brown's approach and planning of the audit;
- Evaluated the qualifications and independence of the auditors;
- Monitored the progress of the audit phases;

- Reviewed Brown's audit report and selected work products, to ensure compliance with Government Auditing Standards and contract deliverables; and
- Coordinated issuance of the audit report.

The audit oversight work the EAC OIG performed in evaluating Brown's conduct of the audit was not sufficient to support an opinion on the audit results and conclusions. Brown is responsible for the attached auditor's report and the finding and conclusions expressed in the report, thus EAC OIG does not express any opinion on the audit report's finding and conclusions.

#### **Audit Follow-up**

In accordance with the Office of Management and Budget (OMB) Circular No. A-50, *Audit Follow-up*, each agency shall establish systems to assure the prompt and proper resolution and implementation of audit recommendations. Resolution shall be made within a maximum of six months after receipt of the final audit report. Agency management officials are responsible for receiving and analyzing audit reports, providing timely responses to the EAC OIG, and taking corrective action where appropriate. If EAC management has not provided audit resolution to the EAC OIG within six months of report issuance, the audit recommendation will be considered outstanding.

The Inspector General Act of 1978, as amended, requires semiannual reporting to Congress on all reports issued, actions taken to implement recommendations, and recommendations that have not been implemented. Therefore, the EAC OIG will report the issuance of this audit report in our next semiannual report to Congress.

The distribution of this report is not restricted and copies are available for public inspection. Pursuant to the IG Empowerment Act of 2016, the report will be publicly posted to the EAC OIG website and Oversight.gov.

We appreciate the courtesies and cooperation extended to Brown and the EAC OIG during the audit. Please feel free to contact me if you have any questions regarding this report.

cc: Commissioner Donald L. Palmer, Chairman  
Commissioner Thomas Hicks, Vice-Chairman  
Commissioner Christy McCormick  
Commissioner Benjamin W. Hovland,

Attachment

**PERFORMANCE AUDIT REPORT  
ON THE EAC PURCHASE CARD PROGRAM**



**U.S. ELECTION ASSISTANCE COMMISSION  
WASHINGTON, D.C.**

**FISCAL PERIOD  
October 1, 2018 to September 30, 2020**

**Presented by:  
Brown & Company CPAs and  
Management Consultants, PLLC  
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**PERFORMANCE AUDIT REPORT  
ON THE EAC PURCHASE CARD PROGRAM**

**FISCAL PERIOD  
October 1, 2018 to September 30, 2020**

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Mia Forgy, Deputy Inspector General  
U.S. Election Assistance Commission  
633 3rd Street NW, Suite 200  
Washington, DC 2000

## **Independent Auditors' Report on the EAC Purchase Card Program**

We were engaged by the U.S. Election Assistance Commission ("EAC"), Office of Inspector General ("OIG"), to conduct a performance audit of the EAC purchase card program. EAC uses purchase cards to reduce the administrative cost of processing small dollar purchases.

Purchase cards are high risks for fraud, waste, abuse, and misuse. Accordingly, if the internal controls governing the EAC purchase card program are not sufficient, properly designed, and fully implemented, EAC will not be able to detect and prevent fraudulent purchases or other improper uses and abuses of the cards.

Our performance audit objectives over the EAC purchase card program, which had been requested by the EAC OIG, were:

- Internal purchase card policies and procedures are formally documented, consistent with OMB Circular A-123, Appendix B, and communicated to provide reasonable assurance of preventing illegal, improper, or erroneous transactions, to include disciplinary actions;
- Purchase card program activity is operating in compliance with all applicable sections of OMB Circular A-123, Appendix B and its own internal policies; and
- Controls over purchase card activity (purchases and payments) are designed, implemented and operating effectively to ensure only valid and authorized transactions are processed.

To perform our audit, we interviewed personnel within EAC's Finance Office (FO). We reviewed the existing EAC purchase card directives, guidance issued by regulatory agencies, and purchase card data supplied by EAC's third party service providers. We selected samples of the agency's controls over both the issuance and closing of purchase cardholder accounts. We selected a statistical sample of purchase card activity made between October 1, 2018 and September 30, 2020 to conduct control and substantive tests over the EAC purchase card program. Further background information appears in Appendix A. Our complete scope, methodology, and criteria are contained in Appendix B.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Results in Brief

We found the EAC purchase card program to be in substantial compliance with laws and regulations, specifically the Office of Management and Budget (OMB) Circular. A-123, Appendix B, *A Risk Management Framework for Government Charge Card Programs*, August 27, 2019. We found that EAC has properly designed its internal controls over its purchase card program to detect and prevent fraud, waste, abuse and misuse.

We found, through our substantive sampling procedures, exceptions over the validity and approval of purchase card transactions. We issued a Notice of Finding and Recommendation (NFR) to EAC over the identified deficiencies.

## Results

**Objective 1 - Internal purchase card policies and procedures are formally documented, consistent with OMB Circular A-123, Appendix B, and communicated to provide reasonable assurance of preventing illegal, improper, or erroneous transactions, to include disciplinary actions.**

The EAC purchase card program is the responsibility of the FO. EAC follows the policies and procedures stated in the *U.S. Department of The Treasury Charge Card Management Plan: Government-wide Commercial Purchase Cards*, hereafter referred to as “EAC directives.” We performed walkthroughs with EAC personnel to gain an understanding of the controls documented in the EAC directives.

To determine if the internal controls and processes documented in the EAC directives were designed appropriately to meet the requirements of OMB A-123, Appendix B, we developed a crosswalk between the requirements from OMB and the internal control policies and procedures documented in the EAC directives. Based on our audit procedures, we determined that the internal controls documented in the EAC directives are designed properly, to detect and prevent fraud, waste, abuse, and misuse in the EAC purchase card program.

Since our audit would not necessarily disclose all significant matters in the internal control structure, we do not express an opinion on the set of internal controls for the EAC purchase card program taken as a whole.

**Objective 2 - Purchase card program activity is operating in compliance with all applicable sections of OMB Circular A-123, Appendix B and its own internal policies.**

The FO has overall responsibility for compliance with laws and regulations covering the EAC purchase card program.

In order to determine if the EAC purchase card program is in compliance with laws and regulations, we first made inquiries with FO personnel and obtained the EAC directives covering the purchase card program. We then identified the following applicable Federal law and regulations for the management and oversight of purchase card programs:



- Government Charge Card Abuse Prevention Act of 2012 (Public Law 112-194); and
- OMB Circular No. A-123, Appendix B, *A Risk Management Framework for Government Charge Card Programs*, August 27, 2019.

Using the above EAC directives and the applicable Federal laws and regulations, we compared the requirements found in the laws and regulations to the EAC procedures. Our tests for compliance with the applicable provisions of laws and regulations disclosed no instances of noncompliance for the periods covered by our performance audit.

**Objective 3 - Controls over purchase card activity (purchases and payments) are designed, implemented and operating effectively to ensure only valid and authorized transactions are processed.**

The FO is responsible for the implementation, operating effectiveness, and monitoring of the internal control environment stated in the EAC directives.

We determined if procedures for issuing purchase cards, monitoring the use of the purchase cards, and providing training to employees having responsibilities for purchase cards are adequate. We tested the implementation, operating effectiveness, and monitoring of the controls by first identifying the key controls in the directives to meet the objectives of this performance audit. We designed procedures to test the operating effectiveness of the controls.

In order to determine if EAC is issuing purchase cards in accordance with its directives, we obtained the universe of purchase cards issued between October 1, 2018 and September 30, 2020. This universe consisted of 16 issued purchase cards. We selected the 16 purchase cards opened in our testing period.

For purchase cards, we verified that prior to issuing the purchase card, the card applicant had completed the Citibank government charge card set-up form and successfully completed the GSA SmartPay charge cardholder training. No exceptions were identified as a result of our test work.

We verified the FO is monitoring the use of purchase cards, in accordance with their directives. We noted that every month EAC cardholders review and reconcile their e-statements from the CitiDirect system using the purchase log and supporting receipts. The cardholder is responsible for reviewing the accounting string codes designated for each purchase card transaction. After the cardholder reconciles their statement for that billing cycle, they submit it to the approving official for final review and approval. After, the cardholder submits the e-statement to the Approving Official, the Approving Official logs into CitiDirect to review (with supporting documentation) and submit the e-statement. This process occurs every month (billing cycle). Additionally, the Approving official monitors the spending activity of cardholders in between billing cycles. No exceptions were identified as a result of our test work.

In order to determine if EAC is closing purchase cards in accordance with its directives, we obtained the universe of purchase cards during the testing period. This universe consisted of 6 closed purchase cards. We selected the 6 purchase cards closed in our testing period. We confirmed that the approving official destroyed disabled purchase cards, verified that the purchase cards were disabled in a timely manner and no transaction activity occurred after the accounts were closed. No exceptions were identified as a result of our test work.



EAC management has responsibility to ensure purchase card transactions are valid and properly approved. Our audit found deficiencies in purchase card documentation controls such as missing supporting documents, a missing invoice, insufficient documentation, and missing shipping information. We considered the above to be a deficiency in the operating effectiveness of the EAC purchase card program. See below Finding and Recommendation for details.

## **Finding and Recommendation**

### ***Finding No 1: Lacks Sufficient Documentation to Support the EAC Purchase Card Program.***

#### **Condition:**

EAC follows the policies and procedures stated in the *U.S. Department of The Treasury Charge Card Management Plan: Government-wide Commercial Purchase Cards*. To test the validity of the purchase card transactions, we selected a random sample of forty-five (45) transactions totaling \$87,737 from the purchase card population of 717 transactions totaling \$764,539.31 during the period October 1, 2018 to September 30, 2020. For purchase cards, we performed the following procedures:

- Traced amounts to supporting invoices;
- Verified funds had been obligated for purchase;
- Verified payments agreed to obligating documents and invoice(s);
- Traced amounts to the receiving report;
- Verified the transaction dates agree;
- Verified the Financial Manager signed the Requisition/Procurement Request For Equipment; and
- Verified the Merchant Category Code (MCC) is allowable.

In our statistical sample of 45 transactions, 9 transactions were identified as missing documents, 1 transaction identified as missing invoice, 1 transaction identified as insufficient documentation, and 3 transactions identified were missing shipping information. The total unsupported amount \$37,414.70.

#### **Criteria:**

Public Law 112-194, *An Act: To prevent abuse of Government charge cards* states “the head of each executive agency that issues and uses charge cards and convenience checks shall establish and maintain safeguards and internal controls.”

The Federal Managers’ Financial Integrity Act (FMFIA) requires agencies to establish internal control and financial systems that provide reasonable assurance of achieving the three objectives of internal control, which are: Effectiveness and efficiency of operations; Compliance with regulations and applicable laws; and Reliability of financial reporting.

U.S. Department of The Treasury, *Charge Card Management Plan: Government-wide Commercial Purchase Cards*, January 2018, states:

- **3.9.1 File Management and Content.** Files shall be kept electronically or in paper, and be made available, upon request. Files shall be organized by transaction and include all supporting documentation related to the transaction.
- **3.9.2 Transaction Log.** A Bureau-developed transaction log should be kept with an index of the purchases and contain notes to assist in file reconciliation between the log and the file folders.
- **3.9.3 Purchase Cardholder's Files for Purchases at or Below the Micro-purchase Threshold.** Purchase Cardholder's files shall contain, as applicable, the following documentation:
  - Purchase receipt;
  - Invoice;
  - Quote(s)/Offer(s) from the vendor(s);
  - Market research;
  - If applicable, documentation supporting why a required source of supply (FAR 8.002) or Treasury mandatory source (DTAP 1008.002) was not used;
  - If competitive quotations were solicited and award was made to other than the low bidder (lowest quote), documentation to support the purchase may be limited to identification of the solicited concerns and an explanation for the award decision (see FAR 13.203(b));
  - E-mail or other documentation indicating authorization of the purchase from an appropriate authority; a. This information shall provide the requester's name, item description, quantity, estimated cost, date of request.
  - Correspondence regarding the requirement; and
  - Documentation of receipt and acceptance.

GAO-14-704G - *Standards for Internal Control in the Federal Government* (known as the Green Book) states the following:

- Section 4 – Additional Considerations – Documentation Requirements:

Documentation is a necessary part of an effective internal control system. The level and nature of documentation vary based on the size of the entity and the complexity of the operational processes the entity performs. Management uses judgment in determining the extent of documentation that is needed. Documentation is required for the effective design, implementation, and operating effectiveness of an entity's internal control system.

**Cause:**

EAC lacks sufficient documentation that provide reasonable assurance of compliance with the agency's policies and procedures for the purchase card program.

**Effect:**

1. The EAC's lack of sufficient documentation have the following effect:
  - a. The Agency could not document the effectiveness of internal control for the purchase card program.
  - b. The Agency could not document compliance the *U.S. Department of The Treasury Charge Card Management Plan: Government-wide Commercial Purchase Cards* for file management and content.
  - c. The Agency could not support purchase card transactions totaling \$37,414.70 of the sampled amount of \$87,737.

**Recommendation:**

We recommend that the U.S. Election Assistance Commission's Finance Office enhance the documentation, monitoring, and enforcement of its file management procedures over the purchase card program.

**Management's Response**

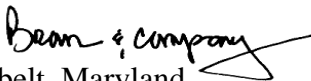
EAC's management provided the following response:

The EAC will review internal processes and procedures to improve the monitoring and enforcement of the purchase card program. Additionally, the agency is currently looking into software that can automate and streamline the purchase card process and improve record management.

The full Management Response is in Appendix D.

**Auditors' Evaluation of Management's Response**

The U.S. Election Assistance Commission concurred with the finding and recommendation and they indicated that the recommendation will be implemented.

  
Greenbelt, Maryland  
March 26, 2021

# Appendices

## Appendix A

### Background

A U.S. government charge card is an internationally accepted credit card issued by individual contractors and available to personnel in all federal agencies under a single General Services Administration (GSA) contract. The purpose of the EAC purchase card program is to minimize the paperwork needed to make purchases with proper authorization.

The Office of Management and Budget (OMB) Circular No. A-123, Appendix B, *A Risk Management Framework for Government Charge Card Programs*, August 27, 2019, consolidate current government-wide charge card program management requirements and guidance issued by the Office of Management and Budget (OMB), the General Services Administration (GSA), the Government Accountability Office (GAO), the Department of the Treasury (Treasury), and other Federal agencies, as well as provide a single document that incorporates new guidance or amendments to existing guidance. In addition, the guidance establishes standard minimum requirements and best practices for government charge card programs that may be supplemented by individual agency policies and procedures.

The Government Charge Card Abuse and Prevention Act of 2012 (Pub. L. No. 112-194) requires all Executive Branch agencies to establish and maintain safeguards and internal controls to prevent waste, fraud, and abuse of charge cards, travel cards, fleet cards, integrated cards, and centrally billed accounts while enhancing program integrity through increased opportunities for community collaboration and transparency.

### *Internal Control*

EAC uses government purchase cards to comply with the government-wide charge card program management requirements. Management's understanding of internal controls is essential in ensuring accountability at all levels of purchase card use. Purchase cards allow the same individual to order, pay for, and receive goods and services. Purchase cards are at high risk for misuse, fraud, waste, and abuse. Accordingly, if the internal controls governing the EAC purchase card program are not sufficient, properly designed, and fully implemented, EAC will not be able to detect and prevent fraudulent purchases or other improper use of the cards.

The Finance Office (FO) at EAC has responsibility for overall management of the EAC purchase card program. EAC follows the policies and procedures stated in the *U.S. Department of The Treasury Charge Card Management Plan: Government-wide Commercial Charge Cards*, hereafter referred to as "EAC directives." We performed walkthroughs with EAC personnel to gain an understanding of the controls documented in the EAC directives. EAC directive includes the responsibilities for cardholders and Approving Officials, guidance on authorized use of the purchase card, purchase limits, reconciliation and payments and training requirements for those involved with the use of the agency's purchase card.

Key roles within the EAC purchase card program include the Agency/Organization Program Coordinator (A/OPC), Approving Officials (AO), Alternate Approving Official (AAO), and

cardholders. The A/OPC oversees the purchase card program for his or her Agency/Organization, establishes guidelines, is the focal point for establishing and maintaining accounts, and is the person responsible for the issuance and destruction of purchase cards. The AO is usually the office director or supervisor designated to approve purchase card transactions, monitor purchase card activity in an organization, and certify the invoice for payment for the purchase card services. The AO reviews each cardholder's transactions to ensure that the purchases are valid and allowable.

Purchase cards are issued to a responsible employee as designated by the appropriate director in the EAC, or other management official who has budget control and responsibilities. Purchase cards, while issued to a named cardholder, are a delegation of EAC's procurement authority. Purchase cards are intended to be used as the purchasing vehicle for micro-purchases and as a payment for contracts above the micro-purchase threshold up to \$25,000. The cardholder's delegation of procurement authority authorizes them to make purchases up to \$3,500 for supplies and \$2,500 for services. For purchases exceeding the delegated authority requires an additional signature of the Contracting Officer or delegated official.

## **Appendix B**

### **Objective, Scope, Methodology, Risk Assessment and Criteria**

#### **Objectives**

The audit objectives were as follows:

- 1) Internal purchase card policies and procedures are formally documented, consistent with OMB Circular A-123, Appendix B, and communicated to provide reasonable assurance of preventing illegal, improper, or erroneous transactions, to include disciplinary actions,
- 2) Purchase card program activity is operating in compliance with all applicable sections of OMB Circular A-123, Appendix B and its own internal policies, and
- 3) Controls over purchase card activity (purchases and payments) are designed, implemented and operating effectively to ensure only valid and authorized transactions are processed.

#### **Scope**

The scope of this audit covered testing of all purchase card program transactions between October 1, 2018 and September 30, 2020.

Our performance audit was not designed to, and we did not, perform a financial audit of the amounts obligated or expended by EAC.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). GAGAS consists of the professional standards and guidance contained in the *Government Auditing Standards*, issued by the Comptroller General of the United States.

We assess internal controls, deemed significant to our audit, which includes the following:

- Risk Assessment:
  - Define Objectives and Risk Tolerances
  - Identify, Analyze, and Respond to Risks
  - Identify, Analyze, and Respond to Change
- Control Activities:
  - Design Control Activities
  - Implement Control Activities
- Information and Communication:
  - Communicate Internally
  - Communicate Externally
- Monitoring:
  - Perform Monitoring Activities
  - Evaluate Issues and Remediate Deficiencies

Since our audit would not necessarily disclose all significant matters in the internal control structure, we do not express an opinion on the set of internal controls for the EAC purchase card program taken as a whole.

## Methodology

We conducted interviews and process walkthroughs with officials at EAC and within the Finance Office (FO) organization to understand the internal controls, processes, systems, and procedures used to manage the agency's purchase card program.

We selected samples of the agency's controls over the issuance of charge accounts and closing of cardholder accounts at separation. Sample items were tested for compliance with EAC policies and procedures as well as compliance with the requirements of OMB Circular A-123, Appendix B.

We selected samples of purchase card transactions between October 1, 2018 and September 30, 2020. Testing performed over the sample included verification of transaction support, transaction approval, allowable MCC codes, evidence to support amounts were available prior to purchase, appropriate purchases for government use, dispute of unauthorized charges, purchases were from the required sources of supply and service, cardholder not splitting purchases, and balances paid timely.

## Risk Assessment

### *Objective:*

The objective of the risk assessment is to assess the risks of illegal, improper, and erroneous purchases and payments in the EAC purchase card programs.

### *Scope:*

The scope of this audit covered testing of all purchase card program transactions between October 1, 2018 and September 30, 2020.

Table 1 shows the total number of charge cardholders, number of transactions and total spending between October 1, 2018 and September 30, 2020.

**Table 1: Number of Charge Cardholders and Spending  
between October 1, 2018 and September 30, 2020**

Charge Card Program	Number of Cardholders	Number of Transactions	Disbursement Amount
Purchase Card	16	717	\$764,539.31



### *Methodology:*

We conducted the risk assessment of the purchase card program using a Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis.

- We reviewed the strengths (S) and weaknesses (W) in the design and the operating effectiveness of the purchase card internal controls based on EAC's directives.
- We identified and evaluated opportunities (O) to establish controls in the purchase card program; (e.g., third party system controls; merchant codes; and daily, weekly, or monthly purchase card spending limits).
- We identified and evaluated the threats (T) to the purchase card program, their likelihood to occur, and their impact quantitatively and qualitatively.

As part of the risk assessment, we:

- Reviewed the requirements of applicable laws and regulations.
- Obtained an understanding of EAC internal controls over its purchase card programs.
- Conducted interviews and process walkthrough with officials at EAC and within the Finance Office (FO).
- Ensured that EAC purchase card disbursements data used in our analysis were complete by reconciling it to the disbursement reported in the government-wide account statements between October 1, 2018 and September 30, 2020.
- Reviewed the FY 2020 Agency Financial Report (AFR) auditor's report and the report on internal control over financial reporting for weaknesses in the purchase card program.
- Judgmentally selected a sample of 45 purchase cards between October 1, 2018 and September 30, 2020 population and reviewed related supporting documentation for those transactions and considered the strengths and weaknesses in EAC's internal controls.

### *Conclusion:*

Based on the procedures performed, we determined that the EAC charge card program poses a moderate risk of illegal, improper, or erroneous purchases and payments. The results of our risk assessment should not be interpreted to conclude the purchase card program low risk are free of illegal, improper, or erroneous purchases and payment. Likewise, a high risk in the charge card programs should not be interpreted to indicate actual or known illegal, or erroneous purchases and payments.

### **Criteria**

We used the following to perform the audit:

- GAO *Government Auditing Standards*, 2018, GAO-18-568G
  - Chapter 8: Field Work Standards for Performance Audits
  - Chapter 9: Reporting Standards for Performance Audits
- GAO *Standards for Internal Control in the Federal Government*, September 2014
- OMB Circular. A-123, Appendix B, *A Risk Management Framework for Government Charge Card Programs*, August 27, 2019
- Government Charge Card Abuse Prevention Act of 2012 (Public Law 112-194)

## Appendix C

### Acronyms and Abbreviations

<i>A/OPC</i>	<i>Agency/Organization Program Coordinator</i>
<i>AA/OPC</i>	<i>Agency Alternative/Organization Program Coordinator</i>
<i>AAO</i>	<i>Alternate Approving Official</i>
<i>AO</i>	<i>Approving Official</i>
<i>CPA</i>	<i>Certified Public Accountant</i>
<i>EAC</i>	<i>Election Assistance Commission</i>
<i>FO</i>	<i>Finance Office</i>
<i>FY</i>	<i>Fiscal Year</i>
<i>GAGAS</i>	<i>Generally Accepted Government Auditing Standards</i>
<i>GAO</i>	<i>U.S. Government Accountability Office</i>
<i>GSA</i>	<i>General Services Administration</i>
<i>MCC</i>	<i>Merchant Category Code</i>
<i>OIG</i>	<i>Office of Inspector General</i>
<i>OMB</i>	<i>Office of Management and Budget</i>
<i>U.S.C.</i>	<i>United States Code</i>

## Appendix D

### Election Assistance Commission Response



U.S. ELECTION ASSISTANCE COMMISSION  
633 3<sup>rd</sup> Street, NW – Suite 200  
Washington, DC 20001

March 26, 2021

To: Brown & Company  
From: Paul Repak, Financial Director  
Subject: Management Response to Notice of Findings and Recommendations, Purchase Card Audit

The EAC acknowledges and understands the Notice of Findings and Recommendations (NFR) for the Purchase Card Audit from Brown & Company. Due to COVID-19 and the recent office move, the EAC was unable to provide some samples and supporting documentation within the period of the audit. The immediate shift to remote work without notice caused all staff to not have access to the office building due to the pandemic. The EAC did make an effort to submit the remaining deliverables after the field work was completed, and successfully submitted approximately half of the outstanding items referenced in the NFR after the audit had closed.

The EAC will review internal processes and procedures to improve the monitoring and enforcement of the purchase card program. Additionally, the agency is currently looking into software that can automate and streamline the purchase card process and improve record management.

Thank you,

*Paul W Repak*

Paul W Repak  
Financial Director

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