



OFFICE OF INSPECTOR GENERAL

U.S. International Development Finance Corporation

DFC Implemented an Effective Government Charge Card Program for Fiscal Year 2024

September 23, 2025
Audit Report DFC-25-004-C

1100 New York Avenue NW
Washington, D.C. 20527
<https://www.dfc.gov/oig>



Report Highlights

Office of Inspector General International Development Finance Corporation

DFC Implemented an Effective Government Charge Card Program for Fiscal Year 2024

What Was Reviewed

The U.S. International Development Finance Corporation Office of Inspector General (OIG) contracted with the independent public accounting firm RMA Associates, LLC (RMA) to audit DFC's charge card program in accordance with Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act). The Charge Card Act requires the OIG to conduct periodic reviews of DFC's charge card program for illegal, improper, or erroneous transactions to prevent fraud, delinquency, or misuse.

The objectives of this audit were as follows:

1. To determine the scope, frequency, and number of audits or reviews, conduct a risk assessment to assess, identify, and analyze the risks of illegal, improper, or erroneous purchases and payments within DFC's charge card program.
2. Address the requirements of the Charge Card Act, OMB and General Services Administration (GSA) requirements and standards.

What Was Found

In its audit of DFC, RMA found that DFC implemented an effective Government Charge Card Program for FY 2024. As a result, there were no recommendations. RMA concluded that based on the results of their review of the current information, the results of their sample testing, and Appendix B guidance, that the next audit of the charge card program should be in FY 2026 for FY 2025 transactions. There were no prior year recommendations findings and all recommendations prior to 2022 were closed.



Office of Inspector General

U.S. International Development Finance Corporation

MEMORANDUM:

DATE: September 23, 2025

TO: Mr. Keron White
Vice President and Chief Administrative Officer (CAO)

Ms. Mildred O. Callear
Vice President and Chief Financial Officer (CFO)

FROM: Ms. Erika Ersland
Acting Assistant Inspector General for Audits, Office of Inspector General

SUBJECT: DFC Implemented an Effective Government Charge Card Program for Fiscal Year 2024 (Audit Report DFC-25-004-C)

The Office of Inspector General (OIG) contracted with the independent certified public accounting firm of RMA Associates, LLC (RMA) to conduct the Government Charge Card Program performance audit of the United States International Development Finance Corporation for Fiscal Year 2024. The contract required RMA to perform the engagement in accordance with generally accepted government auditing standards; Government Charge Card Abuse Prevention Act of 2012, Public Law No. 112-194; and Office of Management and Budget (OMB) Circular No. A-123, Appendix B, a Risk Management Framework for Government Charge Card Programs (Aug. 27, 2019).

In its audit of DFC, RMA found that DFC implemented an effective Government Charge Card Program for FY 2024. As a result, there were no recommendations. RMA concluded that based on the results of their review of the current information, the results of their sample testing, and Appendix B guidance, that the next audit of the charge card program should be in FY 2026 for FY 2025 transactions. There were no prior year recommendations findings and all recommendations prior to 2022 were closed.

RMA is responsible for the attached auditor's report dated September 18, 2025, and the conclusions expressed therein. We do not express, opinions or conclusions on whether DFC's government charge card program complied substantially with applicable laws and regulations, addressed prior year recommendations, or when the next audit should be conducted.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact me at 202-641-2614.

CC: Dev Jagadesan (Acting CEO and Deputy General Counsel)
Conor Coleman (Chief of Staff)



Office of Inspector General

U.S. International Development Finance Corporation

Alan Villabroza (Deputy Vice President and Treasurer)
Managing Director of Financial Management
Managing Director of Corporate Administrative Services
Managing Director and Travel Officer
Director Acquisition Operations and Support
Supervisory Contract Specialist
Managing Director of Internal Controls
RMA Associates

U.S. International Development Finance Corporation (DFC)

DFC Implemented an Effective Government Charge Card Program for Fiscal Year 2024

Final Report

Date: September 18, 2025

RMA Associates, LLC

4121 Wilson Blvd, Suite 1100

Arlington, VA 22203

Phone: (571) 429-6600

Fax: (703) 852-7272

www.rmafed.com

September 18, 2025

Erika Ersland, Acting Assistant Inspector General for Audits
Office of Inspector General
U.S. International Development Finance Corporation

Dear Ms. Ersland,

RMA Associates, LLC (RMA) is pleased to submit our performance audit report for the fiscal year 2024 for DFC's government charge card program.

Our scope included testing management plans, testing samples of charge card (purchase and travel) transactions for completeness and accuracy, and conducting a risk assessment.

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.

We very much appreciate the opportunity to serve you and will be pleased to discuss any questions you may have.

Sincerely,



RMA Associates, LLC
Arlington VA

Table of Contents

Background	1
Objectives	2
Scope	2
Criteria	3
Summary of Results	3
Summary of Findings	4
Appendix A: Management Comments	5
Appendix B: Methodology	6
Appendix C: Glossary of Acronyms and Abbreviations	9

Background

The U.S. International Development Finance Corporation (DFC) helps bring private capital to the developing world. DFC was created by the Better Utilization of Investments Leading to Development Act of 2018 (BUILD Act). DFC began operations in December 2019, consolidating the functions of its predecessor agencies, the Overseas Private Investment Corporation (OPIC) and the U.S. Agency for International Development's (USAID) Development Credit Authority (DCA).

The Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act) requires the Office of Inspector General (OIG) to conduct annual risk assessments of Federal agencies' purchase and travel card programs to mitigate the risk of fraud, misuse, and delinquency. Furthermore, Office of Management and Budget (OMB) issued guidance that prescribes the policies and procedures regarding how Executive Branch agencies establish and maintain safeguards and internal controls to prevent waste, fraud, and abuse of purchase cards, travel cards, fleet cards, integrated cards, and centrally billed accounts while enhancing program integrity through increased opportunities for community collaboration and transparency. Effective internal controls provide reasonable assurance that significant risks or weaknesses that could adversely impact the agency's ability to meet its objectives are prevented, minimized, or detected in a timely manner.

OMB Circular A-123, Appendix B addresses controls, policies, and practices for the Purchase Card Program. Risk Management controls, policies, and procedures are critical tools for ensuring the efficiency and integrity of the Charge Card Program. These controls, policies, and practices are put in place with the intention of eliminating payment delinquencies, charge card misuse, fraud, and other forms of waste and abuse. In addition, the OMB Circular provides definitions of misuse, fraud, waste, and abuse.

1. Misuse: Unintentional use of a federal charge card for other than the official Government purpose for which it is intended.
2. Fraud: Felonious act of corruption or attempt to cheat the Government or corrupt the Government's agent.
3. Waste: Any activity took with respect to a government charge card that fosters or results in unnecessary costs or other program inefficiencies.
4. Abuse: Intentional use of a government charge card in violation of the Federal Acquisition Regulation (FAR), Defense Federal Acquisition Regulation Supplement (DFARS), Agency Supplements, or activity Government Purchase Card (GPC) policies/procedures.

According to the OMB Circular, charge card officials are responsible for the following:

- Implementing the appropriate controls to ensure compliance with Federal laws, Federal and agency regulations, and for monitoring program effectiveness.
- Ensuring that any risk management policies and practices established in the agency's charge card management plan are conducted effectively and that the charge card management plan is updated with enhanced risk management policies and practices, as applicable.

- Ensuring that purchase business line statement reconciliation or transaction reconciliation is in a timely manner.
- Routinely review charge card reports and closely monitor and address delinquencies.
- Coordinate with the agency's Human Resources Office to ensure that delinquent payments are addressed, and corrective actions are taken to prevent further occurrence.

OMB Circular A-123, Appendix B, also sets forth general training requirements for all charge card program participants. Specifically, all participants must be trained prior to appointment or receiving a purchase card; must take refresher training, at a minimum, every three years; and must certify that they have received the training, understood the regulations and procedures, and knew the consequences of inappropriate actions.

During the audit, RMA Associates, LLC (RMA) obtained the universe and evaluated data transactions for both purchase cards and travel cards over fiscal year (FY) 2024 to assess the risk level associated with DFC's charge card program (**Table 1**).

Table 1: Size of DFC's Charge Card Program for FY 2024

Category	Purchase Card	Travel Card ¹
Dollar value of transactions	\$1,419,552.87	\$9,104,458.18
Number of transactions	856	16,248

Objectives

This report presents the results of work conducted by RMA to address performance audit objectives related to DFC's FY 2024 audit of the government charge card program and risk assessment.

Our objectives for this audit are as follows:

1. **Objective 1:** To determine the scope, frequency, and number of audits or reviews, conduct a risk assessment to assess, identify, and analyze the risks of illegal, improper, or erroneous purchases and payments within DFC's charge card program.
2. **Objective 2:** Address the requirements of the Charge Card Act, OMB and General Services Administration (GSA) requirements and standards.

Scope

RMA conducted a charge card audit for FY 2024 and applicable procedures, certifications, documentation, and controls to achieve this process. Specifically, RMA reviewed the evidence supporting purchases documented, and reconciled monthly statements by DFC, identifying and quantifying any questioned purchases.

¹ Includes the Centrally Billed Account.

Criteria

Provided below are the relevant criteria upon which the results of our testing are based:

- Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act);
- Travel and Transportation Reform Act of 1998 (P.L. 105-264);
- Chief Financial Officers Act of 1990 (P.L. 101-576);
- Executive Order (EO) 11541;
- 31 United States Code (USC) §1111;
- 41 USC §1909;
- 10 USC § 2784;
- OMB Memorandum M-17-26, Reducing Burden for Federal Agencies by Rescinding and Modifying OMB Memoranda, June 25, 2017;
- OMB Circular A-123, Appendix B, A Risk Management Framework for Government Charge Card Programs, August 27, 2019; and
- Generally Accepted Government Auditing Standards (GAGAS), 2018 Revision, Technical Update April 2021.

Summary of Results

DFC implemented an effective Government Charge Card Program for FY 2024. Per Appendix B to OMB Circular No. A-123, an annual audit is required for executive agencies with more than \$10 million in annual purchases under the charge card program. DFC's charge card program did not surpass the \$10 million threshold for FY 2024. If DFC's charge card program surpasses this amount in future years, an annual audit will be required.

Objective 1: To determine the scope, frequency, and number of audits or reviews, conduct a risk assessment to assess, identify, and analyze the risks of illegal, improper, or erroneous purchases and payments within DFC's charge card program. Given the review of the current information, the results of our sample testing, and Appendix B guidance, we recommend the next audit of the Charge Card Program be in FY 2026 with the auditing of FY 2025 transactions. Refer to Appendix B for testing methodology and details.

Objective 2: Address the requirements of the Charge Card Act, OMB and GSA requirements and standards. RMA obtained an understanding of DFC's internal controls over applications, transactions, review and approval, and charge card management. RMA determined the DFC charge card program addresses the requirements of the Charge Card Act, OMB, and GSA requirements. Refer to Appendix B for testing methodology and details.

For DFC's FY 2024 OMB A-123 Appendix B assessment, RMA did not identify any findings related to the charge card program. There were no prior year recommendations and all recommendations prior to 2022 were closed. Appendix B contains a more detailed description of our methodology for achieving our audit objectives.

Summary of Findings

RMA did not identify any findings nor issue any recommendations during this performance audit of DFC's charge card program for FY 2024.

Appendix A: Management Comments



MEMORANDUM

September 8, 2025

TO: Erika Ersland
Acting Assistant Inspector General for Audits
DFC – Office of the Inspector General

FROM: Keron White
Vice President and Chief Administrative Officer

KERON Digitally signed
by KERON WHITE
WHITE Date: 2025.09.10
13:36:45 -04'00'

SUBJECT: DFC's Management Comments to "DFC Implemented an Effective Government Charge Card Program for Fiscal Year 2024"
(Audit Report DFC-25-004-C)

We greatly appreciate the Office of the Inspector General issuing an audit report that confirms DFC implemented an effective charge card program. The report recognizes the Corporation's strong internal controls and commitment to sound financial management and accountability.

As stewards of federal funds, DFC takes very seriously its responsibility to uphold high standards of internal control over its charge card programs. The OIG's assessment underscores the Corporation's dedication to transparent government spending and to fostering a workforce culture accountable to the American public.

We greatly appreciated the OIG's professionalism and diligence throughout the audit process, and we value the constructive engagement with your team.

1100 New York Avenue Northwest
Washington, DC 20527
Office +1 202.336.8400
dfc.gov

Appendix B: Methodology

In accordance with GAGAS, 2018 Revision Technical Update April 2021, RMA reviewed DFC's management charge card plans and policies for FY 2024. We analyzed the population of all purchase card and travel card transactions that occurred in FY 2024 and selected samples to test the effectiveness of controls. To select our test sample, RMA used our proprietary Data Extraction and Analysis Procedures system (DEAPs). DEAPs, designed jointly by our in-house team of data scientists, statisticians, auditors, and CPAs, is a statistical sampling tool that uses mathematical algorithms to extract statistical data from a variety of information systems and stratifies the population into homogeneous groups. This allows our team to effectively select samples based on the nature of testing performed (i.e., control testing). Stratification also increases the reliability of the samples and minimizes the risk that the sample is not representative of the population. After selecting a sample, we requested documentation to verify that DFC's purchase and travel card cardholders complied with DFC's policies and procedures and applicable laws and regulations.

We also assessed the reliability of the data by 1) reconciling the data to supporting documentation, 2) reviewing existing information about the data and the system that produced them, and 3) conducting a walkthrough with DFC personnel knowledgeable about the data. We determined that the data was sufficiently reliable for the purposes of this report.

The sampling plan and methodology for each area tested and examined are described in more detail below.

Sampling Plan and Monetary Impact Projection

Our sample was selected from the population of purchase card and travel card transactions made in FY 2024, excluding negative amounts that indicate reversals. For travel card transactions, samples were selected from the population of selected travelers due to the high dollar value of their total transaction amounts and average transaction amounts.

Table 2 details the population of records and the resulting sample sizes for each charge card program.

Table 2: Resulting Sample Size for FY 2024

Category	Purchase Card	Travel Cards	Centrally Billed Accounts
Population	856	11,637	4,611
Sample Size	20	20	20

Assessment of Management Plans and Internal Controls

RMA assessed DFC's management plans for FY 2024 against required elements per OMB Circular A-123, Appendix B and whether the policy outlined in the plans were followed.

Additionally, our team assessed DFC's internal controls for the purchase card and travel card program for FY 2024. The purpose was to assess the following controls:

- Application;
- Transaction;
- Review and approval; and
- Charge card management.

Travel Card Testing

RMA obtained the universe and evaluated data transactions for travel cards for FY 2024 to assess the risk level associated with this area of DFC's charge card program. The \$325,299.39 value of travel card transactions selected for FY 2024 consists of debits and credits of \$201,714.31 worth of Centrally Billed Account transactions and debits and credits of \$123,585.08 worth of individual travel card transactions for selected travelers with the highest dollar value of total transaction amounts and average transaction amounts.

RMA tested travel approvals, travel vouchers, and monthly bank statements for selected samples for FY 2024 to evaluate accuracy, completeness, and timeliness against the required elements per OMB Circular A-123, Appendix B and DFC management plans.

Sample testing of travel vouchers and monthly statements for the centrally billed account was also performed for FY 2024.

Travel card training was tested in the FY 2024 period. In testing training compliance, we reviewed DFC's travel card policies and procedures and travel card management plans, certificates of completion for selected samples, and spreadsheets documenting the status of cardholder training completions.

Purchase Card Testing

RMA obtained the universe and evaluated data transactions for purchase cards for FY 2024 to assess the risk level associated with this area of DFC's charge card program. The dollar value of purchase card transactions selected for FY 2024 consists of debits and credits of \$243,472.74.

RMA tested approvals, receipts, monthly reconciliation cover sheets, monthly bank statements, and confirmation packages for selected samples for FY 2024 to evaluate accuracy, completeness, and timeliness.

Purchase card training was tested in the FY 2024 period. In testing training compliance, we reviewed DFC's purchase card policies and procedures and purchase card management plans, certificates of completion for selected samples, and spreadsheets documenting the status of cardholder training completions.

Risk Assessment

RMA conducted a risk assessment of DFC's charge card program by reviewing policies, procedures, and other controls applicable to the charge card program. Comparison of charge card documentation to monthly statements was used to identify patterns of improper, erroneous, or illegal charge card use in FY 2024.

Appendix C: Glossary of Acronyms and Abbreviations

Table 3 contains definitions of all acronyms and abbreviations used in this report.

Table 3: Acronyms and Abbreviations

Acronym	Definition
CAO	Chief Administrative Officer
CFO	Chief Financial Officer
DCA	Development Credit Authority
DEAPs	Data Extraction and Analysis Procedures system
DFARS	Defense Acquisition Regulation Supplement
DFC	U.S. International Development Finance Corporation
EO	Executive Order
FAR	Federal Acquisition Regulation
FOIA	Freedom of Information Act
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
GPC	Government Purchase Card
GSA	General Services Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
OPIC	Overseas Private Investment Corporation
P.L.	Public Law
RMA	RMA Associates, LLC
USAID	U.S. Agency for International Development
USC	United States Code