OIG

Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

Audit Report

Council of the Inspectors General on Integrity and Efficiency Purchase Card Project

OIG Office *of the* Inspector General
SOCIAL SECURITY ADMINISTRATION

MEMORANDUM

Date: February 21, 2018   **Refer To:**

To: The Commissioner

From: Acting Inspector General

Subject: Council of the Inspectors General on Integrity and Efficiency Purchase Card Project
(A-13-17-50266)

The attached final report presents the results of the Office of Audit's review. The objective was to review the Social Security Administration's purchase card transactions as prescribed for the Government-wide Council of the Inspectors General on Integrity and Efficiency Purchase Card Project.

If you wish to discuss the final report, please call me or have your staff contact Rona Lawson, Assistant Inspector General for Audit, 410-965-9700.

Gale Stallworth Stone

Gale Stallworth Stone

Attachment

cc:
General Counsel

Council of the Inspectors General on Integrity and Efficiency Purchase Card Project
A-13-17-50266

Objective

To review the Social Security Administration's (SSA) purchase card transactions as prescribed for the Government-wide Council of the Inspectors General on Integrity and Efficiency (CIGIE) Purchase Card Project.

Background

In October 2016, the CIGIE Information Technology (IT) Committee, in conjunction with several Offices of Inspector General (OIG), initiated a project to assess certain purchase card transactions. The Government purchase card, part of the General Services Administration SmartPay Program, enables authorized Federal employees to make purchases on the Government's behalf in support of their agency/organization's mission. Federal Acquisition Regulations allow for purchase cards to be used to procure supplies and/or services valued at or below the $3,500 micro-purchase threshold. During the review period, 2,343 active cardholders had 38,468 transactions, totaling about $18.6 million.

OIGs participating in the Purchase Card Project selected and reviewed certain transactions, as prescribed by guidance used for the Purchase Card Project, considered as high-risk transactions. Transactions reviewed occurred from October 1, 2016 through March 31, 2017.

Findings

Based on project guidance for high-risk transactions, we selected 46 SSA transactions to review to determine whether the purchase card transactions were illegal, improper, or erroneous. Of the 46 purchase card transactions reviewed, 42 complied with the Agency's policies and procedures. However, we identified four instances of possible split purchases. Our 2010 and 2016 purchase card audits also identified instances where SSA staff performed possible split purchases.

Of the four instances, SSA staff confirmed three, totaling $20,041, involved split purchases. The remaining instance involved staff using Fiscal Year (FY) 2017 funds to pay for services SSA contracted for in FY 2016—an unauthorized commitment of $2,763 of FY 2017 funds.

Conclusions

Generally, the purchase card transactions we reviewed complied with the Agency's purchase card policies and procedures. We identified three split purchases and the unauthorized commitment of FY 2017 funds. SSA staff reported it had reviewed the supporting documentation for the split purchases and the unauthorized commitment of funds but, because of staffing resources, had not completed the Agency's ratification process. Agency staff planned to take appropriate actions to correct the split purchases and the unauthorized commitment of FY 2017 funds.

CIGIE plans to issue a report summarizing the review results of all OIGs participating in the Government-wide Purchase Card Project. The results of this review will be included in CIGIE's report.

Recommendation

We recommended SSA complete applicable corrective actions pertaining to the split purchases and the unauthorized commitment of FY 2017 funds.

SSA agreed with our recommendation.

TABLE OF CONTENTS

ABBREVIATIONS

Act	*Government Charge Card Abuse Prevention Act of 2012*
AIMS	Administrative Instructions Manual System
C.F.R.	Code of Federal Regulations
CIGIE	Council of the Inspectors General on Integrity and Efficiency
FY	Fiscal Year
IT	Information Technology
MRM	Materiel Resources Manual
OAG	Office of Acquisition and Grants
OIG	Office of the Inspector General
Pub. L. No.	Public Law Number
SSA	Social Security Administration
U.S.C.	United States Code

OBJECTIVE

Our objective was to review the Social Security Administration's (SSA) purchase card transactions as prescribed for the Government-wide Council of the Inspectors General on Integrity and Efficiency (CIGIE) Purchase Card Project.

BACKGROUND

The *Government Charge Card Abuse Prevention Act of 2012*[1] (Act), reinforces efforts to prevent waste, fraud, and abuse in Government-wide charge card programs. The Act addresses agencies' management of their Government purchase and travel card programs by requiring that Inspectors General of executive agencies ". . . perform analysis or audits as necessary, of purchase card transactions to identify . . . potentially illegal, improper, or erroneous use of purchase cards."[2]

In October 2016, the CIGIE Information Technology (IT) Committee, in conjunction with several Offices of Inspector General (OIG), initiated a project to assess certain purchase card transactions. Led by the Department of Agriculture OIG, the Purchase Card Project had participating OIGs analyze specific purchase card transactions for their respective agencies.

The Government purchase card, part of the General Services Administration SmartPay Program, enables authorized Federal employees to make purchases on the Government's behalf in support of their agency/organization's mission. Federal Acquisition Regulations allow for purchase cards to be used to procure supplies and/or services valued at or below the $3,500 micro-purchase threshold.[3] In addition, warranted contracting officers can use purchase cards for purchases that exceed $3,500 provided the single purchase limit does not exceed their delegated authority.[4]

OIGs participating in the Purchase Card Project reviewed certain transactions made during the period October 1, 2016 through March 31, 2017. We obtained electronic data extracts of all SSA purchase card transactions made from October 1 through December 31, 2016 and January 1 through March 31, 2017. For these periods, the data extracts contained 38,468 transactions, totaling about $18.6 million,[5] for 2,343 active cardholders.

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[1] *Government Charge Card Abuse Prevention Act of 2012*, Pub. L. No. 112-194, §§ 2-4, 126 Stat. 1445, pp. 1445-1450.

[2] *Government Charge Card Abuse Prevention Act*, § 2, 126 Stat., p. 1447, codified at Title 41 U.S.C. § 1909(d)(2)(A).

[3] 48 C.F.R. § 13.301 (2009).

[4] SSA, AIMS, *Materiel Resources Manual* (MRM), ch. 06.16, sec. 06.16.03 (March 31, 2017) indicates contracting officers can use the purchase card for transactions that exceed $3,500.

[5] The total absolute value of the transactions is about $18.6 million: positive value is $18,600,787 and negative value is $20,112.

As prescribed by Purchase Card Project guidance, project participants used an analytical tool[6] to identify transactions considered to be high-risk items. The tool used data analysis software to apply nine algorithms to determine high-risk transactions. The algorithms pertained to weekend and holiday purchases, prohibited and questionable merchant category code purchases, sales tax, third-party vendors, single purchase card limits, closed accounts, and split purchases. See Appendix A for detailed information concerning Purchase Card Project algorithms.

For the periods October through December 2016 and January through March 2017, the analytical tool identified 4,217 and 4,277 high-risk transactions, respectively. Of those high-risk transactions, in compliance with project guidance for sample selection, we identified the top 25 percent and selected 46 transactions to review—23 from each period—to determine whether the purchase card transactions were potentially illegal, improper, or erroneous. See Appendix B for our scope and methodology and Appendix C for our sampling methodology.

RESULTS OF REVIEW

Of the 46 purchase card transactions reviewed, 42 complied with the Agency's policies and procedures. However, we identified four instances of possible split purchases. Our 2010[7] and 2016 purchase card audits[8] also identified instances where SSA staff performed possible split purchases.

Office of Acquisition and Grants (OAG) staff analyzed the four possible split purchases and confirmed three split purchases. The remaining instance involved two requisitions related to the unauthorized commitment of funds for purchases, totaling $2,763. Staff had used Fiscal Year (FY) 2017 funds to pay for services SSA contracted for in FY 2016. Agency staff reported it had reviewed supporting documentation for the split purchases and the unauthorized commitment of funds but, because of staffing resources, had not completed the Agency's ratification process.[9]

Purchase Card Transactions

Of the 46 purchase card transactions reviewed, 42 complied with SSA policies and procedures. Using the analytical tool, we selected and reviewed 23 transactions made from October 1 through December 31, 2016 and 23 transactions made from January 1 through March 31, 2017.

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[6] CIGIE provided the analytical tools to provide uniformity for processing and reporting the results across the CIGIE community.

[7] SSA, OIG, *The Social Security Administration's Government Purchase Card Program*, A-13-09-29027 (March 2010).

[8] SSA, OIG, *The Social Security Administration's Fiscal Year 2014 Government Purchase Card Program*, A-13-15-50038 (May 2016).

[9] SSA, OAG, *Micro Purchasing in SSA*, Part I, Chapter 5, Section 3, pp. 25-28 (March 2017) indicates the ratification process requires that OAG staff investigate the transactions and provide the facts to OAG's Associate Commissioner for approval or denial. If approved, OAG takes appropriate action to approve and correct the transactions. If denied, OAG's Associate Commissioner forwards the request to the Deputy Commissioner for Budget, Finance, and Management for review.

These purchase card transactions met the conditions of eight algorithms. Of the 46 purchase card transactions examined, 90 percent, totaling $68,712, complied with SSA's purchase card policies and procedures.

We reviewed these 42 transactions to determine the appropriateness of purchases (1) made on weekends or holidays; (2) made with prohibited or questionable merchant category codes; (3) with purchase costs that include sales taxes; and/or (4) made to third-party vendors. We also reviewed the transactions to determine whether (1) billed amounts were greater than the single purchase limit, (2) purchase card transaction dates occurred after account closed dates, or (3) potential split purchases existed.

We found the 42 transactions (a) were authorized within the purchase cost thresholds, (b) contained appropriate approvals, (c) were documented properly in cardholders' purchase logs, and (d) contained appropriate supporting documentation for purchase and receipt of goods and services.

Split Purchase Transactions

We identified four instances of possible split purchases.[10] Split purchases circumvent the cardholder's single-purchase limit and avoid the requirement to obtain competition on purchases over the $3,500 micro-purchase threshold.[11] When a purchase exceeds the micro-purchase dollar threshold, the component should process the purchase through the contracting office under SSA's procedures for competitive purchases. The four purchases totaled about $25,708. For the period October 1 through December 31, 2016, we found the following.

- A cardholder made two online purchases for executive chairs, totaling about $4,493, including installation charges per chair. A single cardholder made the purchases on the same day with the same vendor. The vendor acknowledged these purchases by sending the cardholder emails. The cardholder's purchase log also showed the purchases for those amounts to that vendor.

- A cardholder made seven purchases for language interpreter services, totaling about $11,590. A single cardholder made the purchases on the same day with the same vendor. On the date of service, the interpreters provided signatures acknowledging interpreter service provided. The cardholder's purchase log also showed the purchases for those amounts to that vendor.

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[10] Each instance of a split purchase included one transaction from our sample selection and other transactions related to the split purchase.

[11] SSA, OAG, *Micro Purchasing in SSA*, Part I, Chapter 3, Section 1, pp. 9-11 (March 2017) indicates the single purchase limit for individual purchases of supplies is $3,500. The single purchase limits for individual purchases of services and construction are $2,500 and $2,000, respectively.

- A cardholder made four purchases, totaling about $5,667, for an SSA lessor to provide heating, ventilation, and air conditioning as well as cleaning services and minor construction work above services outlined in the lease agreement. The vendor acknowledged these purchases by sending the cardholder a letter itemizing services. The cardholder's purchase log also showed the purchases for those amounts to that vendor.

From January 1 through March 31, 2017, we found a cardholder made three purchases, totaling $3,958, for oversized chairs for employees. A cardholder made the purchases on the same day with the same vendor. The vendor acknowledged these purchases by sending the cardholder an invoice, receipt of payment, and shipping instructions. The cardholder's purchase log also showed the purchases for those amounts to that vendor.

Our 2010[12] and 2016[13] purchase card audits also identified instances where SSA staff performed possible split purchases. In 2010, we recommended SSA instruct cardholders to comply with SSA policy and procedures to prevent split purchases. When we detected the issue again in 2016, we recommended SSA assess the split purchases we identified to determine whether they were detected by SSA's monitoring process and adjust the monitoring process to identify and resolve such transactions, as needed. The Agency agreed with our recommendations. On August 23, 2016, SSA's OAG[14] issued an acquisition alert reminding cardholders to avoid making split purchases, obtain and maintain pre-approval documentation, maintain a purchase log, and obtain and retain receipts and acceptances of supplies and services' records. Overall, our two audits found no significant deficiencies. Prior audit findings concerning split purchases had limited monetary impact.

On August 10, 2017, we forwarded the four possible split purchases to OAG for review. OAG staff analyzed the four possible split purchases and confirmed three split purchases. The remaining instance consisted of two purchase requisitions for specific services provided in FY 2016 and two requisitions related to the unauthorized commitment of funds for purchases totaling $2,763. Staff used FY 2017 funds to pay for services SSA contracted for in FY 2016. Agency staff reported it had reviewed supporting documentation for the split purchases and the unauthorized commitment of funds but, because of staffing resources, had not completed the Agency's ratification process.[15] SSA staff plans to take appropriate actions to correct the split purchases and the unauthorized commitment of funds.

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[12] See Footnote 7.

[13] See Footnote 8.

[14] Within the Office of the Deputy Commissioner for Budget, Finance, and Management, OAG oversees the Agency's Purchase Card Program.

[15] See Footnote 9.

CONCLUSIONS

Generally, the purchase card transactions we reviewed complied with the Agency's purchase card policies and procedures. We identified four instances of possible split purchases. SSA confirmed three instances of split purchases, and the remaining instance involved the unauthorized commitment of FY 2017 funds. CIGIE plans to issue a report summarizing the review results of all OIGs participating in the Government-wide Purchase Card Project, which will include our review of SSA transactions.

RECOMMENDATION

We recommend that SSA complete applicable corrective actions pertaining to the split purchases and the unauthorized commitment of FY 2017 funds.

AGENCY COMMENTS

SSA agreed with our recommendation. For the full text of the Agency comments, see Appendix F.

Rona Lawson
Assistant Inspector General for Audit

APPENDICES

Appendix A – PURCHASE CARD ALGORITHMS

We obtained from the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Information Technology (IT) Committee an analytical tool that included pre-defined data-mining algorithms with weights. Using the provided analytical tool, we applied the algorithms to Social Security Administration (SSA) purchase card transactions to identify high-risk transactions. See Table A–1 for details.

Table A–1: CIGIE IT Committee's Purchase Card Algorithms

#	Purchase Card Algorithm	Algorithm Description
1	Is it a weekend transaction?	Weekend purchases in the operations of a normal governmental organization could offer a high probability of identifying potentially fraudulent, improper, and abusive transactions.
2	Is it a holiday transaction?	Holiday purchases in the operations of a normal governmental organization could offer a high probability of identifying potentially fraudulent, improper, or abusive transactions.
3	Is the merchant category code prohibited?	Charging a purchase from a vendor with a blocked merchant category code should be automatically rejected at the point of purchase.
4	Is the merchant category code questionable?	Determine whether the cardholder purchased items or services from questionable merchant category code vendors.[1]
5	Is billed amount greater than single purchase limit?	Determine whether the cardholder spent above his/her authorized single purchase limit.
6	Does the transaction have a transaction date after the account-closed date?	Determine whether purchases occurred after the cardholder's account was closed.
7	Does the transaction include sales tax?	Determine whether any purchases had sales tax charged and the purchaser documented attempts to recover the tax.
8	Is it a third-party vendor transaction?	Determine whether cardholder performed a purchase through a third-party vendor.
9	Is it a potential split purchase?[2]	Determine whether the cardholder split two or more transactions that would have normally been a single-purchase transaction to circumvent the micro-purchase threshold of $3,500.

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[1] Questionable merchant category codes were defined by each participating Office of Inspector General. We defined questionable merchant category codes as those that seemed suspicious and not related to governmental transactions.

[2] Split purchases are defined as purchase card transactions conducted with the same vendor, on the same day, with the same cardholder, and the total exceeds $3,500.

Appendix B – SCOPE AND METHODOLOGY

To achieve our objectives, we:

- Reviewed applicable laws, regulations, and Social Security Administration (SSA) policies and procedures regarding the purchase card program.

- Reviewed prior Office of the Inspector General reports.

- Interviewed staff from SSA's Offices of Acquisition and Grants and Finance.

- Obtained and reviewed SSA's Annual Purchase Card Management Plan for 2016.

- Obtained purchase charge card data for the period October 1, 2016 through March 31, 2017. This included 2,343 cardholders and 38,468 purchase card transactions totaling about $18.6 million.[1]

- Obtained from the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Information Technology (IT) Committee nine data-mining algorithms, to include data-analytical and statistical tools, and procedures to determine high-risk purchase card transactions. See Appendix A for the data-mining algorithms.

- Obtained from the CIGIE IT Committee the sampling methodology to select high-risk transactions for review. See Appendix C for sampling methodology.

We determined the computer-processed data used for this audit were sufficiently reliable for their intended use. Further, any data limitations were minor in the context of this assignment, and the use of the data should not lead to an incorrect or unintentional conclusion. We obtained the data used in our audit from the CitiDirect Card Management System and SSA.

The principal entity audited was the Office of the Deputy Commissioner for Budget, Finance, and Management. We conducted our review between May and August 2017 at SSA Headquarters in Baltimore, Maryland. 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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[1] Our review did not include Office of the Inspector General purchase charge cardholders or their transactions.

Appendix C – SAMPLING METHODOLOGY

We obtained purchase charge card data for the period October 1, 2016 through March 31, 2017.[1] The data pertained to 2,343 Social Security Administration purchase cardholders' 38,468 purchase card transactions totaling about $18.6 million.[2] We populated the data extracts into the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Information Technology (IT) Committee's analytical tool, to which pre-defined algorithm weights were applied. For the periods October through December 2016 and January through March 2017, the analytical tool flagged 4,217 and 4,277 purchase card transactions as high-risk transactions, respectively.

Using the CIGIE IT Committee's sampling procedures and sampling selection tool, we:

- Sorted the sample population of high-risk transactions first by algorithm weight and second by the billing amount.

- Divided the total sample population of high-risk transactions by four to identify the number of high-risk transactions in the top 25 percent. For the periods October 1 through December 31, 2016 and January 1 through March 31, 2017, the high-risk top 25 percent included 1,054 and 1,069 transactions, respectively.

- Placed the high-risk top 25 percent transactions into the provided random number worksheet to randomize and select purchase card transactions for review.

- Selected a sample of 23 from the high-risk top 25 percent transactions for stratum 1 (October 1 through December 31, 2016) and a second sample of 23 for stratum 2 (January 1 through March 31, 2017).

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[1] Data were from the CitiDirect Card Management System.

[2] Our review did not include Office of the Inspector General purchase charge cardholders or their transactions.

Appendix D – PHASE 1 SAMPLE TRANSACTIONS REVIEWED

Table D–1 shows the 23 sampled purchase card transactions we reviewed for the period October 1 through December 31, 2016. Purchase card transactions listed below may apply to more than one algorithm. Therefore, the transactions identified are not mutually exclusive.

Table D–1: Phase 1 Sample Transactions with Selected Algorithms

Sample Item	Weekend or Holiday	Prohibited Merchant Category Codes	Questionable Merchant Category Codes	Bill Amount > Single Purchase Limit	Transaction Date after Account Closed	Sales Tax	Third-Party Vendor	Potential Split Purchase	Transaction Amount
1	X		X						$27.30
2								X	$3,819.98
3							X		$99.98
4							X		$1,086.40
5								X	$6,290.75
6								X	$4,492.50
7							X		$112.40
8							X		$89.99
9							X		$29.45
10								X	$4,786.00
11	X						X		$333.85
12							X		$69.52
13	X						X		$67.96
14								X	$11,590.00
15		X							$120.00
16	X					X			$181.07
17								X	$6,648.65
18							X		$119.56
19							X		$37.25
20	X				X				$27.05

Sample Item	Weekend or Holiday	Prohibited Merchant Category Codes	Questionable Merchant Category Codes	Bill Amount > Single Purchase Limit	Transaction Date after Account Closed	Sales Tax	Third-Party Vendor	Potential Split Purchase	Transaction Amount
21							X		$3,000.00
22							X		$25.99
23		X						X	$5,667.27
Total	**5**	**2**	**1**	**0**	**1**	**1**	**12**	**7**	**$48,722.92**

Appendix E – PHASE 2 SAMPLE TRANSACTIONS REVIEWED

Table E–1 shows the 23 sampled purchase card transactions we reviewed for the period January 1 through March 31, 2017. Purchase card transactions listed below may apply to more than one algorithm. Therefore, the transactions identified are not mutually exclusive.

Table E–1: Phase 2 Sample Transactions with Selected Algorithms

Sample Item	Weekend or Holiday	Prohibited Merchant Category Codes	Questionable Merchant Category Codes	Bill Amount > Single Purchase Limit	Transaction Date after Account Closed	Sales Tax	Third-Party Vendor	Potential Split Purchase	Transaction Amount
1								X	$3,594.71
2								X	$3,511.90
3			X						$3,360.00
4							X		$59.95
5							X		$459.54
6							X		$658.00
7							X		$185.51
8								X	$6,072.28
9							X		$53.19
10							X		$12.50
11								X	$3,958.08
12	X						X		$42.99
13							X		$41.36
14	X					X			$413.82
15							X		$1,136.54
16								X	$6,999.49
17								X	$11,227.50
18							X		$161.20
19							X		$63.96
20							X		$18.34

Sample Item	Weekend or Holiday	Prohibited Merchant Category Codes	Questionable Merchant Category Codes	Bill Amount > Single Purchase Limit	Transaction Date after Account Closed	Sales Tax	Third-Party Vendor	Potential Split Purchase	Transaction Amount
21							X		$8.99
22								X	$3,650.00
23							X		$6.99
Total	**2**	**0**	**1**	**0**	**0**	**1**	**14**	**7**	**$45,696.84**

SOCIAL SECURITY

MEMORANDUM

Date: February 14, 2018   Refer To: S1J-3

To: Gale S. Stone
          Acting Inspector General

From: Stephanie Hall   /s/
          Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Council of the Inspectors General on Integrity and
          Efficiency Purchase Card Project" (A-13-17-50266)--INFORMATION

          Thank you for the opportunity to review the draft report. Please see our attached comments.

          Please let me know if we can be of further assistance. You may direct staff inquiries to
          Gary S. Hatcher at (410) 965-0680.

          Attachment

COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT, "COUNCIL OF THE INSPECTORS GENERAL ON INTEGRITY AND EFFICIENCY PURCHASE CARD PROJECT" (A-13-17-50266)

Recommendation 1

Recommend SSA complete applicable corrective actions pertaining to the split purchases and the unauthorized commitment of fiscal year 2017 funds.

Response

We agree. We have completed our acquisition management review of the split purchases and unauthorized commitments. We are in the process of taking further corrective action.

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