

AUDIT REPORT

Internal Controls over Voyager Card Transactions – LAX Los Feliz Station, CA

July 28, 2016



Report Number FT-FM-16-004



HIGHLIGHTS

July 28, 2016

Internal Controls over Voyager Card Transactions – LAX Los Feliz Station, CA

Report Number FT-FM-16-004

BACKGROUND:

The U.S. Postal Service Office of Inspector General (OIG) uses data analytics to identify financial anomalies. Tripwires are analytic tools that look at specific behaviors and patterns that are strong indicators of improper activity. The Voyager credit card tripwire identified purchases made outside of OIG-defined normal workhours (7 a.m. – 5 p.m.) and exceeding Long Life Vehicle (LLV) and Ford Windstar tank capacities at the LAX Los Feliz Station, CA. These types of purchases are considered suspicious and could indicate ineffective internal controls or fraud.

Every Postal Service-owned vehicle is assigned a Voyager card and every driver receives a personal identification number (PIN). The card is used to pay for fuel, oil, and routine vehicle maintenance. Site managers are responsible for verifying Voyager card transactions and all supporting documentation.

The objectives of this audit were to review the validity of transactions outside of normal workhours and over the LLV and Ford Windstar fuel tank capacities and assess internal controls over the Voyager card purchases at the LAX Los Feliz Station.

WHAT THE OIG FOUND:

The OIG tripwire identified 112 of 570 transactions (20 percent) valued at \$6,345 were made outside of normal

workhours. We found the site delivered mail and Amazon products to customers and other post offices from 1 a.m. to 11 p.m. from November 2015 to January 2016; therefore, we considered these transactions valid fuel purchases.

Additionally, the Voyager credit card tripwire identified 114 of 570 transactions (20 percent) where the amount of fuel purchased exceeded the LLV and Ford Windstar tank capacities. Reviewing Voyager card transaction supporting documentation, we verified 111 of 570 transactions exceeded the tank capacities by at least 1 gallon. The total value of the excess fuel was \$2,543.06. The site manager did not exercise due diligence completing the required monthly Voyager card reconciliation. Specifically, he did not review receipts for allowable gallons and question overcapacity transactions. We referred the information to the OIG's Office of Investigations for further review.

Also, we determined controls over Voyager card transactions needed improvement. The site manager did not:

 Require receipts or other documentation to explain missing receipts. In evaluating missing receipts, we reviewed 165 of the 570 total transactions and identified 37 transactions, valued at \$2,203.24, that were missing receipts or the required supporting documentation to explain the missing receipts.

 Actively monitor driver PINs. We identified 58 transactions made by employees using PINs not assigned to them. We also referred this information to the OIG's Office of Investigations for further review.

When internal controls are not in place and functioning, Voyager card holders may misuse the card to make unauthorized or improper purchases. Further, the practice of sharing PINs inhibits accountability of purchases by driver, making it more difficult for site managers or their designees to identify unauthorized use.

As a result of the audit, management agreed to stop the practice of sharing PINs. In addition, the site manager contacted U.S. Bank to deactivate shared PINs. As of May 16, 2016, U.S. Bank confirmed the deactivations and provided an updated PIN list.

WHAT THE OIG RECOMMENDED.

We recommended management establish controls to ensure the Voyager card policy for monthly reconciliation high-risk transactions, missing receipts, and PIN security are followed.

Link to review the entire report



July 28, 2016

MEMORANDUM FOR: ALFRED SANTOS

DISTRICT MANAGER, LOS ANGELES DISTRICT

E-Signed by Lorie Nelson
ERIFY authenticity with eSign Deskto

FROM: Lorie Nelson

Director, Finance

SUBJECT: Audit Report – Internal Controls Over Voyager Card

Transactions – LAX Los Feliz Station, CA

(Report Number FT-FM-16-004)

This report presents the results of our audit of Internal Controls Over Voyager Card Transactions at the LAX Los Feliz Station, CA (Project Number 16BG012FT000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Asha Mede, deputy director, Financial Controls, or me at 703-248-2100.

Attachment

cc: Corporate Audit and Response Management

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Introduction

This report presents the results of our audit of Internal Controls over Voyager Card Transactions – LAX Los Feliz Station, CA (Project Number 16BG012FT000). The LAX Los Feliz Station is in the Los Angeles District of the Pacific Area. This self-initiated audit is one of several audits of the Voyager card designed to provide U.S. Postal Service management with timely information on potential financial control risks at Postal Service locations.

We reviewed Voyager Fleet card¹ purchases and the related receipts from November 1, 2015, to January 31, 2016, to determine the validity of the transactions. We also evaluated the Voyager card process and interviewed the site manager and other personnel responsible for the oversight of the process. We relied on computer-generated data maintained by Postal Service systems, including the Enterprise Data Warehouse (EDW),² Fleet Commander,³ Fuel Asset Management System (FAMS),⁴ Time and Attendance Collection System,⁵ and Web-based Complement Information System.⁶ We did not test the validity of controls over these systems; however, we verified the accuracy of the data by confirming our analysis and results with Postal Service managers. We determined that the data were sufficiently reliable for the purposes of this report.

We conducted this audit from May through July 2016, 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 objective. We discussed our observations and conclusions with management on May 16, 2016 and included their comments where appropriate.

Transactions Outside Normal Workhours

The Voyager credit card tripwire identified 112 of 570 (20 percent) transactions valued at \$6,345 that were made outside of U.S. Postal Service Office of Inspector General (OIG)-defined normal workhours.⁷ We found the site delivered mail and Amazon

¹ Assigned to Postal Service vehicles and used to pay for fuel, oil, and routine vehicle maintenance.

² A repository intended for all data and the central source for information on retail, financial, and operational performance. Mission-critical information comes to the EDW from transactions that occur across the mail delivery system, points-of-sale, and other sources.

³ Provides total access to observe, update, track, and manage fleet operations and fleet card accounts.

⁴ A cost management tool for managing and controlling fuel costs. The system allows authorized users to display and reconcile expenses (for example, fuel, oil, repairs, and washing), that were charged to Voyager credit cards.

⁵ A system used by all installations that automates the collection of employee time and attendance information.

⁶ A web interface that displays and stores information about employee complement details down to the office or unit level. The system gives local management a resource for monitoring and tracking employee complement.

⁷ 7 a.m. to 5 p.m.

products to customers and other post offices from 1 a.m. to 11 p.m. during the scope period. We reviewed supporting documentation and found all transactions were for fuel; therefore, we considered these transactions valid fuel purchases. Further, the Voyager card policy did not set a specific timeframe for purchasing fuel.

Transactions Exceeding Vehicle Capacity

The Voyager credit card tripwire identified 114 of 570 transactions (20 percent) where the amount of fuel purchased exceeded the Long Life Vehicle (LLV) and Ford Windstar tank capacities. Reviewing Voyager card transaction supporting documentation, we verified 111 of 570 (19 percent) transactions exceeded the tank capacities by at least 1 gallon. The total value of the excess fuel was \$2,543.06 (see Table 1).

The site manager did not exercise due diligence in terms of completing the required monthly Voyager card reconciliation. Specifically, he did not review receipts for allowable gallons and question overcapacity transactions. The FAMS Reconciliation by Exception Process⁸ classifies fuel purchases exceeding the allowed amount as high-risk transactions. Site managers are responsible for verifying questionable purchases and must reconcile each high-risk transaction against supporting documentation. They must provide a written explanation or select the applicable explanation from a drop-down menu to explain the exception. For all transactions reconciled from November 2015 through January 2016, the site manager selected "Too many fuel purchases within a single month," a selection that did not explain why individual transactions exceeded tank capacities.

Identifying why gallons of fuel exceed the vehicle's tank capacity could help mitigate the risk and recurrence of overcapacity transactions. In addition, if Voyager card transactions are not properly reconciled, there is an increased risk the Postal Service may pay for improper transactions. We considered the \$2,543.06 of fuel charges in excess of tank capacity as unsupported questioned costs.⁹

Receipts

The site manager did not have supporting receipts or the documentation that is required to explain missing receipts. We identified 37 of 165¹⁰ fuel transactions (22 percent), valued at \$2,203.24 that did not have supporting receipts or the required documentation to explain the missing receipts. The site manager was aware of the policy and

⁸ Voyager Fleet Card Standard Operating Procedures, July 17, 2015, 4.1. Responsibilities.

⁹ A weaker claim and a subset of questioned costs. Claimed because of failure to follow policy or required procedures, but does not necessarily connote any real damage to the Postal Service.

¹⁰ We did not review all fuel transactions during our scope period for missing receipts. We compared the number of transactions made after OIG-defined workhours (112) and the number of transactions where the amount of fuel purchased exceed vehicle tank capacity by 1 gallon or more (111) and excluded duplicate transactions. We used that total (165) as our universe to review transactions for required receipts.

established a process for drivers to turn in signed receipts at the end of the day.¹¹ However, he did not ensure the drivers followed his process.

The policy¹² states every attempt should be made to secure a receipt for each transaction. In cases where the receipt is missing, the site manager must:

- Contact the cardholder to determine why the receipt is missing
- Secure a signed Voyager Fleet Card Transaction: No Receipt Form
- Verify the purchase was valid
- Annotate the results of the determination in FAMS

If the site manager does not obtain and verify documentation supporting these Voyager card transactions, the facility may be at risk for paying for unauthorized transactions. We considered \$1,654.11¹³ of transactions missing receipts or the required form to explain missing receipts as unsupported questioned costs.

Security of Voyager Card Personal Identification Numbers

The site manager did not ensure appropriate security of Voyager card personal identification numbers (PIN). We identified 58 fuel transactions made by employees using PINs not assigned to them.

This occurred because PINs were shared between drivers. Postal Service policy states that every Postal Service-owned vehicle is assigned a Voyager card, and every driver must receive a randomly assigned PIN that is a private number. Site managers must instruct each driver to only use their unique PIN, which helps identify the drivers who make the purchases. Site managers secure the PINs and maintain appropriate security to avoid misuse.¹⁴

Sharing PINs inhibits the accountability of purchases by drivers. Drivers could misuse the PINs if the site manager does not actively oversee PINs to ensure they are not shared.

As a result of the audit, management agreed to stop the practice of sharing PINs In addition, the site manager contacted U.S. Bank to deactivate shared PINs. As of May 16, 2016, U.S. Bank confirmed the deactivations and provided an updated PIN list.

¹¹ Although not required by policy, management at the Los Feliz Station required carriers to turn in signed receipts at the end of the day when the card is returned. The policy requires each driver to input their PIN, record their vehicle number, and give receipts to their supervisor.

¹² Voyager Fleet Card Standard Operating Procedures, July 17, 2015.

¹³ One transaction with missing receipts also included fuel exceeding the vehicle tank capacity. Therefore, that amount, \$549 was included in the Transactions Exceeding Vehicle Capacity finding and is not included here.

¹⁴ Voyager Fleet Card Standard Operating Procedures, July 17, 2015, 2.2.2. PIN Management.

Recommendation

We recommend the manager, Los Angeles District, instruct the postmaster, Los Angeles, to:

1. Establish controls to ensure the Voyager card policy for monthly reconciliation high-risk transactions, missing receipts and personal identification number security are followed.

Management's Comments

Management generally agreed with the findings, recommendation, and monetary impact and instructed personnel to follow reconciliation guidelines, apply standard operating procedures to strengthen internal controls, discontinue sharing PINs, and review Voyager Card transactions for suspicious transactions. Management also stated that cards are signed in and out daily and are maintained and locked in a secure location. Also, carriers put their name, vehicle number, and ending mileage on receipts kept in a designated envelope and reconciled daily.

Management disagreed that employees made transactions while not on official duty due to delivery of Amazon Fresh where carriers deliver as early as 3:00 a.m. and as late as 11:00 p.m.

See Appendix A for management's comments in their entirety.

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendation in the report. We consider the recommendation closed with the issuance of this report.

Regarding transactions made while not on official duty, we acknowledged in the report that the site delivered mail and Amazon products to customers and other post offices from 1 a.m. to 11 p.m. during the scope period. We found all transactions were for fuel; therefore, we considered these transactions valid fuel purchases. Further, the Voyager card policy did not set a specific timeframe for purchasing fuel.

Table 1. Transactions Exceeding Vehicle Fuel Tank Capacity by at Least One Gallon

				Number of	Excess		
	Product		Tank	Gallons	Tank	Cost Per	Excess
Transactions	Purchased	Purchase Date	Capacity ¹⁵	Purchased	Capacity	Gallon	Amount
1	Unleaded	November 1, 2015	15	26.66	11.66	\$2.95	\$34.50
2	Unleaded	November 2, 2015	15	23.60	8.60	2.96	25.45
3	Diesel	November 2, 2015	15	16.12	1.12	2.99	3.36
4	Unleaded	November 2, 2015	15	21.73	6.73	3.19	21.53
5	Unleaded	November 2, 2015	15	17.79	2.79	3.28	9.15
6	Diesel	November 3, 2015	15	24.28	9.28	4.00	37.12
7	Unleaded	November 3, 2015	15	22.11	7.11	2.95	21.04
8	Diesel	November 4, 2015	15	20.42	5.42	2.99	16.25
9	Unleaded	November 4, 2015	15	25.31	10.31	3.19	32.97
10	Unleaded	November 4, 2015	15	19.57	4.57	3.21	14.71
11	Unleaded	November 6, 2015	15	19.52	4.52	3.16	14.28
12	Unleaded	November 7, 2015	15	26.45	11.45	2.96	33.89
13	Unleaded	November 7, 2015	15	18.92	3.92	3.19	12.54
14	Unleaded	November 8, 2015	15	21.96	6.96	2.96	20.60
15	Diesel	November 9, 2015	15	19.34	4.34	2.99	13.02
16	Unleaded	November 9, 2015	15	26.85	11.85	2.95	35.07
	Unleaded	,					
17	Super	November 11, 2015	15	16.82	1.82	3.20	5.82
18	Unleaded	November 12, 2015	15	25.25	10.25	2.95	30.33
19	Unleaded	November 13, 2015	15	31.29	16.29	3.19	52.12
20	Unleaded	November 13, 2015	15	17.50	2.50	3.33	8.35
21	Unleaded	November 14, 2015	15	23.31	8.31	2.95	24.59
22	Unleaded	November 14, 2015	15	27.54	12.54	2.95	37.11
23	Unleaded	November 15, 2015	15	24.45	9.45	2.96	27.97
24	Unleaded	November 16, 2015	15	16.17	1.17	3.60	4.21
25	Unleaded	November 16, 2015	15	19.60	4.60	3.10	14.26
26	Unleaded	November 16, 2015	15	20.87	5.87	3.16	18.55
27	Unleaded	November 18, 2015	15	16.83	1.83	3.16	5.78
28	Unleaded	November 18, 2015	15	22.30	7.30	2.96	21.61
29	Unleaded	November 19, 2015	15	22.12	7.12	3.19	22.78
30	Unleaded	November 22, 2015	15	26.90	11.90	3.13	37.35
31	Unleaded	November 22, 2015	15	17.26	2.26	2.90	6.55
32	Unleaded	November 23, 2015	20	30.96	10.96	2.89	31.78
33	Unleaded	November 24, 2015	15	22.31	7.31	2.90	21.20
	Unleaded						
34	Plus	November 24, 2015	15	18.93	3.93	3.02	11.86
35	Unleaded	November 25, 2015	15	16.36	1.36	2.90	3.94
36	Unleaded	November 26, 2015	15	24.26	9.26	\$2.90	\$26.85
37	Unleaded	November 27, 2015	15	19.58	4.58	2.89	13.28
38	Unleaded	November 28, 2015	15	17.82	2.82	2.79	7.89

¹⁵ LLV have a 15 gallon fuel tank capacity. Ford Windstar vehicles have a 20 gallon fuel tank capacity.

Internal Controls over Voyager Card Transactions — LAX Los Feliz Station, CA

				Number of	Excess		
	Product		Tank	Gallons	Tank	Cost Per	Excess
Transactions	Purchased	Purchase Date	Capacity ¹⁵	Purchased	Capacity	Gallon	Amount
39	Unleaded	November 28, 2015	15	20.34	5.34	2.89	15.48
40	Unleaded	November 29, 2015	15	16.92	1.92	2.90	5.57
41	Unleaded	December 1, 2015	15	24.59	9.59	2.90	27.81
42	Unleaded	December 1, 2015	15	20.60	5.60	2.70	15.12
43	Unleaded	December 1, 2015	15	17.20	2.20	2.89	6.38
44	Unleaded	December 2, 2015	15	25.00	10.00	2.90	29.00
45	Unleaded	December 2, 2015	15	29.53	14.53	3.09	45.03
46	Unleaded	December 3, 2015	15	19.95	4.95	2.89	14.35
47	Diesel	December 6, 2015	15	23.70	8.70	2.99	26.09
48	Unleaded	December 6, 2015	15	30.76	15.76	3.09	48.84
49	Unleaded	December 8, 2015	15	23.83	8.83	2.82	24.90
50	Unleaded	December 9, 2015	15	17.38	2.38	3.09	7.37
51	Unleaded	December 10, 2015	15	27.61	12.61	2.80	35.30
52	Unleaded	December 12, 2015	15	29.08	14.08	2.99	42.23
53	Unleaded	December 12, 2015	15	23.96	8.96	2.77	24.82
54	Diesel	December 13, 2015	15	16.26	1.26	2.99	3.78
55	Diesel	December 15, 2015	15	22.15	7.15	3.00	21.45
56	Unleaded	December 15, 2015	15	24.61	9.61	2.80	26.91
57	Unleaded	December 15, 2015	15	25.84	10.84	2.99	32.51
58	Unleaded	December 17, 2015	15	22.86	7.86	2.80	22.01
59	Unleaded	December 18, 2015	15	23.13	8.13	2.88	23.42
60	Unleaded	December 18, 2015	15	21.48	6.48	2.88	18.66
61	Unleaded	December 19, 2015	15	24.58	9.58	2.98	28.55
62	Unleaded	December 21, 2015	15	20.02	5.02	2.97	14.95
63	Unleaded	December 21, 2015	15	22.62	7.62	2.89	22.09
64	Unleaded	December 21, 2015	15	23.78	8.78	3.09	27.21
65	Unleaded	December 23, 2015	15	34.00	19.00	2.97	56.60
66	Unleaded	December 23, 2015	15	19.21	4.21	3.10	13.05
67	Unleaded	December 23, 2015	15	19.80	4.80	2.98	14.30
68	Unleaded	December 24, 2015	15	19.89	4.89	2.97	14.57
69	Unleaded	December 24, 2015	15	27.63	12.63	3.19	40.40
70	Unleaded	December 24, 2015	15	16.88	1.88	3.08	5.79
71	Unleaded	December 28, 2015	15	21.76	6.76	3.07	20.81
72	Unleaded	December 30, 2015	15	22.40	7.40	3.08	22.79
73	Unleaded	December 30, 2015	20	30.40	10.40	3.08	32.03
74	Unleaded	December 30, 2015	15	22.13	7.13	3.08	21.96
75	Unleaded	January 4, 2016	15	17.26	2.26	3.06	6.91
76	Unleaded	January 5, 2016	15	25.24	10.24	3.13	32.14
77	Unleaded	January 5, 2016	15	25.85	10.85	3.29	35.79
78	Unleaded	January 5, 2016	15	20.22	5.22	2.93	15.34
79	Unleaded	January 6, 2016	15	24.56	9.56	\$3.14	\$30.02
80	Unleaded	January 7, 2016	15	22.76	7.76	3.30	25.61
81	Unleaded	January 8, 2016	15	20.10	5.10	3.03	15.50
82	Unleaded	January 8, 2016	15	26.79	11.79	3.03	35.82
83	Unleaded	January 10, 2016	15	20.66	5.66	3.20	18.11
84	Unleaded	January 10, 2016	15	17.66	2.66	3.40	9.04

	Product		Tank	Number of Gallons	Excess Tank	Cost Per	Excess
Transactions	Purchased	Purchase Date	Capacity ¹⁵	Purchased	Capacity	Gallon	Amount
85	Unleaded	January 11, 2016	15	29.05	14.05	3.03	42.70
86	Unleaded	January 11, 2016	15	19.82	4.82	3.03	14.65
87	Unleaded	January 12, 2016	15	26.80	11.80	3.04	35.87
88	Unleaded	January 12, 2016	15	20.09	5.09	3.23	16.49
89	Unleaded	January 13, 2016	15	19.85	4.85	3.03	14.74
90	Unleaded	January 13, 2016	15	25.09	10.09	3.13	31.67
91	Unleaded	January 14, 2016	15	20.69	5.69	2.93	16.72
92	Unleaded	January 16, 2016	15	30.56	15.56	3.00	46.67
93	Unleaded	January 16, 2016	15	34.90	19.90	3.19	63.66
94	Unleaded	January 18, 2016	15	33.09	18.09	2.99	54.26
95	Unleaded	January 19, 2016	15	27.00	12.00	3.00	36.00
96	Unleaded	January 20, 2016	15	21.20	6.20	2.94	18.23
97	Unleaded	January 20, 2016	15	19.13	4.13	2.98	12.31
98	Unleaded	January 21, 2016	15	17.38	2.38	2.98	7.09
99	Unleaded	January 22, 2016	15	17.50	2.50	2.97	7.45
100	Unleaded	January 23, 2016	15	28.85	13.85	2.98	41.27
101	Unleaded	January 23, 2016	15	18.21	3.21	2.97	9.56
102	Unleaded	January 23, 2016	15	16.52	1.52	3.16	4.80
103	Unleaded	January 23, 2016	15	17.85	2.85	3.16	9.01
104	Unleaded	January 24, 2016	15	27.17	12.17	2.94	35.78
105	Unleaded	January 26, 2016	15	27.51	12.51	2.93	36.77
106	Unleaded	January 27, 2016	15	17.01	2.01	2.93	5.91
107	Unleaded	January 27, 2016	15	26.89	11.89	2.89	34.47
108	Unleaded	January 28, 2016	15	27.04	12.04	2.88	34.67
109	Unleaded	January 28, 2016	15	23.28	8.28	2.89	24.01
110	Unleaded	January 28, 2016	15	19.84	4.84	2.88	13.94
111	Unleaded	January 28, 2016	15	21.35	6.35	2.88	18.29
TOTAL							\$2,543.06

Source: Postal Service; FAMS.

Appendix A: Management's Comments

Los Angeles District



July 21, 2016

LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Voyager Over Capacity Fuel Purchases and After Hours Fuel Transactions (Report Number 16BG012Ft000 dated July 2016)

Thank you for the opportunity to review and respond the subject draft audit report. Management generally agrees with the findings and monetary impact identified in the report, however we do not agree with the OIG's finding that there were 93 transactions valued at \$5,389.60 identified made by employees who were not on official duty for the Postal Service at the time. Los Feliz is a 22 hour operation office due to the delivery of Amazon Fresh in which carriers deliver as early as 3:00am and as late as 11:00pm.

Management agrees with the recommendation and has taken action to address the recommendation as noted below:

Recommendation:

We recommend the manager, Los Angeles District, instruct the postmaster, Los Angeles, to: Establish controls to ensure the Voyager card policy for monthly reconciliation high-risk transactions, missing receipts, and personal identification number security are followed.

Management Response/Action Plan:

The Postmaster, Los Angeles, instructed the Manager Customer Services for the LAX-Los Feliz station to:

- 1. Follow FAMS reconciliation guidelines for voyager card fuel transactions.
- Discontinue the practice of sharing PINS and contact the US Bank to deactivate PINS that have been shared.
- 3. Apply standard operating procedures over the Voyager Card Program to strengthen internal controls.
- 4. Review voyager card transactions for suspicious transactions.

In addition, management also took the following action:

1. All cards were reordered and received by April 15, 2016.

7001 S. Central Ave., Ste. 320 Los Angeles, CA 90052-9998 (323) 586-1200 (651) 456-6087 efax -2-

- 2. Cards are maintained and locked in a secure location on a daily basis.
- 3. All carriers have their own specific pin number and the sharing of pins has been discontinued.
- 4. All carriers must sign out a gas card and sign it back in upon returning daily.
- 5. All carriers are required to annotate their name, vehicle number and ending mileage on the receipts upon returning from the street.
- 6. All receipts are kept in a designated envelope for each month.
- 7. Receipts are reconciled daily to ensure Voyager cards are being used properly.

Target Implementation Date:

Completed

Responsible Official:

Vicente Sanchez, Manager, Customer Service LAX - Los Feliz Station

As the recommendation has been implemented, management requests closure of the audit with issuance of the final report.

Al Santos

District Manager, Los Angeles District