



Travel Cards

Report No. OIG-AMR-75-15-02

June 16, 2015

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Memorandum from the Chief Financial Officer, Response to Inspector
General report on Travel Card audit, dated June 11, 2015

EXECUTIVE SUMMARY

The National Labor Relations Board's personnel are required to use the Government contractor-issued travel credit card for all expenses incurred when traveling on official business. At the National Labor Relations Board, Citibank issues the travel card and the Finance Branch administers the travel card program.

The Government Charge Card Abuse Prevention Act of 2012 and Office of Management and Budget guidance require that we perform a periodic assessment of the Agency's travel card program. During our 2014 annual risk assessment, we observed an apparent lack of internal controls over the travel card program, particularly relating to the documentation of controls in a Travel Card Management Plan and how improper transactions were reviewed. Based upon our observations, we determined that it was necessary to initiate this audit.

The objectives of the audit were to determine whether the travel card program is operated in accordance with applicable laws, regulations, and Agency policies, and to determine whether controls are sufficient to prevent or detect waste, fraud, and abuse. In general, the internal controls documented in the Agency's policy were not applied consistently and the travel card program was not managed in a manner that would prevent or detect travel card abuse. We made 11 recommendations to correct the identified issues.

The Chief Financial Officer reviewed the draft report and provided comments stating agreement with the factual accuracy of the report and the recommendations. The comments also noted that the Office of the Chief Financial Officer has begun remediation actions. The comments are included as an Appendix.

BACKGROUND

The National Labor Relations Board's (NLRB or Agency) personnel are required to use the Government contractor-issued travel credit card for all expenses incurred when traveling on official Government business. Travel cards may not be used for expenses unrelated to official travel. At the NLRB, Citibank issues the travel card and the Finance Branch administers the travel card program.

The Government Charge Card Abuse Prevention Act of 2012 and the Office of Management and Budget (OMB) Memorandum M-13-21 require the Office of Inspector General (OIG) to conduct periodic assessments of purchase and travel card programs that identify and analyze risks of illegal, improper, or erroneous purchases and payments for use in determining the scope, frequency, and number of periodic audits of these programs. During the course of the risk assessment, we observed an apparent lack of internal controls over the travel card program, particularly relating to the documentation of controls in a Travel Card Management Plan and how improper transactions were reviewed. Based upon our observations, we determined there was a high risk of illegal, improper, or erroneous purchases through the NLRB's travel card program. As a result, we initiated this audit.

OBJECTIVE, SCOPE, AND METHODOLOGY

The audit's objectives were to determine whether the travel card program is operated in accordance with applicable laws, regulations, and Agency policies, and to determine whether controls are sufficient to prevent or detect waste, fraud, and abuse. The scope of the audit was travel card activity during Fiscal Year (FY) 2014. We excluded the Finance Branch's activity related to OIG employees' travel cards from the scope of the audit.

We reviewed Governmentwide laws and regulations related to travel cards. We also reviewed guidance issued by OMB, including OMB Circular A-123, Appendix B, Improving the Management of Government Charge Card Programs. We obtained and reviewed the Agency's Travel Card Management Plan and interviewed staff in the Finance Branch to identify internal controls used to manage the travel card program.

We obtained and reviewed the reports used by the Finance Branch during FY 2014 to identify misuse and to determine whether the Finance Branch was following procedures documented in the NLRB Travel Card Management Plan. We reviewed travel card documentation maintained by the Finance Branch to determine whether the documentation was maintained in accordance with the NLRB Travel Card Management Plan.

We reviewed the Finance Branch's documentation of refresher training to determine whether travel cardholders received refresher training. We also reviewed training documentation for employees assigned the roles as Agency/Organization Program Coordinator (A/OPC) to determine whether those employees received the required training.

From the Citibank Reporting System, we obtained listings of all travel cardholders as of the end of FY 2014, all travel cardholders with new accounts created during FY 2014, and all travel card transactions in FY 2014. We obtained a report from the General Services Administration (GSA) listing employees who took travel card training through the GSA Web site during FY 2014. We obtained from the Federal Personnel Payroll System a listing of all employees that separated from the Agency in FY 2014.

For employees who separated during FY 2014, we reviewed the listing of travel cardholders as of the end of FY 2014 to determine whether the Finance Branch closed the travel card accounts in a timely manner. For employees who had new accounts created during FY 2014, we reviewed the travel card documentation to determine whether the travel cardholder received initial training and whether a credit check was performed.

We conducted this performance audit in accordance with generally accepted government auditing standards during the period November 2014 through May 2015. 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.

INTERNAL CONTROLS

Internal control is a significant part of managing an organization. It comprises the plans, methods, and procedures used to meet missions, goals, and objectives. Internal control also serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud. Control activities occur at all levels and functions of the entity. They include a wide range of diverse activities such as approvals, authorizations, verifications, maintenance of security, and the creation and maintenance of related records which provide evidence of execution of these activities as well as appropriate documentation.

We used the Internal Control Management Evaluation Tool, issued by the Government Accountability Office (GAO), to evaluate the travel card program's internal controls and we did specific control testing. The NLRB's travel card program's internal control environment is primarily based upon OMB guidance rather than regulatory requirements. In general, we determined that internal controls were not applied consistently and the travel card program was not managed in a manner that would prevent or detect travel card abuse.

The complete results of the Internal Control Management Evaluation Tool are listed as an attachment. The following sections describe our testing of specific internal controls.

MONITORING FUNCTIONS

Agency/Organization Program Coordinator

OMB Circular A-123, Appendix B requires the travel card management plan to designate an A/OPC and requires the A/OPC to be trained on the roles and responsibilities of that position before assuming those duties. The NLRB Travel Card Management Plan designates the A/OPC as the Accounting Officer, Office of the Chief Financial Officer, and the alternate A/OPC as the Chief of Systems and Procedures Section.

We found that neither the A/OPC nor the alternate A/OPC met the training requirements. We also found that neither the A/OPC nor the alternate A/OPC performed the duties of

the A/OPC outlined in OMB Circular A-123, Appendix B. Instead, those duties were performed by a Systems Accountant. The Systems Accountant received the appropriate training on the duties of the A/OPC.

Recommendations

1. We recommend that the Finance Branch amend the NLRB Travel Card Management Plan to identify the Systems Accountant position as the A/OPC.
2. We recommend that the Finance Branch develop an internal control to ensure that all employees overseeing the travel card program, including those performing supervisory functions, meet the mandatory training requirements.

Monitoring Travel Card Use and Identifying Misuse

OMB Circular A-123, Appendix B requires the Agency to review card statements and account activity reports to identify questionable or suspicious transactions. According to the NLRB Travel Card Management Plan, the A/OPC is responsible for reviewing travel card reports to ensure that travel card charges are appropriate and related to business travel. The plan requires that questionable charges on a travel cardholder's statement be referred to the Special Counsel or the OIG.

The NLRB Travel Card Management Plan also requires the A/OPC to reduce travel card limits to \$1.00 for infrequent travelers. Finance Branch officials stated that the Agency was not following this procedure during the period that was within the scope of the audit.

Travel card transactions have a four digit merchant category code (MCC) that identifies the type of goods or services that the merchant provides. We observed that the Finance Branch uses a list of questionable MCCs to create a monthly report to identify potential travel card misuse. The Finance Branch reviews the transactions on the report to determine which transactions appear to be inappropriate. After reviewing the monthly report, the Systems Accountant would send the travel cardholders with suspected inappropriate transactions an email message requesting an explanation. If the travel cardholder's response indicated that the travel

card was used in an improper manner, the Systems Accountant would then send a reply by email message requesting that the travel cardholder not use the travel card for that purpose. If a travel cardholder had repeated episodes of misuse, the Systems Accountant would then send the travel cardholder an email message with guidance on the proper use of the travel card. During an audit interview, the Finance Branch Chief stated that there are generally no repercussions for improper use of the travel card unless the travel cardholder does not pay the amount due, in which case the travel card is cancelled.

We examined the monthly MCC reports that were used by the Finance Branch. We found that the Finance Branch was completing the questionable transaction review on a monthly basis. The results of their review are shown in the table below:

MCC Report Month	Identified Transactions	Employees on MCC Report	Employees Contacted	Transactions Found Inappropriate
October 2013	8	5	3	0
November 2013	38	12	3	0
December 2013	17	11	6	0
January 2014	34	18	10	1
February 2014	25	19	6	2
March 2014	31	21	7	3
April 2014	47	22	5	0
May 2014	51	20	11	5
June 2014	34	16	2	1
July 2014	69	30	5	3
August 2014	50	28	3	2
September 2014	16	10	0	0

In reviewing the Finance Branch’s monthly MCC reports, we also found 24 transactions identified on the reports that had a code that was not on the questionable code list. We then ran a query using the list of Finance Branch’s questionable codes and compared the transactions we identified to Finance Branch’s monthly reports. By doing so, we identified nine transactions that had a code on the list of questionable codes that were not identified on a monthly MCC report.

We also found inconsistencies in how 334 transactions involving 16 questionable codes were addressed by the Finance Branch. In those cases, the Finance Branch contacted travel cardholders regarding 81 transactions, but did not contact travel cardholders regarding 253 other transactions. The distribution by questionable code is shown in the table below:

Questionable Code Description	Contacted	
	Yes	No
Accounting, Auditing, Bookkeeping Services	2	1
Automotive Tire Stores	1	1
Bar, Lounge, Disco, Nightclub, Tavern-Alcoholic Drinks	13	16
Barber and Beauty Shops	1	1
Book Stores	1	1
Business Services - Not Elsewhere Classified	2	3
Computer Network/Information Services	1	34
Drug Stores and Pharmacies	11	41
Gift, Card, Novelty and Souvenir Shops	4	3
Government Services - Not Elsewhere Classified	22	58
Grocery Stores and Supermarkets	12	50
Information Retrieval Services	4	14
Miscellaneous Food Stores	1	20
Miscellaneous General Merchandise Stores	2	2
Office, School Supply, and Stationery Stores	2	3
Professional Services - Not Elsewhere Classified	2	5
Total	81	253

We requested documentation of whether any of the inappropriate transactions were provided to Special Counsel and the OIG. Finance Branch could not provide documentation that information regarding the transaction or the travel cardholder’s response was provided to Special Counsel and the OIG.

Recommendations

3. We recommend that the Finance Branch develop and implement procedures to identify infrequent travelers and reduce the credit limits for those travel cardholders.
4. We recommend that the Finance Branch develop and implement procedures to ensure that contacting travel cardholders regarding transactions with questionable MCCs are handled in a consistent manner.

5. We recommend that the Finance Branch develop and implement procedures to ensure that inappropriate transactions are provided to Special Counsel and the OIG.

Delinquencies

OMB Circular A-123, Appendix B requires A/OPCs to:

- Closely monitor delinquency reports from the travel charge card vendor;
- Contact the delinquent travel cardholder promptly to ensure that a payment is made or to obtain a remediation plan; and
- Formally notify the travel cardholder that delinquency in payment may result in disciplinary action.

The NLRB Travel Card Management Plan requires that travel cardholder accounts be monitored by the A/OPC for repeated instances of delinquency.

Staff in the Finance Branch stated that delinquency reports available in the Citibank Reporting System were not monitored. Finance Branch staff stated that at times they may learn an account is delinquent when a travel cardholder contacts them to find out why his or her card was declined. Finance Branch staff stated that Citibank would have already taken action on the account due to the delinquency.

Delinquency reports are available in the Citibank Reporting System. To determine the type of delinquency information that would be available to the Finance Branch, we obtained and reviewed the delinquency report as of March 30, 2015. The table below shows the results of the review:

Number of Billing Cycles	Account Status and Number of Accounts			
	Past Due	Suspended	Cancelled	Closed Because Mail Returned
1	12	0	0	1
2	0	1	0	0
3	0	2	0	0
4	0	0	1	0
5	0	0	1	0
6	0	0	1	0

Recommendation

6. We recommend that the Finance Branch use the reports available in the Citibank Reporting System to monitor delinquencies and that it develop and implement procedures to take action on delinquent accounts.

Cash Advances

OMB Circular A-123, Appendix B requires the A/OPC to review cash withdrawals for reasonableness and association with official travel. The NLRB Travel Card Management Plan lists the Cash Advance report as one of the reports that the A/OPC uses monthly to monitor delinquency, misuse, performance metrics and other transactions and program management issues.

We requested the reports reviewed by the Finance Branch for cash advances during FY 2014. Finance Branch staff did not provide any of the requested reports and stated they were not performing this review.

Recommendation

7. We recommend that the Finance Branch use the reports available in the Citibank Reporting System to monitor cash advances.

ADMINISTRATIVE FUNCTIONS

Credit Checks

OMB Circular A-123, Appendix B requires that agencies assess the creditworthiness of all new travel card

applicants prior to issuing a travel card. The NLRB Travel Card Management Plan states that the monthly card credit limit is \$10,000 for travel cardholders with a credit score of 660 and above and is \$1,000 for travel cardholders with a score below 660.

To open a new travel card account, the prospective travel cardholder submits a travel card application to the Finance Branch. The Finance Branch then checks the application for completeness and requests the prospective travel cardholder's credit score from the Security Branch. The travel cardholder's credit score is then used to establish the employee's credit limit in an amount that is in accordance with the NLRB Travel Card Management Plan.

There were 81 new travel cardholders in FY 2014. Credit checks were documented for 80 of those travel cardholders. Thirteen of the new travel cardholders had a credit score that required a reduced credit limit. Two of those accounts were not set at the reduced credit limit.

Initial Training

OMB Circular A-123, Appendix B, requires that all travel cardholders be trained prior to receiving a travel card. The NLRB Travel Card Management Plan states that the A/OPC will verify completion of the GSA Smartpay Travel Card training.

During the period of the scope of the audit, the prospective travel cardholders were instructed to log on to the GSA Web site and completed the training for travel cardholders. Upon completion, the prospective travel cardholder was asked to provide a copy of a certificate showing completion and the travel card application to the Finance Branch.

For all travel cardholders whose accounts were created during FY 2014, we compared the date that the GSA travel card training was completed to the date when the travel card account was opened. We found that 26, or 32.1 percent, of the 81 new travel cardholders did not receive training before their accounts were opened and, of those travel cardholders, 16, or 19.8 percent of all new travel cardholders, did not receive training before the end of FY 2014.

Recommendation

8. We recommend that the Finance Branch develop and implement procedures to ensure that new travel cardholders receive the initial cardholder training prior to receiving a travel card.

Refresher Training

OMB Circular A-123, Appendix B, also requires that travel cardholders take refresher training every 3 years. In September 2014, the Finance Branch sent an email message to Regional Office managers and Headquarters administrative assistants to notify the offices that refresher training sessions were being held on particular dates. The Finance Branch did not notify the heads of the offices. The training was conducted by Webinar and the travel cardholders were asked to sign attendance sheets. The attendance sheets were to be sent back to the Finance Branch. Once the initial round of training was completed, the Finance Branch sent out an email message with makeup session dates to Regional Office managers.

We found that 25 offices with travel cardholders did not return the attendance sheets. We also tallied up the number of employees that signed in as taking the refresher training. We found that 39.96 percent of the travel cardholders either did not complete the refresher training or failed to sign the attendance sheet.

Recommendation

9. We recommend that the Finance Branch develop and implement procedures to monitor the training completion by travel cardholders to ensure that travel cardholders meet the training requirements.

Cancellation of Separated Cardholders' Travel Cards

The Government Charge Card Abuse Prevention Act of 2012 requires that the travel card be cancelled immediately upon separation of a travel cardholder from the Agency. The NLRB Travel Card Management Plan assigns that responsibility to the A/OPC.

In FY 2014, 94 travel cardholders separated from the Agency. We examined the information available on the

Citibank Reporting System and found that of the 94 separated travel cardholders, 79 accounts were closed by the Agency, 1 account was closed by Citibank, and 14 accounts were not closed.

The table showing the breakdown of the timeliness of cancellation by department is listed below.

When Account Closed	Headquarters	Judges (Satellite)	Regional Office
Before Separation	12	1	14
On Day of Separation	2	0	2
Between 1 and 7 Days After Separation	0	2	18
Between 8 and 14 Days After Separation	2	3	11
Between 15 and 21 Days After Separation	0	0	2
Between 22 and 28 Days After Separation	0	0	2
Between 29 and 56 Days After Separation	0	0	3
Greater than 56 Days After Separation	0	0	6
Remain Open	0	0	14

We verified that, as of February 5, 2015, the 14 open accounts had not been used after the travel cardholder separated.

Recommendation

10. We recommend that the Finance Branch develop and implement procedures to ensure that travel card accounts are closed when a travel cardholder separates from the Agency.

Record Retention

The Government Charge Card Abuse Prevention Act of 2012 requires that the Agency maintain a record of each travel cardholder with the credit limits listed. The NLRB Travel Card Management Plan requires that a copy of the travel card application and credit score be maintained on-site for 3 fiscal years in a secured cabinet.

We examined the records of the 156 travel cardholders who obtained a travel card account during FY 2012, FY 2013, or FY 2014. We found that:

- The Finance Branch could not provide the records for the 16 travel cardholders who obtained accounts between October 2011 and May 2012;
- The Finance Branch provided a record of a credit check and travel card application for 136 of the remaining 140 travel cardholders; and
- The Finance Branch did not provide complete records for the four remaining travel cardholders; one record was missing documentation of the credit score check and three records were missing documentation of both the application and the credit score check.

Recommendation

11. We recommend that the Finance Branch develop and implement procedures to ensure that travel card records are maintained in accordance with the NLRB Travel Card Management Plan.

ATTACHMENT

GAO Evaluation Tool	OIG Determination	OIG Observation
The control activities identified as necessary are in place and being applied. Consider the following:		
Control activities described in policy and procedures manuals are actually applied and applied properly.	No	The Finance Branch was not consistently following its own internal control procedures.
Supervisory personnel review the functioning of established control activities and remain alert for instances in which excessive control activities should be streamlined.	No	Within the scope of the audit, we were provided documentation that the Finance Branch updated the NLRB Travel Card Management Plan. Those changes did not streamline or substantially alter the internal control procedures.
Timely action is taken on exceptions, implementation problems, or information that requires follow-up.	No	Information that requires follow up was not addressed in a timely manner.
Control activities are regularly evaluated to ensure that they are still appropriate and working as intended.	No	The findings of the report document that the internal control procedures were not fully implemented and therefore not regularly evaluated.
Information Processing – The agency employs a variety of control activities suited to information processing systems to ensure accuracy and completeness. Consider the following:		
Edit checks are used in controlling data entry.	N/A	N/A
Access to data, files, and programs is appropriately controlled.	Partially	Travel card applications are to be stored in a locked file cabinet; however, we observed that some applications were temporarily stored in an unsecured box in the middle of the hallway. Travel card applications contain personally identifiable information.

GAO Evaluation Tool	OIG Determination	OIG Observation
Physical Control Over Vulnerable Assets – The agency employs physical control to secure and safeguard vulnerable assets. Consider the following:		
Physical safeguarding policies and procedures have been developed, implemented, and communicated to all employees.	N/A	Travel cards are issued by Citibank directly to the travel cardholders. The Finance Branch does not maintain any travel cards.
The agency has developed a disaster recovery plan, which is regularly updated and communicated to employees.	N/A	N/A
Segregation of Duties – Key duties and responsibilities are divided or segregated among different people to reduce the risk of error, waste, or fraud. Consider the following:		
No one individual is allowed to control all key aspects of a transaction or event.	No	One Finance Branch employee was responsible for performing all internal control procedures.
Responsibilities and duties involving transactions and events are separated among different employees with respect to authorization, approval, processing and recording, making payments or receiving funds, review and auditing, and the custodial functions and handling of related assets.	No	
Duties are assigned systematically to a number of individuals to ensure that effective checks and balances exist.	No	
Recording of Transactions and Events – Transactions and other significant events are properly classified and promptly recorded. Consider the following:		

GAO Evaluation Tool	OIG Determination	OIG Observation
Transactions and events are appropriately classified and promptly recorded so that they maintain their relevance, value, and usefulness to management in controlling operations and making decisions.	N/A	Controlled by Citibank
Proper classification and recording take place throughout the entire life cycle of each transaction or event, including authorization, initiation, processing, and final classification in summary records.	N/A	
Proper classification of transactions and events includes appropriate organization and format of information on original documents (hardcopy paper or electronic) and summary records from which reports and statements are prepared.	N/A	
Access Restrictions to and Accountability for Resources and Records – Access to resources and records is limited and accountability for their custody is assigned. Consider the following:		
The risk of unauthorized use or loss is controlled by restricting access to resources and records only to authorized personnel	Partially	Travel cards are in the possession of the individual employees. The Finance Branch has a number of control activities that should mitigate the risk of unauthorized uses. However, the control activities were not implemented in a consistent manner. As noted above, records are not always safeguarded.

GAO Evaluation Tool	OIG Determination	OIG Observation
Accountability for resources and records custody and use is assigned to specific individuals.	Yes	Accountability for storage of records is assigned to the A/OPC
Periodic comparison of resources with the recorded accountability is made to determine if the two agree, and differences are examined.	N/A	N/A
How frequently actual resources are compared to records and the degree of access restrictions are functions of the vulnerability of the resource to the risk of errors, fraud, waste, misuse, theft, or unauthorized alteration.	N/A	N/A
Documentation – Internal Control and all transactions and other significant events are clearly documented. Consider the following:		
Written documentation exists covering the agency's internal control structure and for all significant transactions and events.	Yes	The internal control procedures are documented in the NLRB Travel Card Management Plan.
The documentation is readily available for examination.	Yes	Although the Travel Management Plan was readily available, we initiated this audit because the Finance Branch personnel stated to the Inspector General, during the OIG's annual risk assessment of the program, that they were not aware of the NLRB Travel Card Management Plan.

GAO Evaluation Tool	OIG Determination	OIG Observation
The documentation for internal control includes identification of the agency's activity-level functions and related objectives and control activities and appears in management directives, administrative policies, accounting manuals, and other such manuals.	Yes	The NLRB Travel Card Management Plan adequately identifies the function and objectives of the control activities.
Documentation for internal control includes documentation describing and covering automated information systems, data collection and handling, and the specifics of general and application control related to such systems.	N/A	N/A
Documentation of transactions and other significant events is complete and accurate and facilitates tracing the transaction or event and related information from authorization and initiation, through its processing, to after it is completed.	No	During the period of the scope of the audit, 7 months of transaction information is missing and was not available for review.
All documentation and records are properly managed, maintained, and periodically updated	No	
Documentation, whether in paper or electronic form, is useful to managers in controlling their operations and to any others involved in evaluating or analyzing operations.	Yes	The Citibank database of travel cardholder activity is adequate to evaluate and analyze the travel card program.
Authorization Control		

GAO Evaluation Tool	OIG Determination	OIG Observation
Source documents are controlled and require authorization. Consider the following:		
Key source documents require authorizing signatures.	Yes	Key source documents, such as travel card applications require a signature from the A/OPC.
Supervisory or independent review of data occurs before it is entered into application system	N/A	N/A
Completeness Control		
All authorized transactions are entered into and processed by the computer.	N/A	N/A
Reconciliations are performed to verify data completeness.	N/A	N/A
Accuracy Control		
The agency's data entry design features contribute to data accuracy.	N/A	N/A
Data validation and editing are performed to identify erroneous data.	N/A	
Erroneous data are captured, reported, investigated, and promptly corrected.	N/A	
Output reports are reviewed to help maintain data accuracy and validity.	N/A	
Management has a strategy to ensure that ongoing monitoring is effective and will trigger separate evaluations where problems are identified or systems are critical and testing is periodically desirable. Consider the following:		

GAO Evaluation Tool	OIG Determination	OIG Observation
The monitoring strategy includes methods to emphasize to program managers their responsibility for internal control and their duties to regularly monitor the effectiveness of control activities.	No	Controls identified in the NLRB Travel Card Management Plan were not being followed and the plan had no mechanism for oversight.
The strategy includes a plan for periodic evaluation of control activities for critical operational and mission support systems.	Yes	The NLRB Travel Card Management Plan outlines a strategy that included periodic evaluation of control activities.

APPENDIX

UNITED STATES GOVERNMENT
National Labor Relations Board
Office of the Chief Financial Officer
Memorandum



Date: June 11, 2015

To: David P. Berry
Inspector General

From: Ronald E. Crupi
Chief Financial Officer

Subject: Response to Inspector General report on Travel Card audit

We have reviewed and concur with the factual accuracy of the subject report. We have begun remediation actions and are preparing a Corrective Action Plan to address all findings and recommendations. The Corrective Action Plan will be provided to the Office of the Inspector General within 30 days of the issuance of the final report.

We anticipate that the audit remediation actions will be completed during Fiscal Year 2015.

RONALD CRUPI

Digitally signed by RONALD CRUPI
DN: cn=US, o=U.S. Government, ou=National Labor
Relations Board, cn=RONALD CRUPI,
6.9.2.342.19.201006.100.1.1=63001002879276
Date: 2015.06.11 09:25:00 -0400

Ronald E. Crupi, Chief Financial Officer

Copy: Chairman
General Counsel
Deputy General Counsel