

OFFICE *of*
INSPECTOR GENERAL
NATIONAL ARCHIVES

Audit of NARA's Travel Card Program


September 29, 2021

OIG Audit Report. No. 21-AUD-13



September 29, 2021

TO: David Ferriero
Archivist of the United States

FROM: Dr. Brett M. Baker 
Inspector General

SUBJECT: *Audit of NARA's Travel Card Program*
OIG Audit Report No. 21-AUD-13

Attached is the Office of Inspector General's final report of our *Audit of NARA's Travel Card Program*. The report contains eight recommendations to strengthen oversight and internal controls over NARA's travel card program. Agency staff indicated they had no comments for inclusion in this report.

Please provide planned corrective actions and expected dates to complete the actions for each of the recommendation(s) within 30 days of the date of this report. As with all OIG products, we determine what information is publicly posted on our website from the attached report. Consistent with our responsibility under the *Inspector General Act, as amended*, we may provide copies of our report to congressional committees with oversight responsibility over NARA.

We appreciate the cooperation and assistance NARA extended to us during the audit. Please contact Jewel Butler, Assistant Inspector General for Audits, with any questions.

cc: Debra Wall, Deputy Archivist of the United States
Micah Cheatham, Chief of Management and Administration
William Bosanko, Chief Operating Officer
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Executive Summary

Audit of NARA's Travel Card Program

OIG Audit Report No. 21 AUD 13

September 29, 2021

Why Did We Conduct This Audit?

The Government Charge Card Abuse Prevention Act of 2012, Public Law 112-194, requires agencies to establish and maintain internal control activities to ensure the proper, efficient, and effective use of the travel cards. In fiscal years (FY) 2018 and 2019, the National Archives and Records Administration (NARA) incurred approximately \$1.4 million in travel card transactions in each fiscal year.

The NARA Office of Inspector General (OIG) performed this audit to determine whether NARA's travel card program had effective internal controls to safeguard against unauthorized use, abuse, and improper transactions not associated with official travel.

What Did We Recommend?

We made eight recommendations to strengthen oversight and internal controls over NARA's travel card program. Management concurred with the recommendations in this report.

What Did We Find?

NARA's travel card program did not have effective internal controls in place and was not always in compliance with Federal requirements and established NARA policies. Specifically, (1) oversight controls for travel cards need strengthening; (2) all travel transactions were not immediately reviewed by XA; (3) quarterly audits were not used effectively; (4) standard operating procedures did not exist and travel policies were outdated; and (5) travel card refresher training was not always completed. This occurred because NARA management did not have adequate oversight mechanisms in place to ensure the travel card program operated as intended. As a result, there is an increased risk that fraud, waste, and abuse in the travel card program may go undetected.

Summary of Recommendations

Finding 1: Oversight Controls for Travel Cards Needs Strengthening

Number	Recommendation	Responsible Office
1	Enhance monitoring controls of travel card accounts, to include but not be limited to (1) activating, closing, and reducing spending levels of travel cards timely and (2) timely identification of delinquencies and when warranted suspension or cancellation of travel cards.	Office of Chief Financial Officer

Finding 2: All Travel Transactions Were Not Immediately Reviewed

Number	Recommendation	Responsible Office
2	Develop and implement a methodology for Accounting Policy and Operations Branch to review an appropriate number of travel authorizations and vouchers for all NARA locations.	Office of Chief Financial Officer
3	Review unreimbursed official travel conference expenses identified during the audit and reimburse those employees for eligible expenses.	Office of Chief Financial Officer

Finding 3: Quarterly Audits Were Not Used Effectively

Number	Recommendation	Responsible Office
4	Enhance procedures for quarterly travel audits, to include but not limited to (1) timing of the audits; (2) formal communication of results and recommendations; and (3) formalized training, especially when there are repetitive findings.	Office of Chief Financial Officer

Finding 4: Standard Operating Procedures Did Not Exist and Travel Policies Were Outdated

Number	Recommendation	Responsible Office
5	Review, update, and implement revised NARA 601, <i>NARA Travel Policy</i> , and <i>NARA Travel Card Management Plan</i> to reflect current practices, and the current versions of Federal Travel Regulation and Appendix B to OMB A-123, <i>A Risk Management Framework for Government Charge Card Programs</i> .	Office of Chief Financial Officer
6	Develop and implement standard operating travel procedures for XA, reviewers, and approving officials for the review and approval of travel authorizations and vouchers.	Office of Chief Financial Officer
7	Develop and implement formal training for reviewers and approving officials for the review of travel authorizations and vouchers.	Office of Chief Financial Officer

Finding 5: Travel Card Refresher Training Was Not Always Completed Timely

Number	Recommendation	Responsible Office
8	Develop and implement monitoring procedures for travel card refresher training.	Office of Chief Financial Officer

Background

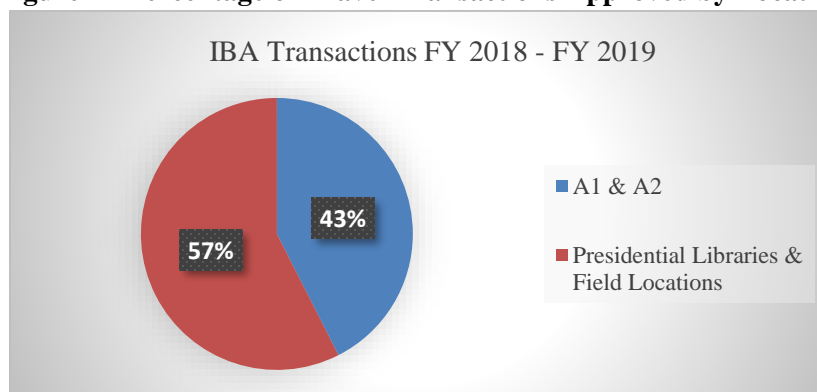
The Government Charge Card Abuse Prevention Act of 2012, Public Law 112-194, require all agencies to establish and maintain internal controls for travel cards to ensure the proper, efficient, and effective use of the travel cards. Inspectors General (IG's) may perform reviews or audits, as necessary, of travel card transactions to identify potentially illegal, improper, or erroneous uses of travel cards. Congress mandated that federal Government cardholders use their travel card for expenses essential to official business, which includes but not limited to transportation, lodging, and per diem.

To help agencies manage their respective travel program, the General Services Administration (GSA) established the SmartPay Program (SmartPay). Through a master contract with multiple banks, the SmartPay enables agencies, organizations, and tribes across the federal Government to obtain payment solutions to support mission needs. Under SmartPay, the National Archives and Records Administration (NARA) is eligible for charge payment solution services that allows for the purchase of common carrier transportation, car rentals, lodging and meals for official travel and travel-related expenses. In addition, the program allows NARA to participate in GSA's City Pair Program for discounted government airfares and to access management reports that help manage travel expenses.

In fiscal year (FY) 2018 and FY 2019, NARA incurred approximately \$1.4 million each FY in travel card transactions. There were a total of 20,989 transactions (see Figure 1).

- 8,924 of the 20,989 (43%) transactions were for Archives I and Archives II employees, and
- 12,065 of the 20,989 (57%) transactions were for Presidential Libraries and field location¹ employees.

Figure 1 - Percentage of Travel Transactions Approved by Location



Source: Office of the Chief Financial Officer, Accounting Policy and Operations Branch

¹ Also known as Archival Operation Locations.

NARA's Office of the Chief Financial Officer (CFO), Accounting Policy and Operations Branch (XA) manages the travel program, establishes policies governing travel and government travel cards, and provides guidance concerning travel management policies and procedures. XA also works closely with NARA offices to process travel authorizations and vouchers, maintains internal controls for travel management processes, manages the financial review processes for the travel card program, and serves as liaison with the travel management system provider.

Policies governing NARA's travel card program include the Federal Travel Regulation (FTR), 41 Code of Federal Regulations (CFR), Chapters 300 through 304; Appendix B to Office of Management and Budget (OMB) Circular A-123, *A Risk Management Framework for Government Charge Card Programs* (Appendix B to OMB A-123); NARA 601, *NARA Travel Policy*; and the NARA Travel Card Management Plan. The FTR implements statutory requirements and Executive branch policies for travel by Federal civilian employees and others authorized to travel at Government expense. Appendix B to OMB A-123 establishes standard minimum requirements and best practices for government charge card programs. NARA 601, *NARA Travel Policy*, used in conjunction with the FTR, provides NARA policy for official Government travel for Temporary Duty Station (TDY) travel, local travel, and non-travel expenses. The NARA Travel Card Management Plan outlines the policies to ensure that a system of internal controls is followed and to mitigate the potential for fraud, misuse, abuse, and delinquency.

NARA Office of Inspector General's (OIG's) *Audit of NARA's Foreign and Premium Travel*² found opportunities for NARA to strengthen its effectiveness and control over the management of expenses related to premium and foreign travel. The audit disclosed many internal controls weaknesses to include the following:

- Inadequate review of travel activity;
- Ineffective oversight and reporting of travel;
- Requests for reimbursement from non-federal sources was not centralized;
- No verification of payment received for non-federal sources;
- Conflict of interest determinations were not always obtained; and
- Ineffective monitoring of travel cards for improper charges or unusual activity.

NARA addressed the weaknesses and thirteen recommendations were closed. Although the recommendations were closed, some of the same issues appear in this audit report. In addition, the audits of NARA's FY 2019 and FY 2020 Financial Statement³ identified a repeat

² Audit of NARA's Foreign and Premium Travel, OIG Audit Report No. 11-14, dated July 7, 2011.

³ Audit of NARA's FY 2019 Financial Statements, OIG Audit Report No. 20-AUD-09, dated April 22, 2020 and Audit of NARA's FY 2020 Financial Statements, OIG Audit Report No. 21-AUD-04, dated November 10, 2020.

management comment that NARA's entity wide travel policy had not been updated timely. The same recommendation has been reported since FY 2016 and remains open (See Appendix B).

Objective, Scope, Methodology

Objective

The objective of this audit was to determine whether NARA's travel card program had effective internal controls to safeguard against unauthorized use, abuse, and improper transactions not associated with official travel.

Scope and Methodology

To accomplish our audit objective, we performed audit procedures at Archives II in College Park, Maryland, and from the auditors' approved COVID-19 public health emergency telework location, from October 2019 until January 2021.⁴

Specifically, we performed the following:

- Reviewed applicable laws, regulations, and NARA policies.
- Conducted interviews and walkthroughs with personnel from Accounting Policy and Operations, and Business Support Services.
- Gained an understanding of the travel card program internal control environment.
- Completed verification and authorization of questionable charges.
- Reviewed training certificates and risk assessments.
- Conducted interviews and walkthroughs at a judgmentally selected sample⁵ of 11 field locations (Fort Worth, Denver, Atlanta, and Philadelphia⁶) and Presidential Libraries (Jimmy Carter, George Bush, George W. Bush, Lyndon B. Johnson, Harry S. Truman, Dwight D. Eisenhower, and Franklin D. Roosevelt) to determine their compliance with federal regulations and NARA policies.
- Compared selected travel card transactions to source documentation in Concur.Gov and with Human Capital rosters to identify any obvious errors or omissions in the data.
- Judgmentally selected and completed transaction testing of 30 out of 20,989 FY 2018 and FY 2019 transactions to determine compliance with federal regulation and NARA policies (see Table 1). The transactions selected were greater than \$1,000. These samples were non-statistical and cannot be projected to the intended population.

⁴ This audit was impacted by the COVID-19 pandemic and other unforeseen circumstances.

⁵ The OIG judgmentally selected Presidential Libraries and field locations based on the following: highest travel dollars by state for FY 2019, existing travel for the Audit of Controls over Loans NARA Holdings, and recommendation by XA.

⁶ Due to the COVID-19 pandemic, we virtually conducted walkthroughs at Presidential Libraries and field locations located in Texas, Atlanta, Philadelphia, and Denver.

Table 2 – Individually Billed Account (IBA) Travel Card Transactions FY 2018 – FY 2019

	FY 2018	FY 2019	Total Transactions
Number of Transactions	10,790	10,199	20,989
Transactions > \$1,000	107	99	206
Total Sample	9	21	30

Source: Office of the Chief Financial Officer, Accounting Policy and Operations Branch

This performance audit was conducted in accordance with *Generally Accepted Government Auditing Standards*. Those standards require 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.

In planning and performing this audit, we identified the following internal control components and underlying internal control principles as significant to the audit objective:

- Control Environment - Enforce Accountability
- Control Activities - Implement Control Activities
- Monitoring - Remediate Deficiencies

We assessed the design, implementation, and/or operating effectiveness of these internal controls and identified deficiencies that we believe could affect NARA's ability to ensure travel card transactions were consistently reviewed, processed, and approved in accordance with Federal regulations and NARA policies. Based on the assessment, there is the potential that errors may not be identified and debts not collected. The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to aspects of these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Kimberly Boykin, Audit Director; Kimberly Nikraves, (Lead) Senior Program Auditor; William Brown, Senior Program Auditor; Andrew Clements, Senior Information Technology (IT) Auditor; Jina Lee, Senior IT Auditor; Alicia McNair, Senior Program Auditor; Teresa Rogers, Senior Program Auditor, Carol Seubert, Senior Financial Auditor; and Kurt Thompson, Senior Program Auditor, made key contributions to this report.

Audit Results

Although the audit did not identify any fraudulent transactions or misuse of travel cards, we found NARA's travel card program did not have effective internal controls in place and was not always in compliance with Federal requirements and established NARA policies. Specifically, (1) oversight controls for travel cards need strengthening; (2) all travel transactions were not immediately reviewed; (3) quarterly audits were not used effectively; (4) standard operating procedures did not exist and travel policies were outdated; and (5) travel card refresher training was not always completed. This occurred because NARA management did not have adequate oversight mechanisms in place to ensure the travel card program operated as intended.

Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government*, states management is responsible for establishing and maintaining internal controls to achieve specific internal control objectives related to operations, reporting, and compliance. In addition, Appendix B to OMB A-123, states it is the general responsibility of government charge card managers to implement risk management controls, policies and practices to ensure compliance with federal laws, federal and agency regulations and for monitoring program effectiveness to mitigate the risks of fraud, misuse, and delinquencies. As a result, there is an increased risk that fraud, waste, and abuse in the travel card program may go undetected.

Finding 1. Oversight Controls for Travel Cards Need Strengthening

NARA did not deactivate inactive travel cards timely. The agency also did not timely identify and address delinquencies after transitioning from GSA SmartPay 2 to GSA SmartPay 3. This occurred because NARA did not have the appropriate oversight controls in place for travel cards. Improper oversight could lead to liability of charges to the cardholder.

Inactive travel cards

In January 2020, 236 of the 890⁷ (27%) travel cards in the CitiManager Reporting System had not been activated within 60 days of receipt. In addition, XA's Agency/Organization Program Coordinator (A/OPC) indicated, there were inactive travel cards that had not been used since 2008. Supervisors requested travel cards for employees with no immediate need for official business travel.

The FTR indicates to reduce travel card delinquencies by employees, agencies should consider for inactive accounts (cards not used within six months, one year, etc.), reducing card limit to \$1 and

⁷ The number of travel cards was extracted from the CitiManager Reporting System on January 3, 2020.

increasing the dollar limit when necessary. In addition, Appendix B to OMB A-123 states charge card managers are responsible for implementing policy for account closure when the account is no longer needed.

Travel card delinquencies

After transitioning in May 2019 to GSA SmartPay 3, XA no longer reviewed the GSA SmartPay 2 delinquent accounts. As a result, in September 2019, XA identified 12 delinquent GSA SmartPay 2 accounts and notified the employees accordingly. The late identification contributed to the cancellation of one travel card by Citibank.

Additionally, when accounts remained delinquent after employee notification, XA did not initiate timely disciplinary action and/or notify the OIG, Human Capital, or the employee's supervisor about the delinquency. The FTR states for collection of undisputed delinquent amounts that agencies must provide the employee with written notice of the type and amount of the claim, the intention to collect the claim by deduction of disposable pay, and an explanation of their rights as a debtor before collecting undisputed delinquent amounts. NARA's Travel Card Management Plan states to suspend or reduce spending limit to \$1, at 61 days past due, the card will be suspended by Citibank at 90-100 days past due, and cancelled by Citibank at 101 days past due.

In one example, we identified a senior level employee's SmartPay 3 travel card was improperly canceled for a delinquency. XA notified the employee in December 2019 about the delinquency and the employee confirmed the debt had been paid in the prior month (November 2019). In April 2020, XA contacted the same traveler that there was a delinquency on their GSA SmartPay 3 account for current expenses. The traveler worked with XA to understand the delinquency and subsequently paid the debt in April 2020. However, in June 2020, Citibank closed the travel card account due to failure to pay the balance in a timely manner.

The recurring delinquency occurred because the CitiManager Reporting System defaulted to displaying the GSA SmartPay 2 balances and not the GSA SmartPay 3 balances when employees accessed their Citibank accounts. Although employees were required to manually switch their CitiManager view from GSA Smart Pay 2 to GSA SmartPay 3 to see and pay their current balances, XA did not alert employees of this requirement and the potential of making payments to a wrong account. As a result, employee payments were subsequently applied to the wrong accounts and then flagged as delinquent.

In another example, we identified an employee that failed to pay their May 2019 travel card expenses. XA notified the traveler in September 2019 about the delinquent account and instructed the employee to remit the payment immediately. However, in March 2020, we determined the employee had not paid the debt and XA had not cancelled the travel card. In

addition, the employee's supervisor was not aware of the delinquency until they were notified by the OIG during the audit. NARA's *Travel Card Management Plan* requires XA to cancel accounts timely and notify the employee.

Recommendation

We recommend the Chief Financial Officer:

Recommendation 1: Enhance monitoring controls of travel card accounts, to include but not be limited to (1) activating, closing, and reducing spending levels of travel cards timely and (2) timely identification of delinquencies and when warranted suspension or cancellation of travel cards.

Finding 2. All Travel Transactions Were Not Immediately Reviewed by XA

XA did not review all travel transactions across NARA. Instead, XA relied on Presidential Libraries and field location approving officials to review transactions. However, those officials were not adequately knowledgeable of the FTR and NARA 601, *NARA Travel Policy*, or trained to solely review and approve travel transactions. According to the A/OPC, XA is unable to review the Presidential Libraries and field locations transactions because of limited XA staff resources. According to NARA 101, *NARA Organization and Delegation of Authority*, the Office of the CFO is responsible for working closely with NARA program offices to ensure timely and accurate processing of travel authorizations and vouchers. In addition, XA is responsible for managing, establishing, and providing guidance for the travel program for the entire agency. Approvers without adequate knowledge of the FTR and NARA 601, *NARA Travel Policy*, increases the risk of erroneous payments.

XA routinely reviewed travel authorizations and vouchers for only Archives I and II employees. These reviews were completed immediately after submission within ConcurGov. When and if errors were identified by XA, corrections were made immediately, and before a reimbursement occurred. Travel authorizations and vouchers for Presidential Libraries and field locations were infrequently reviewed by XA. Specifically, in FY 2018 and FY 2019 XA reviewed 100% of the travel transactions of Archives I and II employees. However, XA only reviewed 1.4% of Presidential Libraries and field locations employees travel transactions as a part of the quarterly audits (see Table 3):

Table 3 – FY 2018 – FY 2019 Travel Card Transactions Reviewed by XA Staff

	Archives I and Archives II employees	Presidential Libraries and field location employees
FY 2018 and FY 2019 Total Transactions	8,924	12,065
Transactions Reviewed	8,924	168
% Reviewed	100%	1.4%

Source: Office of the Chief Financial Officer, Accounting Policy and Operations Branch

Presidential Libraries and field location travel authorizations and vouchers were reviewed by approved staff who were provided on-the-job training. XA only reviewed these transactions if they were selected for quarterly travel audits (10% are randomly selected⁸) or if a reviewer at the facility requested interpretation of policies. The FTR states, the certifying officer assumes ultimate responsibility under 31 U.S.C. 3528 for the validity of the claim and the authorizing/approving

⁸ This percentage may be adjusted depending on the data population.

official shall review the completed claim to ensure that the claim is properly prepared in accordance with regulations and agency procedures prior to authorizing it for payment.

Although Presidential Libraries and field office staff were expected to review travel authorizations and vouchers with the same scrutiny as an XA employee, these reviewers are not subject matter experts in interpreting the FTR and NARA 601, *NARA Travel Policy*. This was evident when we reviewed transactions and found NARA did not always reimburse employees for conference travel expenses. Specifically, although two employees were authorized to attend a conference, which NARA paid the registration fees, they were required to pay out-of-pocket for lodging, transportation, and per diem expenses to attend the conference. But, approvers (Presidential Libraries and field office locations) were confused as to what was allowed for reimbursement and there were concerns regarding whether funding was available to fully fund the conference expenses. When the OIG brought this to the attention of XA, the A/OPC indicated employees paying for some or all of their expenses to attend training and conferences were a violation of NARA 601, *NARA Travel Policy*, and the FTR; and the traveler was entitled to full reimbursement of travel expenses if the travel was considered official business, which it was. However, the field location was unaware of this policy and used their own interpretation to approve only the registration fees and not the other conference related expenses. The FTR states employees are eligible for reimbursement of transportation, lodging, and miscellaneous expenses essential to the transaction of official business.

Recommendations

We recommend the Chief Financial Officer:

Recommendation 2: Develop and implement a methodology for Accounting Policy and Operations Branch to review an appropriate number of travel authorizations and vouchers for all NARA locations.

Recommendation 3: Review unreimbursed official travel conference expenses identified during the audit and determine whether NARA can reimburse employees for eligible expenses.

Finding 3. Quarterly Audits Were Not Used Effectively

Although XA conducts quarterly audits of travel transactions, they did not use the results to proactively establish internal controls to ensure travel transactions adhered to the FTR and NARA 601, *NARA Travel Policy*. XA did not consider using the quarterly audit results in this manner. According to GAO *Standards for Internal Control in the Federal Government* management should establish and operate monitoring activities to monitor the internal control system and evaluate the results. In addition, management should remediate identified internal control deficiencies on a timely basis. As a result NARA is not benefiting from sharing the results of deficiencies from the quarterly audits with all NARA approvers to improve its program.

XA conducted quarterly travel audits to identify non-compliance with the FTR and NARA 601, *NARA Travel Policy*, including debts owed. Based on the OIG's review of the quarterly audit results, the results of the audits were not used to strengthen internal control policies to address issues identified. They were only used to correct travel vouchers and collect any differences from employees. Although many of the findings and recommendations repeated each quarter (e.g., lodging booked outside of system, no deduction for conference meals, no selection of economy/long-term lot at airport, and lodging taxes exemptions), evidence provided was not sufficient to support formal communication of the findings identified in an effort to change behavior. Furthermore, findings from the quarterly audits mirrored some of the same types of issues identified when travel authorizations and vouchers were reviewed by XA at Archives I and II. However, only those at Archives I and II were routinely rejected.

Recommendation

We recommend the Chief Financial Officer:

Recommendation 4: Enhance procedures for quarterly travel audits, to include but not limited to (1) timing of the audits; (2) formal communication of results and recommendations; and (3) formalized training, especially when there are repetitive findings.

Finding 4. Standard Operating Procedures Did Not Exist and Travel Policies Were Outdated

Standard operating procedures for performing travel card oversight duties did not exist. In addition, NARA's travel policies were outdated and not reflective of current federal regulations. This occurred because management did not make it a priority to develop procedures and update policies. Appendix B to OMB A-123 states each agency must develop, issue, and maintain written policies and procedures for the appropriate use of charge cards consistent with the requirements of the guidance. The plan must be updated within 12 months of a newly awarded GSA SmartPay master contract, every two years, or more frequently, if necessary to remain current. NARA 111, *NARA Directives*, states directives are to be reviewed at least every two years from the date of signature and updates are to be coordinated. As a result, staff may rely on policies no longer relevant. In addition, the lack of documented procedures results in process inefficiencies.

NARA 601, *NARA Travel Policy*, had not been updated since March 2008. In addition, both NARA 601, *NARA Travel Policy* and *NARA Travel Card Management Plan*,⁹ were not reflective of the current FTR and Appendix B to OMB A-123, nor of current practices.¹⁰ In addition, during the audit the OIG requested standard operating procedures for XA, travelers, reviewers, or authorizing officials performing travel duties and found these documents did not exist. Reviewers and authorizing officials did not receive formal training and stated they relied on their understanding of the FTR, the outdated NARA 601, *NARA Travel Policy*, and information provided by XA in emails and conference calls. XA indicated reviewing and updating the travel policies is an on-going process, however, this finding has been reported in the annual Audit of NARA's Financial Statements since FY 2016.

Recommendations

We recommend the Chief Financial Officer:

Recommendation 5: Review, update, and implement revised NARA 601, *NARA Travel Policy*, and *NARA Travel Card Management Plan* to reflect current practices, and the current versions of Federal Travel Regulation and Appendix B to OMB A-123, *A Risk Management Framework for Government Charge Card Programs*.

⁹ *NARA Travel Card Management Plan* FY 2019 outlines the policies to ensure that a system of internal controls is followed and to mitigate the potential for fraud, misuse, abuse, and delinquency.

¹⁰ Some of the changes that have not been updated include, but not limited to: new Automated Teller Machine (ATM) Cash Limit Withdrawal amounts; reimbursement of tolls; exceptions allowed for not using the most cost effective airport; the change in travel systems, from GovTrip to ConcurGov, in June 2014; the transition to GSA SmartPay 3 (SP3) in May 2019; and Appendix B to OMB A-123 significant revisions in August 2019, related to related to risk management and internal controls, training on data analytics, and performance metrics and data requirements.

Recommendation 6: Develop and implement standard operating travel procedures for XA, reviewers, and approving officials for the review and approval of travel authorizations and vouchers.

Recommendation 7: Develop and implement formal training for reviewers and approving officials for the review of travel authorizations and vouchers.

Finding 5. Travel Card Refresher Training Was Not Always Completed Timely

NARA travel account holders did not take GSA's SmartPay Travel Account Holder Mandatory Refresher Training, as required. This occurred because the A/OPC did not regularly monitor whether travel account holders completed the refresher training. Appendix B to OMB A-123 states all charge card program participants, regardless of level or responsibilities, must receive training prior to appointment or issuance of a card and all travel card program participants are required to take refresher training every three years. When refresher training is not enforced, XA misses the opportunity to reinforce the FTR to ensure compliance.

The A/OPC is responsible for ensuring travel card holders complete the required training, including tracking and sending reminders to the account holders. The OIG identified 280 (33%) of the 848¹¹ travel card account holders did not take refresher training in the past three years. The A/OPC attributed some of the overdue training to account holders from the Presidential Libraries and field locations declining to take the training¹². However, there was no recourse from XA, including contacting supervisors or cancellation of cards, when account holders declined to take the training.

Recommendation

We recommend the Chief Financial Officer:

Recommendation 8: Develop and implement monitoring procedures for travel card refresher training.

¹¹ The number of travel card account holders was based on the A/OPC's count extracted from the NARA Travel Cardholders Training Record spreadsheet provided December 5, 2019.

¹² After the OIG brought the observation to the attention of XA, the A/OPC made efforts to get travel account holders trained.

Appendix A – Acronyms

A/OPC	Agency/Organization Program Coordinator
ATM	Automated Teller Machine
CFO	Chief Financial Officer
CFR	Code of Federal Regulation
FTR	Federal Travel Regulation
FY	Fiscal Year
GAGAS	Generally Accepted Government Auditing Standards
GAO	Government Accountability Office
GSA	General Services Administration
IBA	Individually Billed Account
IG	Inspector General
IT	Information Technology
NARA	National Archives and Records Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
TDY	Temporary Duty Station
XA	Accounting Policy and Operations

Appendix B – Prior Audit Recommendations

The status of the recommendations of the *Audit of NARA's Foreign and Premium Travel* (OIG Report No. 11-14, July 7, 2011).

Rec. No.	Recommendation Text	Status
1a	The Executive for Business Support Services (B) should enforce NARA 601, <i>NARA Travel Policy</i> , and deny any travel authorizations or vouchers that are in violation of it.	Closed
1b	The Executive for Business Support Services (B) should conduct periodic Budget and Finance (BCB) departmental meetings to discuss violations of travel policies.	Closed
2a	The Executive for Business Support Services (B) should develop and implement a mandatory specialized training course for travelers and authorizing officials reiterating their roles and responsibilities. Refresher courses should be provided on a periodic basis. Until a training course is developed and implemented, require the applicable travelers and authorizing officials to review the FTR and agency policies and procedures related to their responsibilities in traveling, reviewing travel vouchers, and approving travel expenditures.	Closed
2b	The Executive for Business Support Services (B) should develop and implement formal procedures for conducting quarterly audits of travel vouchers to ensure applicable Department and government-wide policies are adhered to. At a minimum, procedures should outline (1) objectives, (2) sampling requirements, (3) audit steps, (4) communicating with travelers and authorizing officials, and (5) reporting results and corrective actions.	Closed
2c	The Executive for Business Support Services (B) should develop and implement procedures for reviewing international travel requests to ensure trips meet the agency's mission, fulfill the objectives of NARA's Strategic Plan, and are economically feasible.	Closed
2d	The Executive for Business Support Services (B) should develop and implement procedures to follow-up on travel vouchers not submitted within five working days. Take appropriate action for people who do not comply within five working days.	Closed
3	The Executive for Business Support Services should create a webpage within NARA@work which includes all travel information including, but not limited to links to the FTR, NARA 601, <i>NARA Travel Policy</i> , GovTrip, the travel card application and agreement, and NABF contacts.	Closed
4	The Executive for Business Support Services should direct BCB to review the exceptions identified in this finding and make a determination as to whether potential funds can be recovered.	Closed
5a	The Executive for Business Support Services should require BCB to monitor travel documentation more carefully to ensure the established controls for non-	Closed

	federal source payments are operating effectively.	
5b	The Executive for Business Support Services should establish a mechanism to track travel arrangements approved for funding by non-federal sources. This mechanism can also be used to track payments.	Closed
5c	The Executive for Business Support Services should develop a procedure to follow-up with all non-federal sources who have not reimbursed the agency in a timely manner.	Closed
6a	The Executive for Business Support Services should review and update policy and procedures for issuing travel cards to employees. Include additional restrictions as outlined in OMB Circular A-123 on cardholders with credit scores less than 660.	Closed
6b	The Executive for Business Support Services should enhance procedures to perform timely periodic reviews of the appropriateness of individually and centrally billed travel cards to help ensure the effectiveness of travel card expenditure controls. Specifically, as outlined in OMB Circular A-123, review ATM cash withdrawals for reasonableness and association with official travel.	Closed

The status of the recommendation from the *Audit of NARA’s FY 2016 Financial Statements* (OIG Report No. 17-AUD-05, November 11, 2016)

Rec. No.	Recommendation Text	Status
2	We recommend that management update the travel policy to ensure that all written policies and procedures are reviewed and revised timely.	Subsumed in FY17

The status of the recommendation from the *Audit of NARA’s FY 2017 Financial Statements* (OIG Report No. 18-AUD-03, November 14, 2017).

Rec. No.	Recommendation Text	Status
2	We recommend that management update the travel policy to ensure that all written policies and procedures are reviewed and revised timely.	Subsumed in FY18

The status of the recommendation from the *Audit of NARA’s FY 2018 Financial Statements* (OIG Report No. 19-AUD-01, November 15, 2018).

Rec. No.	Recommendation Text	Status
1	We recommend that management update the travel policy to ensure that all written policies and procedures are reviewed and revised timely.	Subsumed in FY19

The status of the recommendation from the *Audit of NARA’s FY 2019 Financial Statements* (OIG Report No. 20-AUD-09, April 22, 2020)

Rec. No.	Recommendation Text	Status
1	The Chief Financial Officer update the travel policy to ensure that all written policies and procedures are reviewed and revised timely.	Open

The status of the recommendation from the *Audit of NARA's FY 2020 Financial Statements* (OIG Report No. 21-AUD-04, November 10, 2020).

Rec. No.	Recommendation Text	Status
1	The Chief Financial Officer update the travel policy to ensure that all written policies and procedures are reviewed and revised timely.	Open

Appendix C – Agency Comments

Agency management reviewed a discussion draft and provided no comments to this report. Agency management stated their general agreement with the findings and recommendations and opted not to provide formal comments for inclusion in this report.

Appendix D – Report Distribution List

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