

**AUDIT OF THE CORPORATION'S PROCUREMENT AND  
TRAVEL CREDIT CARD PROGRAMS**

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Audit Report No. 00-015  
May 24, 2000




**OFFICE OF AUDITS  
OFFICE OF INSPECTOR GENERAL**

**DATE:** May 24, 2000

**TO:** Fred Selby, Director  
Division of Finance

Arleas Upton Kea, Director  
Division of Administration

**FROM:**   
David H. Loewenstein  
Assistant Inspector General for Headquarters Audits

**SUBJECT:** *Audit of the Corporation's Procurement and Travel Credit Card Programs*

The Office of Inspector General (OIG) has completed a review of the Federal Deposit Insurance Corporation's (FDIC) procurement credit card and travel credit card programs. The procurement card program is for use when goods or limited administrative services costing less than \$5,000 are acquired on behalf of FDIC in both its corporate and receivership capacities. The travel card is an FDIC-sponsored program for official travel expenses of FDIC employees. During the review we determined that the credit card servicer, Bank of America, had not been performing according to contract requirements. Bank of America failed to provide the FDIC detailed credit card data in a timely, accurate, and usable form for the first 13 months of the contract. However, the situation has recently improved since Bank of America began providing acceptable data that captures the FDIC's travel card activities in December 1999. Prior to contracting with Bank of America, the FDIC was considered to be a "best practices" government agency with respect to credit card administration by the GSA.

## **BACKGROUND**

The FDIC established separate task orders with NationsBank under a master contract through GSA to provide credit card services for the procurement card and the travel card beginning on November 30, 1998. The master contract through GSA was amended on April 30, 1999 to reflect a merger between NationsBank and Bank of America. However, Bank of America<sup>1</sup> did not deliver services according to its contract, and GSA issued a "cure" letter to notify Bank of America of its failure to comply with critical master contract requirements on September 17, 1999. Approximately 42 other government agencies have also encountered problems similar to those experienced by the FDIC. Along with the FDIC, these agencies, through meetings with GSA, identified common problems and brought them to Bank of America's attention. The cure

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<sup>1</sup> All future references to Bank of America include the period of the contract that NationsBank held with the GSA.

letter instructed Bank of America to address what action would be taken to cure the deficiencies noted in the enclosure to the letter. Failure to provide an adequate response would constitute sufficient grounds to terminate the contract for cause. Bank of America responded to GSA on October 4, 1999. As of December 1999, Bank of America has addressed the FDIC's concerns; however, they continue to work on problems affecting other agencies.

The Division of Administration (DOA) administers the procurement credit card program. The FDIC processed almost 21,000 procurement credit card transactions for 384 cardholders totaling approximately \$5.6 million from January 1, 1998 to December 31, 1998 and \$1.8 million from January 1, 1999 to April 30, 1999.

The Division of Finance (DOF) administers the travel card program. The FDIC incurred almost \$55 million in regular duty travel costs, a considerable portion of which related to travel credit card charges during the period of December 1998 through October 1999. The FDIC could not determine the number of transactions and cardholders or total dollar amounts for the travel credit card program during our review. Bank of America, the contractor responsible for providing credit card services to the FDIC, had not provided reliable, accurate information in a form that was useful to the FDIC for administering the travel credit card program. However, due to the efforts of DOA and DOF staff and a cure letter that was issued by the GSA, Bank of America is now providing acceptable data to the FDIC.

DOA and DOF monitor their charge card programs differently. DOA monitors and administers the procurement credit card program through a separate tracking system from Bank of America's system. In addition, the FDIC makes payment directly to Bank of America for the procurement card transactions. DOF, however, primarily relies on data provided by Bank of America for monitoring and administering the travel credit card program. For travel card charges, the employee is responsible for direct payment to Bank of America. The FDIC guidance on administering the credit card programs is provided in section 9(E), *FDIC Procurement Credit Card Program*, of the *Acquisition Policy Manual* and Circular 2500.3, *The FDIC Sponsored Government Travel Card Program*.

## **OBJECTIVES, SCOPE, AND METHODOLOGY**

The specific objectives of the review were to: (1) evaluate the Corporation's internal controls over credit card programs and (2) determine whether the credit cards are being used properly. The scope of the review covered the periods of January 1, 1998 through April 30, 1999 for the procurement credit card program and November 30, 1998 through October 31, 1999 for the travel credit card program. We limited the period of review for the travel credit card to the time when FDIC initiated the contract with Bank of America starting on November 30, 1998. We did not perform internal control testing for the travel credit card program because Bank of America did not provide acceptable data to the FDIC.

During our review we interviewed FDIC personnel from DOA, DOF, the Office of Internal Control Management (OICM), DOF Financial Information Management Branch (FIMB), and Bank of America regarding credit card program activities. We reviewed pertinent FDIC policies,

procedures, and directives to ensure that proper internal controls are documented. We reviewed correspondence files, DOA and DOF task orders with Bank of America, and GSA's master contract for the credit card programs. We verified DOA procurement cardholder lists and obtained data from the Financial Data Warehouse regarding the DOF travel credit card program. (The Financial Data Warehouse is an FDIC system that provides access to financial data that has been collected through various corporate financial and business systems). We also obtained correspondence regarding FDIC employees with documented credit card problems. We searched the Internet for documentation of work performed at other agencies regarding problems with Bank of America.

We did not perform tests of credit card data to confirm the adequacy of internal controls for the DOF travel credit card program due to the lack of correct, reliable data in a useful form from Bank of America. To obtain assurance regarding the controls in the procurement card program, we examined all nine of DOA's administrative compliance reviews (ACRs) performed during the period October 1997 through September 1999. In addition, we reviewed the workpapers prepared by DOA to ensure that proper documentation and evidence was obtained to support the results of its review for the most recent ACR. We did not test the results of the reports or procurement transactions since we relied on the testing performed by DOA in its ACRs. We conducted our review from September 1999 through December 1999 in accordance with generally accepted government auditing standards.

## **RESULTS OF REVIEW**

Internal controls over the procurement credit card program are working effectively and, according to DOA's ACRs, the credit cards are being used properly. Although DOF's internal controls over the travel credit card program seem adequate based on our interviews and evaluation of policies and procedures, audit tests could not be performed to verify the adequacy of internal controls and misuse of the travel credit card due to the lack of correct, reliable data from Bank of America during 1999. However, since December 1999, acceptable data is being provided by Bank of America to the FDIC. DOF has just begun to perform its monthly reviews of the data and will need to consider the cost effectiveness of reviewing all data provided by Bank of America for the period December 1998 through December 1999.

Our review also found that the Corporation needs to re-examine its existing policy for the reinstatement of travel credit cards. Further, DOF needs to review data supporting approximately \$32,000 that its contractor has estimated to be additional costs due to time spent reviewing inaccurate, incorrectly formatted, and untimely data provided by the Bank of America. Finally, DOF should perform a self-assessment of internal controls once the travel credit card review and reporting process has been resumed.

## **PROCUREMENT CREDIT CARD PROGRAM IS WORKING AS INTENDED**

The internal controls over the procurement credit card process are working effectively based on our interviews and evaluation of policies and procedures for the procurement credit card program. The policies and procedures were well documented and the process for administering

the program is in accordance with those guidelines. Internal controls included separation of duties and independent verification of transactions during the process to ensure the accuracy of data.

DOA performs periodic ACRs at FDIC offices and divisions in Washington and field locations. DOA examines 100 percent of the procurement transactions for each review it performs. The ACRs include steps to ensure compliance with procurement policies and procedures and verify that all transactions are tracked. The nine ACRs in our sample revealed that according to DOA, cardholders were in compliance with established DOA policies and guidelines for credit card usage and no major findings or systemic problems were detected. For example, DOA found minor instances of employees splitting purchases to comply with the purchasing limits placed on their accounts. In response, DOA admonished the employees and, where necessary, recommended remedies such as raising the limits on purchasers' accounts to accommodate purchasing requirements. In addition, DOA raised the limit for individual purchases from \$2,500 to \$5,000 to reflect legitimate increases in procurement needs.

Based on our examination of the nine reviews performed by DOA from October 1997 to September 1999, the reviews were well documented, thorough, and reliable. In addition, we interviewed DOA staff responsible for these reviews, and we reviewed the workpapers prepared by DOA to ensure that proper documentation and evidence was obtained to support the results of their most recent ACR. We did not test the results of the ACR reports or procurement transactions since we relied on the testing performed by DOA in its ACR.

## **CONTRACTOR'S NONPERFORMANCE LIMITS THE FDIC'S ABILITY TO ADMINISTER THE TRAVEL CARD PROGRAM**

Internal controls are well documented for the travel credit card program based on our interviews and evaluation of policies and procedures. However, we could not fully assess their effectiveness because Bank of America had not provided data to the FDIC according to the contract. Prescribed internal controls include separation of duties, verification of the accuracy of data, and identification of misuse and delinquency of accounts through monthly reviews. However, due to Bank of America's failure to provide timely, accurate data in a usable form, these controls could not be properly administered by DOF. Prior to contracting with Bank of America, the FDIC was considered to be a "best practices" government agency by the GSA with respect to credit card administration. At that time, DOF was able to provide the GSA with information regarding the results of the FDIC's travel credit card program.

DOF worked with Bank of America throughout the contract period to resolve data issues, and, as part of that effort, FDIC changed the software used to manage travel credit card data to accommodate Bank of America. FDIC also spent time identifying incorrect data in the files provided by Bank of America, working out discrepancies in file layouts, and changing data set naming conventions. In addition, Bank of America frequently missed deadlines to provide needed data to the FDIC. As of December 1999, however, these issues had been resolved, and Bank of America is now providing timely and accurate data.

With regard to misuse of the travel credit card by employees, DOF had not been able to review data and provide information to FDIC management in divisions and offices for the period December 1998 through December 1999. Prior to the contract with Bank of America, DOF performed monthly control tests that included checking the account status report for accuracy and updating, reviewing the activity report for improper charges, reviewing delinquency reports to verify their accuracy, and reviewing the ATM activity report for unusual activity. The amount of misuse during the period December 1998 through December 1999 is unknown, although Bank of America has begun providing data to the FDIC regarding delinquent accounts. During the contract period with Bank of America, there have been instances of employees admitting to misuse of the credit cards and, as a result, their cards have been cancelled by DOF. However, other employees who may have misused their cards have not had the card cancelled because DOF was not receiving reports of misuse from Bank of America. According to DOF, Bank of America has provided information for the period December 1998 through December 1999 and DOF has begun a review of the data and resumed its monthly reviews.

The FDIC spent funds for a contractor to review data provided by Bank of America. This contractor estimated that the FDIC incurred over \$32,000 in additional costs due to time spent reviewing inaccurate, incorrectly formatted, and untimely data from the inception of the contract through December 1999. Since the inception of the contract with Bank of America, the FDIC has been working with the Bank of America and GSA to get accurate, timely, and correctly formatted credit card information. Representatives of the Bank of America admitted that they had not provided adequate information for the FDIC to administer its travel card program effectively. GSA requested that affected government agencies provide expenditure data to them so that GSA might recover amounts from Bank of America for failing to meet contract requirements. FDIC's expenditure data will support the GSA and other government agencies' efforts to compel Bank of America to perform its duties as contracted.

## **REINSTATEMENT POLICY NEEDS TO BE RE-EVALUATED**

DOF indicated that there are instances where an employee's travel credit card is reinstated even though DOF does not receive a proper explanation from the employee for the cancellation. Often the request is made for immediate reinstatement because an employee is required to travel for business reasons by its respective office. Prior to the contract with Bank of America, DOF indicated that it reinstated an average of three or four accounts in a 1-month period. During the scope of our survey, DOF personnel stated they had been reinstating about three to four accounts every week. According to FDIC policy, if a card is to be reinstated, the following should occur: all balances must be paid in full; reinstatement must be requested in writing, and the cardholder must state why the card was cancelled; and written concurrence must be obtained by the division or office director. DOF then reviews the request and asks the card contractor to reinstate the credit card if a decision to reinstate is made. Though these policies must be followed to reinstate an employee, they do not address for how long a period a credit card should be cancelled. It does not appear that the policy to cancel cards due to delinquency or misuse serves the purpose of deterring employees from delinquency or misuse when reinstatement is often occurring soon after cancellation.

DOF estimates that it reinstated approximately 29 percent of all cards cancelled due to misuse and delinquency soon after the cards were cancelled during the time that Bank of America has provided services to the FDIC. During the period December 1998 through November 1999, approximately 51 of 173 cancelled traveler's credit cards were reinstated within 1 week of cancellation. Also, the total number of delinquencies has increased from 7 to 10 a month to 10 to 15 a month for the same period.

## **CONCLUSIONS AND RECOMMENDATIONS**

DOF should review the data that supports the \$32,000 estimate calculated by the FDIC contractor responsible for reviewing Bank of America data and provide it to the GSA. This will support the GSA and other government agencies' efforts to compel Bank of America to perform its duties as contracted. In addition, DOF should reevaluate the policy regarding cancellation and reinstatement of the travel credit card. It does not appear that the policy to cancel cards due to delinquency or misuse serves the purpose of deterring employees from delinquency or misuse when reinstatement is occurring soon after cancellation. Instead, DOF may wish to consider prohibiting use of the card for certain periods of time after cancellation before reinstating cardholders that misuse the card or are delinquent in making payments. Further, DOF should consider the time and effort required to perform reviews of the data for the period December 1998 through December 1999 for misuse and the related costs against the benefits that may be obtained from such reviews. DOF should take into account the fact that many accounts that had been cancelled due to delinquency or misuse have been reinstated in short periods of time, effectively nullifying the cancellation. Canceling any other accounts due to a review of the data for the period December 1998 through December 1999 will not be effective if reinstatement occurs soon afterward. Finally, we were unable to perform internal control testing for the travel credit card program due to Bank of America's failure to provide acceptable data to the FDIC. We therefore believe that DOF should perform a self-assessment of internal controls related to the travel card program now that data provided by Bank of America is acceptable and the travel credit card review and reporting process is back in place to ensure that prescribed controls are in place and operating effectively.

Accordingly, we recommend that the Director of DOF:

- (1) Review the data supporting the \$32,000 estimated by the FDIC contractor responsible for reviewing Bank of America data and provide this information to the GSA to support its efforts to compel Bank of America to perform according to the master contract.
- (2) Review the current policy regarding the cancellation and reinstatement of credit cards to determine whether it is having its intended effect, and revise the policy accordingly.
- (3) Determine whether performing DOF's scheduled monthly reviews on the recently obtained data for the period December 1998 through December 1999 would be cost effective, and proceed accordingly.

- (4) Perform a self-assessment of internal controls related to the travel card program when data provided by Bank of America is acceptable and the travel credit card review and reporting processes have been resumed.

## **CORPORATION COMMENTS AND OIG EVALUATION**

On April 3, 2000, the Director of DOF, provided a written response to the recommendations in the draft report. DOF's response is presented in Appendix I of this report. The Director's response agreed with all recommendations to the draft report. However, recommendation 2 will need to be approved by the National Treasury Employees Union (NTEU). Although no recommendations were addressed specifically to DOA, we received a response from DOA to the draft report. DOA's response is presented in Appendix II of this report.

A summary of the Director's response to recommendations 2 and 3 and our analysis follows. The response to recommendations 1 and 3 is not summarized because the actions planned or completed are identical to those recommended. Appendix III presents management's proposed action on our recommendations and shows that there is a management decision for each recommendation in this report.

**Review the current policy regarding the cancellation and reinstatement of credit cards to determine whether it is having its intended effect, and revise the policy accordingly (recommendation 2):** The Director, DOF, stated that DOF has recently reviewed the policy regarding cancellation and reinstatement of travel charge cards. This review was prompted primarily by an awareness of inconsistencies among the various FDIC divisions and offices as to how much time, if any, an employee must wait before requesting reinstatement into the travel charge card program. For example, certain FDIC divisions require canceled employees to wait 6 months before requesting reinstatement. Other divisions allow their employees to request reinstatement almost immediately following cancellation. In an effort to bring more equity and consistency to this policy, the following policy will be proposed to the FDIC, Labor and Employee Relations Branch (LERB) and the NTEU for review.

An employee whose card has been cancelled due to delinquency or misuse may apply for reinstatement if the employee meets the criteria listed below:

- Three months has elapsed since the first cancellation due to delinquency or misuse;
- Six months has elapsed since the second cancellation due to delinquency or misuse;
- Twenty-four months has elapsed since the third cancellation due to delinquency or misuse.

If cancellation occurs for a fourth time due to delinquency or misuse, this will render the employee ineligible for reinstatement into the program. While in cancellation status, employees will not be permitted to use the FDIC Corporate account to charge airline tickets at the government contract airfare.

DOF also stated that such policy changes must be negotiated with the NTEU. DOF will propose changes to the policy with NTEU and will attempt to make the changes effective July 1, 2000.



We agree with DOF and the proposed policy changes. To avoid the appearance that certain individuals receive preferential treatment, we believe that each FDIC division and office must adhere to the same policy for cancellation and reinstatement when an FDIC employee is delinquent or misuses the travel card. Setting specific timeframes that an employee must wait for reinstatement will ensure that all individuals are treated alike. The action taken by DOF is responsive to our recommendation and meets the requirements of a management decision. However, we request that DOF provide us a copy of the revised policy for reinstatement when it is approved by the NTEU.

**Determine whether performing DOF's scheduled monthly reviews on the recently obtained past 13 months of data would be cost effective, and proceed accordingly (recommendation 3):**

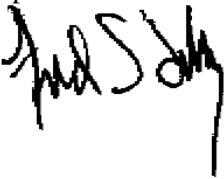
The Director of DOF stated that the issue of whether or not it would be cost effective to review 13 months of charge card data has been discussed at length within DOF. DOF does share the OIG's concern regarding the cost effectiveness of such an undertaking. However, discussions with FDIC's LERB have resulted in the decision to distribute and review the 13 months of retail charge reports in question. These discussions highlighted the importance of the consistent handling of employees in similar situations throughout the life of the travel charge card program. Therefore, in the interest of treating all employees equally under the travel charge card program, the decision was made to review all 13 months of reports.

We agree with DOF and the decision to review 13 months of reports for misuse. DOF considered the cost of performing this review; however, the LERB had concerns about the importance of consistent handling of employees in similar situations. Treating employees equally is one of the FDIC's primary goals. In addition, the cost of a potential lawsuit by an FDIC employee who might have been treated unfairly could be greater than the cost of the review. The action taken by DOF is responsive to our recommendation and meets the requirements of a management decision.



**DATE:** April 3, 2000

**MEMORANDUM TO:** David H. Lowenstein  
Assistant Inspector General for Headquarters Audits



**FROM:** Fred Selby  
Director, Division of Finance

**SUBJECT:** Management Response to Draft Report: *Review of the Corporation's Charge Card Programs*

The Division of Finance, (DOF) has completed its review of the draft report issued by the Office of the Inspector General (OIG), entitled "*Review of the Corporation's Charge Card Programs.*" DOF appreciates the review performed by the OIG and has the following comments with respect to the recommendations contained within the draft report.

- 1) DOF will review the data supporting the \$32,000 estimate provided by the Division of Information and Resource Management contractor responsible for reviewing the data contained in the interface files provided by Bank of America. DOF will then work with the Acquisition Services Branch, Division of Administration, to draft a letter to the General Services Administration (GSA) to support its efforts to compel Bank of America to perform according to the terms of the master contract. A copy of the letter will be provided to the OIG. The expected completion date for this action is May 31, 2000.
- 2) DOF has recently reviewed the policy regarding the cancellation and reinstatement of travel charge cards. This review was prompted primarily by an awareness of inconsistencies among the various FDIC divisions and offices as to how much time, if any, an employee must wait before requesting reinstatement into the Travel Charge Card Program. For example, certain FDIC divisions require canceled employees to wait six (6) months before requesting reinstatement. Other divisions allow their employees to request reinstatement almost immediately following cancellation. In an effort to bring more equity and consistency to this policy, the following policy will be proposed to FDIC, LERB and the NTEU for review.

An employee whose card has been canceled due to delinquency or misuse may apply for reinstatement if they meet the criteria listed below:

- Three (3) months has elapsed since the first cancellation due to delinquency or misuse;
- Six (6) months has elapsed since the second cancellation due to delinquency or misuse;
- Twenty-four (24) months has elapsed since the third cancellation due to delinquency or misuse.

If cancellation occurs for a fourth time due to delinquency or misuse, this will render the employee ineligible for reinstatement into the program. While in cancellation status, employees will NOT be

permitted to use the FDIC Corporate Account to charge airline tickets at the government contract airfare.

Unfortunately, DOF cannot unilaterally make the above changes in policy. Such a policy change must be negotiated with the NTEU. Therefore, DOF cannot guarantee that these changes will, in fact be implemented. However, when negotiating with NTEU for these changes, an effective date of July 1, 2000 will be requested by DOF.

- 3) The issue of whether or not it would be cost effective to review 13 months of charge card data has been discussed at length within DOF. DOF does share the OIG's concern regarding the cost effectiveness of such an undertaking. However, discussions with FDIC, LERB have resulted in the decision to distribute and review the 13 months of retail charge reports in question. These discussions highlighted the importance of the consistent handling of employees in similar situations throughout the life of the Travel Charge Card Program. Therefore, in the interest of treating all employees equally under the Travel Charge Card Program, the decision was made to review all 13 months of reports. Given the amount of work involved in the review of these reports, the estimated time for completion of this task is June 16, 2000.
- 4) DOF will complete a self assessment of internal controls related to the Travel Charge Card Program. In order to allow time for the backlog of reports to be reviewed and for normal operations to resume and remain in place for a few months, DOF proposes a completion date of September 20, 2000 for the self assessment.

Questions regarding this response may be directed to Stanley J. Pawlowski, Audit Liaison for the Division of Finance. Mr. Pawlowski may be reached at (202) 416-7343.

cc: Arleas Upton Kea  
Connie Brindle  
Sally Rinaldi  
Stan Pawlowski



**FDIC**


**Federal Deposit Insurance Corporation**  
550 17th Street, NW, Washington, DC 20429

APPENDIX II

Division of Administration

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**MEMORANDUM TO:** David H. Lowenstein  
Assistant Inspector General for Headquarters Audits

**FROM:** Arleas Upton Kea   
Director, Division of Administration

**SUBJECT:** Management Response to Draft Report: *Review of the Corporation's Credit Card Programs*

The Division of Administration (DOA) has completed its review of the draft report issued by the Office of the Inspector General (OIG) entitled *Review of the Corporation's Credit Card Programs*. DOA appreciates the review performed by the OIG. Since the draft report contained no recommendations specific to DOA, we have no comments.

If you have any questions regarding the response, our point of contact for this matter is Andrew O. Nickle, Audit Liaison for the Division of Administration. Mr. Nickle can be reached at (202) 942-3190.

cc: Vijay Deshpande  
Fred Selby

## MANAGEMENT RESPONSES TO RECOMMENDATIONS

The Inspector General Act of 1978, as amended, requires the OIG to report the status of management decisions on its recommendations in its semiannual reports to the Congress. To consider FDIC's responses as management decisions in accordance with the act and related guidance, several conditions are necessary. First, the response must describe for each recommendation

- the specific corrective actions already taken, if applicable;
- corrective actions to be taken together with the expected completion dates for their implementation; and
- documentation that will confirm completion of corrective actions.

If any recommendation identifies specific monetary benefits, FDIC management must state the amount agreed or disagreed with and the reasons for any disagreement. In the case of questioned costs, the amount FDIC plans to disallow must be included in management's response.

If management does not agree that a recommendation should be implemented, it must describe why the recommendation is not considered valid.

Second, the OIG must determine that management's descriptions of (1) the course of action already taken or proposed and (2) the documentation confirming completion of corrective actions are responsive to its recommendations.

This table presents the management responses that have been made on recommendations in our report and the status of management decisions. The information for management decisions is based on management's written response to our report.

Rec. Number	Corrective Action: Taken or Planned/Status	Expected Completion Date	Documentation That Will Confirm Final Action	Monetary Benefits	Management Decision: Yes or No
1	The Director, DOF, stated that DOF will review the data supporting the \$32,000 estimate provided by the Division of Information and Resource Management contractor responsible for reviewing the data contained in the interface files provided by Bank of America. DOF will then work with the Acquisition Services Branch, DOA, to draft a letter to the General Services Administration (GSA) to support its efforts to compel Bank of America to perform according to the terms of the master contract.	05/31/2000	Letter to the GSA.	N/A	Yes
2	The Director, DOF, stated that DOF has recently reviewed the policy regarding cancellation and reinstatement of travel charge cards. This review was prompted primarily by an awareness of inconsistencies among the various FDIC divisions and offices as to how much time, if any, an employee must wait before requesting reinstatement into the travel charge card program. For example, certain FDIC divisions require canceled employees to request reinstatement almost immediately following cancellation. In an effort to bring more equity and consistency to this policy, DOF will propose changes to the policy. However, DOF cannot unilaterally make changes to the policy. Such changes must be negotiated with the National Treasury Employees Union (NTEU). DOF will propose changes to the policy with NTEU and will attempt to make the changes effective July 1, 2000.	07/1/2000	Revised policy for cancellation of the travel charge card program.	N/A	Yes
3	The Director, DOF, stated that the issue of whether or not it would be cost effective to review 13 months of charge card data has been discussed at length within DOF. DOF does share the OIG's concern regarding the cost effectiveness of such an undertaking. However, discussions with FDIC's Labor and Employee Relations Branch have resulted in the decision to distribute and review the 13 months of retail charge reports in question. These discussions highlighted the importance of the consistent handling of employees in similar situations throughout the life of the travel charge card program. Therefore, in the interest of treating all employees equally under the travel charge card program, the decision was made to review all 13 months of reports.	06/16/2000	Completed review of 13 months of reports provided by Bank of America.	N/A	Yes
4	The Director, DOF, stated that DOF would complete a self-assessment of internal controls related to the travel charge card program. In order to allow time for the backlog of reports to be reviewed and for normal operations to resume and remain in place for a few months, DOF proposes a completion date of September 20, 2000 for the self-assessment.	09/20/2000	Completed Internal Control Review.	N/A	Yes