



Audit Report



OIG-12-068

Report on the Bureau of the Public Debt Administrative Resource Center's Description of its Financial Management Services and the Suitability of the Design and Operating Effectiveness of its Controls for the Period July 1, 2011 to June 30, 2012

August 17, 2012

Office of
Inspector General

Department of the Treasury



OFFICE OF
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

August 17, 2012

**MEMORANDUM FOR VAN ZECK, COMMISSIONER
BUREAU OF THE PUBLIC DEBT**

FROM: Michael Fitzgerald
Director, Financial Audits

SUBJECT: Report on the Bureau of the Public Debt Administrative Resource Center's Description of its Financial Management Services and the Suitability of the Design and Operating Effectiveness of its Controls for the Period July 1, 2011 to June 30, 2012

I am pleased to transmit the attached Report on the Bureau of the Public Debt (BPD) Administrative Resource Center's Description of its Financial Management Services and the Suitability of the Design and Operating Effectiveness of its Controls for the period July 1, 2011 to June 30, 2012. Under a contract monitored by the Office of Inspector General, KPMG LLP, an independent certified public accounting firm, performed an examination of the description of controls, the suitability of the design and operating effectiveness of the accounting and procurement processing, and general computer controls related to certain services provided by BPD's Administrative Resource Center to various Federal Government agencies (Customer Agencies) for the period July 1, 2011 to June 30, 2012. The contract required that the examination be performed in accordance with generally accepted government auditing standards and the American Institute of Certified Public Accountants' Statement on Standards for Attestation Engagements Number 16, *Reporting on Controls at a Service Organization*.

In its examination, KPMG LLP found in all material respects:

- the *Description of Controls Provided by the BPD* fairly presents the accounting and procurement processing, and general computer controls that were designed and implemented throughout the period July 1, 2011 to June 30, 2012,
- that these controls were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively throughout the period July 1, 2011 to June 30, 2012, and

customer agencies applied the complementary customer agency controls and sub-service organizations applied the controls contemplated in the design of BPD's controls throughout the period July 1, 2011 to June 30, 2012, and

- that the controls tested, which together with the complementary customer agency controls and sub-service organizations' controls, if operating effectively, were those necessary to provide reasonable assurance that the control objectives were achieved, operated effectively throughout the period July 1, 2011 to June 30, 2012.

In connection with the contract, we reviewed KPMG LLP's report and related documentation and inquired of its representatives. Our review, as differentiated from an examination of the description of controls, the suitability of the design and operating effectiveness of controls in accordance with generally accepted government auditing standards, was not intended to enable us to express, and we do not express, an opinion on BPD's description of controls, the suitability of the design of these controls and the operating effectiveness of controls tested. KPMG LLP is responsible for the attached independent service auditors' report dated August 16, 2012, and the conclusions expressed in the report. However, our review disclosed no instances where KPMG LLP did not comply, in all material respects, with generally accepted government auditing standards.

Should you have any questions, please contact me at (202) 927-5789, or a member of your staff may contact Mark S. Levitt, Manager, Financial Audits at (202) 927-5076.

Attachment



**U.S. Department of the Treasury
Bureau of the Public Debt**

**Administrative Resource Center
Financial Management Services
Accounting and Procurement Processing and
General Computer Controls**

**Report on Administrative Resource Center's Description of Its Financial
Management Services and the Suitability of the Design and Operating
Effectiveness of Its Controls
For the Period July 1, 2011 to June 30, 2012**

**U.S. DEPARTMENT OF THE TREASURY
BUREAU OF THE PUBLIC DEBT
ADMINISTRATIVE RESOURCE CENTER
FINANCIAL MANAGEMENT SERVICES**

**REPORT ON ADMINISTRATIVE RESOURCE CENTER’S DESCRIPTION OF ITS
FINANCIAL MANAGEMENT SERVICES AND THE SUITABILITY OF THE DESIGN AND
OPERATING EFFECTIVENESS OF ITS CONTROLS**

Table of Contents

<u>Section</u>	<u>Description</u>	<u>Page</u>
I.	Independent Service Auditors’ Report Provided by KPMG LLP	1
II.	Management Assertion	5
III.	Description of Controls Provided by the Bureau of the Public Debt	9
	Overview of Operations	10
	Relevant Aspects of the Control Environment, Risk Assessment, and Monitoring.....	18
	Control Environment.....	18
	Risk Assessment.....	18
	Monitoring.....	18
	Information and Communication.....	20
	Information Systems	20
	Communication	21
	Control Objectives and Related Controls	
	<i>The Bureau of the Public Debt’s control objectives and related controls are included in Section IV of this report, “Control Objectives, Related Controls, and Tests of Operating Effectiveness.” Although the control objectives and related controls are included in Section IV, they are, nevertheless, an integral part of the Bureau of the Public Debt’s description of controls.</i>	
	Complementary Customer Agency Controls	22
	Sub-service Organizations	24
IV.	Control Objectives, Related Controls, and Tests of Operating Effectiveness	28
	Accounting Processing Controls.....	29
	Obligations	29

Disbursements	33
Unfilled Customer Orders, Receivables, and Cash Receipts	38
Deposits.....	41
Payroll Accruals	44
Payroll Disbursements	45
USSGL	47
Accruals.....	51
Government-Wide Reporting.....	54
Administrative Spending.....	57
Budget	59
Manual Journal Entries.....	62
Federal Investments	63
Suppliers and Banks Record Changes.....	64
 Procurement Processing Controls	 65
Acquisitions and Contracts.....	65
Sufficiently Funded Requisitions	66
 General Computer Controls	 67
System Access	67
System Changes	77
Non-Interruptive System Service	80
Records Maintenance	84
 V. Other Information Provided by Bureau of the Public Debt	 87
Contingency Planning.....	88

**I. INDEPENDENT SERVICE AUDITORS' REPORT
PROVIDED BY KPMG LLP**



KPMG LLP
1676 International Drive
McLean, VA 22102

Independent Service Auditors' Report

Inspector General, U.S. Department of the Treasury
Deputy Executive Director, Administrative Resource Center

Scope

We have examined the Bureau of the Public Debt (BPD) Administrative Resource Center's (ARC's) description of its accounting and procurement processing, and general computer controls used for processing customer agencies' transactions throughout the period July 1, 2011 to June 30, 2012 (description) and the suitability of the design and operating effectiveness of controls to achieve the related control objectives stated in the description. The description indicates that certain control objectives specified in the description can be achieved only if complementary customer agency controls and controls at the sub-service organizations contemplated in the design of BPD's controls are suitably designed and operating effectively, along with related controls at the service organization. We have not evaluated the suitability of the design or the operating effectiveness of such complementary customer agency controls or controls at the sub-service organizations.

BPD uses external service organizations (sub-service organizations). The description in Sections III and IV includes only the control objectives and related controls of BPD and excludes the control objectives and related controls of the sub-service organizations. Our examination did not extend to controls of sub-service organizations.

Service organization's responsibilities

In Section II, BPD has provided an assertion about the fairness of the presentation of the description, the suitability of the design and the operating effectiveness of the controls to achieve the related control objectives stated in the description. BPD is responsible for preparing the description and for the assertion, including the completeness, accuracy, and method of presentation of the description and the assertion, providing the services covered by the description, specifying the control objectives and stating them in the description, identifying the risks that threaten the achievement of the control objectives, selecting and using suitable criteria, and designing, implementing, and documenting controls to achieve the related control objectives stated in the description.

The information in Section V of management's description of the service organization's system, "Other Information Provided by Bureau of the Public Debt," is presented by management of BPD to provide additional information and is not a part of BPD's description of its system made available to Customer Agencies during the period July 1, 2011, to June 30, 2012. Information in Section V has not been subjected to the procedures applied in the examination of the description of the system and of the suitability of the design and operating effectiveness of controls to achieve the related control objectives stated in the description of the system, and, accordingly, we express no opinion on it.



Service auditors' responsibilities

Our responsibility is to express an opinion on the fairness of the presentation of the description, the suitability of the design and the operating effectiveness of the controls to achieve the related control objectives stated in the description, based on our examination. We conducted our examination in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) and applicable *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether, in all material respects, the description is fairly presented, the controls were suitably designed and the controls were operating effectively to achieve the related control objectives stated in the description throughout the period July 1, 2011 to June 30, 2012.

An examination of a description of a service organization's system and the suitability of the design and operating effectiveness of the service organization's controls to achieve the related control objectives stated in the description involves performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design and the operating effectiveness of those controls to achieve the related control objectives stated in the description. Our procedures included assessing the risks that the description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the description. Our procedures also included testing the operating effectiveness of those controls that we consider necessary to provide reasonable assurance that the related control objectives stated in the description were achieved. An examination engagement of this type also includes evaluating the overall presentation of the description and the suitability of the control objectives stated therein, and the suitability of the criteria specified by the service organization and described in management's assertion in Section II of this report. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Inherent limitations

Because of their nature, controls at a service organization may not prevent, or detect and correct, all errors or omissions in processing or reporting transactions. Also, the projection to the future of any evaluation of the fairness of the presentation of the description, or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives is subject to the risk that controls at a service organization may become inadequate or fail.

Opinion

In our opinion, in all material respects, based on the criteria described in BPD's assertion, (1) the description fairly presents the accounting and procurement processing, and general computer controls that were designed and implemented throughout the period July 1, 2011 to June 30, 2012, (2) the controls related to the control objectives stated in the description were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively throughout the period July 1, 2011 to June 30, 2012, and customer agencies applied the complementary customer agency controls and sub-service organizations applied the controls contemplated in the design of BPD's controls throughout the period July 1, 2011 to June 30, 2012, and (3) the controls tested, which together with the complementary customer agency controls and sub-service organizations' controls referred to in the scope paragraph of this report, if operating effectively, were those necessary to provide reasonable assurance that the control objectives stated in the description in Section IV were achieved, operated effectively throughout the period July 1, 2011 to June 30, 2012.



Description of tests of controls

The specific controls and the nature, timing, extent, and results of the tests are listed in Section IV.

Restricted use

This report, including the description of tests of controls and results thereof in Section IV, is intended solely for the information and use of the management of BPD, customer agencies of BPD's financial management services during some or all of the period July 1, 2011 to June 30, 2012, the U.S. Department of the Treasury Office of Inspector General, the Office of Management and Budget, the Government Accountability Office, the U.S. Congress, and the Independent Auditors of BPD's customer agencies, who have a sufficient understanding to consider it, along with other information including information about controls implemented by customer agencies themselves, when assessing the risks of material misstatements of customer agencies' financial statements. This report is not intended to be and should not be used by anyone other than these specified parties.

KPMG LLP

August 16, 2012
McLean, Virginia

II. MANAGEMENT ASSERTION



Department of the Treasury
 Bureau of the Public Debt
 Administrative Resource Center
 Parkersburg, WV 26106-1328



Administrative Resource Center's Assertion
 August 16, 2012

We have prepared the description of the Administrative Resource Center 's (ARC) Administrative Systems (financial management services accounting processing and general computer controls) for user entities of the system during some or all of the period July 1, 2011 to June 30, 2012, and their user auditors who have a sufficient understanding to consider the description, along with other information, including information about controls operated by user entities of the system themselves, when obtaining an understanding of user entities' information and communication systems relevant to financial reporting. We confirm, to the best of our knowledge and belief, that:

- a. The accompanying description in Sections III and IV, fairly presents the ARC system made available to user entities of the system during some or all of the July 1, 2011 to June 30, 2012 for processing their transactions in the ARC financial management systems.

Sub-Service Organization	Description of Services
Treasury	<p>Central Accounting and Reporting System (CARS) provides reports and information of Customer Agencies Fund Balance with Treasury.</p> <p>Secure Payment System (SPS) provides invoice processing.</p> <p>Internet Payment Platform (IPP) is used to route invoices for approval and payment.</p> <p>CASHLINK II, CARS, and Intra-governmental Payment and Collection (IPACS) is used for Statement of Transactions activity.</p> <p>TGANet and OTCnet is used to process checks for deposit.</p> <p>Used by customer agencies for FACTS I and FACTS II reporting and producing financial statements.</p> <p>Treasury Information Executive Repository (TIER) and Financial Analysis Reporting</p>

	System (FARS) is used for producing Treasury and Department of Homeland Security financial statements.
Third Party Payroll Service Providers	Processing of payroll transactions
Northrop Grumman Mission Systems	Processing of travel related transactions
Dun & Bradstreet	Used for procurement transactions
Bureau of Public Debt	Used to purchase and redeem Government Account
Oracle Corporation	Provides hosting services Oracle and PRISM

The description in Sections III and IV includes only the controls and related control objectives of ARC and excludes the control objectives and related controls of the services listed above from the respective service organizations. The criteria we used in making this assertion were that the accompanying description:

- i. Presents how the systems made available to user entities of the system was designed and implemented to process relevant transactions, including:
 1. The types of services provided, including, as appropriate, the classes of transactions processed;
 2. The procedures, within both automated and manual systems, by which those transactions were initiated, authorized, recorded, processed, corrected as necessary, and transferred to the reports prepared for user entities;
 3. The related accounting records, supporting information, and specific accounts that were used to initiate, authorize, record, process, and report transactions; this includes the correction of incorrect information and how information was transferred to the reports prepared for user entities;
 4. How the systems captured and addressed significant events and conditions, other than transactions;
 5. The process used to prepare reports or other information for user entities;
 6. Specified control objectives and controls designed to achieve those objectives;
 7. Controls that we assumed, in the design of the system, would be implemented by user entities, and which, if necessary to achieve control objectives stated in the accompanying description, are identified in the description along with the specific control objectives that cannot be achieved solely by controls implemented by us; and
 8. Other aspects of our control environment, risk assessment process, information and communication systems (including the related business processes), control activities, and monitoring controls that are relevant to processing and reporting transactions of user entities transactions.

- ii. Does not omit or distort information relevant to the scope of the Administrative Systems being described, while acknowledging that the description was prepared to meet the common needs of a broad range of user entities and their independent auditors and may

not, therefore, include every aspect of the Administrative Systems that each individual user entity may consider important in its own particular environment.

- b. The description includes relevant details of changes to ARC's systems during the period covered by the descriptions.
- c. The controls related to the control objectives stated in the description were suitably designed and operated effectively throughout the period July 1, 2011 to June 30, 2012 to achieve those control objectives. The criteria we used in making this assertion were that
 - i. The risks that threatened achievement of the control objectives stated in the description were identified;
 - ii. The identified controls would, if operated as described, provide reasonable assurance that those risks did not prevent the stated control objectives from being achieved;
 - iii. The controls were consistently applied as designed, including whether manual controls were applied by individuals who have the appropriate competence and authority; and
 - iv. Sub-service organizations applied the controls contemplated in the design of ARC's controls.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Springer', is written over a horizontal line.

For/ Cynthia Z. Springer, Executive Director
Administrative Resource Center

**III. DESCRIPTION OF CONTROLS PROVIDED BY THE BUREAU OF
THE PUBLIC DEBT**

OVERVIEW OF OPERATIONS

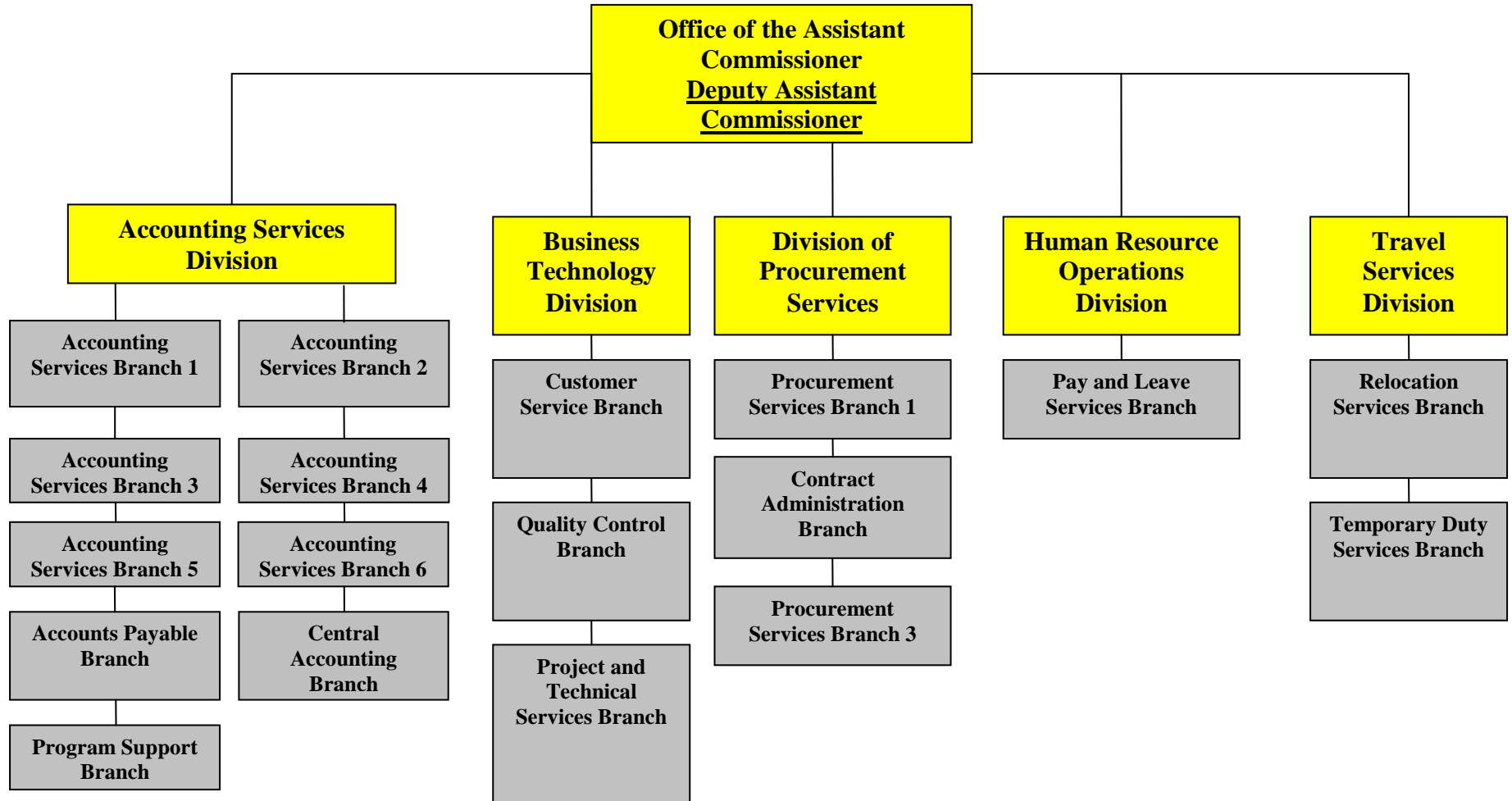
The Bureau of the Public Debt's (BPD's) Administrative Resource Center (ARC) has been a member of the Treasury Franchise Fund (TFF) since August 1998. The TFF was established by P.L. 104-208 and was made permanent by P.L. 108-447. ARC provides administrative support services on a competitive, fee-for-service, and full-cost basis. ARC's mission is to aid in improving overall government effectiveness by delivering responsive and cost effective administrative support to its Customer Agencies; thereby, improving their ability to effectively discharge their mission.

As of June 30, 2012, ARC provided financial management services to approximately 50 Customer Agencies. Financial management services include accounting, budgeting, reporting, travel, procurement and systems support and platform services. The ARC divisions, branches and the financial management services that they provide are:

Accounting Services Division (ASD)	Services Provided
Accounting Services Branch 1 (ASB1)	Accounting Services Reporting Services
Accounting Services Branch 2 (ASB2)	Accounting Services Reporting Services
Accounting Services Branch 3 (ASB3)	Accounting Services Reporting Services Budget Services
Accounting Services Branch 4 (ASB4)	Accounting Services Reporting Services
Accounting Services Branch 5 (ASB5)	Document Processing Reporting Services
Accounting Services Branch 6 (ASB6)	Reporting Services
Accounts Payable Branch (APB)	Document Processing
Central Accounting Branch (CAB)	Supplier Table Update and Maintenance Record and Reconcile Payroll 1099 Reporting Purchase Card Processing
Program Support Branch (PSB)	Deposit Services SPS Operations

Travel Services Division (TSD) Temporary Duty Services Branch (TDSB)	Services Provided Temporary Duty Travel Services Operate/Maintain GovTrip Provide GovTrip Training Services Document Processing
 Relocation Services Branch (RSB)	 Relocation Services Operate/Maintain moveLINQ Record and process relocations Tax Reporting
Business Technology Division (BTD) Customer Service Branch (CSB)	Services Provided Provide Financial Management System Support/Training
 Quality Control Branch (QCB)	 Operate/Maintain Financial Management Systems
 Project and Technical Services Branch (PTSB)	 Application Development/Analysis/Project Management
Human Resources Operations Division (HROD) Pay and Leave Services Branch (PLSB)	Services Provided Administer webTA System User Access
Division of Procurement Services (DPS) Procurement Services Branch 1 (PSB1)	Services Provided Acquisition Services
 Contract Administration Branch	 Acquisition Services
 Procurement Services Branch 3 (PSB3)	 Acquisition Services

ARC Organizational Chart



Accounting Services

Accounting Services consists of the following:

- Recording financial transactions in Oracle Federal Financials (Oracle), including appropriation, apportionment, allocations, revenue agreements, accounts receivable, collections, commitments, obligations, accruals, accounts payable, disbursements, and journal entries.
- Examining and processing vendor and other employee payments.
- Examining and processing revenue and other collections.

To maximize efficiencies and enhance Customer satisfaction, ARC has developed financial management service guidelines for Customer Agencies. The guidelines are available to customers via ARC's customer websites. The guidelines provide accounting service overviews, links to regulations and data submission requirements for the various types of services and accounting transactions that ARC processes.

Prior to providing accounting services to Customer Agencies, ARC meets with them to learn and understand the authorizing legislation and mission. This enables ARC to assist them in defining their accounting needs and to ensure that the accounting services provided comply with applicable regulations and are able to meet their internal and external reporting needs.

ARC's automated accounting systems provide for budgeting and funds control at various organizational and spending levels. The levels used are established based on the Customer Agency's authorizing legislation, apportionment level, or their request to control at a lower level than required by law.

ARC offers commitment accounting to Customer Agencies to better enable them to monitor and control their funds availability. When applicable, ARC sets aside funds that are available for obligation based on an approved purchase requisition (PR). In the event that the actual order amount is greater than the approved purchase request amount, a modification to the PR is required unless overage tolerances have been pre-approved by the customer agency.

ARC records obligations based on fully executed purchase orders, contracts, training orders or interagency agreements. Recording the obligations in the accounting system sets aside funds to ensure that funds are available to pay for the goods or services when provided and billed by suppliers. All obligations must be approved for funds availability prior to issuance. This is generally done through processing a PR, but is the responsibility of the Customer Agency if they elect not to have commitment accounting services. In the event that the invoice amount is greater than the obligated amount, a modification is required unless overage tolerances have been pre-approved by the Customer Agency.

Customer Agencies are required to notify ARC when goods/services have been received but not invoiced by the supplier at the end of a reporting period. Based on the information received, ARC records expense accruals in the accounting system. The notification process is established at the Customer Agency level and can include submitting receiving reports or schedules that detail the items to be accrued.

ARC processes and/or records all Customer Agency disbursements. These include supplier invoices, purchase card payments, Intra-governmental Payment and Collection (IPAC) transactions, employee travel reimbursements, and employee payroll.

The preferred approach for payment of qualifying supplier goods/services is the government's purchase card program. Customer Agencies are encouraged to obtain and use a government purchase card to the greatest extent possible and they are encouraged to participate in ARC's purchase card program and use Citibank's CitiDirect system. CitiDirect allows Customer Agency cardholders and approving officials to electronically reconcile, route, approve, and submit the purchase card statement to ARC for payment.

Generally, ARC Customer Agencies use three methods of receiving and monitoring the status of supplier invoices. The preferred method, due to efficiencies in processing and approvals from electronic work flow, requires that supplier invoices be submitted via the Internet Payment Platform (IPP). As of July 30, 2012 IPP changed its name to the Invoice Processing Platform, but functionality had not changed. The vendor submits their invoice through IPP and the invoice is routed to the invoice approver designated on the purchase order. The second method occurs when invoices are submitted directly to ARC, ARC has controls that ensure that all invoices are logged with the date received, are forwarded to the Customer Agency staff designated on the obligating document for review and approval, and are monitored to ensure that invoices are returned to ARC for processing in accordance with the Prompt Payment Act. The third method (under unique circumstances) requires that supplier invoices be sent directly to the Customer Agency. When using this method, the Customer Agency is required to establish controls to ensure that all invoices are stamped with the date received, reviewed, certified by the staff member designated on the obligation document, and submitted to ARC for processing in accordance with the Prompt Payment Act.

All invoices are examined by ARC and Customer Agency staff to ensure that they are proper, as defined by the Prompt Payment Act. In addition, invoices are matched to the obligating documents and receiving reports (when applicable) and are certified by invoice approvers. If receiving reports are not submitted, the invoice approver certifies that the invoice is in accordance with the terms of the order, and provides the dates the goods/services were received and accepted.

After the invoice approver certifies the invoice, it is submitted to ARC to process the payment to the supplier. The Customer Agency is responsible for ensuring that invoices are submitted in time to receive discounts, if applicable, and to pay the invoice prior to the Prompt Payment Act due date. Upon receipt, ARC reviews the invoice for proper certification, accuracy and completeness and either schedules the payment in accordance with the terms of the order, the Prompt Pay Act and Electronic Funds Transfer (EFT) Rules or returns the invoice to the customer for clarification or additional information.

ARC transmits EFT and check payment files to the U.S. Department of the Treasury using Treasury's Secure Payment System (SPS). In addition, ARC processes most intra-governmental payments using Treasury's IPAC system. ARC obtains Customer Agency approval prior to initiating an IPAC payment to another federal agency. ARC also monitors IPAC activity initiated against the Customer Agency by another federal agency and forwards all IPAC payments to the appropriate certifying official for approval. ARC records all IPAC payments in the accounting period the IPAC was accomplished.

Third-party payroll processors provide ARC with a file of payroll data at least bi-weekly (weekly if payroll adjustment files are applicable) to interface into the accounting system. ARC reconciles all payroll transactions recorded to disbursements reported by the third-party processor. ARC records payroll accruals on a monthly basis and reverses the accrual in the subsequent accounting period. The payroll accrual is a prorated calculation performed by the accounting system that is based on the most recent payroll disbursement data available.

ARC processes revenue and collection related transactions (i.e., unfilled customer orders, receivables, and cash receipts) with Customer Agency approval. Customer Agencies either forward to ARC approved source documents or a summary of their transactions. ARC records IPAC transactions in the period in which they are processed in FMS's IPAC System. Check deposits are made by ARC or the Customer Agency. When checks are deposited by customers, the Standard Form (SF) 215 deposit ticket is forwarded to ARC. In addition, all deposits require the Customer Agencies to provide the accounting information necessary to record the cash receipt.

ARC records proprietary and budgetary accounting entries using the United States Standard General Ledger (USSGL) and Treasury approved budget object codes at the transaction level. In addition, ARC reconciles general ledger accounts to ensure transactions are posted to the appropriate accounts.

ARC utilizes CA Records Manager, a software application managed by BPD's Office of Management Services' (OMS), Information Management Branch (IMB), to store hardcopy and electronic data records. ARC generates labels, which are printed and placed on boxes that are to be stored in BPD's warehouse. The information recorded on the label is entered into CA Records Manager so that the boxes can subsequently be requested by ARC personnel, as they are needed. Once the data is recorded in CA Records Manager, BPD warehouse personnel either pick up the box to be placed in storage or return the box to ARC, as applicable.

ARC works with Customer Agencies to develop and implement processes to ensure the accuracy of their accounting information. This includes reviewing open commitment, obligation, expense accrual, customer agreement, and open billing document reports for completeness, accuracy, and validity. This review is conducted by Customer Agencies no less frequently than quarterly. Based on the review, a determination is made on the action(s) needed to adjust or remove any invalid items in ARC's accounting records.

Budget Services (provided by Accounting Services)

ARC enters the Customer Agency's budget authority in the accounting system based on the supporting documentation, which may include enacted legislation, anticipated resources, Treasury warrants or transfer documents, an Apportionment and Reapportionment Schedule (SF 132), the Customer Agency's budget plan or recorded reimbursable activity. The budget process makes funds available for commitment, obligation, and/or expenditure, and with controls in place, the automated accounting system checks for sufficient funds in the Customer Agency's budget at the specified control levels.

Reporting Services (provided by Accounting Services)

ARC performs all required external reporting for Customer Agencies, including the following reports: FMS 224, FACTS I, FACTS II, Report on Receivables, Treasury Information Executive Repository (TIER), and quarterly and year-end financial statements. In addition, ARC has created a standard suite of management reports that are available to all Customer Agencies. ARC reconciles certain general ledger accounts on a monthly basis and ensures that proprietary and budgetary general ledger account relationships are maintained and accurate.

Temporary Duty Travel Services

Travel Services consist of the following:

- Operating and maintaining the E-Gov Travel system (GovTrip) in compliance with the Federal Travel Regulations (FTR) for all ARC Customer Agencies
- Researching and implementing the FTR and Agency/Bureau travel policies

- System Administration
- Providing customer service and training to system users
- Evaluating, recommending, and implementing approved changes to existing systems and/or new systems, including working with the E-Gov Travel vendor and the General Services Administration (GSA) on system enhancements and deficiencies
- Processing employee reimbursements via interface to Oracle Federal Financials (Oracle)

Travel documents (authorizations and vouchers) and miscellaneous employee reimbursements are entered by Customer Agencies into GovTrip and are electronically routed to an Approving Official for review and approval. The Approving Official electronically signs the documents with a status of “approved.” All “approved” documents are interfaced and reconciled to Oracle daily. GovTrip contains system audits that prohibit documents that do not meet certain Federal Travel Regulations or do not contain the required accounting information from being approved and therefore will not interface to Oracle..

Access to GovTrip is restricted to users with a valid logon ID and password. All GovTrip users must complete the self-registration process. An account token will be forwarded to the user by the TSD helpdesk after the self-registration information is verified for the user to activate their account. Budget Reviewers and Approving Officials must complete, sign, and submit an approved *Form PD5409E – Administrative Resource Center (ARC) Online Applications Access Request* or have their approving official or agency travel contact submit an e-mail request to Travel Services. Changes to a user’s identification (i.e., name change) require a resubmitted Form PD5409E or an e-mail from the user copying his/her approving official or agency travel contact. Changes to a user’s role require a resubmitted PD5409E or e-mail approval from the traveler’s approving official or agency travel contact.

Relocation Services (provided by Travel Services Division)

Relocation Services consist of the following:

- Operating and maintaining moveLINQ, a government relocation expense management system in compliance with the Federal Travel Regulations (FTR), Joint Travel Regulations (JTR) and Joint Federal Travel Regulations (JFTR) to record and process permanent change of station moves for Customer Agencies
- Researching and implementing relocation regulations and Agency/Bureau relocation travel policies
- System Administration
- Providing customer service
- Providing system support and training to internal users
- Evaluating, recommending, and implementing approved changes to the existing system, including working with the moveLINQ vendor, mLINQS, on system enhancements and deficiencies
- Processing relocations through the moveLINQ system
- Processing obligations and disbursements via interface to Oracle Federal Financials (Oracle)

Relocation travel documents (authorizations, amendments, advances, and vouchers) are entered by ARC into moveLINQ. Prior to being submitted in moveLINQ, the vouchers are reviewed for accuracy by a second ARC employee. Completed documents are faxed or digitally scanned and e-mailed to the traveler and/or approving official for review and approval, as appropriate. For customers that we process payments, approved documents are interfaced and reconciled to Oracle daily.

Access to moveLINQ is restricted to ARC users with a valid logon and password. The process for requesting, establishing, issuing, and closing user accounts is controlled through the use of the moveLINQ Online Application Access Request Form which requires lead/supervisor approval. Changes to a user's identification (i.e. name change) require a resubmitted moveLINQ Online Application Access Request Form. Changes to a user's role require a resubmitted Application Access Request Form.

Procurement Services

Procurement Services consist of the following:

- Awarding contracts and purchase orders in accordance with Federal Acquisition Regulations, Treasury Acquisition Regulations, Customer Agencies Regulations when applicable
- Contract administration

Requests for procurement actions are initiated by customers through requisitions. The requisitions contain a performance work statement or requirements document, estimated dollar amount for the goods or service, validation that funds are available and approval from an authorized official. Requisitions may be sent electronically through PRISM or manually.

Upon receipt of a completed requisition, ARC procurement personnel will develop an acquisition strategy based upon the item or service being purchased and the expected dollar amount of the purchase. Using information from the requisition, ARC personnel will develop and publicize the solicitation requesting proposals. ARC personnel will conduct the evaluation of the proposals with technical team of experts from our Customer Agencies. With input from the technical team, an ARC contracting officer will select the vendor that best meets the customer's requirements.

Following award of the contract, ARC personnel will provide contract administration services. This includes executing approved and authorized contract modification, resolving issues that arise during the life of the contract, monitoring delivery schedules and closing out the contract at completion.

System Platform Services (provided by the Business Technology Division)

ARC maintains system support staff that provide customer services and training activities. Customer support is provided via phone or e-mail. ARC maintains a training course curriculum that is generally provided in a hands-on classroom environment.

ARC performs all system access activities in accordance with established procedures for granting, changing, and removing user access. Included in these procedures are independent reviews of system access activity and user inactivity.

ARC performs all system change activities in accordance with established procedures for evaluating, authorizing, and implementing. To this end, ARC maintains responsibility for System Integration Testing, providing customers an opportunity to perform User Acceptance Testing, and approving production changes.

RELEVANT ASPECTS OF THE CONTROL ENVIRONMENT, RISK ASSESSMENT, AND MONITORING

Control Environment

ARC Financial Management Service operations are under the direction of the Office of the Executive Director of ARC. ARC's mission is to aid in improving overall government effectiveness by delivering responsive and cost effective administrative support to its Customer Agencies; thereby, improving their ability to effectively discharge their mission.

ARC employees and contractors working at ARC are responsible for processing and reporting accounting activity, providing system support and development services, procurement, and travel services for its Customer Agencies. ARC holds management meetings on a regular basis to discuss special processing requests, operational performance, and the development and maintenance of projects in process. Written position descriptions for employees are maintained. The descriptions are inspected and revised as necessary.

References are sought and background, credit, and security checks are conducted for all BPD personnel when they are hired. Additional background, credit, and security checks are performed every three to five years. The confidentiality of user-organization information is stressed during the new employee orientation program and is emphasized in the personnel manual issued to each employee. BPD provides a mandatory orientation program to all full time employees and encourages employees to attend other formal outside training. Training available to BPD employees with related work responsibilities includes, but is not limited to: Prompt Pay and Voucher Examination, Appropriation Law, Federal Acquisition Regulations, Federal Travel Regulations, Reconciling with and Reporting to Treasury, Dollars & Sense, Federal Accounting Fundamentals, USSGL Practical Applications, Budgeting and Accounting – Making the Connection and Computer Security Training Awareness.

All BPD employees receive an annual written performance evaluation and salary review. These reviews are based on goals and objectives that are established and reviewed during meetings between the employee and the employee's supervisor. Completed appraisals are reviewed by senior management and become a permanent part of the employee's personnel file.

Risk Assessment

BPD has placed into operation a risk assessment process to identify and manage risks that could affect ARC's ability to provide reliable accounting and reporting, system platform and travel services for Customer Agencies. This process requires management to identify significant risks in their areas of responsibility and to implement appropriate measures and controls to manage these risks.

Monitoring

BPD management and supervisory personnel monitor the quality of internal control performance as a normal part of their activities. Management and supervisory personnel inquire of staff and/or review data to ensure that transactions are processed within an effective internal control environment. An example of a key monitoring control is that ASD Accounting Services Branch Managers and/or Supervisors review reconciliations from Oracle sub ledgers to the related general ledger accounts. ASD prepares budgetary to proprietary account relationship

reconciliations on a monthly basis. In addition, ASD prepares and reconciles the FACTS II submitted reports to the trial balance and statement of budgetary resources each time the FACTS II file is submitted. ARC also uses the results of the annual Statements on Standards for Attestation Engagements (SSAE 16) examination as a tool for identifying opportunities to strengthen controls.

INFORMATION AND COMMUNICATION

Information Systems

Oracle Federal Financials (Oracle)

Oracle on Demand operates Oracle version 11i, Oracle 10g database in a Linux operating system environment. Oracle uses a two-tier web-based infrastructure with a front-end Internet user interface and a database residing on the secure network. The application accesses the database IP to IP on a specified port that was defined in the Access Control List. Only select Internet Protocol (IP) addresses that are defined in the Access Control List are permitted to connect to the database IP. Internet access is via a 128-bit Secure Sockets Layer (SSL) encrypted connection. The application is compliant with Section 508 of the Rehabilitation Act Amendment for 1998 for Americans with Disabilities (ADA). Functions of Oracle include budget execution, general ledger, purchasing, accounts payable, accounts receivable, fixed assets, and manufacturing. ARC also uses a report writer package called Discoverer that provides users with the ability to create their own ad hoc reports for query purposes.

Procurement Request Information System Management (PRISM)

Oracle on Demand operates PRISM version 7.1, on Windows operating system and Oracle 10g database in a Linux operating system environment. PRISM uses a two-tier web-based infrastructure with a front-end Internet user interface using Windows as its operating system and a database residing on the secure Oracle on Demand network. The application accesses the database on a specified port that is defined in the Access Control List. Only select Internet Protocol (IP) addresses that are defined in the Access Control List are permitted to connect to the database IP. Internet access is via a 128-bit SSL encrypted connection. Transactions entered through PRISM interface real-time with Oracle.

Internet Payment Platform (IPP)

ARC uses the Financial Management Service's IPP electronic invoice processing solution (mandated for all Treasury Bureaus by the Department of Treasury). IPP is a web-based electronic invoicing and payment information system that is hosted by the Federal Reserve Bank of Boston. Purchase orders are interfaced from Oracle to IPP. Invoices are submitted in IPP by either the vendor or ARC personnel and are routed to the customer for approval. Upon approval, the invoice interfaces from IPP to Oracle and the invoice is scheduled for payment. Remittance information then interfaces from one of three Regional Finance Centers (RFC), Treasury Financial Management Service processing centers that provide payment services for federal agency sites, back to IPP. IPP users consist of invoice approvers, viewers and administrators.

webTA

ARC uses Kronos' webTA as its time and attendance system for most of its Customer Agencies whose payroll is processed by the NFC. Transactions that are entered in webTA interface with NFC, and NFC ultimately sends payroll data back to ARC for an interface into Oracle.

ARC operates webTA version 3 on Windows 2003. webTA uses the Oracle 11g database, which runs on the ARC subnet and accesses data in the ARC DMZ using Linux AS 2.1 as its operating system. Office of Information Technology (OIT) serves as the webTA database administrator and provides primary support for tape backup and recovery. webTA uses a two-tier web-based infrastructure with a front-end Internet user interface and a database residing on the secure network. The application (web-applet) accesses the database on a specified port that is defined in the Access Control List. Only select IP addresses that are defined in the Access Control List are permitted to connect to the database IP. External Internet access is via 128-bit encrypted

connection. External security is provided by OIT through firewall rules and router access control lists.

GovTrip

ARC uses Northrop Grumman Mission System's (NGMS's) GovTrip travel system (system selected by the U.S. Department of the Treasury as its E-Gov Travel solution). NGMS developed and hosts GovTrip. GovTrip is a web-based, self-service travel system that incorporates traditional reservation and fulfillment support and a fully-automated booking process. GovTrip uses system processes and audits to ensure compliance to the FTR and/or Agency policy. GovTrip is used to prepare, examine, route, approve, and record travel authorizations and vouchers. It is used to process all temporary duty location (TDY) authorizations, vouchers, local vouchers and miscellaneous employee reimbursements. Approved documents interface to Oracle for obligation or payment during a daily batch process. GovTrip users consist of travelers, document preparers, budget reviewers, approving officials and administrators.

moveLINQ

ARC uses mLINQS relocation expense management system, moveLINQ, to meet their relocation management program, payment system and reporting requirements. moveLINQ is an E-Gov Travel Services and Federal Travel Regulations, Chapter 302 compliant web-based system that automates relocation expense management processes, policy and entitlement for both domestic moves and international relocations. The application is used for household goods shipment and storage arrangements, employee travel arrangements, third party real estate payments and relocation tax administration, including W-2 preparation. Approved documents interface to Oracle for obligation or payment during a daily scheduled batch process. moveLINQ users consist of authorized TSD personnel. OIT hosts the moveLINQ system and serves as the Microsoft SQL database administrator and provides primary support for tape backup and recovery.

PRISM, IPP, GovTrip, moveLINQ, and E-Payroll to Oracle Reporting (EOR) are feeder systems that interface with Oracle. Oracle on Demand hosts Oracle, PRISM and EOR, Northrop Grumman hosts GovTrip, the Federal Reserve Bank of Boston hosts IPP, and ARC hosts moveLINQ. ARC performs application administration for all feeder systems.

Communication

BPD has implemented various methods of communication to ensure that all employees understand their individual roles and responsibilities over processing transactions and controls. These methods include orientation and training programs for newly hired employees, and use of electronic mail messages to communicate time sensitive messages and information. Managers also hold periodic staff meetings as appropriate. Every employee has a written position description that includes the responsibility to communicate significant issues and exceptions to an appropriate higher level within the organization in a timely manner. Managers also make an effort to address continuing education needs of all employees by identifying training opportunities made available through BPD's employee training and career development programs, internal training classes, and professional conferences.

COMPLEMENTARY CUSTOMER AGENCY CONTROLS

The BPD's processing of transactions and the controls over the processing were designed with the assumption that certain controls would be placed in operation by Customer Agencies for the control objectives to be achieved. This section describes some of the controls that should be in operation at Customer Agencies to complement the controls at BPD. Customer Agency auditors should determine whether user Customer Agencies have established controls to provide reasonable assurance to:

- Properly approve and accurately enter obligations into the procurement and travel systems in the proper period.
- Send valid requests to record manual obligations to ARC in a timely manner.
- Review open obligation and accrual reports for completeness, accuracy, and validity.
- Restrict Customer Agency access to Oracle, Discoverer, PRISM, IPP, webTA, and GovTrip to authorized individuals.
- Approve and return relocation travel authorizations to Relocation Services Branch (RSB) for processing in moveLINQ in a timely manner.
- Communicate Customer Agency required levels of budget and spending controls to ARC.
- Approve and return relocation travel vouchers to RSB for processing in moveLINQ in a timely manner.
- Compare actual spending results to budgeted amounts.
- Review the financial reports provided by ARC to ensure that disbursement transactions are complete and accurate.
- Approve invoices for payment and send approved invoices to ARC in a timely manner.
- Ensure that invoices properly reflect the invoice receipt date and formal or constructive acceptance date according to the Prompt Payment Act.
- Approve travel vouchers and accurately enter the vouchers into GovTrip in the proper period.
- Maintain and communicate to ARC, a list of individuals authorized to approve invoices and travel vouchers when it is not communicated in the authorizing agreement.
- Communicate Customer Agency required levels of budget and spending controls to ARC.
- Send approved and accurate documentation of unfilled customer orders, receivables, and cash receipts transactions to ARC in the proper period.
- Review unfilled customer orders, receivable and advance reports for completeness, accuracy, and validity.
- Monitor and pursue collection of delinquent balances.
- Review the financial reports provided by ARC to ensure that payroll accruals are complete and accurate.
- Verify that payroll processed by third-party providers is complete and accurate.
- Review the financial reports provided by ARC to ensure that payroll disbursements are complete and accurate.

- Approve and send revenue and expense accruals to ARC in a timely manner.
- Review and approve, prior to submission, the financial reports prepared by ARC to ensure that all reports prepared for external use are complete, accurate, and submitted in a timely manner.
- Provide certification of FACRS II to ARC prior to ARC’s FACTS II system certification.
- Send approved budget plans to ARC in a timely manner.
- Review the financial reports provided by ARC to ensure that budget entries are complete and accurate.
- Communicate OMB apportionment status to ARC.
- Monitor usage of budget authority during periods of operation under a Continuing Resolution to ensure that OMB directed apportionment limits are not exceeded.
- Send valid and approved requests to record manual journal entries to ARC in a timely manner.
- Maintain and communicate to ARC, a list of individuals authorized to submit manual journal entries that are initiated by the Customer Agency.
- Review and approve listing of users with current Oracle, PRISM, IPP, webTA, and GovTrip access to ensure appropriateness.
- Ensure exiting employee timecards are coded “Final” as this will help ensure that HR staff deactivate the employee’s webTA access.

Specific complementary Customer Agency Controls are provided for Control Objectives 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, and 17, in the Control Objectives, Related Controls, and Tests of Operating Effectiveness section of this report.

SUB-SERVICE ORGANIZATIONS

In order to provide financial management services, ARC relies on systems and services provided by other organizations external to BPD (sub-service organizations). The achievement of control objectives depends on whether controls at the sub-service organizations anticipated in the design of BPD's controls were implemented and operating effectively. These sub-service organizations were not subject to examination by KPMG LLP.

Name of Sub-service Organization	Name of System	Function/Responsibilities
Treasury Financial Management Service (FMS)	Central Accounting and Reporting System (CARS)	Treasury's FMS provides reports to inform agencies of their Fund Balance With Treasury and to assist agencies in reconciling their general ledger balances to FMS balances. ARC uses these reports to perform reconciliations.
	Secure Payment System (SPS)	ARC uses SPS to process payments for invoices.
	Internet Payment Platform (IPP)	ARC uses IPP to electronically route invoices for approval and payment.
	CA\$HLINK II, CARS TDO Payments, Intra-governmental Payment and Collection transactions (IPACs)	Each month, Treasury's FMS issues the FMS 6652, <i>Statement of Differences</i> , to agency location codes (ALC) when differences are identified between the cash activity reported by the agency on the FMS 224, <i>Statement of Transactions</i> , and data reported to Treasury's CA\$HLINK II, CARS TDO Payments, and IPAC systems. ARC accountants minimize month-end disbursement differences by comparing preliminary FMS 224 data to data obtained from Treasury's CA\$HLINK II, CARS TDO Payments, and IPAC systems.

Name of Sub-service Organization	Name of System	Function/Responsibilities
	FACTS I	Treasury's FMS maintains the FACTS I system. The FACTS I system has edit checks to verify that the submitted USSGL accounts and attributes are valid and have equal debit and credit balances.
	FACTS II	Treasury's FMS maintains the FACTS II system. The FACTS II system performs USSGL edit checks and rejects any files that fail the edit checks.
	TGANet and OTCnet	Treasury General Account Deposit Reporting Network (TGANet) and Over The Counter Channel Application (OTCnet) enable Federal Program Agency (FPA) users to report over-the-counter receipts in a secure, web-based system. In addition to the summary deposit information currently required on the paper SF 215, TGANet and OTCnet collect sub-total accounting information that can feed the FPA's administrative accounting systems as well as the Treasury's central accounting system

Name of Sub-service Organization	Name of System	Function/Responsibilities
Treasury	Treasury Information Executive Repository (TIER)	<p>For ARC's Treasury and the Department of Homeland Security Customer Agencies, FACTS I and II reporting requirements are met using TIER. TIER is Treasury's departmental data warehouse that receives monthly uploaded financial accounting and budgetary data from the Treasury and the Department of Homeland Security bureaus and other reporting entities within the Department of the Treasury and the Department of Homeland Security in a standardized format. Data submitted to TIER by an ARC accountant is validated based on system-defined validation checks.</p> <p>ARC has customized programs in Oracle that extract the accounting and budgetary data in the required TIER format. TIER has a standardized chart of accounts that is compliant with USSGL guidance issued by the Department of the Treasury. FACTS II edit checks are incorporated in the TIER validation checks. After submitting the adjusted trial balances into TIER, ARC accountants review the edit reports and resolve any invalid attributes or out-of-balance conditions. ARC accountants document this review by completing the TIER Submission Checklist, which is further reviewed by a supervisor.</p>
	Financial Analysis and Reporting System (FARS)	Treasury's FARS produces financial statements using data bureaus have submitted to TIER.

Name of Sub-service Organization	Name of System	Function/Responsibilities
Various third-party payroll processors	Various systems	Third-party payroll processors transmit payroll files to ARC after the end of a pay period. ARC uses these files for recording payroll disbursements.
Northrop Grumman Mission Systems (NGMS)	GovTrip	<p>NGMS developed and hosts the GovTrip system, which is an E-Gov travel platform. NGMS is the vendor for E-Gov travel selected by the Department of the Treasury.</p> <p>NGMS maintains the data in their Business Data Warehouse for six years and three months.</p>
General Services Administration (GSA)	Central Contractor Registration (CCR)	Primary registrant database for the U.S. Federal Government; collects, validates, stores and disseminates data in support of Customer Agency acquisition missions.
Bureau of the Public Debt	FedInvest	Used to purchase and redeem Government Account Series (GAS) securities; data source for Customer Agency federal investment interfaced transactions with Oracle.
Oracle Corporation	Oracle on Demand	<p>ARC hosts its Oracle and PRISM applications at Oracle on Demand. BPD retains application administration responsibilities and Oracle on Demand provides the computer processing infrastructure and support thereto.</p> <p>Oracle on Demand staff serve as the database and system administrators and provides backup and recovery services for Oracle and PRISM.</p>

**IV. CONTROL OBJECTIVES, RELATED CONTROLS, AND
TESTS OF OPERATING EFFECTIVENESS**

ACCOUNTING PROCESSING CONTROLS

Control Objective 1 - Obligations

Controls provide reasonable assurance that obligations are authorized, reviewed, documented, and processed timely in accordance with Administrative Resource Center (ARC) policies and procedures.

Description of Controls

ARC has documented procedures for staff to follow for the processing of obligations.

PRISM System Interface

An obligation is created when a Customer Agency enters into a legally binding contract with a vendor for goods or services. The obligation is entered into the accounting system through an interface between PRISM and Oracle. The interface changes the budget status from a commitment (if applicable) to an obligation in the general ledger and updates the corresponding system tables. The interface between the procurement and accounting systems is real-time. The procurement system has built-in controls that validate information provided by the Customer Agency and ensure proper authorization is granted prior to the interface into the accounting system. These include:

- Limited options based on roles;
- Field inputs limited to look-up tables;
- Data validations;
- Pre-populated fields for default or standard entries;
- Validation of funds availability; and
- Non-editable fields (i.e., total when amount is per unit).

The interface between PRISM and Oracle is monitored periodically throughout the day by systems analysts. The analysts periodically monitor a report that identifies transactions that have been in the Pending Financial Approval status for more than 15 minutes and a report that identifies transactions that were disapproved during the Pending Financial Approval status. The analysts monitor the reports to ensure transactions are processed timely and to identify and investigate any issues. Additionally, for transactions that terminate in Pending Financial Approval status, the report indicates that when Oracle attempted to insert the record into the general ledger database a successful message was not returned. The report lists all transactions currently in this state. The analyst investigates all transactions included in the report to resolve the issues and change the status accordingly. Additionally, the Customer Agency approver receives notification of the failure in their PRISM inbox if the document status is disapproved.

Manually Recorded Obligations – Customer Agency Approval

For obligations not processed through the interface, Customer Agencies and/or Procurement sends ARC a signed copy of the agreement or an e-mail to obligate the funds. Upon receipt from the Customer Agency, the ARC technician responsible for processing the Customer Agency's accounting transactions reviews the documentation to ensure that adequate accounting information has been received, and manually enters the obligation into Oracle. Obligations that are posted in Oracle are available for both ARC and Customer Agency review through ad hoc Discoverer reports.

Temporary Duty Travel System Interface

Customer Agencies enter travel authorizations into GovTrip and electronically route them to Approving Officials for review and approval. Approving Officials electronically sign the authorization with a status of “approved”. All “approved” authorizations are interfaced daily via batch processing to Oracle which records an obligation in the general ledger. Each day an interface file is received from Northrop Grumman Mission Systems (NGMS) which is used for processing, report generation, and identification of exceptions. The file is loaded into the Oracle interface and accepted records are added to Oracle as obligations in the general ledger. A Travel Order Status Report is generated and reviewed to identify and correct data interface errors and exceptions between GovTrip and Oracle. To correct transactions of this nature, the transactions are manually entered into the system. Approved authorizations in GovTrip are reconciled daily by an accounting technician with an Oracle generated report to ensure that all GovTrip authorizations have been interfaced and processed in Oracle. In addition, GovTrip prevents a user from both entering and approving travel authorizations unless they have authorized access.

Relocation Travel System Interface

The Relocation Services Branch (RSB) personnel enter PCS travel authorizations into moveLINQ, print and send them to Approving Officials for review and approval. When the signed document is received by RSB, Relocation Coordinators stamp the document in moveLINQ with a status of “approved”. All “approved” documents are interfaced daily via batch process to Oracle which records an obligation in the general ledger. Approved authorizations in moveLINQ are reconciled daily by an accounting technician with an Oracle generated report to ensure that all moveLINQ authorizations have been interfaced and processed in Oracle.

Budget Execution System Controls

Customer Agencies can establish and monitor both legally established and internally developed budget plans in Oracle to ensure obligations are authorized and recorded. Budget plans can be established at the following levels of the accounting structure in Oracle:

- Appropriation/Fund (Based upon the customer’s appropriation)
- Apportionment (Based upon the apportionment schedule on the SF-132)
- Cost Center (Based upon the customer’s internal budget plan)
- Reporting Category (Based upon the customer’s internal budget plan)
- Project Code (Based upon the customer’s internal budget plan)
- Budget Object Code (Based upon the customer’s internal budget plan)

Budget execution system controls can be set to prevent spending beyond the budget plan amount or allow spending over the budget plan amount at any level of the budget plan. Spending beyond the apportionment and appropriation levels (legal levels) are prohibited. System controls are designed to prevent the user from apportioning more than was appropriated, and allocating more than was apportioned. Decisions on control settings that permit or prevent spending beyond other budget plan levels are determined by the Customer Agency. System controls are applied at the fund level after passage of appropriation legislation and a high-level budget is loaded at the allocation level. Upon receipt and input of a detailed financial plan, controls are established at a more detailed level if desired by the Customer Agency.

Budget execution settings are determined by the Customer Agency and set-up in Oracle by the Customer Service Branch (CSB). System settings are reviewed with the Customer Agency on an annual basis. Budget plans are input into Oracle by ARC staff, based upon budget plans provided by Customer Agencies. Budget plans are input into Oracle by ARC Staff and independently reviewed.

Document Numbering

All accounting entries recorded into Oracle require a transaction or document identification number. System controls prohibit the use of duplicate document numbers on obligating documents. ARC has developed and implemented a standard document-numbering scheme to avoid duplicate document processing and to enable readers of ARC reports to better identify and/or determine the nature of transactions processed by ARC. When an ARC user attempts to enter a transaction identification number that already exists, Oracle issues an error message that alerts the user of the duplication.

Complementary Customer Agency Controls

Customer Agencies should establish controls to:

- Properly approve and accurately enter obligations into the procurement and travel systems in the proper period.
- Send valid requests to record manual obligations to ARC in a timely manner.
- Review open obligation reports for completeness, accuracy, and validity.
- Review and approve listing of users with current Oracle, PRISM, IPP, webTA, and GovTrip access to ensure appropriateness.
- Approve and return relocation travel authorizations to RSB for processing in moveLINQ in a timely manner.
- Communicate Customer Agency required levels of budget and spending controls to ARC.
- Compare actual spending results to budgeted amounts.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the processing of obligations and determined that the procedures were formally documented for the processing of obligations.
2. Observed the validation tables in the PRISM system and noted that the system was configured to validate obligation document types and to ensure accuracy and completeness of the data interfaced from the PRISM system to the Oracle System.
3. Observed the PRISM Support Desk Staff monitoring the “Pending Financial Approval” and “Disapproved during Pending Financial Approval” reports and noted that the reports appeared to be monitored, and backlogs were not building up.
4. For a selection of manually entered obligations, inspected evidence of Customer Agency approval and determined that manually entered obligations were approved prior to being entered into Oracle by ARC Staff.
5. Observed the daily GovTrip interface and noted that approved travel authorizations were interfaced into the Oracle system and recorded as an obligation.
6. For a selection of dates, inspected GovTrip to Oracle interface reconciliations and determined that daily reconciliations were performed to ensure that data from the GovTrip system interfaced to the Oracle System.

7. Observed an ARC staff member entering travel vouchers into GovTrip and determined that the system required the travel vouchers to be routed to an approving official.
8. Observed an approving official attempt to enter and approve travel vouchers and determined that GovTrip prevented a user from both entering and approving travel vouchers.
9. Observed the daily moveLINQ interface and noted that approved relocation authorizations were interfaced into the Oracle system and recorded as an obligation.
10. For a selection of days, inspected the reconciliation of authorization from moveLINQ to the Oracle System and determined that the interface activity was reconciled to ensure all approved authorizations were completely and accurately interfaced to the Oracle System.
11. For a selection of Customer Agencies, inspected evidence and determined that for the year they specified their budget controls, they were input by CSB staff, and then reviewed by a supervisor for completeness and accuracy.
12. Observed an ARC staff member attempt to enter a transaction into Oracle with a document number that had already been entered into Oracle and noted that Oracle automatically rejected the entry of a duplicate document number.

No exceptions noted.

Control Objective 2 - Disbursements

Controls provide reasonable assurance that the disbursement of invoices and vouchers is authorized, reviewed, processed timely, reconciled, and properly documented in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures for staff to follow for the processing of disbursements.

Customer Agency Invoice Approvals

ARC only processes disbursements for invoices with Customer Agency approval. Vendors can submit invoices through the Internet Payment Platform (IPP) or send invoices to the Customer Agency or ARC, depending on the instructions in the purchase order. If the vendor submits the invoice through IPP it is routed to the invoice approver designated on the purchase order. If invoices are sent to the Customer Agency, the Customer Agency reviews and approves the invoice and forwards the invoice and documentation of Customer Agency approval to ARC. When invoices are sent to ARC, ARC obtains Customer Agency approval through an executed receiving document, or ARC submits the invoice to an authorized Customer Agency contact for approval. Appropriate contacts are either specified in the purchase order or are communicated to ARC by the Customer Agency. Intra-governmental Payment and Collection transactions (IPACs) which decrease an ARC Customer Agency's Fund Balance with Treasury (FBWT) must be approved in advance by the Customer Agency, unless the IPAC was initiated against the Customer Agency by another federal agency. To ensure that IPAC transactions initiated against the Customer Agency by another federal agency are posted in the proper accounting period, ARC may obtain Customer Agency approval after the IPAC has been recorded. Disbursement may also occur with information from feeder systems (PRISM, GovTrip, and moveLINQ).

Statistical Sampling of Invoices

All invoices are subject to ARC internal review. System controls set at the user identification and/or vendor level ensure that payment of invoices greater than or equal to \$2,500 which are processed by an accounting technician must be reviewed and approved by a lead accounting technician or an accountant. Invoices less than \$2,500 are subject to statistical sampling. System user access profiles restrict accounting technicians' ability to process documents that require secondary review and approval and ensure proper segregation of duties is maintained. A 100% post audit management review is conducted monthly on all invoices greater than \$2,500 that are both processed and approved by the same individual.

Temporary Duty Travel Vouchers

Customer Agencies enter temporary duty travel vouchers into GovTrip and electronically route them to Approving Officials for review and approval. Approving Officials electronically sign the voucher with a status of "approved". All "approved" travel vouchers are interfaced daily via batch processing to Oracle which records a disbursement in the general ledger. Each day an interface file is received from the GovTrip System which is used for processing, report generation, and identification of exceptions. The file is loaded into the Oracle interface and accepted records are added to Oracle as disbursements in the general ledger. The travel voucher is then matched against an existing authorization. A Travel Voucher Status Report is generated and reviewed to identify and correct data interface errors and exceptions between GovTrip and Oracle. To correct transactions of this nature, the transactions are manually entered into the system. Approved vouchers in GovTrip are reconciled daily by an accounting technician with an Oracle generated report to ensure that all GovTrip vouchers have been interfaced and processed

in Oracle. In addition, GovTrip prevents a user from both entering and approving travel vouchers.

Statistical Sampling of Temporary Duty Travel Vouchers

Temporary Duty Services Branch (TDSB) staff completes a post audit review of temporary duty travel vouchers to verify the accuracy of the interfaced data and compliance with Federal Travel Regulations (FTR), using statistical sampling procedures to select documents less than \$2,500, based on the Customer Agency's travel policy (FTR or FTR/ARC). A 100% post audit review is conducted on all documents greater than \$2,500. Errors discovered during the review are sent via e-mail to the traveler or document preparer and approving official to review and/or take action. Billing documents are created for amounts owed by a traveler of \$25 or greater, resulting from an overpayment in which the Customer Agency has declared the overpayment a debt of the government. The traveler sends a check to cover the overpayment.

Relocation Services Travel Vouchers

RSB personnel enter and audit each PCS travel voucher in moveLINQ, print and then send them to Approving Officials for review and approval. When the signed document is received by RSB, Relocation Coordinators stamp the document in moveLINQ with a status of "approved". All "approved" documents are interfaced daily via batch processing to Oracle which records a disbursement in the general ledger. Approved vouchers in moveLINQ are reconciled daily by an Accounting Technician with an Oracle generated report to ensure that all moveLINQ vouchers have been processed in Oracle.

Payment Date Calculations

Based on the Customer Agency's contracts with its suppliers, ARC staff or the vendor via IPP enters the invoice date and the later of the invoice receipt date, or the earlier of the formal or constructive acceptance dates in Oracle based on the supporting documentation from the Customer Agency. On a daily basis, Oracle selects invoices that are due for payment and creates files for manual uploading into Treasury's Secure Payment System (SPS). The ARC SPS certifying officer compares the number and dollar amount of payments from the SPS generated schedule to the payment files generated by Oracle to ensure all payment files have been uploaded to Treasury. For invoices that are subject to the Prompt Payment Act, Oracle schedules payments to disburse 30 days after the later of the invoice receipt date and the earlier of the date of formal or constructive acceptance (unless the supplier's contract or invoice states otherwise). If the vendor is classified as a Small Business, Oracle schedules payment as soon as approved. Any payments that are subject to the Prompt Payment Act that are paid after their Oracle scheduled due date are subject to prompt pay interest to cover the period the payment was due but not paid. Oracle automatically determines if interest is due based on the dates in the accounting system. If interest is due, Oracle calculates interest and generates an interest payment to the vendor, provided the total interest is more than one dollar.

Reconciliation – Fund Balance With Treasury Activity

Each month, Treasury's Financial Management Service (FMS) issues the *Statement of Differences* to agency location codes (ALC) when differences are identified between the cash activity reported by the agency on the FMS 224, *Statement of Transactions*, and data reported to Treasury's CASHLINK II, CARS TDO Payments, and IPAC systems. ARC accountants minimize month-end disbursement differences by comparing preliminary FMS 224 disbursement data to data obtained from Treasury's CASHLINK II, CARS TDO Payments, and IPAC systems. Any differences identified by the accountant are corrected by an accounting technician or another accountant prior to the close of the accounting period. ARC accountants prepare monthly *Statement of Differences* reconciliations for supervisory review. If a *Statement of Differences* was

received, the transaction(s) that caused the difference is (are) identified and if necessary, correcting entries are posted by an accounting technician or another accountant and reported in the subsequent accounting period.

Budget Execution System Controls

Customer Agencies can establish and monitor both legally established and internally developed budget plans in Oracle to ensure obligations are authorized and recorded. Budget plans can be established at the following levels of the accounting structure in Oracle:

- Appropriation/Fund (Based upon the customer's appropriation)
- Apportionment (Based upon the apportionment schedule on the SF-132)
- Cost Center (Based upon the customer's internal budget plan)
- Reporting Category (Based upon the customer's internal budget plan)
- Project Code (Based upon the customer's internal budget plan)
- Budget Object Code (Based upon the customer's internal budget plan)

Budget execution system controls can be set to prevent spending beyond the budget plan amount or allow spending over the budget plan amount at any level of the budget plan. Spending beyond the apportionment and appropriation levels (legal levels) are prohibited. System controls are designed to prevent the user from apportioning more than was appropriated, and allocating more than was apportioned. Decisions on control settings that permit or prevent spending beyond other budget plan levels are determined by the Customer Agency. System controls are applied at the fund level after passage of appropriation legislation and a high-level budget is loaded at the allocation level. Upon receipt and input of a detailed financial plan, controls are established at a more detailed level if desired by the Customer Agency.

Budget execution settings are determined by the Customer Agency and set-up in Oracle by the CSB. System settings are reviewed with the Customer Agency on an annual basis. Budget plans are input into Oracle by ARC staff, based upon budget plans provided by Customer Agencies.

Document Numbering

All accounting entries recorded into Oracle require a transaction or document identification number. System controls prohibit the use of duplicate document numbers for the same vendor on accounts payable transactions. ARC has developed and implemented a standard document-numbering scheme to avoid duplicate document processing and to enable readers of ARC reports to better identify and/or determine the nature of transactions processed by ARC. When an ARC user attempts to enter a transaction identification number that already exists, Oracle issues an error message that alerts the user of the duplication.

Complementary Customer Agency Controls

Customer Agencies should establish controls to:

- Review the financial reports provided by ARC to ensure that disbursement transactions are complete and accurate.
- Approve invoices for payment and send approved invoices to ARC in a timely manner.
- Ensure that invoices properly reflect the invoice receipt date and formal or constructive acceptance date according to the Prompt Payment Act.
- Approve travel vouchers and accurately enter the vouchers into GovTrip in the proper period.

- Approve and return relocation travel vouchers to RSB for processing in moveLINQ in a timely manner.
- Maintain and communicate to ARC, a list of individuals authorized to approve invoices and travel vouchers when it is not communicated in the authorizing agreement.
- Communicate Customer Agency required levels of budget and spending controls to ARC.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the processing of disbursements and determined that the procedures were formally documented.
2. For a selection of invoices, inspected documentation of Customer Agency authorization and related general ledger entries and determined that disbursements were authorized and processed timely.
3. For a selection of Intergovernmental Payment and Collection (IPAC) transactions, inspected documentation of Customer Agency authorization and related general ledger entries and determined that disbursements were authorized and processed timely.
4. Observed an accountant process an invoice over \$2,500 and noted that the system automatically routed the invoice to a secondary lead accounting technician or an accountant for review and approval.
5. For a selection of months, inspected evidence of the statistical review of invoices less than \$2,500 and determined that the statistical review was performed subject to statistical sampling by a lead accounting technician or an accountant.
6. For a selection of months, inspected evidence and determined that the 100% post audit management reviews were conducted monthly on all invoices greater than \$2,500 which were both processed and approved by the same individual and determined that the review was performed appropriately.
7. Observed the daily GovTrip interface and noted that approved travel authorizations were interfaced into the Oracle system and were recorded as an obligation.
8. For a selection of days, inspected GovTrip voucher reconciliations and determined that approved vouchers in GovTrip were reconciled daily to Oracle by an accounting technician.
9. Observed a user in GovTrip attempting to approve their own travel voucher and noted that the system automatically prevented the user from approving their own travel voucher.
10. There were no temporary duty travel voucher invoices over \$2,500 that were processed during the selected months that were processed and approved by the same individual.
11. Observed relocation vouchers interfaced into Oracle and determined that approved vouchers were interfaced via automated batch process.
12. For a selection of days, inspected evidence and determined that vouchers in moveLINQ were reconciled daily by an Accounting Technician with an Oracle generated report.
13. For a selection of days, inspected evidence that the ARC SPS certifying officer compared the number and dollar amount of payments and determined that the review was completed daily to ensure interfaces were uploaded completely.

14. For a selection of invoices subject to the Prompt Payment Act, inspected documentation and determined that Oracle schedules payments to disburse 30 days after the later of the invoice receipt date and the earlier of the date of formal or constructive acceptance (unless the supplier's contract or invoice states otherwise).
15. For a selection of late payments, inspected evidence and determined that proper interest was calculated and paid based on the number of days the payment was late.
16. For an example late payment, recalculated the interest owed and determined that Oracle calculated interest and generated an interest payment to the vendor.
17. For a selection of months, inspected the Statement of Differences and determined that supervisors reviewed the reconciliations.
18. For identified differences from the selection of months and Customer Agencies, inspected evidence and determined that accounting technicians or another accountant corrected differences prior to the close of the accounting period or in the subsequent accounting period if necessary, based on timing.
19. For a selection of Customer Agencies, inspected evidence and determined that for the year they specified their budget controls, they were input by CSB staff, and then reviewed by a supervisor for completeness and accuracy.
20. Observed an ARC staff member attempt to enter a transaction into Oracle with a document number that had already been entered into Oracle and noted that Oracle automatically rejected the entry of a duplicate document number.

No exceptions noted.

Control Objective 3 – Unfilled Customer Orders, Receivables, and Cash Receipts

Controls provide reasonable assurance that unfilled customer orders, receivables, and cash receipts are reconciled and properly documented in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures for staff to follow for the processing of unfilled customer orders, receivables, and cash receipts.

Customer Agency Approval

ARC only processes unfilled customer orders, receivables, and cash receipts with Customer Agency approval, with the exception of checks received for deposit directly by ARC on the customer's behalf for accounts payable invoice refunds of overpayments and/or vendor rebates. Customer Agencies either send signed source documents or provide a summary of their transactions via fax or e-mail. ARC enters all transactions into Oracle, which are available for review through reporting systems. To help ensure that cash receipts are posted in the proper accounting period, ARC may obtain Customer Agency approval after the cash receipt has been recorded.

Reconciliation – Fund Balance With Treasury Activity

Each month, Treasury's FMS issues the *Statement of Differences* to ALCs when differences are identified between the cash activity reported by the agency on the FMS 224, *Statement of Transactions*, and data reported to Treasury's CASHLINK II and IPAC systems. ARC accountants minimize month-end differences relating to collections by comparing preliminary FMS 224 collection data to Treasury's CASHLINK II and IPAC systems. Any differences identified by the accountant are corrected by an accounting technician or another accountant prior to the close of the accounting period. ARC accountants prepare monthly *Statement of Differences* reconciliations for supervisory review. If a *Statement of Differences* was received, the transaction(s) that caused the difference is (are) identified and if necessary, correcting entries are posted by an accounting technician or another accountant and reported in the subsequent accounting period.

Reporting - Receivables

ARC accountants prepare and submit a quarterly *Report on Receivables Due from the Public* for all Customer Agencies. This report requires agencies to track the collection of receivables and report on the status of delinquent balances according to an aging schedule. Accountants that are responsible for preparing the *Report on Receivables Due from the Public* review and reconcile all activity (i.e., new receivables, revenue accruals, collections, adjustments and write-offs) with the public on a quarterly basis. An ARC supervisory accountant reviews the report. Customer Agencies are responsible for monitoring and pursuing collection of delinquent balances. On an annual basis, the Customer Agency's Chief Financial Officer must certify that the report submitted to the Department of the Treasury is accurate and consistent with agency accounting systems.

Intra-governmental Transactions

ARC adheres to applicable intra-governmental elimination guidance. This involves recording transactions at a level that allows for identification of its governmental trading partners and for reconciling the transactions/balances with trading partners on a quarterly basis. For its non-Treasury and non-Homeland Security Customer Agencies, ARC accountants reconcile fiduciary

account balances with their trading partners (Bureau of the Public Debt, Office of Personnel Management and Department of Labor) after uploading account balances into the Intra-governmental Fiduciary Confirmation System (IFCS). The Department of Treasury and the Department of Homeland Security utilize IFCS to reconcile Treasury and Homeland Security agency fiduciary account balances with trading partners. For the non-fiduciary transactions of its Customer Agencies, ARC accountants prepare and submit confirmations to the appropriate trading partners in accordance with the elimination reconciliation guidance. Upon submitting the confirmations to the trading partners, ARC works with the trading partners to reconcile transactions/balances and identify and record any necessary adjustments. Reconciliations are not performed for non-Treasury Customer Agencies. Non-Treasury Customer Agencies receive confirmations only.

Document Numbering

All accounting entries recorded in Oracle require a transaction or document identification number. System controls prohibit the use of duplicate document numbers on unfilled customer orders and receivables. A system control alerts the user of the use of duplicate document numbers on cash receipt and advance transactions. ARC has developed and implemented a standard document-numbering scheme to avoid duplicate document processing and to enable readers of ARC reports to better identify and/or determine the nature of transactions processed by ARC. When an ARC user attempts to enter a transaction identification number that already exists, Oracle issues an error message that alerts the user of the duplication.

Customer Agency Control Consideration

Customer Agencies should establish controls to:

- Send approved and accurate documentation of unfilled customer orders, receivables, and cash receipts transactions, to ARC in the proper period.
- Review unfilled customer orders, receivable and advance reports for completeness, accuracy, and validity.
- Monitor and pursue collection of delinquent balances.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the processing of unfilled customer orders, cash receipts, receivables, advances, and write-offs and observed ARC personnel process transactions, and determined that the transactions were processed in accordance with the procedures.
2. For a selection of unfilled customer orders, inspected documentation of Customer Agency authorization and determined that transactions were authorized by Customer Agencies.
3. For a selection of receivables, inspected documentation of Customer Agency authorization and determined that transactions were authorized by Customer Agencies.
4. For a selection of cash receipts, inspected documentation of Customer Agency authorization and determined that transactions were authorized by Customer Agencies.
5. For a selection of months, inspected Statement of Differences reconciliations and determined that reconciliations were documented and that any correcting entries were posted by an

accounting technician or another accountant and reported in the subsequent accounting period.

6. For a selection of quarters, inspected the Report on Receivables Due from the Public reconciliations and determined that reconciliations were documented.
7. For a selection of quarters, inspected Reports on Receivables Due from the Public and determined that they were reviewed by an ARC supervisory accountant.
8. Inspected a quarterly selection of intra-governmental confirmations and reconciliations and determined that confirmations were sent, reconciliations were documented, and trading partners identified.
9. Inspected a quarterly selection of non-Treasury and non-Homeland Security Customer Agency intra-governmental Fiduciary Confirmation System balances and determined that fiduciary account balances were reconciled with trading partner balances.
10. Inspected a selection of non-fiduciary transaction confirmations of ARC Customer Agencies and determined that ARC accountants prepared and submitted confirmations to the appropriate trading partners in accordance with the elimination reconciliation guidance.
11. Inspected a selection of transaction(s)/balance(s) reconciliations and determined that upon submitting the confirmations to the trading partners, ARC worked with the trading partners to reconcile transactions/balances and identify and record any necessary adjustments.
12. Inspected a selection of reconciliations and determined that confirmations were performed for non-Treasury Customer Agencies.
13. Observed an ARC staff member attempt to enter a transaction into Oracle with a document number that had already been entered into Oracle and noted that Oracle automatically rejected the entry of a duplicate document number.

No exceptions noted.

Control Objective 4 - Deposits

Controls provide reasonable assurance that checks are secure and deposited timely by appropriate personnel and documented in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures for the safeguarding and recording of deposits.

Safeguarding Checks

Checks received by the mailroom are scanned and a batch ticket with the number of checks received is generated. Copies of the batch ticket along with the checks are sent via confidential mail to the appropriate ARC branch. An ARC accounting technician or administrative staff member who does not have accounting system access to post accounts receivable transactions, receives, opens and logs all checks received in the branch's check deposit log. The number of checks received is compared to the number of checks listed on the batch ticket. Checks are to be deposited as soon as possible after the purpose and validity of the check's issuance are identified. While the accounting technician responsible for processing deposits for the Customer Agency is researching the check's purpose and validity, the check is locked in the ARC accounting technician's drawer until it is ready to be deposited.

Manual Deposits – Segregation of Duties

When the check is ready for manual deposit, a deposit ticket and the check are placed in a locked bag and picked up by the mail clerk. A copy of the deposit ticket is retained by the ARC accounting technician for comparison with the receipt and deposit ticket signed by the bank teller. The mail clerk delivers the locked bag containing the deposit ticket and checks to the local federal depository. The bag containing the bank teller's deposit ticket and receipt are returned to the branch office that processed the deposit. After the bank teller receipt and deposit ticket are compared to the copy retained by the branch and the ARC accounting technician updates the check deposit log to record the date the deposit was made, an independent ARC accounting technician processes the cash receipt in the accounting system.

Paper Check Conversion System Deposits and Reconciliation

For customers using the Paper Check Conversion Over the Counter (PCC OTC) system, an ARC accounting technician will scan each check into the PCC OTC system. The batch list is automatically temporarily saved to the server until it is transmitted to the Federal Reserve Bank (FRB) by the ARC accounting technician. Upon settlement with the FRB, the ARC accounting technician reconciles the batch list with the paper checks and signs off to indicate the reconciliation is complete. After reconciliation, the checks are held awaiting confirmation of the deposit in the Financial Management Service's deposit application, CASHLINK II. Upon confirmation, the ARC accounting technician destroys the checks. The cash receipt is recorded in Oracle by an independent ARC accounting technician.

Over the Counter Channel Application

Over the Counter Channel Application (OTCnet) is a web-based application that integrates the functionality of PCC OTC and TGA.net. OTCnet's design accommodates "check capture" and "deposit reporting and processing" using electronic collection mechanisms instead of paper based processing.

On March 19, 2011, OTCnet officially replaced TGAnet as FMS's deposit reporting application. Throughout FY2011 and 2012, agencies will migrate from PCC to OTCnet. A PCC to OTCnet migration schedule is maintained by FMS and communicated to agencies as their migration date approaches.

On the "check capture" side of OTCnet, checks are scanned for deposit and a batch list is created. The batch list is automatically temporarily saved to the server until it is transmitted to the Federal Reserve Bank (FRB) by the ARC accounting technician. Upon settlement with the FRB, the ARC accounting technician reconciles the batch list with the paper checks and signs off to indicate the reconciliation is complete. After reconciliation, the checks are held awaiting confirmation of the deposit in the Financial Management Service's deposit application, CASHLINK II. Upon confirmation, the ARC accounting technician destroys the checks. The cash receipt is recorded in Oracle by an independent ARC accounting technician.

On the "deposit reporting and processing" side of OTCnet, an ARC accounting technician will manually enter the deposit information into the OTCnet system. A deposit ticket and the check(s) are sent in a locked money bag that is picked up by a mail clerk who then delivers it to the local federal depository. A copy of the deposit ticket is retained by the ARC accounting technician for comparison with the deposit receipt from the bank teller and the confirmed deposit ticket from the OTCnet system. The money bag containing the bank teller's deposit receipt is returned to the branch office that processed the deposit. After the bank teller receipt and OTCnet confirmed deposit ticket are compared to the copy retained by the branch, the cash receipt is recorded in Oracle by an independent ARC accounting technician.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the safeguarding and recording of deposits and determined that ARC had documented procedures for the safeguarding and recording of deposits.
2. Inspected the checks received by the mailroom and the associated batch tickets and determined that a batch ticket with the number of checks received was generated.
3. From a selection of batch tickets generated by the mailroom, inspected notes and determined that copies of batch tickets were sent via confidential mail to the appropriate ARC branch.
4. Inspected a selection of check logs and determined that an ARC administrative staff member who did not have accounting system access to post account receivable transactions, received, opened and logged all checks received in the branch's check deposit log.
5. Inspected a selection of checks received and associated batch tickets and determined that the number of checks received were compared to the number of checks listed on the batch ticket.
6. Inspected a selection of check deposit records and check issuance attributes and determined that checks were deposited as soon as possible after the purpose and validity of the check's issuance were identified.
7. For a selection of un-deposited checks from the check deposit log, observed the checks and note that they are properly secured in a locked drawer.
8. For a selection of checks ready for deposit, observed that the deposit tickets and the checks are placed in a locked bag and picked up by the mail clerk.

9. Inspected a selection of signed check deposit logs and determined that a copy of the checks was retained by the ARC administrative staff member for comparison with the receipt and deposit ticket signed by the bank teller.
10. Inspected a selection of reconciliations from the deposit tickets to the bank teller deposit tickets and receipts and determined that the reconciliations were performed.
11. For a selection of dates, inspected PCC reconciliations and determined that the reconciliations were performed and exceptions were resolved.
12. Inspected a selection of check deposits and the subsequent posting Oracle of OTCnet confirmed deposit receipts to those retained by the ARC branch and determined that the total checks were posted completely and accurately to Oracle.

No exceptions noted.

Control Objective 5 – Payroll Accruals

Controls provide reasonable assurance that period-end payroll accruals are processed timely, reviewed, and properly documented in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures for staff to follow for the processing of payroll accruals.

System Calculation of Accruals

Payroll accruals are recorded on a monthly basis and reversed in the subsequent accounting period. The payroll accrual is a prorated calculation performed by the accounting system that is based on the most recent payroll disbursement data available. To make its calculation, the accounting system requires a payroll accountant to enter specific parameters (e.g., number or percentage of workdays to accrue and the base pay period number).

Complementary Customer Agency Controls

- Review the financial reports provided by ARC to ensure that payroll accruals are complete and accurate.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the processing of payroll accruals and determined that the procedures were formally documented and for the processing of payroll accruals.
2. For a selection of months, inspected payroll accruals for a selection of Customer Agencies for entry into the system and determined that payroll accruals were entered timely.

No exceptions noted.

Control Objective 6 – Payroll Disbursements

Controls provide reasonable assurance that payroll disbursement data (disbursed by a third-party) is reviewed, reconciled, and properly documented in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures for staff to follow for the processing of payroll disbursements.

Automated Payroll Posting Process

Third-party payroll processors transmit payroll files to ARC during the first and/or second weeks after the end of a pay period, depending on the payroll provider and the need to record payroll adjustments. Upon converting the data into a format that can be uploaded into Oracle, the ARC payroll accountant reconciles the converted data to the original raw data from the third-party processors. The ARC payroll accountant processes payroll entries using a batch interface that posts summary payroll data to Oracle. The payroll accountant reviews and corrects transactions that reject in the interface. A Discoverer report is used to identify those records that reject. The payroll accountant contacts the customer for resolution of erroneous accounting codes, funding issues, or other circumstances that would prevent the payroll from being recorded. Until the errors are cleared, the data is viewed as invalid and will not be able to be posted to the general ledger. If the third-party payroll processor provides adjustment files for additional transactions between main payroll files, the ARC payroll accountant follows the same procedure for processing these files.

Reconciliation – Payroll Activity

Payroll accountants prepare a monthly reconciliation of payroll disbursements recorded in Oracle and payroll disbursements as reflected on the CARS Account Statement. The payroll accountant investigates and resolves any differences identified. This reconciliation is reviewed and approved by the supervisor or manager of ARC's Central Accounting Branch. In addition, ARC prepares monthly CARS Account Statement reconciliations from the general ledger to Treasury's record. Any reconciliation differences identified by the branch accountant who prepares the CARS Account Statement reconciliation, that requires correction, are posted by another accountant or accounting technician in a subsequent accounting period. ARC supervisory accountants review and approve the CARS Account Statement/*Fund Balance with Treasury* reconciliations.

Complementary Customer Agency Controls

Customer Agencies should establish controls to:

- Verify that payroll processed by third-party providers is complete and accurate.
- Review the financial reports provided by ARC to ensure that payroll disbursements are complete and accurate.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the processing of payroll disbursements and determined that the consistent use of the procedures by staff were documented to help prevent the inaccurate, unauthorized, or untimely entry of payroll disbursements into ARC information systems.
2. Inspected an interface error report and determined that during the interface, input files were checked for errors and interface error reports were created if errors were identified and determined that data would not interface until errors were corrected.
3. For a selection of months, inspected payroll reconciliations and determined that reconciliations were performed and that any exceptions were resolved.
4. For a selection of months, inspected CARS Account Statement, Undisbursed Appropriation Account Ledger reconciliations and determined that reconciliations were performed and that any exceptions were resolved.

No exceptions noted.

Control Objective 7 - USSGL

Controls provide reasonable assurance that transactions are processed in accordance with the U.S. Standard General Ledger (USSGL) and Treasury Financial Manual (TFM) guidance.

Description of Controls

ARC has documented procedures for processing transactions consistent with the USSGL.

Transaction Set-up Controls

ARC records proprietary and budgetary accounting entries using the USSGL at the transaction level. This is accomplished using a combination of transaction code, system setup, and data entry in Oracle. In addition, Oracle cross-validation rules have been established to prevent transactions from being processed to inappropriate USSGL accounts.

ARC follows the TFM to establish accounting transaction posting models in Oracle. System administrators require authorization from a supervisor or manager to establish new posting models for transaction processing.

On an annual basis, ARC reviews the USSGL Board's proposed and approved additions, deletions and/or modifications to USSGL account titles and/or account descriptions to determine their applicability to ARC Customer Agencies. Once the changes to the USSGL are approved by Treasury's FMS and the new TFM guidance is issued (generally mid-summer), ARC supervisors and managers communicate the appropriate changes to system administrators to ensure the accounting transaction posting models are revised.

General Ledger Account Reconciliations

Accountants perform general ledger account reconciliations (utilizing accounting system sub ledgers or Excel spreadsheets) on balance sheet accounts except where account sub ledgers are not made available to ARC, for supervisory review, to ensure related accounting transactions were posted to the appropriate general ledger accounts. ARC accountants prepare budgetary to proprietary account relationship reconciliations on a monthly basis, for supervisory review, to ensure complete general ledger account posting for all recorded transactions. An accounting technician or an accountant corrects invalid out-of-balance relationships.

FACTS I Edit Checks

ARC enters pre-closing adjusted trial balances for its non-Treasury customers, except for the Department of Homeland Security, into the FACTS I system at the Treasury appropriation/fund group level using USSGL accounts and attributes. Treasury's FMS maintains the FACTS I system. The FACTS I system checks that the trial balance has, in aggregate, equal debit and credit balances before the trial balance can be submitted in FACTS I. FACTS I also flags abnormal balances for scrutiny by an ARC accountant. After entering the adjusted trial balances into FACTS I, ARC reviews the submitted balances and resolves any invalid abnormal balances or out-of-balance conditions. Once any necessary corrections have been made, the accountant submits the adjusted trial balance into the FACTS I system.

FACTS II Edit Checks

ARC submits the FACTS II files for its non-Treasury customers, except for the Department of Homeland Security, using a bulk file upload. Accountants create the bulk files by running a job within the Oracle application. Oracle requires the data to pass several edit checks before it will create the bulk file. ARC manually uploads the FACTS II files into the FACTS II system.

Treasury's FMS maintains the FACTS II system. The FACTS II system performs USSGL edit checks and rejects any files that fail the edit checks. ARC investigates and resolves any files rejected by the FACTS II system.

Treasury Information Executive Repository (TIER) Validation Checks

For ARC's Treasury and Department of Homeland Security Customer Agencies, FACTS I and II reporting requirements are met using TIER. TIER is a departmental data warehouse that receives monthly uploaded financial accounting and budgetary data from the bureaus and other reporting entities in a standardized format. Data submitted to TIER by an ARC accountant is validated based on system-defined validation checks.

ARC utilizes custom solutions that extract accounting and budgetary data from Oracle to generate necessary TIER data. TIER has a standardized chart of accounts that is compliant with USSGL guidance issued by the Department of the Treasury. FACTS II edit checks are incorporated in the TIER validation checks. After submitting the adjusted trial balances into TIER, ARC accountants review the edit reports and resolve any invalid attributes or out-of-balance conditions. ARC accountants document this review by completing the TIER Submission Checklist, which is further reviewed by a supervisor.

Financial Statement Crosswalks

ARC accountants prepare a *Balance Sheet*, *Statement of Net Cost* and *Statement of Budgetary Resources* for all Customer Agencies that are covered by the Chief Financial Officer Act and the Accountability of Tax Dollars Act of 2002. The statements are submitted each quarter to the Director of the Office of Management and Budget (OMB) and the Congress. Additionally, ARC accountants prepare the *Statement of Changes in Net Position*, and *Statement of Custodial Activity* (when applicable) for all Customer Agencies. ARC accountants compare TFM financial statement crosswalks to ARC's internally prepared financial statements to ensure compliance with the Customer Agency's government wide reporting requirements. ARC investigates and resolves any differences between TFM financial statement crosswalks and ARC's internally prepared financial statements.

Financial Statement Review

For Department of Treasury and Department of Homeland Security Customer Agencies, quarterly financial statements are produced by departmental systems using the data submitted in TIER. Quarterly consolidated financial statements are submitted to the Director of OMB and the Congress by the Department. ARC accountants compare the quarterly financial statements to ARC's internally prepared financial statements, which is further reviewed by a supervisor, and any differences are resolved.

Financial Statement Variance Analysis

For both Department of Treasury and Department of Homeland Security Customer Agencies, accountants prepare a quarterly financial statement variance analysis. Explanations for variances that exceed Department materiality thresholds must be provided to the Department. The Department submits a consolidated analysis to OMB. The bureau variance analysis is reviewed by an ARC supervisory accountant and approved by the bureau CFO or designee prior to submission to the Department. The Homeland Security bureau variance analysis is also certified by an ARC manager and the Homeland Security's CFO or designee also approves the variance analysis.

For non-Treasury and non-Homeland Security Customer Agencies, accountants prepare a quarterly financial statement variance analysis for interim periods based on the guidance in OMB Circular A-136. Explanations for variances that exceed the OMB Circular A-136 guidelines are provided to OMB. The variance analysis is reviewed by an ARC supervisory accountant prior to submission to OMB.

Complementary Customer Agency Controls

Customer Agencies should establish controls to:

- Review and approve, prior to submission, the financial reports prepared by ARC to ensure that all reports prepared for external use are complete, accurate, and submitted in a timely manner.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the processing of transactions consistent with the USSGL and determined that procedures were documented.
2. Observed the processing of a transaction to an inappropriate USSGL account and noted the existence of Oracle cross-validation rules.
3. Inspected a list of users with access to change posting models and determined that system administrators had access to administer posting models.
4. For a selection of posting model changes and additions, inspected ARC supervisory approval of the changes and inspected TFM/USSGL guidance and determined that the changes and additions were authorized and that they were in agreement with TFM/USSGL guidance.
5. Inspected evidence of the annual review of USSGL account titles and descriptions and determined that the annual review was performed by ARC supervisors and Managers.
6. For a selection of months, inspected monthly general ledger account reconciliations and determined that reconciliations were performed, any exceptions were resolved and the reconciliation was reviewed by an ARC supervisor.
7. Inspected a selection of FACTS I edit check reports and determined that FACTS I was completed, reviewed, and any issues were resolved.
8. Inspected a selection of Reporting and Reconciliation Internal Control Checklists and determined that the FACTS I was completed.
9. Observed the staff run the Oracle job that creates the FACTS II bulk data upload file and noted that Oracle edit checks were applied to the data, and that the ARC accountant resolved any exceptions.
10. Inspected a selection of TIER Submission Checklists and determined that TIER submissions were reviewed by a supervisor.
11. For a selection of quarters for a selection of Customer Agencies, inspected ARC comparison of TFM financial statement crosswalk with ARC's internally prepared financial statements and determined that ARC complied with reporting requirements.

12. Inspected results of ARC's investigation of Treasury's financial statement crosswalk and ARC's internally prepared financial statements and determined that ARC investigated and resolved any differences.
13. Inspected selection of quarterly financial statement reviews and determined that the reconciliations were reviewed and approved by a supervisor.
14. For a selection of months, inspected reconciliation of financial statements prepared by Treasury to internally prepared financial statements and determined that reconciliations were performed, any exceptions were resolved and they were reviewed by a supervisory accountant before submission.

No exceptions noted.

Control Objective 8 - Accruals

Controls provide reasonable assurance that the period-end accruals are authorized, processed timely, reviewed, reconciled, and properly documented in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures for staff to follow for the processing of accruals.

Customer Review of Revenue and Expense Accruals

Accounting technicians record period-end accruals for goods and services provided/received, but not billed/invoiced, in Oracle based on instruction provided from the Customer Agency.

For all Customer Agencies, except the Treasury Franchise Fund, accounting technicians record period-end accruals for goods and services provided, but not billed in the accounting system through standard accrual transactions.

For Treasury Franchise Fund Customer Agencies, accounting technicians record period-end accruals for goods and services provided but not billed in Oracle using an automated journal entry process. The amounts recorded are based on information provided by e-mail from the Customer Agency. Accounting technicians enter information received from the Customer Agency into a spreadsheet template. An accountant reviews the spreadsheet and converts it into a data file that is automatically loaded into Oracle and reviewed and approved by a supervisory accountant.

Non-Invoice Accrual Reviews

Accountants record non-invoice related expense accruals, such as workers' compensation and leave liability in Oracle. The workers' compensation accruals are based on historical trend analysis and/or actual costs incurred. The leave liability accruals are based on data provided by the Customer Agency's payroll provider or Human Resources office. For applicable Customer Agencies, the ARC payroll accountant processes payroll leave accrual entries using a batch interface that posts summary payroll data to Oracle. For non-batch interfaced leave accruals, a supervisory accountant reviews the accrued employee benefits to determine that the accrual is processed and posted.

TIER Submission Checklist

Supervisory accountants validate the quality of TIER data by reviewing an ARC accountant-prepared TIER Submission Checklist, which includes verification that non-invoice related expense accruals are posted at least quarterly.

General Ledger to Subledger Reconciliation

On a monthly basis, ARC accountants prepare a reconciliation of revenue and expense accrual balances in the general ledger to the sub ledger detail, which is reviewed by a supervisor. Accountants reconcile only billed revenue accruals since unbilled revenue accruals are recorded directly in the general ledger. Any differences identified are corrected by an accounting technician or accountant in the subsequent accounting period.

Budget Execution System Controls

Customer Agencies can establish and monitor both legally established and internally developed budget plans in Oracle to ensure obligations are authorized and recorded. Budget plans can be established at the following levels of the accounting structure in Oracle:

- Appropriation/Fund (Based upon the customer's appropriation)
- Apportionment (Based upon the apportionment schedule on the SF-132)
- Cost Center (Based upon the customer's internal budget plan)
- Reporting Category (Based upon the customer's internal budget plan)
- Project Code (Based upon the customer's internal budget plan)
- Budget Object Code (Based upon the customer's internal budget plan)

Budget execution system controls can be set to prevent spending beyond the budget plan amount or allow spending over the budget plan amount at any level of the budget plan. Spending beyond the apportionment and appropriation levels (legal levels) are prohibited. System controls are designed to prevent the user from apportioning more than was appropriated, and allocating more than was apportioned. Decisions on control settings that permit or prevent spending beyond other budget plan levels are determined by the Customer Agency. System controls are applied at the fund level after passage of appropriation legislation and a high-level budget is loaded at the allocation level. Upon receipt and input of a detailed financial plan, controls are established at a more detailed level if desired by the Customer Agency.

Budget execution settings are determined by the Customer Agency and set-up in Oracle by the CSB. System settings are reviewed with the Customer Agency on an annual basis. Budget plans are input into Oracle by ARC Staff and independently reviewed.

Document Numbering

All accounting entries recorded into Oracle require a transaction or document identification number. System controls prohibit the use of duplicate document numbers on revenue and expense accruals processed through standard accrual transactions. ARC has developed and implemented a standard document-numbering scheme to avoid duplicate document processing and to enable readers of ARC reports to better identify and/or determine the nature of transactions processed by ARC. When an ARC user attempts to enter a transaction identification number that already exists, Oracle issues an error message that alerts the user of the duplication.

Complementary Customer Agency Controls

Customer Agencies should establish controls to:

- Review open obligation and accrual reports for completeness, accuracy, and validity.
- Approve and send revenue and expense accruals to ARC in a timely manner.
- Communicate Customer Agency required levels of budget and spending controls to ARC.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the processing of accruals and observed ARC staff processing accruals, and noted that the processing was in accordance with the procedures.
2. For a selection of accruals, inspected documentation of Customer Agency authorization and supervisory accountant review and determined that the accruals were authorized and reviewed appropriately.
3. For a selection of months, inspected non-invoice batch payroll leave accruals and determined that the files were sent to ARC for processing and posting of summary payroll data to the core accounting system.
 - **Exception noted:** One out of the ten (1/10) accrual selections tested were not correctly posted for the month of August 2011.
Remediation efforts were performed by Management to review reports to verify that all applicable customer's leave accruals have been posted and reversed in the correct periods.
4. For a selection of quarters, inspected non-invoice non-batch leave accrual and determined that a supervisory accountant reviewed the manually calculated leave accruals to ensure they were properly calculated and input into Oracle.
5. For a selection of months, inspected TIER Submission Checklists for evidence of ARC supervisory review of TIER data and timeliness of submission and determined that submissions had been reviewed.
6. For a selection of months, inspected reconciliation of revenue and expense accrual balances in the general ledger to the subledger detail and determined that reconciliations were performed and that any exceptions were resolved.
7. For a selection of Customer Agencies, inspected budget instructions and determined that for the current year they specified their budget controls, they were input by CSB staff, and then reviewed by a supervisor for completeness and accuracy.
8. Observed an ARC staff member attempt to enter a transaction into Oracle with a document number that had already been entered into Oracle and noted that Oracle automatically rejected the entry of a duplicate document number.

No exceptions noted, except as described above.

Control Objective 9 – Government-Wide Reporting

Controls provide reasonable assurance that Government-wide reporting is performed in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures for staff to follow for the preparation of government-wide reports.

FACTS I & II

ARC policies require the submission of *FACTS I* and *FACTS II* reports based on FMS's criteria for these applications. All reports must pass all FACTS edit checks. For non-Treasury Customer Agencies, except the Department of Homeland Security, supervisory accountants review all submissions prepared by accountants and review all data to ensure all reporting deadlines are met. All fourth quarter FACTS II submissions require certification by an ARC supervisor or manager, or other designated Customer Agency representative.

TIER

Treasury reporting entities are required to submit financial accounting and budgetary data each month to TIER, Treasury's data warehouse within Treasury's submission timeline which is generally the third business day of the subsequent month. The Department of Homeland Security reporting entities are required to submit financial accounting and budgetary data each month to TIER, Homeland Security's data warehouse, within Homeland Security's submission timeline. To meet this requirement, ARC performs the Oracle month-end close processes on the second business day after the end of the month. Supervisory accountants validate the quality of TIER data to ensure reporting deadlines are met by reviewing an accountant-prepared TIER Submission Checklist. The TIER Submission Checklist consists of internally and Treasury department defined data quality standards.

EFT and Prompt Payment

ARC follows the Treasury guidelines for the *EFT* and *Prompt Payment* reports for its customers. ARC prepares these reports on a monthly basis. Independent accountants review these reports before submission. Treasury also requires that a Customer Agency representative sign the *Prompt Payment* reports.

Financial Statements

ARC accountants prepare a *Balance Sheet*, *Statement of Net Cost* and *Statement of Budgetary Resources* for all Customer Agencies that are covered by the Chief Financial Officer Act and the Accountability of Tax Dollars Act of 2002. The statements are to be submitted each quarter to the Director of the OMB and the Congress. Additionally, ARC accountants prepare the *Statement of Changes in Net Position* and *Statement of Custodial Activity* (when applicable) for all Customer Agencies. ARC accountants compare TFM financial statement crosswalks to ARC's internally prepared financial statements to ensure compliance with the reporting requirements. ARC investigates and resolves any differences between TFM financial statement crosswalks and ARC's internally prepared financial statements.

Financial Statement Review

For Department of Treasury and Department of Homeland Security Customer Agencies, quarterly financial statements are produced by departmental systems using the data submitted in TIER. Quarterly consolidated financial statements are submitted to the Director of OMB and the

Congress by the Department. ARC accountants compare the quarterly financial statements to ARC's internally prepared financial statements, for supervisory review, and resolves any differences.

Financial Statement Variance Analysis

For both Department of Treasury and Department of Homeland Security Customer Agencies, accountants prepare a quarterly financial statement variance analysis. Explanations for variances that exceed Department materiality thresholds must be provided to the Department. The Department submits a consolidated analysis to OMB. The bureau variance analysis is reviewed by an ARC supervisory accountant prior to submission to the Department.

For non-Treasury and non-Homeland Security Customer Agencies, accountants prepare a quarterly financial statement variance analysis for interim periods based on the guidance in OMB Circular A-136. Explanations for variances that exceed the OMB Circular A-136 guidelines are provided to OMB with the quarterly financial statement submission. The variance analysis is reviewed by an ARC supervisory accountant prior to submission to OMB.

Receivables

ARC accountants prepare and submit a quarterly *Report on Receivables Due from the Public* for all Customer Agencies. The report is reviewed by an ARC supervisory accountant prior to submission to Treasury.

Complementary Customer Agency Controls

Customer Agencies should establish controls to:

- Review and approve, prior to submission, the financial reports prepared by ARC to ensure that all reports prepared for external use are complete, accurate, and submitted in a timely manner.
- Provide certification of FACTS II to ARC prior to ARC's FACTS II system certification.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures and determined that ARC had documented procedures for the preparation of government-wide reports.
2. For a selection of fourth quarter FACTS II submissions, inspected evidence of management review and determined that they were reviewed and certified.
3. For a selection of months, inspected TIER Submission Checklists for evidence of ARC supervisory review of TIER data and timeliness of submission and determined that submissions had been reviewed.
4. For a selection of months, inspected *EFT* and *Prompt Payment* reports and determined that they were reviewed by a supervisory accountant before submission.
5. For a selection of months, inspected reconciliations of financial statements prepared by FARS to internally prepared financial statements and determined that reconciliations were reviewed and that any differences were resolved.

6. For a selection of months, inspected reconciliation of financial statements prepared by FARS to internally prepared financial statements and determined that reconciliations were performed and any exceptions were resolved and were reviewed by a supervisory accountant before submission.
7. For a selection of quarters, inspected the *Report on Receivables Due from the Public* reconciliations and determined that reconciliations were documented.
8. For a selection of quarters, inspected *Reports on Receivables Due from the Public* and determined that they were reviewed by an ARC supervisory accountant.

No exceptions noted.

Control Objective 10 – Administrative Spending

Controls provide reasonable assurance that administrative spending controls are reviewed, reconciled, and documented in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures related to administrative spending controls.

Budget Execution System Controls

Customer Agencies can establish and monitor both legally established and internally developed budget plans in Oracle to ensure obligations are authorized and recorded. Budget plans can be established at the following levels of the accounting structure in Oracle:

- Appropriation/Fund (Based upon the Customer's appropriation)
- Apportionment (Based upon the apportionment schedule on the SF132)
- Cost Center (Based upon the Customer's internal budget plan)
- Reporting Category (Based upon the Customer's internal budget plan)
- Project Code (Based upon the customer's internal budget plan)
- Budget Object Code (Based upon the Customer's internal budget plan)

Budget execution system controls can be set to prevent spending beyond the budget plan amount or allow spending over the budget plan amount at any level of the budget plan. Spending beyond the apportionment and appropriation levels (legal levels) are prohibited. System controls are designed to prevent the user from apportioning more than was appropriated, and allocating more than was apportioned. Decisions on control settings that permit or prevent spending beyond other budget plan levels are determined by the Customer Agency. System controls are applied at the fund level after passage of appropriation legislation and a high-level budget is loaded at the allocation level. Upon receipt and input of a detailed financial plan, controls are established at a more detailed level if desired by the Customer Agency.

Budget execution settings are determined by the Customer agency and set-up in Oracle by the CSB. System settings are reviewed with the Customer Agency on an annual basis. Budget plans are input into Oracle by ARC Staff and independently reviewed.

Reconciliation – Budgetary and Proprietary Account Relationships

ARC accountants prepare budgetary to proprietary account relationship reconciliations on a monthly basis, for supervisory review, to ensure complete general ledger account posting for all recorded transactions. An accounting technician or an accountant corrects invalid out-of-balance relationships.

Reconciliations – Fund Balance With Treasury (Activity and Balances)

A Federal Agency's FBWT account assists the agency in monitoring use of budget authority. Treasury's FMS provides the following reports to inform agencies of their FBWT and to assist agencies in reconciling their general ledger balances to FMS balances:

- Statement of Differences (Disbursements/Deposits) provides the net difference between FMS's control totals and the agency's FMS 224 submission.
- CARS Account Statement (Transactions) provides increases and decreases to balances, detailed at the submitting ALC levels.
- CARS Account Statement (Account Summary) provides beginning balance, current month net activity and ending balance.

ARC accountants reduce the probability of month-end differences relating to disbursements by comparing preliminary FMS 224 disbursement data to month-to-date data obtained from CASHLINK II, CARS TDO Payments, and IPAC systems. Any differences identified by the accountant are corrected by an accounting technician or another accountant prior to the close of the accounting period.

ARC accountants perform Statement of Differences reconciliations, for supervisory review, as well as reconciliations of CARS Account Statement balances to general ledger FBWT balances. If differences are identified during the reconciliations, ARC accountants determine the cause of the difference and the action, if any, that is needed to resolve the discrepancy. If the difference requires correction, an entry is posted in the accounting system by an accounting technician or another accountant.

Complementary Customer Agency Controls

Customer Agencies should establish controls to:

- Properly approve and accurately enter obligations into the procurement and travel systems in the proper period.
- Approve and return relocation travel vouchers to RSB for processing in moveLINQ in a timely manner.
- Send valid requests to record manual obligations to ARC in a timely manner.
- Review open obligation reports for completeness, accuracy, and validity.
- Review and approve listing of users with current Oracle, PRISM, IPP, webTA, and GovTrip access to ensure appropriateness.
- Communicate Customer Agency required levels of budget and spending controls to ARC.

Tests of Operating Effectiveness and Results of Testing

1. Inspected the written procedures related to administrative spending, inspect reconciliations, and observed ARC staff process transactions and determined that processing was in accordance with the procedures.
2. For a selection of Customer Agencies, inspected evidence and determined that for the year they specified their budget controls, were input into Oracle by CSB staff, and were reviewed by a supervisor for completeness and accuracy.
3. For a selection of months, inspected budgetary to proprietary account relationship reconciliations and determined that reconciliations were performed and that any exceptions were resolved.
4. For a selection of months for a selection of Customer Agencies, inspected evidence and determined that the accountants perform reconciliations, of CARS Account Statement balances to general ledger FBWT balances and supervisory review was completed.

No exceptions noted.

Control Objective 11 – Budget

Controls provide reasonable assurance that budget entries are documented and processed in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures for staff to follow for the processing of budget entries.

Budget Documentation

For Customer Agency appropriations subject to annual enactment, ARC enters an appropriation based on the amount approved in the annual appropriations process, as supported by the automatic amount calculated during a continuing resolution (CR), the enacted appropriation legislation, or Treasury documentation. ARC enters an apportionment in Oracle from the Customer Agency's SF 132, Apportionment and Reapportionment Schedule. Upon receipt of the Customer Agency's budget plan or reprogramming guidance, ARC allocates funding to the Customer Agency's accounting values according to the detail provided by the customer.

For Customer Agency sources of funds that are not subject to the annual appropriations process, such as reimbursable or revolving accounts, ARC enters an appropriation and apportionment based on the Customer Agency's SF 132 and recorded reimbursable activity for those accounts subject to the apportionment process. ARC allocates funding to the Customer Agency's accounting values based on the Customer Agency's budget plan or recorded reimbursable activity.

For sources of funds not subject to both the annual appropriations process and the apportionment process, ARC enters an appropriation and apportionment at the fund level and allocates funding to the Customer Agency's accounting values based on the Customer Agency's budget plan, recorded reimbursable activity, or reprogramming guidance.

Budget Execution System Controls

Customer Agencies can establish and monitor both legally established and internally developed budget plans in Oracle to ensure obligations are authorized and recorded. Budget plans can be established at the following levels of the accounting structure in Oracle:

- Appropriation/Fund (Based upon the customer's appropriation)
- Apportionment (Based upon the apportionment schedule on the SF132)
- Cost Center (Based upon the customer's internal budget plan)
- Reporting Category (Based upon the customer's internal budget plan)
- Project Code (Based upon the customer's internal budget plan)
- Budget Object Code (Based upon the customer's internal budget plan)

Budget execution system controls can be set to prevent spending beyond the budget plan amount or allow spending over the budget plan amount at any level of the budget plan. Spending beyond the apportionment and appropriation levels (legal levels) are prohibited. System controls are designed to prevent the user from apportioning more than was appropriated and allocating more than was apportioned. Decisions on control settings that permit or prevent spending beyond other budget plan levels are determined by the Customer Agency. System controls are applied at the fund level after passage of appropriation legislation and a high-level budget is loaded at the allocation level. Upon receipt and input of a detailed financial plan, controls are established at a more detailed level if desired by the Customer Agency.

Budget execution settings are determined by the Customer Agency and set-up in Oracle by the Business Technology Division's Customer Service Branch (CSB). System settings are reviewed with the Customer Agency on an annual basis. Budget plans are input into Oracle by ARC Staff and independently reviewed.

Reconciliation – Budgetary and Proprietary Account Relationships

ARC accountants prepare budgetary to proprietary account relationship reconciliations on a monthly basis, for supervisory review, to ensure complete general ledger account posting for all recorded transactions. An accounting technician or an accountant corrects invalid out-of-balance relationships.

Reconciliation – Fund Balance With Treasury

A Federal Agency's FBWT assists the agency in monitoring budget authority. Treasury's FMS provides the following reports to inform agencies of their FBWT and to assist agencies in reconciling their general ledger balances to FMS balances:

- CARS Account Statement (Transactions) provides increases and decreases to balances, detailed at the submitting ALC levels.
- CARS Account Statement (Account Summary) provides beginning balance, current month net activity and ending balance.

ARC accountants perform reconciliations, for supervisory review, of CARS Account Statement balances to general ledger FBWT balances. If differences are identified during the reconciliations, ARC accountants determine the cause of the difference and the action, if any, that is needed to resolve the discrepancy. If the difference requires correction, an entry is posted in the accounting system by an accounting technician, another accountant or a budget analyst.

Document Numbering

All accounting entries recorded into Oracle require a transaction or document identification number. System controls prohibit the use of duplicate document numbers on budget documents. ARC has developed and implemented a standard document-numbering scheme to avoid duplicate document processing and to enable readers of ARC reports to better identify and/or determine the nature of transactions processed by ARC. When an ARC user attempts to enter a transaction identification number that already exists, Oracle issues an error message that alerts the user of the duplication.

Complementary Customer Agency Controls

Customer Agencies should establish controls to:

- Review the financial reports provided by ARC to ensure that budget entries are complete and accurate.
- Send approved budget plans to ARC in a timely manner.
- Communicate Customer Agency required levels of budget and spending controls to ARC.
- Communicate OMB apportionment status to ARC.
- Monitor usage of budget authority during periods of operation under a Continuing Resolution to ensure that OMB directed apportionment limits are not exceeded.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for budget entries and determined that they were consistent with the control description.
2. For a selection of Customer Agencies, inspected evidence and determined that for the year they specified their budget controls, they were input by CSB staff, and then reviewed by a supervisor for completeness and accuracy.
3. For a selection of months, inspected monthly general ledger account reconciliations and determined that reconciliations were performed, any exceptions were resolved and the recompilation was reviewed by a supervisor.
4. For a selection of months and Customer Agencies, inspected evidence and determined that the accountants performed reconciliations of CARS Account Statement balances to general ledger FBWT balances and supervisory review was completed.
5. Observed an ARC staff member attempt to enter a transaction into Oracle with a document number that had already been entered into Oracle and noted that Oracle automatically rejected the entry of a duplicate document number.

No exceptions noted.

Control Objective 12 – Manual Journal Entries

Controls provide reasonable assurance that manual journal entries are authorized.

Description of Controls

ARC has documented procedures for staff to follow for the processing of manual journal entries.

Journal Entry Approval

A user's profile in Oracle determines whether or not the user can prepare and/or approve a manual journal entry. Oracle system controls require that all manual journal entries be routed to an approver. Once a user has entered a journal entry, Oracle automatically routes the journal entry to an authorized approver's queue.

Document Numbering

Oracle assigns all manual journal entries a specific journal category and journal source and ARC follows a standard document numbering scheme. Documentation supporting the journal entry accompanies each request for approval. The approver compares the documentation to Oracle and approves the journal entry.

Complementary Customer Agency Controls

- Send valid and approved requests to record manual journal entries to ARC in a timely manner.
- Maintain and communicate to ARC a list of individuals authorized to submit manual journal entries that are initiated by the Customer Agency.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the processing of manual journal entries and determined that procedures were documented.
2. Inspected the list of Oracle users with the ability to create manual journal entries and determined that they were assigned a supervisor in Oracle and would be subject to the automated approval work flow.
3. Inspected the list of Oracle users with the ability to approve manual journal entries and the list of users with the ability to enter manual journal entries and determined that users without a specified supervisor did not have the ability to enter a manual journal entry.
4. For a selection of journal entries, inspected hardcopy supporting documentation and related Oracle journal entries and determined that the manual journal entries had proper hardcopy documentation and were authorized.
5. Observed an ARC staff member attempt to enter a transaction into Oracle with a document number that had already been entered into Oracle and noted that Oracle automatically rejected the entry of a duplicate document number.

No exceptions noted.

Control Objective 13 - Federal Investments

Controls provide reasonable assurance that Federal investments in Government Account Series (GAS) investments are authorized, reviewed, processed timely, reconciled, and properly documented in accordance with Customer Agency policies and procedures.

Description of Controls

ARC accountants process purchases of Federal investments in accordance with Customer Agency instruction. Instructions include the type and amount of securities to be purchased or the amount of residual cash to be retained. An independent accountant reviews investment purchases.

All investment activity in GAS investments is recorded in general ledger through a daily interface between the Federal Investment System (FedInvest), a subsystem of the Government Agency Investment Services System, and Oracle. Accountants reconcile investment general ledger accounts to the FedInvest application on a monthly basis to ensure all investment activity has been properly recorded. A supervisor reviews investment account reconciliations.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures for the processing of GAS investments and determined that policies were documented to ensure that Federal investments were authorized, reviewed, processed timely, reconciled and properly documented.
2. For a selection of Customer Agencies, inspected investment instructions and determined that they were provided to ARC and defined the investment objectives for the agencies.
3. For a selection of investment purchases, inspected evidence and determined that an independent accountant reviewed the purchases.
4. For a selection of months for a selection of Customer Agencies inspected evidence and determined that the accountants reconciled investment general ledger accounts to the FedInvest application in a timely manner.

No exceptions noted.

Control Objective 14 – Suppliers and Banks Record Changes

Controls provide reasonable assurance that changes made to Suppliers and Banks records require appropriate system access and the changes are reviewed, approved, and documented in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures related to Suppliers and Banks record changes for staff to follow.

Segregation of Duties – Changes to Suppliers and Banks Records

User profiles set by Oracle system administrators, as authorized by the user's supervisor or manager, ensure that only authorized Central Accounting Branch (CAB) employees are able to make changes to Suppliers and Banks records. Authorized employees who have Suppliers and Banks record change privileges do not have authorization to approve vendor payments in the accounting systems allowing for proper segregation of duties.

Changes to Suppliers and Banks records that include taxpayer identification number, address, or bank routing/account number require:

- A source document (Central Contractor Registration (CCR) database or a document supplied by a vendor or customer, when CCR is not applicable, - i.e., grants and loans, payroll database, and/or e-mail, etc.), and
- Independent review.

Review – Changes to Suppliers and Banks Records

Authorized employees review and process changes to Suppliers and Banks records and maintain the supporting source documentation as described above.

A reviewing employee compares changes to Suppliers and Banks records from the Oracle system to the change request documents and initials the audit report indicating review. The reviewing employee does not have access to make changes to Suppliers and Banks records in Oracle. Therefore, if errors were made, the reviewing employee would provide a copy of the source document to an authorized employee for correction and subsequent review.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures and determined that ARC had documented procedures for Suppliers and Banks record changes.
2. Inspected a list of users with access to update, modify, or delete Suppliers and Banks records and determined that users had the appropriate privileges.
3. Inspected a list of users with access to process vendor payments and determined that users had the appropriate privileges.
4. For a selection of changes to Suppliers and Banks records, inspected the reviewed report signed by the reviewing employee and determined that the Suppliers and Banks record changes were reviewed and approved.

No exceptions noted.

PROCUREMENT PROCESSING CONTROLS

Control Objective 15 – Acquisitions and Contracts

Controls provide reasonable assurance that acquisitions are compliant with Federal laws, regulations and policies.

Description of Controls

All acquisitions using simplified acquisition procedures must use the Simplified Acquisition Folder (PD F 5477) issued by Treasury. The inside front and back folder pages represent checklist items for simplified acquisition procurement actions. Each folder checklist and supporting file documentation are reviewed by a warranted Contracting Officer, and subsequently approved when signed on the inside front page.

All commercial item and Uniform Contract Format acquisitions not using simplified acquisition procedures contain a checklist of file contents completed by a Contract Specialist. Signature by the Contracting Officer on the award document certifies the checklist is accurate and that file contents meet legal and regulatory requirements.

Tests of Operating Effectiveness and Results of Testing

1. Inspected a selection of acquisitions using simplified acquisition procedures and determined that the folders were completed.
2. Inspected a selection of acquisitions using commercial item and Uniform Contract Format procedures and determined that the folders contained a completed checklist, signed by a contract specialist, and reviewed by a Contract Officer.

No exceptions noted.

Control Objective 16 – Sufficiently Funded Requisitions

Controls provide reasonable assurance that contract obligations are supported by approved requisitions.

Description of Controls

Contract officers are warranted by Treasury at specified dollar approval thresholds based on experience and training. The automated contract writing system (PRISM) contains award approval limits for each Warranted Contracting Officer at their respective approval dollar threshold prohibiting approval of awards at dollar amounts above their authorized level.

PRISM contains controls to ensure procurement awards are not made without sufficient funding provided by a Purchase Requisition (PR) which is tied to each procurement action in the system.

Tests of Operating Effectiveness and Results of Testing

1. Inspected award authorizations in PRISM and determined that Warranted Contracting Officers approved awards within specified dollar limits.
2. Inspected award authorizations in PRISM and determined that approved awards contained sufficient funding on PRs in the system.

No exceptions noted.

GENERAL COMPUTER CONTROLS

Control Objective 17 – System Access

Controls provide reasonable assurance that systems are protected from unauthorized access in accordance with ARC policies and procedures.

Description of Controls

ARC follows BPD policies and procedures that were developed, documented, disseminated, and that are periodically reviewed and updated to facilitate the implementation of logical access controls. Additionally, procedures specific to Oracle, PRISM, webTA, GovTrip, moveLINQ, and IPP have been documented. The logical access controls are based on Treasury and BPD policies and standards (Treasury Information Technology Security Program TDP-85-01 Volume I), which, in turn, are based on the applicable Federal laws and regulations. These controls are the system-based mechanisms that are used to specify which individuals and/or processes are to have access to a specific system resource and the type of access that is to be permitted. These controls limit user access to information and restrict their system access to their designated level.

Oracle

Access to Oracle is restricted to users with a valid logon ID and password. Oracle logons/sessions are encrypted to protect the information, making it unintelligible to all but the intended users. Sessions are protected using 128-bit Secure Sockets Layer (SSL) encryption. Prospective Oracle users must complete, sign and submit an approved *Administrative Resource Center System Access Form for End User Applications* to request access to Oracle. The end user's signature indicates that they are familiar with the Privacy Act information and security requirements and will comply with computer security requirements established by BPD and ARC. The form defines the user's access specifications, which will allow the user to perform his/her duties in Oracle. Changes to existing user profiles require an e-mail to be sent to the Oracle Support Team mailbox by an authorized individual requesting the change, and defining what access should be added/deleted/changed. In order to remove a user's access, Customer Agencies submit a request for account termination. At that time, the Oracle user account is end-dated in the system to remove their access. Additionally, each day the Oracle Support Team generates and reviews a list of Oracle user accounts that have been inactive for 80 days. An e-mail is sent to the user warning them that their account will be end-dated if they maintain an inactive status for 90 days. After 90 days of inactivity, the user's account will be end-dated. Annually, the ARC sends out a list of system users to each Customer Agency for review. The Oracle Support Team updates the permissions for users based on the responses received from the Customer Agencies.

Oracle uses a multi-org functionality to strengthen security within the application. Each Customer Agency is configured as an operating unit in Oracle. When a new responsibility is created by the Application Administrators, it is mapped to a specific operating unit by a system profile option. The multi-org functionality helps ensure that a user assigned to a responsibility (which in turn is mapped to an operating unit) can only see or enter data for that customer (or operating unit). Oracle also provides a value set security feature, assigned to a responsibility, which further controls new data entry in the operating unit by limiting the list of values (LOV) for the accounting flexfield to those values specific to the customer (or operating unit).

Only the SYSADMIN account controlled by Oracle On Demand are assigned the System Administrator responsibility in the Oracle application. CSB and QCB staff are assigned Application Administrator responsibility in the Oracle application. The employees with the

Application Administrator responsibility have limited access to perform operational functions in Oracle, specifically limited to the month-end closing, during customer conversions (as directed by the functional teams) or emergency situations that can be approved by a supervisor or manager after the fact. Additionally, the individuals with Oracle Application Administrator privileges perform multiple functions, including that of the Oracle Support team members. As a result, these individuals periodically require temporary access privileges of a functional user in order to address user inquiries. An edit check prevents an Oracle Application Administrator from adding or removing any responsibilities from their own user ID.

The CSB/QCB/Project and Technical Services Branch (PTSB) managers can be assigned the Application Administrator responsibility in situations where the manager deems the access is required. This responsibility is granted on a temporary basis with the proper request and approval and will be end-dated once the access is no longer necessary.

Administrative access to the underlying Oracle servers and databases is limited to Oracle on Demand server and database administrators and specific BTD employees.

User Identifications (IDs) are assigned to BPD employees consistent with their network logon ID. User IDs for Customer Agency staff are assigned by an ARC system administrator. A temporary password is assigned to all users by calling the Oracle Support Team. Oracle Support Team personnel are responsible for verifying the caller's identity. Once the user logs onto the accounting system, they must establish their own unique password. An Oracle user's password must meet unique password configuration, password complexity and password expiration criteria to ensure strong password security.

Oracle access attempt logs are reviewed daily by the PRISM Support Team to identify if users attempted to unsuccessfully access the system five or more times in the day. When five or more unsuccessful access attempts were made, an e-mail is sent to the user indicating that the access attempts were noted and requesting that the user notify ARC if the attempts were not made by the user.

PRISM

Access to PRISM is restricted to users with a valid logon ID and password. PRISM logons/sessions are encrypted to protect the information, making it unintelligible to all but the intended users. Sessions are protected using 128-bit SSL encryption. Prospective PRISM users must complete, sign, and submit an approved *Administrative Resource Center System Access Form for End User Applications* to request access to PRISM. The end user's signature indicates that they are familiar with the Privacy Act information and security requirements and will comply with computer security requirements established by BPD and ARC. The form defines the user's access specifications, which will allow the user to perform his/her duties in PRISM. Changes to existing user profiles require an e-mail to be sent to the PRISM Support Team mailbox by an authorized individual at the Customer Agency, requesting the change, and defining what access should be added/deleted/changed. In order to remove a user's access, Customer Agencies submit a request for account termination. At that time, the PRISM user is end-dated in the system to remove their access. Additionally, each day the Oracle Support Team generates and reviews a list of PRISM user accounts that have been inactive for 80 days. An e-mail is sent to the user warning them that their account will be end-dated if they maintain an inactive status for 90 days. After 90 days of inactivity, the user's account will be end-dated. Annually, the ARC sends out a list of users to each Customer Agency for review. Included for review are requisitioner and buyer approval limits by user. The PRISM Support Team updates the access according to the responses received from the Customer Agencies.

User access within PRISM is further limited by only allowing users to approve the addition or modification of records to the operating units they have been assigned in Oracle. PRISM utilizes the existing security features and functionality of Oracle. For example, new users are setup in Oracle and assigned appropriate PRISM responsibilities. Within Oracle, the responsibilities are mapped to PRISM security groups. The user and security groups then flow to PRISM. Within the PRISM application, users are assigned additional responsibilities as authorized on the access form.

Updates to a user's PRISM responsibilities are audited by independent employees within CSB. The changes to functional access privileges are reviewed and compared to the changes to the BTD's Team Responsibilities matrix to determine whether or not the access privileges are appropriate. Follow up is performed to validate the addition of any privileges that are not on the BTD's Team Responsibilities matrix.

The System Administrator responsibility in PRISM is limited to certain employees requiring the access for the performance of job duties. Administrative access to the underlying PRISM servers and databases is limited to Oracle on Demand server and database administrators and specific BTD employees.

User IDs are assigned to BPD employees consistent with their network logon ID. User IDs for Customer Agency staff who utilize PRISM are assigned by an ARC system administrator. A temporary password is assigned to all users by calling the PRISM Support Team. PRISM Support Team personnel are responsible for verifying the caller's identity prior to establishing the user's password. Once the user logs onto the system, they must establish their own unique password. A user's password must meet unique password configuration, password complexity and password expiration criteria to ensure strong password security.

PRISM access attempt logs are reviewed daily by the Oracle Support Team to identify if users attempted to unsuccessfully access the system five or more times in the day. When five or more unsuccessful access attempts were made, an e-mail is sent to the user indicating that the access attempts were noted and requesting that the user notify ARC if the attempts were not made by the user.

webTA¹

Access to webTA is restricted to users with a valid logon ID and password. Access to webTA is provided using 128-bit SSL encryption. All personnel require access to webTA in order to complete time and attendance submission. Users granted standard employee access privileges are not required to submit an access form. However, users that require elevated access privileges (e.g., timekeeper, supervisor) are added to the webTA system following receipt of a supervisor-approved *Administrative Resource Center System Access Form for End User Applications*. The end user's signature indicates they are familiar with the Privacy Act information and security requirements and will comply with computer security rules. The form defines the user's access specifications, which will allow the user to perform his/her duties in webTA. Changes to existing user profiles require a new access form to be submitted by the Customer Agency. Upon receipt of an *Administrative Resource Center System Access Form for End User Applications* requesting the deletion of a webTA user or upon receipt of a timesheet coded as "Final," an HR Administrator in PLSB removes the assigned responsibilities. Annually, an HR Administrator sends out a list of timekeepers and supervisors to each Customer Agency for the agency to use in performing a periodic review of access. The list is limited to those timekeepers and supervisors

¹ The scope of the description of webTA controls applies only to full service webTA customers.

who are not currently responsible for validating or approving time for an active employee at the Customer Agency. The review ensures that these employees who do not currently validate or approve time on a regular basis still require their role as a timekeeper or supervisor.

User access within webTA is further limited by the role the user is assigned in the system (i.e., Employee, Timekeeper, Supervisor, etc.). The System Administrator and HR Administrator roles in webTA are limited to certain employees, ensuring no one serves in both administrator roles. Periodically, there is a need for the System Administrator to research a problem in a production instance using an HR Role. When such an event arises, the System Administrator can be temporarily granted HR specific roles with supervisor approval. Administrative access to the underlying webTA servers and databases is limited to server and database administrators within the OIT.

An HR Administrator assigns user IDs to BPD employees consistent with their network logon ID. User IDs for Customer Agency staff who utilize webTA as timekeepers or supervisors are also assigned by an HR Administrator. An HR Administrator also assigns a temporary password to users by an e-mail. Once the user logs onto the system, they must establish their own unique password. A user's password must meet unique password configuration, password complexity and password expiration criteria to ensure strong password security.

GovTrip

Access to GovTrip is restricted to users with a valid logon ID and password. All users must complete the self-registration process. An account token will be forwarded to the user by the TSD helpdesk after the self-registration information is verified for the user to activate their account. Budget Reviewers and Approving Officials must complete, sign, and submit an approved *Administrative Resource Center Online Applications Access Request* or have an approving official or agency travel contact authorize access via e-mail. The end user's signature indicates they are familiar with the Privacy Act information, security requirements, and will comply with computer security requirements established by BPD and ARC. The form defines the user's access specifications, which will allow the user to perform his/her duties in GovTrip. Changes to a user's identification (i.e., name change) or to the user's role in GovTrip require an *Administrative Resource Center Online Applications Access Request* to be resubmitted or an e-mail from the user copying his/her approving official or agency travel contact. Upon receipt of an Exit Clearance form or e-mail request, GovTrip access is set to indicate that the user has terminated. On an annual basis, TSD staff creates reports of GovTrip users and distributes the reports to Customer Agency Travel contacts for review and verification of the accounts.

GovTrip has user access levels that separate permissions from highest to lowest into these categories:

- System administrators (NGMS only)
- Application administrators; Designated TDSB staff
- Application administrators; Customer Service Help Desk Tier 2, Designated TDSB staff
- Customer Service Help Desk Tier 1, Designated TDSB Staff
- Approving Officials and Budget Reviewers
- User; Traveler and Document Preparer
- Terminated Users; Invitational Travelers

Access privileges are granted in accordance with the concept of least privilege required.

Users must establish their own unique GovTrip password. A user's password must meet unique password configuration, password complexity, and password expiration criteria to ensure strong password security.

moveLINQ

Access to moveLINQ is restricted to authorized TSD users with a valid logon ID and password. The process for requesting, establishing, issuing, and closing user accounts is controlled through the use of the moveLINQ Online Application Access Request Form which requires lead/supervisor approval. The form defines the user's access specifications, which will allow the user to perform his/her duties in moveLINQ. Changes to a user's identification (i.e., name change) or to the user's role in moveLINQ also require a moveLINQ Online Application Access Request Form. The user access list is reviewed by management every time a change is made or six months from the last review, whichever is longer.

User IDs are assigned to authorized TSD employees consistent with their network logon ID. A temporary password is assigned to moveLINQ users in person or by phone. Once the user logs onto moveLINQ, they must establish their own unique password which is encrypted. A user's password must meet unique password configuration, password complexity and password expiration criteria to ensure strong password security.

moveLINQ has user access roles that separate permissions from highest to lowest into these categories:

- Admin
- HHS_Reviewer
- MGMT1
- MGMT2
- RC
- RC_HHS_Reviewer
- SAS_Accting
- STEP
- Tax_Prep
- Tech
- Viewer
- VIP Reviewer

Access privileges are granted in accordance with the concept of least privilege required.

See Control Objective 19 for further discussion of the physical access control process.

Internet Payment Platform (IPP)

Access to IPP is restricted to users with a valid logon ID and password. Internal and external users must complete, sign, and submit an approved *Administrative Resource Center Online Applications Access Request form*. Customer users must submit a Certificate of Completion for the On-line Invoice Approver Training located on their ARC customer webpage, unless they are on the list of attendees that completed the training given during their customer conversion to IPP. The end user's signature indicates they are familiar with the Privacy Act information, security requirements, and will comply with computer security requirements established by BPD and ARC. The form defines the user's access specifications, which will allow the user to perform his/her duties in IPP. The user will receive an e-mail with a user id and one containing a temporary password from the Treasury UPS User Administration. Annually, FRB St. Louis sends a list of all IPP users in the BPD Admin Disburser Account for recertification. ARC reaches out to the customer agency IPP contact and returns the results to FRB St. Louis.

The IPP BPD Admin Disburser Account has user access levels that separate permissions into these categories from highest to lowest:

- Administrator
- Invoice Approver
- Processor
- Viewer

Access is in accordance with the concept of least privilege required.

Users must establish their own unique IPP password. A user's password must meet unique password configuration, password complexity and password expiration criteria to ensure strong password security that follow the configuration requirements established by FMS TWAI.

Complementary Customer Agency Controls

Customer Agencies should establish controls to:

- Review and approve listing of users with current Oracle, PRISM, IPP, webTA, and GovTrip access to ensure appropriateness.
- Ensure exiting employee timecards are coded "Final" as this will help ensure that HR staff deactivate the employee's webTA access.

Tests of Operating Effectiveness and Results of Testing

1. Inspected the Treasury Information Technology Security Program TDP-85-01 Volumes I and II and determined that security policies and procedures were documented.
2. Inspected Oracle user account management procedures and password procedures and determined that the security policies and procedures are documented for Oracle.
3. Inspected PRISM user account management procedures and password procedures and determined that security policies and procedures are documented for PRISM.
4. Inspected webTA user account management procedures and password procedures and determined that security policies and procedures are documented.
5. Inspected GovTrip user account management procedures and password procedures and determined that security policies and procedures are documented for GovTrip.
6. Inspected MoveLINQ user account management procedures and password procedures and determined that security policies and procedures are documented for MoveLINQ.
7. Inspected IPP user account management procedures and password procedures and determined whether security policies and procedures were documented.
8. Observed a logon session and determined that the Oracle users require a valid login ID and password and that logins/sessions are encrypted with 128-bit SSL encryption.
9. For a selection of new Oracle users, inspected user access request forms and determined that the forms are completed, access was authorized, and contained employees' signature to denote that they understand the privacy act requirements.
10. For a selection of changes to Oracle user profiles, inspected authorizing documentation and determined that updates to access rights were authorized.

11. Inspected a selection of requests for termination of customer agencies employees' Oracle access and evidence of when the account was end dated in the Oracle system and determined that requests for termination of access from customer agencies are completed in a timely manner.
12. From the selection of inactive Oracle user account reviews, inspected evidence and determined that the accounts inactive for 90 days or more were properly removed from the system.
13. For a selection of Customer Agencies, inspected evidence of the annual Oracle user access review and determined that the annual reviews are performed.
14. Inspected the list of user accounts and corresponding access within Oracle and determined that that each user's access is restricted to distinct operating units or Customer Agencies.
15. Inspected the user roles assigned to the Oracle Application administrators and compared them to the BTD Allowable Responsibilities Table, to determine whether the functional user permissions are restricted and commensurate with job responsibilities.
16. Observed an Oracle System Administrator attempting to add responsibilities to their user ID, and determined that system administrators could not add responsibilities to their user IDs.
17. No users were granted temporary Admin Access and during the period.
18. Inspected the OOD contract with immixTechnology and determined that a contract was in place for the hosting and management of the Oracle servers.
19. Inspected the Oracle user list and determined that the accounts follow the naming convention.
20. Inspected Oracle profile options and determined that the ORACLE accounts are configured to be locked-out after 30 minutes of inactivity.
21. Inspected Oracle profile options, and determined that failed logins, password complexity, generation, and length requirements are configured in accordance with ARC password standards.
22. Inspected Oracle profile options for system administrators and users, and determined the password lifespan days established for system administrators and users were configured in accordance with ARC password standards.
23. For a selection of dates, inspected Oracle violation logs and evidence of review and determined that violations logs are reviewed.
24. Inspected a screen print of a logon session and determined that user ID and Password are required and that PRISM logins/sessions are encrypted with 128-bit SSL encryption
25. For a selection of new PRISM users, inspected user access request forms and determined that the forms are completed and access was authorized.
26. For a selection of changes to PRISM user accounts, inspected authorizing documentation and determined that updates to the accounts are authorized.
27. Inspected a list of separated employees and a list of PRISM users and determined that separated employees did not retain access to the PRISM.
28. For a selection of days, inspected the inactive reviews and determined that the reviews are performed on a daily basis.
29. Inspected evidence of distribution of PRISM user lists for review and determined that that user account lists are distributed on an annual basis for review.

30. Observed and inspected a screenshot of the production PRISM system for a user and determined that the system can be configured as defined in the control and in the New User Setup document.
31. There were no modified user access requests processed during the period for PRISM.
32. Inspected the PRISM user list and determined that accounts appeared to follow the naming convention, using first initial and second initial if necessary and a last name.
33. Observed the PRISM Support Team member creating a new account in the PRISM system and noted that upon first login the user was immediately directed to reset their password.
34. Inspected PRISM password settings and determined that failed logins, password complexity, aging, generation, and length requirements are configured in accordance with ARC password standards.
35. Inspected PRISM configuration settings and determined that the PRISM sessions are configured to time-out if they remained inactive for 30 minutes.
36. For a selection of dates, inspected PRISM violation logs and evidence of review and determined that violations logs are reviewed.
37. Observed a logon session and noted that webTA logins/sessions required user name and password.
38. Observed a user log into webTA and noted that connections to webTA are encrypted utilizing 128-bit SSL encryption.
39. For a selection of new and modified webTA users with elevated privileges, inspected user access request forms and determined that the forms are completed and access is authorized.
40. Inspected a list of separated employees and a list of webTA users and determined that no separated employees retained access to the webTA application following termination.
41. For a selection of Customer Agencies, inspected evidence of distribution of a list of webTA supervisors and timekeepers for annual user account review by the customer agency and determined that annual reviews of access are completed.
42. Inspected the BPD user privileges within webTA and determined that users are assigned in a role based security configuration.
43. Inspected the BPD user privileges within webTA and determined that users assigned HR Administrator did not have Administrator Access.
44. Inspected the webTA user privileges for a selection of customer agencies and determined that users are assigned in a role based security configuration, and users assigned HR Administrator did not have Administrator Access.
45. Inspected the webTA user privileges for a selection of customer agencies and the BPD group and the BPD employee list and determined that users with Administrator access were restricted to employees in the BTD group.
46. Observed webTA for an initial login and noted that the user is required to create a new password at first login.
47. Inspected webTA password settings and determined that failed logins, password complexity, aging, generation, and length requirements are configured in accordance with ARC password standards.
48. Inspected webTA configuration settings and determined that webTA sessions are configured to time-out if they remained inactive for 10 minutes.

49. Observed a user access the GovTrip system and noted that a user is required to be authenticated prior to accessing the system.
50. For a selection of new GovTrip users, inspected user access request forms or e-mails and determined that the forms or e-mails are completed and access was authorized.
51. For a selection of changes to GovTrip users, inspected authorizing documentation and determined that access changes are documented and access is authorized.
52. Inspected a list of separated employees and a list of GovTrip users, and determined that the separated employees did not retain access to the GovTrip application.
53. Inspected evidence of distribution of GovTrip user lists for review and determined that user account lists are distributed on an annual basis for review.
54. Inspected the user privileges with GovTrip and determined that users are assigned in a role based security configuration from highest to lowest.
55. Observed a user attempting to change their password to an invalid setting and determined that the system automatically prevented the use of password that did not conform to the requirements.
56. Observed a moveLINQ user login to the web based system and noted that they are required to enter a user id and password.
57. Inspected a selection of reviewed moveLINQ user access lists and determined that the review of access was performed.
58. Inspected documentation for a selection of added moveLINQ users and determined that the requests are documented and approved.
59. Inspected a selection of moveLINQ modification requests and determined that the requests are documented and approved.
60. Inspected a selection of moveLINQ termination requests and determined that the removal of access is documented and performed.
61. Inspected the list of ARC separations and the active list of movLINQ accounts and determined there are no accounts of terminated employees on the system.
62. Inspected the current moveLINQ user list and determined that accounts are assigned with network IDs.
63. Observed and noted that a moveLINQ user must reset their password upon initial login.
64. Observed a moveLINQ user attempt to change their password to non-compliant passwords to test length and complexity requirements and noted that the system prevented the changes.
65. Observed a moveLINQ user enter the incorrect password three times and determined that the system locked the user account.
66. Inspected the user privileges with moveLINQ and determined that users are assigned in a role based security configuration from highest to lowest.
67. Observed an IPP user login to the system and noted that they are required to enter a user id and password.
68. Inspected the annual account recertification supporting documentation and determined that ARC contacted customer agencies and the results were returned to FRB St. Louis.
69. Inspected documentation for a selection of added IPP users and determined that the requests were documented and approved.

70. Inspected the list of ARC separations and the active list of IPP accounts and determined there were no accounts of terminated employees on the system.
71. Inspected the user privileges with IPP and determined that users were assigned in a role based security configuration from highest to lowest.

No exceptions noted.

Control Objective 18 – System Changes

Controls provide reasonable assurance that system software and application changes are tested, approved, and documented in accordance with ARC policies and procedures.

Description of Controls

ARC has documented procedures for testing, approving, and documenting changes. ARC System Administrators are facilitators of the formal change management process via My Oracle Support, Oracle on Demand's web-based service request system.

Oracle and PRISM

For Oracle and PRISM, ARC uses iET/My Oracle Support to document key steps for each change: including the initial request, approval, and implementation into production.

ARC processes standard software releases (i.e., patches) for both Oracle and PRISM. Additionally, ARC processes customized application extension changes to Oracle. The ability to process and apply Oracle and PRISM changes is restricted to the database administrators under the coordination of Oracle on Demand.

ARC Application Administrators, as designees of the system owner, serve as the primary initiators of change requests. The following is indicated in the request: all the affected parties, a description of the change, the applicable instance, and the requested date of the change. PTSB staff develops customizations in separate development instances. QCB staff test changes by running test scripts and analyzing the results. Upon successful completion of testing, QCB staff approves the change request and forward it to the performer of the change, Oracle on Demand database administrators. After the approved request has been completed, the performer updates the request in iET/My Oracle Support accordingly, and the request is then closed.

For emergency changes to a production instance of Oracle or PRISM, ARC requires verbal approval from a designated on-call manager (for all production instances). ARC Application Administrators document the emergency change in iET/My Oracle Support on the next business day.

webTA

ARC has a webTA maintenance agreement in place with immixTechnology, a vendor for Kronos' webTA product.

For webTA, ARC applies standard software releases (i.e., patches) only. Unlike Oracle, webTA does not have application extensions that are customizable by ARC.

When a new webTA release is received from Kronos (the developer of webTA), QCB staff test the new release in a separate test instance by running test scripts and analyzing the results. Upon successful completion of customer acceptance testing, the QCB staff forward a request for applying the new webTA release to production to the appropriate parties for approval. The ability to apply webTA releases is restricted to the database administrators under the coordination of OIT. The new webTA release is not applied to production until it has been successfully tested and approved.

GovTrip

GovTrip is hosted and maintained by NGMS at their facility. NGMS informs TSD of scheduled updated system releases and the changes contained therein. System changes are also initiated by TSD Analysts who make enhancement requests to NGMS for changes to be included by NGMS in future scheduled release updates. TSD analysts test all applicable GovTrip changes in a GovTrip acceptance test environment. If any of the changes included in a scheduled GovTrip release update fail TSD's acceptance testing, NGMS may delay implementation of the release update. TSD has documented procedures for testing GovTrip changes. Guidance is provided to customer contacts on any changes.

moveLINQ

moveLINQ is hosted by OIT and maintained at BPD. mLINQS informs the RSB Manager and moveLINQ System Administrators of scheduled updated system releases and the changes contained therein. System changes are also initiated by moveLINQ System Administrators who make enhancement requests to mLINQS for changes to be included by mLINQS in future scheduled release updates. moveLINQ System Administrators and users test all moveLINQ changes in moveLINQ test environments. If any of the changes included in a scheduled moveLINQ release update fail the testing, RSB may delay implementation of the update until the release passes the testing. RSB has documented procedures for testing and implementing moveLINQ changes. RSB uses the Bureau's iETSolutions Workcenter (iET) to track changes to the system.

Internet Payment Platform (IPP)

IPP is a web-based system hosted by the Federal Reserve Bank of Boston (FRBB). FRBB notifies all primary agency users in advance of any new IPP release and holds review/preview meetings to discuss all known changes as well as potential changes for the next release. During the "preview" section of the meeting, agencies can rank the proposed changes for the next release. In addition, FRBB publishes testing schedules and provides the agencies an opportunity to test the changes in a QA environment prior to deploying the code into IPP Production.

Tests of Operating Effectiveness and Results of Testing

1. Inspected written procedures and determined that ARC had documented procedures for testing, approving, and documenting changes.
2. Observed iET and determined that the system was designed to retain the necessary change management documentation and noted when a change to iET is made.
3. Inspected a selection of changes processed in the iET/My Oracle Support and determined that the changes were tested and approved prior to implementation to the production environment.
4. Inspected the OOD contract with immixTechnology and determined that a contract was in place for the hosting and management of the Oracle servers.
5. Inspected the maintenance agreement and determined that the agreement contained system upgrade and maintenance provisions.
6. There were no emergency changes processed in the iET system. We inquired of management about the emergency change process and inspected in iET that there were no emergency changes recorded.
7. Inspected the webTA system maintenance agreement and determined that it contained system maintenance provisions and that it was current.
8. Inspected a selection of webTA upgrades and emergency changes processed in the iET system and determined that documentation of testing and approval was completed.

9. Inspected the GovTrip system maintenance agreement and determined that it contained system maintenance provisions and that it was current.
10. For a selection of GovTrip changes, inspected documentation of testing and determined that changes were tested prior to implementation in production.
11. Inspected written procedures and determined that testing GovTrip changes were completed in accordance with ARC procedures.
12. Inspected the moveLINQ system maintenance agreement and determined that it contained system maintenance provisions and that it was current.
13. For a selection of moveLINQ changes, inspected documentation of testing and determined that changes were tested prior to implementation in production.
14. Inspected written procedures for testing moveLINQ changes and determined that change procedures were formally documented and how they were documented.
15. Observed iET and determined that the system was designed to retain the necessary change management documentation and noted when a change to iET was made.

No exceptions noted.

Control Objective 19 – Non-interruptive System Service

Controls provide reasonable assurance that interruptions due to operational failures are appropriately limited.

Description of Controls

BPD has documented policies and procedures for controlling physical access to BPD buildings and to the data center. These include:

- Identification of sensitive/critical areas to which access needs to be restricted.
- Physical access controls designed to detect unauthorized access.
- Procedures for log reviews and investigation of violations.

The Security Branch issues employee badges, after performing security background checks and fingerprinting.

Employees are required to have badges available at all times upon request.

Terminated employees are required to surrender identification badges and are removed from the Physical Access Control System (PACS) immediately.

The webTA, and moveLINQ servers reside in OIT's data center. Physical access to the OIT Data Center is restricted to authorized users only. An employee needing access to the data center must have his/her Branch Manager request access. The requests are made through iET, a workflow system that is used to approve data center access. After the Branch Manager completes and submits the iET request form, requests are forwarded to OIT's data center managers for approval in the iET. If OIT approves the request, the BPD Division of Security and Emergency Programs (DSEP) Security Branch grants access via PACS. Only designated DSEP specialists have access to PACS. Access to all sensitive areas requires use of a badge. The use of a badge provides an audit trail that is reviewed by OIT management monthly for potential access violations. Any unauthorized access attempts are followed-up on by contacting the individual's supervisor.

Individuals without badge access to the data center must be escorted to the command center and are required to sign in/out of a Visitor log to be issued a data center visitor badge. Visitor badges do not have access to the data center, but rather designate the individual as a visitor. This log is maintained at the main entrance to the data center.

Vendors that are authorized to have a badge are issued a one-day badge and must leave their access badge onsite following completion of work in the data center. A log of One-Day badges is maintained and reviewed daily.

OIT performs a monthly review and reconciliation of individuals with data center access to individuals authorized to have data center access. Additionally, OIT performs an annual review and recertification of individuals with access to the data center. If an individual is found to have unauthorized data center access, OIT will, based on the individual's need for access, make a decision whether to request that DSEP remove their data center access or whether to provide authorization for their access.

From BPD's location, web sites, FTP servers, web servers, and aspects of intrusion detection are monitored every ten minutes with a combination of software monitoring tools. The availability of network infrastructure, such as switches and firewalls are monitored with a combination of software monitoring tools. OIT's data center is physically monitored by environmental monitoring software that provides continuous checking and alarming capabilities for temperature

changes, water, and humidity threats. Fire detection and suppression systems are installed in the data center. Redundant battery-powered uninterruptible power supplies and a backup generator protect the data center from an unplanned loss of power. Redundant air conditioning systems protect data center computers from overheating in the event of air conditioning equipment failure. OIT provides operations, support, capacity planning, performance monitoring, networking, security monitoring, development, change management, back up, hardware acquisitions and maintenance, and installation support for ARC.

Oracle

System operations manuals are provided to each employee assigned system maintenance responsibilities. The Oracle Support Team, within CSB, is available for users to call if they are experiencing difficulties with the system. In addition, Oracle support personnel have access to internal application setup and security documentation, as well as various manuals and documentation produced by the Oracle Corporation.

PRISM

PRISM user manuals are provided to end users. The PRISM Support Team within CSB, is available for end users to call if they are experiencing difficulties with the system, and PRISM application administrators have access to internal application setup and security documentation, as well as various manuals and documentation produced by Compusearch.

webTA

webTA support personnel have access to online documentation produced by Kronos. The Human Resources Support Desk is available for users to call if they are experiencing difficulties with the system. QCB acts as a liaison between the Human Resources Support Desk and OIT to resolve system issues.

OIT performs differential backups of the production system nightly and performs a full tape backup weekly. The monthly backup tapes are sent to a long-term offsite facility.

See Control Objective 20 for further discussion of the backup process.

GovTrip

ARC TSD staff investigates and attempts to resolve any system issues noticed by the ARC staff or reported to TSD by GovTrip users. When possible, TSD staff resolves GovTrip issues. If TSD staff cannot resolve an issue, the issue is escalated to NGMS. TSD notifies system users of the length of the expected outage or malfunction and notifies them again when the issue is resolved.

moveLINQ

ARC purchases new license agreements annually from mLINQS, which include all upgrades and service packs, monthly per diem rates, Federal travel regulation updates, and unlimited technical support.

moveLINQ System Administrators investigate any system issues noticed by the OIT Database Administrators or reported to them by moveLINQ users. When possible, moveLINQ System Administrators resolve moveLINQ issues. If the administrator cannot resolve an issue, the issue is escalated to mLINQS, the vendor. The System Administrator notifies the users of the length of the expected problem and notifies them again when the issue is resolved.

OIT performs differential backups of the moveLINQ production database nightly and performs a full tape backup weekly. The nightly backups are kept on-site for four weeks. The monthly full backup tapes are sent to a long-term off-site facility for two years.

See Control Objective 20 for further discussion of the backup process.

RSB maintains the data in the moveLINQ system for six years and three months.

Internet Payment Platform (IPP)

IPP is a web-based system hosted by the Federal Reserve Bank of Boston (FRBB). FRBB has a customer service center for both agencies and suppliers including a help desk phone line and e-mail address. When IPP system issues arise, BPD sends an e-mail to the IPP Customer Support Center at FRBB for investigation and resolution by FRBB.

Tests of Operating Effectiveness and Results of Testing

1. Inspected physical access policies and procedures for the data center and determined that they were documented and that they included the identification of sensitive/critical areas to which access needs to be restricted, physical access controls designed to detect unauthorized access, and procedures for log reviews and investigation of violations.
2. Observed physical access controls of BPD buildings and the OIT data center to determine that security guards, video cameras, badge readers, and locked doors were in place and in operation to restrict access.
3. Observed persons entering BPD buildings and determined that persons were required to place any materials, packages, bundles, etc. onto an x-ray machine, and additionally were required to pass through a walkthrough metal detector.
4. Observed persons entering BPD buildings and determined that an activation of the walkthrough metal detector resulted in further screening by the security guard, utilizing a handheld metal detector to identify the source of activation.
5. Observed an entrant swipe their badge into the access control system and determined that the controls system granted access to authorized personnel.
6. Inspected a list of employees with card key access to the data center and tape storage room from the card security system and an organizational chart showing employees requiring access to the data center and tape storage room and determined that physical access to the OIT data center was restricted to authorized employees only.
7. For a selection of employees and contractors granted access to the data center, inspected the iET record for granting access and determined that access was approved by the data center manager.
8. For a selection of dates, inspected visitor logs and determined that visitor logs were used.
9. For a selection of dates, inspected the One Day Badge logs and determined that an inventory of vendor badges was performed.
10. Inspected documentation of the monthly review of physical access privileges to the data center and determined that access privileges were reviewed.
11. Inspected documentation of the annual recertification of physical access privileges to the data center and determined that access privileges were recertified.
12. Observed Manage Engine OP Manager and HP Site Scope, and determined that these applications are installed and in use by OIT staff.

13. Observed variance monitoring logs and determined that they automatically generated alerts from HP's Site Scope and determined that the application provided monitoring over websites, FTP servers, and web servers and that OIT staff reviewed these logs and alerts.
14. Observed the Andover monitoring application and determined that the application was installed and used to monitor OIT data center environmental conditions.
15. Observed the OIT data center and determined that sprinklers, hand-held fire extinguishers, and raised floors were present.
16. Inspected completed maintenance work orders and inspection reports for the uninterruptible power supply (UPS), and the emergency power generator and determined that the generator and UPS were maintained.
17. Observed deployed environmental controls determined that environmental controls were present.
18. Observed the Oracle system operations manuals and determined that the manuals were available to support personnel.
19. Observed internal application setup and security documentation, as well as various manuals and documentation produced by Oracle Corporation and determined that Oracle support personnel had adequate access to materials.
20. Observed PRISM application setup and security documentation and system manuals and determined that documentation was available to support personnel.
21. Inquired of management and determined that the PRISM Support Team fielded calls for incidents related to PRISM.
22. Inspected ARC's maintenance agreement for webTA and determined that it was current.
23. Inspected a nightly backup schedule of the production system backups and determined that nightly differential and weekly full tape backups had been performed.
24. Observed the Iron Mountain SecureSync website and determined if WebTA monthly backup tapes were sent to a long-term offsite facility.
25. Inspected the GovTrip incident escalation procedures and determined that if TSD staff cannot resolve an issue they escalate the issue to NGMS.
26. Inspected ARC's maintenance agreement with moveLINQS and determined that it required moveLINQS to provide software and technical support for moveLINQ.
27. Inspected RSB System Administrators escalation procedures and determined that when an RSB Administrator cannot resolve an issue, they escalate the issue to mLINQS.
28. Inspected the agreement with the offsite storage vendor and determined that a formal agreement was in place for the offsite storage of data in real time.
29. Observed the Iron Mountain SecureSync and determined that backups for weekly backup tapes are stored at the offsite.

No exceptions noted.

Control Objective 20 – Records Maintenance

Controls provide reasonable assurance that source document files are retained and safeguarded in accordance with ARC and BPD's Records Management Office policies and procedures.

Description of Controls

moveLINQ

OIT performs backups of specified distributed systems and applications as identified by the data owners. These backups are performed by the guidelines set forth in the Standard Operating Procedures. Once the backups have been completed, the media can be moved to an alternate facility as long as the data is encrypted. Once media is identified as needing to be moved off-site, Enterprise Infrastructure Branch (EIB)/Data Archival and Retrieval Team (DART) is notified with the specified media ID numbers and the desired retention period. EIB/DART will remove the specified media from the tape library and send it to the Public Debt Warehouse and Operations Center (PDWOC) in sealed containers. The location of media is tracked by the various systems that create the images on the media using data backup utilities. In addition, EIB/DART maintains copies of all transmittal sheets that list the media sent in each shipment. Once a week media is picked up and returned by the off-site storage provider. Long-term offsite storage is provided through a contract. Authority to recall tapes from off-site is limited to those individuals identified on a list maintained by the off-site storage provider.

Based on the requirements for the data in the accounting, procurement and relocation systems, backup tapes are created daily, weekly, and monthly. Daily backups are retained onsite for four weeks in the data center tape vault. Weekly backups are retained for eight weeks onsite and monthly backup tapes for two years to indefinitely depending on the data contained, are stored offsite with a tape storage vendor. For the HR time clock system tapes are created weekly and stored off site for two to eleven years depending on the data.

When tapes are returned from long-term storage, OIT reconciles the shipment that they have received to their records of the tapes expected to be returned.

On an annual basis, OIT performs a full physical inventory of all backup tapes that are in BPD's possession, both at the data center tape library in Parkersburg, West Virginia and at the PDWOC.

Network File Servers

Differential tape backups of network servers are created daily. On a weekly basis, OIT completes a full back up of all ARC shared network files to a data tape. OIT retains the backup tapes for five weeks.

Record Storage

CA Records Manager is a National Archives and Records Administration (NARA) approved records storage system used by ARC. Hard copy data records are kept in folders and/or binders on-site for one or two years. When hard copy data records are ready to be transferred off-site, they are either stored in boxes or they are scanned and stored electronically.

Data records that will be retained in hard copy are packed into boxes and sent to off-site storage. Prior to sending the boxes off-site, a description of the data being stored in the box, including the box's latest document date, and approved retention authority is entered into CA Records Manager. BPD's Records Management Office approves the box for storage and produces a label that is placed on the box. The label includes a unique box number, bar code and box description.

The destruction date is calculated using the approved retention period and the latest document date.

Hard copy data records may also be scanned and saved electronically in CA Records Manager. Data records are stored in CA Records Manager folders based on the data's calculated destruction date using the approved retention period and the latest document date. This method provides for quicker access to archived data.

For relocation documents, active hard copy records are locked after hours. Inactive and closed hard copy records are maintained in a locked onsite storage room.

Tests of Operating Effectiveness and Results of Testing

1. Observed the online tape management system and determined that data was encrypted prior to being written to tape and sent off site.
2. Inspected a list of individuals with authority to recall tapes from offsite storage and their job descriptions and determined that authority to recall tapes was commensurate with job responsibilities.
3. Observed the online tape management system and contingency site Tape Manifests and determined that tapes were kept at three separate locations.
4. Inspected the agreement with the offsite storage vendor and determined that a formal agreement was in place for the offsite storage of media.
5. Observed Operations Personnel step through the process of opening received packages of tapes from Iron Mountain and determined that they compared the contents of the package to the tape management records.
6. KPMG could not inspect the full physical inventory documents of all backup tapes that were in BPD's possession since the physical inventory was scheduled for September 2012.
7. For a selected network file server used by ARC, inspected system-generated backup schedules and backup logs and determined that daily differential backups and weekly full backups of the file server were scheduled and successfully completed.
8. Observed the location of the on-site hard copy records and determined that the hard copy records were stored on-site in folders for specified time period.
9. Inspected an example of a hard copy records offsite shipment box and determined that appropriate descriptions were documented.
10. Observed hardcopy records scanned into the CA Records Manager and determine that they were scanned.
11. Inspected hard copy records destruction logs and determined that the log identifies the hard copy records that were destroyed, date approved, and approved by Manager of the files
12. Observed the CA Records Manager system and determined that the records could be created, requested, and saved electronically using CA Records Manager, which was maintained by ASB.
13. Observed the location of the active hard copy data records and determined that the hard copy records were locked after hours.
14. Observed the location of the inactive hard copy data records and determined that the hard copy records were stored in a locked onsite storage room.

15. Inspected the list of authorized individuals that had access to the onsite storage room and determined that only authorized individuals had access.

No exceptions noted.

**V. OTHER INFORMATION PROVIDED BY THE
BUREAU OF THE PUBLIC DEBT**

CONTINGENCY PLANNING

System Back Up

The Oracle Federal Financials (Oracle) accounting system has a contingency plan managed by the Administrative Resource Center (ARC). There is a formal ARC Business Continuity Plan (BCP), which was last updated in January 2012. All essential Oracle functions will be performed with the support of ARC employees. Full disaster recovery testing is performed on an annual basis in conjunction with the Bureau of the Public Debt's (BPD), Office of Information Technology (OIT), Data Center's Disaster Recovery Plan (DRP). The Oracle primary database servers, located at Oracle on Demand's primary site in Austin, TX, are replicated near real time using Data Guard to a contingency location. Oracle's Network File System (NFS) serves as the secondary back up of live data for the application. Data from the NFS is sent to tape back-up twice weekly and stored at an offsite location. These tapes serve as a tertiary back-up.

OIT performs differential backups of the moveLINQ production database nightly and performs a full tape backup weekly. The nightly backups are kept on-site for four weeks. The monthly full backup tapes are sent to a long-term off-site facility for two years. The moveLINQ application is tested annually using a table top exercise.

NGMS is responsible for system backup of GovTrip and maintains data in their Business Data Warehouse for six years and three months.

Internet Payment Platform (IPP) data is stored and backed-up on the storage area network (SAN) and replicates every 5 minutes between EROC (East Rutherford Operational Center) and Dallas. Federal Reserve Bank of Boston (FRBB) does a disaster recovery exercise for contingency planning, typically in February, to test the failover of IPP from their hosting facility in EROC to Dallas. The test ensures that the application successfully moved to Dallas, but does not require agencies to point to a different IP address in Dallas to submit a file due to its manually intensive nature.

Continuity of Operations

A fire alarm and sprinkler system that is managed, maintained, and tested by the building management protects ARC and OIT facilities. Alarms are active 24 hours a day, 7 days a week, and are tied to a local alarm services company for spontaneous notification. Sprinkler heads are located in the ceiling of each room of the buildings. This is a "wet pipe" (always charged with water) system with individual heads that discharge water.

In the event the main building becomes inoperable, network operations would be relocated to the Kansas City Regional Operations Center (KROC) facility in accordance with the OIT data center's DRP. This facility employs a "warm site" strategy for recovery of network operations.

As part of the ARC BCP, should ARC facilities become unavailable, essential ARC personnel will relocate to established telework locations to reestablish their essential functions.