

Board of Governors of the Federal Reserve System

**REPORT ON THE AUDIT OF
THE BOARD'S USE OF AND CONTROLS
OVER PURCHASE CARDS**



OFFICE OF INSPECTOR GENERAL



BOARD OF GOVERNORS
OF THE
FEDERAL RESERVE SYSTEM
WASHINGTON, D. C. 20551

OFFICE OF INSPECTOR GENERAL

May 31, 2002

The Honorable Edward M. Gramlich
Administrative Governor
Board of Governors of the Federal Reserve System
Washington, DC 20551

Dear Governor Gramlich:

We are pleased to present our *Report on the Audit of the Board's Use of and Controls Over Purchase Cards* (A0109). Our audit objectives were to evaluate the purchase card program's internal controls, goals and objectives, and cardholder's compliance with current policy, and to determine whether procedures for issuing cards and ensuring proper use were adequate.

Overall, we found that existing internal controls over the purchase card program for the Board of Governors of the Federal Reserve System (Board) are generally adequate. We did not find any unauthorized purchases (such as making travel-related purchases, obtaining cash advances, or making personal purchases) among the transactions reviewed as part of our sample. Cardholders were complying with the Board's written procedures regarding documentation and record keeping and had received initial training and instructions on the card's use. We also found that the Board's monthly payments to Bank of America were timely. We did not find any indication that the program was out of compliance with the terms of the contract with Bank of America or the interagency agreement with the Department of Interior.

Notwithstanding these conclusions, we believe that opportunities exist for the Board to enhance the program's effectiveness and further improve the control structure. We found that the volume of purchase card transactions and the number of cardholders remain low and that existing dollar limits may not be sufficient to meet all divisions' requirements. We also found transactions made by Procurement staff that we believe should have been made by individual cardholders. As a result, the program is not maximizing the objective of reducing administrative costs for small purchases. In addition, we found that cardholders did not completely reconcile transactions and that processes within the Management Division were insufficient for identifying active cardholders and promptly deactivating accounts.

The findings, conclusions, and recommendations in this report differ from those in our recent *Report on the Audit of the Federal Reserve Board's Government Travel Card Program*. In our travel card audit report, we concluded that controls needed to be strengthened and we recommended, among other things, that the Staff Director provide additional guidance regarding the travel card's use, decrease dollar limits associated with the cards, and periodically review the need for employees to retain travel cards. During our current audit, however, we found that

internal controls over purchase cards are generally stronger than over travel cards. For example, purchase card acquisitions are reviewed by the cardholder's manager prior to payment by the Board, unlike travel card transactions which are paid by individuals without supervisory review. Our government travel card audit also identified potentially inappropriate purchases (such as acquiring personal items) whereas our sample of purchase card transactions did not identify any unauthorized purchases. We therefore believe that the current controls over the Board's purchase card program, combined with the enhancements recommended in this report, provide an internal control framework sufficiently robust to support expanding the purchase card program.

Our report contains three recommendations designed to expand the use of the program and further reduce administrative burden, enhance the reconciliation process, and accurately identify current cardholders and promptly retrieve and deactivate purchase cards when they are no longer needed. We provided a copy of our report to the Director of the Management Division for his review and comment. In his written response, the director generally agreed to take action on all of our recommendations.

We have provided copies of this report to selected Board managers and staff. The report will be added to our public Web site and will be summarized in our next semiannual report to the Congress. Please contact me if you would like to discuss the audit report or any related issues.

Sincerely,



Barry R. Snyder
Inspector General

cc: Vice Chairman Roger Ferguson
Governor Mark Olson
Mr. Stephen Malphrus

Board of Governors of the Federal Reserve System

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BACKGROUND

In 1995, the Board of Governors of the Federal Reserve System (Board) adopted a program to use credit cards for small purchases. The Board's purchase card program is part of the governmentwide commercial credit card program administered by the General Services Administration (GSA). The objective of the governmentwide program, known as GSA SmartPay, is to provide an alternate procurement mechanism that streamlines the manual approval and accounting processes that can be required to make even the smallest purchases of products and services. By enabling authorized employees to make charges within preset limits, the purchase card program allows agencies to expedite acquisitions, streamline payment procedures, and reduce administrative costs.

Contractual Requirements and Board Policy

To implement its SmartPay program, GSA negotiated contracts with five financial institutions, including Bank of America (BoFA), for providing credit card services to government agencies. The services include fleet use (automobile fuel and services), travel use, and purchase of commercial goods and services. Agencies may choose one or more of these contracts according to their needs. Small agencies are allowed to participate in, or "tag along" on, the contracts of lead agencies. The Board is a tag-along agency on the contract between the Department of Interior (Interior) and BoFA for both the purchase and travel card programs. The Board does not pay a fee for participating as a tag-along agency, but is subject to the terms and conditions of the master contract between Interior and BoFA. The master contract outlines a number of specific requirements for the purchase card program. For example, purchase cards are to be used to pay for official expenses, but cannot be used for renting or leasing land or buildings, cash advances, or travel-related expenses.¹

The Procurement Section (Procurement) in the Management Division's Finance Function has overall responsibility for administering the Board's purchase card program. The Procurement manager serves as the Board's program coordinator and acts as liaison between the Board, BoFA, and the GSA contracting officer. The program coordinator also establishes new purchase card accounts and authorization controls, establishes guidelines and credit limitations, deactivates cards, and provides administrative training related to the program. Guidance for the Board's purchase card program is contained in the *Internal Administrative Procedures Manual (IAPM)* and in the "Internal Operating Procedures," a set of written operating procedures developed by Procurement. The Board's "Acquisition Policy" in the IAPM encourages the use of purchase cards to reduce the administrative costs of acquiring low-cost (purchases at or below \$2,500) standard items and contains general guidance on the program's implementation.² The "Internal Operating Procedures," revised in September 2001, provide more detailed program information and contain additional guidance to implement the master contract's requirements. For example,

¹ Expenditures for conferences and meeting rooms are allowable expenditure.

² The "Acquisition Policy" provisions regarding purchase cards mirror requirements of the Federal Acquisition Regulation (FAR), which governs most executive branch procurements. The Board has independent procurement authority and, therefore, does not fall under the FAR. However, the Board generally observes the spirit and intent of the FAR.

the procedures specify that the card may not be used for (1) travel, cash advances, or entertainment; (2) rental or lease of land or buildings; or (3) purchases of telecommunications (telephone) services. Cardholders are also prohibited from exceeding their authorized single purchase limit. In addition, the procedures establish documentation and monthly processing requirements and require cards to be returned to the program coordinator or an approving official when the cards are no longer needed.

Ninety of the Board's 1,681 employees (5.4 percent) participate in the program. The ninety employees comprise three distinct groups of cardholders: (1) purchasing agents in Procurement, (2) vanpool drivers, and (3) other individuals that have been selected by their division director to be cardholders. For the one-year period ending August 31, 2001, purchase card transactions totaled \$2,320,932, representing about 5 percent of the total procurement transactions during the twelve-month period.

Process Overview

Administration of the purchase card program involves four major processes: (1) issuing cards, (2) approving and reconciling purchases, (3) paying the invoice, and (4) closing accounts. Each of these processes is described in more detail below.

1. Issuing Cards

Each division is responsible for determining which employees need purchase cards based on division-specific criteria. Divisions provide the names to the program coordinator who establishes accounts using BofA's Electronic Account Government Ledger System (EAGLS).³ BofA mails the purchase cards to a Procurement staff member who then issues the cards and provides cardholders with written guidance and verbal instructions on proper use. Credit limits are initially set at \$2,500 per single purchase and \$7,500 per month; division directors can, however, request an increase to these limits. Purchasing agents have higher credit limits in order to make authorized purchases for individual cardholders that would otherwise exceed cardholders' preset credit limit. Vanpool cardholders' purchase limits are \$500 per purchase and \$1,500 per month.

2. Approving and Reconciling Purchases

Each division is responsible for establishing the criteria and procedures for approving purchases. Approvals can be verbal or written, and may include memos, e-mails, or training requests. Cardholders are required to obtain and maintain proper documentation for each purchase and allocate (reconcile) their monthly statement of transactions. To reconcile their accounts, cardholders enter a complete description of the item purchased and the appropriate accounting classification code into EAGLS. An approving official, someone other than the cardholder within each division, is responsible for reviewing the cardholder's monthly electronic statement to verify that purchases are authorized and that a proper accounting and description of purchases have been made.

³ EAGLS is owned, deployed, and maintained by BofA.

3. Paying the Invoice

The Board's purchase card account with BofA is a centrally billed account; that is, all cardholder transactions are consolidated into a single monthly invoice. The Board's Finance Function makes an electronic payment to BofA each month between thirteen and seventeen days from the invoice date. Credits and adjustments to individual cardholder transactions are the responsibility of the cardholder and are reflected on subsequent invoices. The Board receives quarterly rebates from BofA for participating in the program; the rebates are based on the volume of activity and timeliness of payments. For the period January 1 through September 30, 2001, the Board received rebates totaling \$9,455.

4. Closing Accounts

Upon separation or transfer, a cardholder must surrender the purchase card to the cardholder's approving official or to the program coordinator. The program coordinator is responsible for suspending and canceling (deactivating) purchase card accounts. To do this, the program coordinator accesses the cardholder's authorization account in EAGLS and deactivates the account after receiving the card or notification of a separation or transfer.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our overall objective was to evaluate the purchase card program's internal controls. Specifically, we determined the adequacy of procedures for issuing cards and ensuring proper use, evaluated cardholders' compliance with current Board policy, and evaluated the program's goals and objectives.

To accomplish our objective, we interviewed Procurement staff responsible for coordinating the program, Finance and Accounting staff responsible for paying the monthly invoice, and executives at BofA responsible for government card services. We also interviewed eighteen cardholders from thirteen offices and divisions and reviewed a risk-based, judgmentally selected sample of 204 transactions made by these cardholders between August 31, 2000 and August 31, 2001.⁴ In selecting our sample, we considered risk indicators such as weekend/holiday transactions; transactions which appeared to exceed credit limits; and transactions with purchase descriptions that were vague, incomplete or missing. We also compared a list of cardholders to current employees to determine that all cardholders were Board employees. In addition, we obtained information regarding the dollar value of procurement transactions from the Board's financial system. We did not, however, perform tests to verify the accuracy of this information because this was not an objective of the audit. Our fieldwork was conducted between September and December 2001, and was performed in accordance with generally accepted government auditing standards.

⁴ The 204 transactions totaled \$230,926.

FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

Overall, we found that existing internal controls over the Board's purchase card program are generally adequate. We did not find any unauthorized purchases (such as making travel-related purchases, obtaining cash advances, or making personal purchases) among the transactions reviewed as part of our sample. Cardholders maintained sufficient documentation to show that the goods and services acquired were appropriate. Cardholders we interviewed had received initial training and instructions on the card's use and our review of financial procedures showed that payments to BofA were timely. In addition, we did not find any indication that the program was out of compliance with the terms of the contract or the interagency agreement.

Notwithstanding these conclusions, we believe that opportunities exist for the Board to enhance the program's effectiveness and further improve the control structure. We found that the volume of purchase card transactions and the number of cardholders remain low and that existing dollar limits may not be sufficient to meet all divisions' requirements. We also found cardholder transactions that exceeded existing dollar limits as well as transactions made by Procurement that we believe should have been made by individual cardholders. As a result, the program is not maximizing the objective of reducing administrative costs for small purchases. In addition, we found that cardholders did not completely reconcile transactions and that processes within the Management Division were insufficient for identifying active cardholders and promptly deactivating accounts. Our report contains three recommendations designed to expand the use of the program and further reduce Procurement's administrative burden, enhance the reconciliation process, accurately identify current cardholders, and promptly retrieve and deactivate purchase cards when they are no longer needed.

- 1. We recommend that the Staff Director for Management expand the Board's purchase card program by (1) raising the dollar threshold for small purchases, (2) increasing cardholder credit limits, and (3) mandating the purchase card's use by all division staff whenever possible.**

During our audit, we analyzed the growth in the Board's purchase card program as one measure of how well the program is meeting the "Acquisition Policy" objective of reducing administrative costs for small purchases. We found that while the dollar value of purchase card transactions increased by 500 percent during the past five years, the ratio of purchase card transactions to total purchases remains low. Only 5.3 percent of the Board's total purchases for the one-year period ending August 31, 2001, were made with a purchase card. We also found that the number of cardholders, while almost doubling over the past five years, still represents only 5.4 percent of all Board employees. Since seven of these cardholders do not use their card, the percentage of current employees who are active cardholders is actually less than 5 percent of the total Board staff.

Because the purchase card allows division staff to acquire items without involving Procurement, we reviewed the composition of purchase card transactions. For the one-year period included in our review, we found that Procurement's purchasing agents still made 37 percent of all credit card purchases of items costing \$2,500 or less. These purchases represent acquisitions made on behalf

of individuals without purchase cards as well as purchases made for current cardholders. We also found that the purchasing agents processed about \$379,000 in purchase orders under \$2,500 during the same one-year period, even though the “Acquisition Policy” encourages the use of a purchase card for acquiring low-cost items.

In addition, we reviewed purchase card dollar limits to identify opportunities to further enhance the purchase card program. Our analysis showed that the present dollar limits (\$2,500 for most cardholders) may not be sufficient to meet all divisions’ requirements. We found that cardholder purchases of items costing between \$2,500 and \$5,000 represented 13 percent of all purchase card transactions. Slightly over half of these purchases (54 percent) were made by Procurement’s purchasing agents because the transaction dollar amounts exceeded division cardholder limits. The remaining 46 percent represent purchases made by division cardholders who had to request a temporary increase in their credit limit or violated current policy by splitting their transactions in order to complete the purchase. Our review of 204 transactions found seventeen transactions made by three of the eighteen cardholders in our sample that were either split transactions or single transactions that exceeded the cardholder’s daily limit.⁵ These three cardholders routinely purchased items such as office supplies and computer hardware in quantities that caused them to exceed their limits.

Based on this analysis, we believe opportunities exist to further expand the program to maximize the benefits associated with the credit card’s use. The purchase card program offers significant advantages by reducing the time required to purchase an item and by eliminating the paperwork normally required to prepare purchase requisitions and purchase orders. Maximizing the card’s use at the division level also reduces Procurement’s administrative burden and allows the purchasing agents to focus on larger, more complex acquisitions.

The Board can take several steps to further expand the purchase card program while reducing the instances of credit limit violations. The Staff Director should work with division directors to evaluate the program’s use within each division. The evaluation should include the types and volume of purchases routinely made by the division, the number of cardholders required to make those purchases, and the appropriate dollar limits. Based on this evaluation, the Staff Director should raise the \$2,500 standard threshold for small purchases and allow cardholders (with division approval) to request permanent increases to their credit limits. If, for example, the threshold had been set at \$5,000 during the one-year period included in our review, an additional \$800,000 in goods and services that were acquired through purchase orders might have been acquired using a purchase card.

We also believe the Staff Director should mandate the credit card’s use by division staff for all purchases within established dollar limits. The “Acquisition Policy” currently states that the purchasing card should be used “to the maximum extent practicable” within established limits. The policy does not, however, actually “mandate” the card’s use nor does it provide examples of when using the card would not be practicable. While we recognize that some vendors may not

⁵ We discussed the split purchases and purchases exceeding credit limits with Procurement staff. Based on their research, they informed us that some merchants were overriding the cardholder’s dollar limit to complete the transaction. We provided Procurement with a complete list of these transactions for their follow-up and appropriate action.

accept purchase cards, we believe these occasions should be the exception and that few small purchases should require the use of a purchase order. Mandating the card's use by division cardholders would also be in keeping with industry current "best practice."⁶ To help enforce the purchase card's use, the Staff Director could use the Board's Intranet web site to promote the card's advantages (reduced time to acquire an item and reduced paperwork through direct ordering) and remind cardholders that cards are to be used for small purchases. The Intranet could also be used to inform cardholders of the process for requesting increases to their credit limits.

2. We recommend that the purchase card program coordinator periodically monitor cardholder reconciliations and provide guidance as required regarding EAGLS and the reconciliation process.

At the end of each monthly billing cycle, cardholders are required to reconcile the information on their statements online (i.e., using the EAGLS system) by filling in the appropriate accounting classification code and providing a description for each purchase. Providing complete descriptions of purchase transactions helps ensure that only authorized transactions are made. The reconciliation requirement, along with general guidelines, is included in the Procurement "Internal Operating Procedures"; detailed instructions on providing descriptions for purchase card transactions are provided in the "EAGLS Accountholder User Guide" which is available on-line to all cardholders. Procurement staff also discuss the reconciliation process as part of the cardholder's initial training.

Our sample analysis showed that sixty-one out of the 204 transactions reviewed (30 percent) were not completely reconciled. The transactions lacked a description or included only a partial description that did little to indicate what the items were or how they related to the work performed. Cardholders we spoke with gave several reasons for not fully reconciling their transactions. The cardholders stated that they were not aware of the correct way of describing purchases or that they experienced technical difficulties, including being "timed-out" while using EAGLS. We brought these problems to the attention of the Procurement staff during the audit so that appropriate action could be taken.

We believe the program coordinator should conduct quarterly or monthly reviews of reconciled transactions to ensure that the cardholders are providing sufficient information to demonstrate that purchases were authorized transactions. If problems are identified, the program coordinator should provide guidance and refresher training as needed to cardholders who are not following procedures. The guidance could include general reminders about the reconciliation process on the Board's Intranet site or individual training on the use of the EAGLS system. Although all of the cardholders in our sample told us that they received some form of training and guidance when they initially received their card, we believe that periodic refresher training would help reinforce the reconciliation requirement. The program coordinator should also provide guidance to the approving officials to help ensure they are conducting a thorough review of cardholders' statements, to include reviewing the purchase descriptions, prior to payment approval.

⁶ Based on information provided by independent consultants assisting the Office of Inspector General on a separate review pertaining to the Board's Finance Function.

3. We recommend that the Director of the Management Division develop procedures to accurately identify active purchase card accounts, and promptly deactivate and retrieve purchase cards when they are no longer needed.

When we began our fieldwork, Procurement provided us a list of cardholders as of September 2001 to help us select our sample. We reconciled Procurement's list by comparing cardholder names to (1) cardholders with purchase card transactions in the Board's financial system, (2) a list of current employees from the Board's human resources management system, and (3) employee separation data provided by Human Resources.

Our reconciliation showed that Procurement's list was not completely accurate. For example, we identified one cardholder that had separated from the Board in August 2000, but was still listed as a cardholder by Procurement more than a year after separation. (We did not find any indication that the purchase card was used after the cardholder separated from the Board). In another instance, we found that a current employee was assigned a card and had used it, but Procurement had not included this cardholder on its list.

We believe that Procurement's list was not accurate for several reasons. Although Procurement staff informed us that cards are deactivated as soon as they are notified of an employee's separation, a formal process for identifying, retrieving, and deactivating purchase cards in a timely manner does not exist. Procurement does not receive timely notification of employees who leave the Board or who are reassigned to positions that do not require a purchase card, nor does Procurement directly receive all cards that are returned when employees separate or transfer. The "Internal Operating Procedures" give cardholders the option of returning cards to an approving official or to the program coordinator; according to Procurement staff, some employees have even returned cards to Finance and Accounting. In addition, we were informed that some employees receive their cards directly from BofA, so Procurement may not be aware that a new cardholder has received their card.

Maintaining an accurate cardholder list can be an effective control mechanism to verify which employees are current cardholders. Routinely reconciling and updating the list can also help identify separated or transferred employees for prompt deactivation of purchase cards when no longer required. We are concerned that under the current system, the potential exists for cards to remain in circulation and accounts to remain active after cardholders separate or transfer, thus exposing the Board to the risk of paying for unauthorized purchases.

We believe that timely communication within the Management Division will help ensure that all cardholders are accounted for and that cards are promptly returned and deactivated when no longer needed. The program coordinator intends to ask the Human Resources Function to inform Procurement when employees separate from the Board. During our recent audit of the Board's government travel card program, we found that the Board's human resources management system provides Finance and Accounting with an automatic notice of an employee's impending departure.⁷ Procurement staff should be provided with this information so they can either close the purchase card account immediately, or determine an appropriate closure date and program EAGLS to automatically close the account on that date. The Management Division director may

⁷ See our *Report on the Audit of the Federal Reserve's Travel Card Program* (A0011) dated January 2002.

also want to consider amending the “Internal Operating Procedures” to require that cards be returned only to the program coordinator. As an additional measure, we believe the program coordinator should periodically request information, such as employee reassignments or financial transaction reports, from the Human Resources and Finance Functions or directly from the EAGLS system to reconcile their cardholder listing. This will help identify cardholders who may have received their cards directly from BofA or transferred to a new position and no longer require a card. Procurement can then use this information to help locate, retrieve, and deactivate cards.

ANALYSIS OF COMMENTS

We provided a copy of this report to the Director of the Management Division for review and comment. His response is included as appendix 1 to this report. The director’s response indicates agreement with the report recommendations and discusses actions that will be taken to implement the recommendations.

Specifically, the director plans to raise the dollar threshold for small purchases from \$2,500 to \$5,000; increase monthly cardholder credit limits to \$25,000; and require written explanations for any requisitions that could have been procured with a purchase card. In order to improve the reconciliation process, the director intends to provide training to cardholders who request or demonstrate a need for additional training. The Management Division will also review monthly listings to determine which cardholders are not providing complete purchase information. In addition, the division will develop a process to promptly notify Procurement when the status of a cardholder changes. The division will also modify procedures to require the return of purchase cards directly to the program coordinator.

APPENDIXES

Appendix 1 – Division Comments



BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
MANAGEMENT DIVISION

DATE: May 17, 2002
TO: Mr. Snyder
FROM: Bill Jones and Steve Clark *WJC*
SUBJECT: Comments on the OIG Draft Report on the Board's Use of and Controls Over Purchase Cards

Thank you for the opportunity to review and comment on the draft *Report*. The report expresses satisfaction with the use of and controls over Board Purchase Cards. Nevertheless, it contains three recommendations with which we generally concur as discussed below.

- 1) **We recommend that the Staff Director for Management expand the Board's purchase card program by (1) raising the dollar threshold for small purchases, (2) increasing cardholder credit limits, and (3) mandating the purchase card's use by all division staff wherever possible.**

Raise the dollar threshold for small purchases.

Concur. The Management Division agrees that this would be useful and proposes a new limit of \$5,000 per item. To implement this suggestion would require that the \$2,500 limit for purchases without competition be raised to \$5,000.

Increase cardholder credit limits.

Concur. This would logically follow increasing the threshold for small purchases. Increasing this number to \$25,000 a month would be reasonable and more than enough for most cardholders.

Mandate the purchase card's use by all division staff whenever possible.

Concur. The policy will be changed to require a written explanation for any requisition for an item that could have been procured with a purchase card. Nevertheless, we do not see a need to significantly increase the number of people who have a purchase card. Increasing the number of people with a purchase card would greatly increase the oversight required and the complexity of review and approval.

Appendix 1 – Division Comments (con't)

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- 2) **We recommend that the purchase card program coordinator periodically monitor cardholder reconciliation and provide guidance regarding EAGLS and the reconciliation process.**

Concur. Procurement already provides guidance on reconciliation and the use of EAGLS. Procurement has provided training in the use of EAGLS. We have found that most users are not interested in receiving additional training, however, we will provide such training to end users who request it or who demonstrate such a need.

Regarding cardholder reconciliation, we will try to add the capability to see if the monthly notice is opened by the reviewing manager. We will also review monthly listings to determine what cardholders are not providing complete purchase information.

- 3) **Develop procedures to accurately identify active purchase card accounts, and promptly deactivate and retrieve purchase cards when they are no longer needed.**

Concur with the observation that improved procedures are required. The Management Division will develop a process that provides for prompt notice to Procurement of a change in the status of a card holder. Currently, our human resources information system is expected to provide advance notice of an employee leaving the Board or changing jobs so that the card can be retrieved. We will enhance that process as part of a general review of our personnel clearing procedures and procedures to transfer staff from one position to another. Also, procedures will be changed to direct the return of purchase cards to the program coordinator.

CC: Steve Malphrus
Mike Kelly
Bill Mitchell
Don Robinson
Kyle Brown

Appendix 2 – Principal Contributors to this Report

Kyle Brown, Senior Auditor and Auditor-in-Charge

Paul Sciannella, Auditor

Silvia Vizcarra, Auditor

William Mitchell, Senior Program Manager