



**REVIEW OF COMMON PROBLEMS AND BEST PRACTICES IN
FEDERAL AGENCIES' TRAVEL CARD PROGRAMS**

**Inspections and Evaluation Roundtable
President's Council on Integrity and Efficiency**

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ACRONYMS

A/OPC	Agency/Organization Program Coordinator
ATM	Automated Teller Machine
Commerce	Department of Commerce
Education	Department of Education
GAO	General Accounting Office
GSA	General Services Administration
Justice	Department of Justice
Labor	Department of Labor
MCC	Merchant Category Code
OIG	Office of Inspector General
OPM	Office of Personnel Management
SSA	Social Security Administration

EXECUTIVE SUMMARY

The purpose of this report is to aid IG oversight of the Federal Travel Card Program as well as provide useful information to organizations that administer the travel card program. This report synthesizes evaluations and audits of six Federal agencies' travel card programs, including the Department of Commerce, Department of Labor, Department of Education, Department of Justice, Office of Personnel Management, and the Social Security Administration. Although the agencies do not contract with the same bank or organize their travel card programs in the same manner, we were able to identify common issues and best practices among these agencies.

In addition to discussing common weaknesses and best practices, the report provides information on the pertinent terms and conditions of the GSA Master Contract, guidance that should be consulted in assessing a travel card program, the GAO's *Standards for Internal Control*, and the roles and responsibilities of the parties involved in the travel card program.

The following is a list of the common problems identified by Inspector General offices. The best practices to address them are discussed in this report:

- Late identification of misuse and delinquency and failure to provide timely notification
- Failure to monitor transactions for misuse, as well as delinquencies
- Not keeping written records of referrals and follow-up
- Lack of oversight by A/OPCs
- Outdated employee information
- No written policies and procedures
- Cardholders not understanding their responsibilities
- Not disciplining employees who refuse to pay their bills or knowingly make inappropriate charges
- Ineffective blocking of merchant category codes
- Using advances to fund the travel of employees who have lost the use of their cards through delinquency or misuse
- Excessive ATM use
- A large number of inactive accounts

FOREWORD

The President's Council on Integrity and Efficiency (PCIE) and the Executive Council on Integrity and Efficiency (ECIE) were established by Executive Order 12805, May 11, 1992, to

- address integrity, economy, and effectiveness issues that transcend individual government agencies, and
- increase the professionalism and effectiveness of Inspector General personnel throughout the government.

The PCIE is primarily composed of the presidentially appointed IGs. The ECIE is mainly composed of the IGs who are appointed by agency heads. Chairing both councils is the Deputy Director for Management for the Office of Management and Budget. The Chair appoints the Vice Chair from each council to assist in carrying out its functions. Officials from the Office of Management and Budget, Federal Bureau of Investigation, Office of Government Ethics, Office of Special Counsel, and Office of Personnel Management serve on both councils.

To accomplish their missions, PCIE and ECIE conduct interagency audit, inspection, and investigative projects aimed at promoting economy, efficiency, and effectiveness in Federal programs and operations. To enhance the efficiency of these projects, the councils have also developed policies, standards, and approaches that have helped build a well-trained and highly skilled OIG workforce. Because PCIE and ECIE are made up of members from many Federal agencies, these projects can effectively address cross-cutting or government-wide issues of fraud, waste, and abuse.

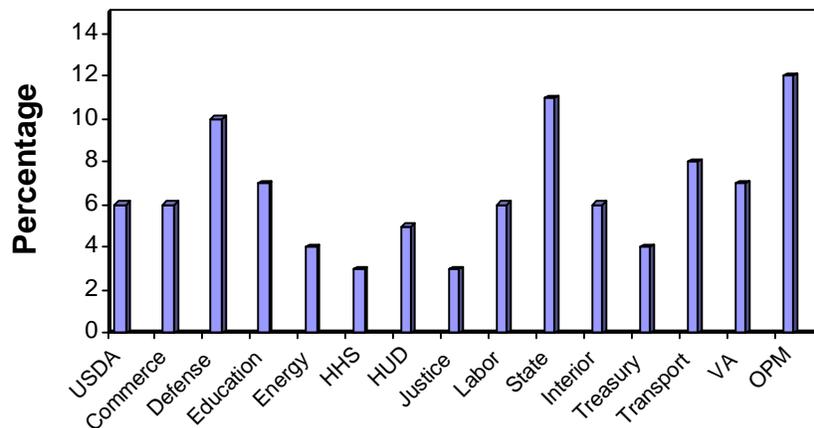
Inspection and Evaluation Committee

The Inspection and Evaluation Committee provides contributions to the Inspector General community as well as the Federal government as a whole by helping to improve (1) the management of Federal programs; (2) the practice of inspections and evaluations by sharing effective practices and insights; and (3) the analytic and administrative skills of OIG inspectors and evaluators by providing training on a variety of pertinent topics. The Committee is supported by a very active Inspections and Evaluation Roundtable. The Roundtable, created in 1993, is generally comprised of the directors or heads of inspection and evaluation units within the Federal Offices of Inspector General. Its purpose is to promote the professional development of employees in those units, improve the practice of evaluation and analysis, and provide positive contributions to the Inspector General community. These advances in professionalism and service aid the Federal government as a whole in improving the management of programs and operations. The Roundtable also serves as an adjunct to the Inspection and Evaluation Committee of the PCIE/ECIE.

INTRODUCTION

Concern over the government's travel card program arose at a May 1, 2001, Congressional hearing before the House Government Reform Committee on Government Efficiency, Financial Management and Intergovernmental Relations. The General Services Administration (GSA) testified that as of March 2001, Federal employees were delinquent in paying more than \$25 million on their travel card accounts.¹ The following chart shows the delinquency rates of twelve Cabinet-level agencies.

**Percentage of Outstanding Total Travel Card Balance
61+ Days Delinquent -- Agency Yearly Average
October 2001 - September 2002**



The Travel and Transportation Reform Act of 1998 (Public Law 105-264) requires government employees to use the Government Travel charge card (travel card) on official business. Government employees must use their travel card to pay for official expenses, such as hotel rooms and airline tickets. In 1998, GSA awarded contracts to four banks (American Express, Citibank, NationsBank and US Bank) to provide travel card services. The GSA contracts set up a point system that allows Federal agencies to receive rebates from the banks based on travel card use. Each Federal agency chooses one of the four banks to provide the services.

The individual cardholder, not the agency, is personally responsible for all travel card payments. Various government regulations and policies, including the Federal Travel Regulations and ethic standards, require that cardholders pay their travel card bills and that the travel card not be used for personal use. In addition, cardholder agreements usually state that by using the card or signing the agreement, the holder enters into a contractual agreement with the bank to pay for the charges incurred and to use the travel

¹ <http://www.govexec.com/dailyfed/0501.050201t1.htm>. Government Executive Magazine -- 5/02/01 "Federal Workers Misuse of Travel Cards."

card only for official travel and official travel-related expenses. Employees are reimbursed by their agencies for travel expenses and are expected to use the reimbursement to pay their travel card bills.

Purpose

The purpose of this report is to aid IG oversight of the Federal Travel Card Program as well as provide useful information to organizations that administer the travel card program. After reviewing the evaluations and audits of six Federal agencies' travel card programs, including the Department of Commerce, Department of Labor, Department of Education, Department of Justice, Office of Personnel and Management, and the Social Security Administration, we were able to identify common weaknesses and best practices among these agencies. The common problems and best practices we identified can apply to all agencies regardless of whether they contract with the same bank or organize their travel card programs in the same manner.

In addition to discussing common weaknesses and best practices, the report provides information on the pertinent terms and conditions of the GSA Master Contract, guidance that should be consulted in assessing a travel card program, the GAO's *Standards for Internal Control*, and the roles and responsibilities of the parties involved in the travel card program.

GSA Master Contract

In 1998, GSA awarded contracts to four banks to provide travel card services. Each agency issued a task order to one of the four banks under a Master Contract. The Master Contract has specific terms and conditions which the bank must adhere to for the suspension and cancellation of the card.

- ❑ **Suspension** – Under the terms of the Master Contract, Section CB.17, the Bank may suspend an account if payment of the undisputed principal amount has not been received 61 calendar days from the closing date on the statement of account in which the charge appeared. Suspended accounts are reinstated by the bank upon payment of the undisputed principal amount.
- ❑ **Cancellation** – Under the terms of the Master Contract, Section CB.18, the Bank may initiate cancellation of an individually billed charge account if:
 1. It is past due 126 days from the closing date on the statement of account in which the charge appeared, **or**
 2. The account has been suspended two times during a 12-month period and is past due again, **or**

3. The card is used for other than authorized purchases and cancellation is approved by the Agency/Organization Program Coordinator (A/OPC).

Guidance

In addition to the GSA Master Contract, Agencies can find guidance on travel card programs in the laws, regulations and policies that concern employee travel. In particular, agencies should review the following when assessing their travel card programs:

- The Travel and Transportation Reform Act of 1998 (Public Law 105-264)
- Federal Travel Regulations, Chapter 301
- Title 5, Code of Federal Regulations, Part 2635, *Standards of Ethical Conduct for Employees of the Executive Branch*
- Agency directives pertaining to travel cards

GAO's Standards for Internal Controls

The Federal Managers' Financial Integrity Act of 1982 requires the GAO to issue standards for internal controls in government. The GAO standards define the minimum level of quality acceptable for internal control in government and provide the basis upon which internal control is to be evaluated. (*Standards for Internal Control in the Federal Government*. November, 1999, GAO/AIMD-00-21.3.1.)

The GAO lists the following five standards for internal control:

- Control Environment** – Management and employees should establish and maintain an environment throughout the organization that sets a positive and supportive attitude toward internal controls and conscientious management.
- Risk Assessment** – Internal controls should provide for an assessment of the risks the agency faces from both external and internal sources.
- Control Activities** – Internal control activities help ensure that employees carry out management directives. The control activities should effectively and efficiently accomplish agency control objectives.
- Information and Communication** – Employees should record and communicate information to management and others within the entity who need it in a form and within a time frame that enables them to carry out their internal control (and other) responsibilities effectively and efficiently.

- ❑ **Monitoring** – Internal control monitoring should assess the quality of performance over time and ensure that audit and other review findings are promptly resolved.

Roles and Responsibilities

Finally, it is important that everyone involved understand his or her roles and responsibilities in the hierarchy of each agency's travel card program.

- ❑ **Departmental Travel Card Program Coordinator** – The Departmental Coordinator is responsible for developing and disseminating Department-wide travel card policies and procedures, monitoring card use, disputes and delinquencies, and representing the Department on Government-wide Travel Card Program workshops and committees. The Departmental Coordinator also serves as the liaison between the A/OPCs, the issuing bank, and GSA.
- ❑ **Agency/Organization Program Coordinator (A/OPC)** – The A/OPC serves as an intermediary between the cardholder, the bank, and the agency's management. The A/OPC is responsible for educating cardholders on the proper use of travel cards, implementing agency policy related to travel card, and reviewing reports and following through on delinquent cardholder accounts and travel card misuse.
- ❑ **Supervisors** – Supervisors are responsible for holding employees accountable for paying their travel card bills on time and taking notice when employees are delinquent or misuse their cards.
- ❑ **Travel Cardholder** – The cardholder is responsible for understanding his or her agency's internal policies and procedures regarding the use of the card and the Cardholder agreement. Cardholder responsibilities also include record keeping, reconciliation, paying his or her monthly statement, reporting lost/stolen cards, and notifying the bank within 60 days of a disputed charge.

COMMON PROBLEMS AND BEST PRACTICES

This list of common problems and best practices was derived from the evaluations and audits of six Federal agencies' travel card programs. The six agencies include the Department of Commerce (Commerce), Department of Education (Education), Department of Justice (Justice), Department of Labor (Labor), Office of Personnel Management (OPM), and Social Security Administration (SSA). If you would like to learn more about a particular problem or best practice, a complete copy of each of the six reports is contained in Attachments 1-6. Please see the Appendix for a listing of all of the reports.

- **Late Identification of Misuse and Delinquency, and Failure to Provide Timely Notification**

A/OPCs should notify supervisors in a timely manner so that supervisors can determine the reasons for the misuse or delinquency, and address the issue with the employee. Timely notification is especially important in cases of delinquency. When the cardholder's supervisor is not notified in a timely manner, the delinquent amount may become so great that the cardholder can not readily pay it. For example, a Justice employee continued to accrue charges over a period of at least four months, resulting in an unresolved delinquency of \$23,139. Early intervention may also reduce the risk of the employee's card privileges being suspended, which can occur when an employee fails to make a payment within 90 days. At 120 days, the bank will cancel a delinquent cardholder account.

Best Practices

- Refer misuse to supervisors as soon as it is detected.
- Refer delinquencies to the cardholder's supervisor at the 60-day point, well before possible suspension of the card and before additional costs can be incurred by the cardholder.

- **Failure to Monitor Transactions for Misuse, As Well As Delinquencies**

Because the banks send out periodic reports listing delinquent cardholders, it is much easier for A/OPCs to identify delinquencies than misuse. Both Education's OIG and OPM's OIG found that A/OPCs in their agencies were only monitoring travel card use for delinquencies. If an A/OPC only monitors delinquencies, employees who misuse their card will not be detected unless they became delinquent.

Labor's OIG found that while A/OPCs did monitor for misuse, they varied greatly in how they identified it. For example, one A/OPC looked for improper store names, such as department stores, and notified the employee and the employee's supervisor if the charge was over \$100. Another A/OPC, in addition to looking for improper store names, looked for use in and around the employee's duty station and notified the agency regardless of the amount.

Best Practices

- ☑ Give program officials access to on-line reports so that they can monitor accounts for misuse.
- ☑ Use the various reports available from the banks to monitor and perform periodic reviews of travel card use to identify misuse.
- ☑ Create an objective standard, such as a checklist, for A/OPCs to use when identifying misuse to ensure that all employees are treated equally. The checklist should contain the types of transactions or patterns of transactions that warrant contacting an employee or an employee's agency, or checking with an employee's travel voucher to ensure that the expenses were incurred on official travel.

▪ Not Keeping Written Records of Referrals and Follow-up

A/OPCs need to keep records of which employees were referred to their supervisors for delinquency and misuse, and require written feedback from the supervisor or employee. As part of Commerce's OIG evaluation, the OIG submitted examples of American Express reports showing delinquencies or charges in question to the appropriate A/OPCs. They asked the A/OPCs to examine the circumstances surrounding the delinquency or use of the card; provide additional information, such as explanations from supervisors and employees; and, provide evidence of actions taken. When the OIG was unable to obtain complete explanations from the A/OPCs, they asked agency heads for the information. Because the OIG was unable to track which employees had been referred to supervisors and what actions the supervisors had taken in response to the referral, the OIG was unable to determine whether supervisors were reviewing monthly reports and halting card misuse.

Records of referrals and written feedback not only provide a check on the supervisors to ensure that they are following up on the situation, they also provide a method for determining how well A/OPCs are monitoring transactions. Written records also are important if the situation warrants disciplinary action against a cardholder or canceling a travel card due to repeated misuse.

Best Practices

- ☑ Keep written records of the employees who were referred to supervisors for misuse and delinquency and the circumstances surrounding the referral.
- ☑ Require written follow-up from either the supervisor or the cardholder explaining how the situation has been handled.

▪ **Lack of Oversight by A/OPCs**

A/OPC supervisors should ensure that A/OPCs follow up on specific delinquencies and individuals who misuse their cards. Supervisors may also want to periodically review reports and contact A/OPCs when they notice unresolved delinquencies or blatant misuse. At Justice, the Federal Bureau of Investigation (FBI) coordinator is provided with reports on FBI employees whose accounts are 100 days past due and personally pursues any delinquencies that appear on the report. The supervisor stated that this oversight is valuable because it keeps him aware of what is going on in the field and it puts both A/OPCs and supervisors on notice that their actions are being scrutinized.

In response to Labor's OIG report, the Department decided to provide more A/OPC oversight. Delinquency rates for the accounts managed by each A/OPC will be provided to the A/OPC and the A/OPC's supervisor on a recurring basis. In addition, the Department coordinator and another designated employee will perform random reviews of travel card accounts to determine if the A/OPC is properly monitoring the program.

Best Practice

- ☑ Monitor the delinquency rates of each A/OPC and periodically review reports to ensure that the accounts are being properly monitored.

▪ **Outdated Employee Information**

Updating employee information on a regular basis improves the accuracy of travel card reports, which is important to effective monitoring of travel card accounts. Evaluations by both the OPM and Education OIGs found that the travel card accounts of separated employees were not cancelled in a timely manner. OPM's OIG found that 46 terminated employees still had active cards at the time of their evaluation. Two of those 46 employees used their cards after their termination dates. Transaction history shows charges or ATM withdrawals totaling \$793. The charges were paid in full.

Justice's OIG report highlighted the FBI's practice of sending the bank a monthly update of employee's name and address changes from its personnel records. The bank then uses this information to update its information. This saves the A/OPCs from monitoring or tracking down employees who no longer work in their divisions.

Best Practices

- ☑ Establish a regular schedule for sending a list of all open travel accounts to program staff, so that they can review the lists and notify the A/OPCs which accounts need to be closed.
- ☑ Send the bank a monthly update of names and address changes from the personnel system.

▪ **No Written Policies and Procedures**

Written policies and procedures are a critical element to any Department's Travel Card Program. They are needed to provide guidance and ensure that the program is administered consistently. Without written policies and procedures, there is an increased risk for inconsistencies, abuse or misuse of the travel card, and higher delinquency rates. Labor's OIG found that the lack of guidance provided to A/OPCs resulted in employees being treated differently depending on which A/OPC monitored their account. In response to the OIG's report, the Department issued A/OPCs specific instructions on managing delinquencies and misuse. The instructions included a list of transactions that may indicate misuse and when and how an employee and/or supervisor should be notified of misuse and delinquencies.

Best Practice

- ☑ Develop written policies and procedures that include individual responsibilities, bank responsibilities and the oversight responsibilities of A/OPCs, immediate supervisors and management. The procedures should also cover charge card privilege reinstatement, what to do in cases of suspected fraud, cancellation procedures for terminated employees, and employee penalties for abuse or misuse of the travel card.

▪ **Cardholders Not Understanding Their Responsibilities**

The bank includes a cardholder agreement when it mails the travel card to the employee; however, employees need additional guidance to ensure that they are aware of all their responsibilities under the program, the prohibition against personal use of the travel card, and the disciplinary actions that may be taken for inappropriate use of the card. The Justice, Education and Labor OIGs found that their respective Departments did not provide formal training for new cardholders

or refresher training for current cardholders. Cardholders rarely receive guidance unless they become delinquent or misuse their cards.

GSA has on-line training available for the travel card program. The course can be accessed through the Internet, requires about an hour to complete, and concludes with a quiz. Participants can print a certificate to demonstrate that they have successfully completed the course. Departments could use this course, or develop one of their own, to ensure that travel cardholders are aware of the requirements of the travel card program. If Departments do not want to use an on-line course, information on the travel card program can be provided at orientation programs or ethics classes.

Departments may also want to develop materials such as a “Do’s and Don’ts” list or “Frequently Asked Questions” to place on a Departmental website or give to employees to use as a reference. In addition to employees knowing their responsibilities, they should be aware that their transactions are being reviewed, and what actions will be taken if they misuse their cards or are delinquent.

Best Practices

- Require employees to take an on-line training course on the travel card program. Current cardholders, as well as new cardholders, should complete the course.
- Provide information on the travel card program during current orientation programs or ethics classes.
- Develop and distribute materials such as a “Do’s and Don’ts” lists and “Frequently Asked Questions” to all employees to use as a reference when they have questions.

▪ Not Disciplining Employees Who Refuse to Pay Their Bills or Knowingly Make Inappropriate Charges

Managers need to communicate and enforce a zero tolerance policy for travel card delinquencies and abuses. Employees who use their travel reimbursements for purposes other than paying their bills are misusing Department money, and employees that make inappropriate charges are misusing their travel card privileges for personal gain. For example, the SSA’s OIG noted that at SSA when an employee’s travel card becomes delinquent, SSA sends a notification to the cardholder to pay the delinquent account. In addition, the appropriate Deputy Commissioner and travel-authorizing official are informed. The delinquency notification is placed in the employee’s file for one year. According to SSA, these letters are effective in getting employees to pay their delinquent accounts.

To implement effective discipline for charge card delinquencies and employees who misuse their travel cards, Departments need to develop and disseminate a written policy that outlines specific disciplinary actions ranging from oral reprimand to dismissal, as well as guidance on mitigating factors that would preclude disciplinary action.

While first-line supervisors can resolve most instances of delinquency or misuse, upper management should be made aware of unresolved delinquencies or of serious or frequent misuse when the first-line supervisor has not resolved the problem. This not only helps hold the first-line supervisor accountable for taking action, it also helps alert management to systematic or serious problems. Departments should also implement a mandatory referral policy that covers when employees' unresolved delinquencies and frequent or serious misuse needs to be referred to internal affairs units or the OIG.

Best Practices

- Apply appropriate and consistent discipline to employees who are delinquent or misuse their travel cards.
- Develop and disseminate a written policy that outlines specific disciplinary policies as well as mitigating factors.
- Alert upper management in instances where the first-line supervisor has not resolved delinquencies or serious or frequent misuse.
- Implement a mandatory referral policy that covers when employees' delinquency or misuse must be referred to internal affairs or the OIG.

▪ Ineffective Blocking of Merchant Category Codes

Banks can block certain MCC codes on travel card accounts thereby preventing the travel cards from being used at certain merchants. Education's OIG found that in FY 2001, 618 charges totaling \$93,642 were made to MCCs that were subsequently blocked. The Commerce's OIG also found numerous instances where employees used their travel card at retail establishments not normally associated with official travel expenses.

Best Practice

- Work with the bank to place appropriate and effective MCC blocks on employee travel cards.

- **Using Advances to Fund the Travel of Employees Who Have Lost the Use of Their Cards Through Delinquency or Misuse**

Some employees whose cards have been cancelled or suspended due to non-payment or misuse are still required to travel as part of their job. While an employee may use a Government Travel Request to pay for airline tickets or other types of transportation, employees should not be given cash advances for lodging and incidental expenses. Providing cash advances not only counteracts the benefits derived by the Department from having a travel charge card program in place, but it also fails to penalize employees for irresponsible actions. It also reduces the incentive for employees to avoid having their cards canceled.

Best Practice

- ☑ Require employees who cannot use their travel cards due to delinquency or misuse to pay their travel expenses with cash or personal credit cards.

- **Excessive ATM Use**

The Automated Teller Machine (ATM) cash advance feature of the travel card program allows travelers to obtain cash advances to pay for official expenses that cannot be charged to the card. ATM withdrawals are allowed only when authorized for official travel and are limited to the estimated amount of the traveler's meals and incidental expenses, such as taxis, and other miscellaneous expenses that cannot be charged. Because allowable advances vary from trip to trip, it is not feasible to place physical controls over ATM withdrawals to ensure that employees are only withdrawing the correct amounts. It is also difficult to initiate controls to ensure that withdrawals are made only when a cardholder is in travel status. Therefore, ATM withdrawals are subject to abuse.

Best Practice

- ☑ Analyze employee's patterns of delinquencies and inappropriate ATM access and assess whether the benefits of ATM use outweigh the costs (delinquencies stemming from ATM use, as well as ATM fees and surcharges associated with ATM withdrawals, both authorized and unauthorized). If the costs outweigh the benefits, agencies should eliminate ATM access.

- **A Large Number of Inactive Accounts**

Depending on a Department's criteria for issuing employees travel cards, employees who travel infrequently may have open accounts. Education's OIG noted that many employees had travel cards, but were not frequently traveling. Justice's OIG found that some of the delinquencies contained in their sample were

made by cardholders who traveled infrequently and were unable to resist using the available credit to make ATM withdrawals or inappropriate purchases. For example, one Justice employee whose delinquency was in excess of \$8,000, including personal charges and ATM withdrawals, told her A/OPC that she voluntarily called the bank and canceled her travel card because of her inability to control her spending.

Best Practices

- Review inactive accounts and determine if some of them should be closed.
- Assess travel requirements and consider not issuing cards to employees who rarely travel.
- Consider having administrators maintain custody of travel cards when employees are not in travel status.

Conclusion

The list of common problems and best practices addresses crosscutting or government-wide issues of fraud, waste and abuse. While this list may not be exhaustive, it is an excellent place for other IGs and program managers to start when evaluating their own agency's travel card programs. We believe that by adopting these best practices, Federal agencies can strengthen their travel card programs and reduce travel card misuse and delinquency.

APPENDIX

**Listing of Inspector General
Reports**

Appendix – Office of Inspector General Reports

Department of Commerce:

Departmental Travel Expenses Need Better Control and Oversight. Audit Report No. EAD-7129-5-0001, September 1995 (See Attachment 1.)

Department of Education:

Audit of Controls Over Government Travel Cards. ED-OIG/A19-B0010, March 2002 (See Attachment 2.)

Department of Justice:

Review of Travel Charge Card Delinquencies. Report No. I-2001-001, March 30, 2001 (See Attachment 3.)

Department of Labor:

Evaluation of the Department of Labor's Travel Card Program – OCFO and OASAM. Report No. 2E-07-001-0001, March 26, 2002 (See Attachment 4.)

Evaluation of the Department of Labor's Travel Card Program – Office of Inspector General. Report No. 2E-09-910-0001, March 26, 2002

Evaluation of the Department of Labor's Travel Card Program – Pension and Welfare Benefits Administration. Report No. 2E-12-001-004, March 26, 2002

Evaluation of the Department of Labor's Travel Card Program – Veterans' Employment and Training Service. Report No. 2E-02-001-0001

Office of Personnel Management:

Report on Audit of Internal Controls Over The Office of Personnel Management's Travel Card Program. Report No. 4A-CF-00-01-102, November 15, 2001 (See Attachment 5.)

Social Security Administration:

Congressional Response Report, The Social Security Administration's SmartPay Program. Report No. A-13-02-22059, November 2001 (See Attachment 6.)