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Information Report: International Boundary and Water Commission, United States and Mexico, U.S. Section, 2025 Purchase Card Risk Assessment

INFORMATION REPORT

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SUMMARY OF REVIEW

The Government Charge Card Abuse Prevention Act of 2012,¹ as implemented by Office of Management and Budget (OMB) Circular A-123, Appendix B,² requires the Office of Inspector General (OIG) to conduct periodic risk assessments of agency purchase and travel card programs. OIG conducts these assessments to identify and analyze the risk of illegal, improper, or erroneous purchases and payments and to determine the appropriate scope, frequency, and number of periodic audits of these programs.³

To assess risk associated with the purchase card program at the International Boundary and Water Commission, United States and Mexico, U.S. Section (USIBWC), OIG reviewed USIBWC's FY 2024 purchase card data and concluded that the risk of illegal, improper, or erroneous purchases and payments within the USIBWC purchase card program was "low." OIG based its conclusion on the USIBWC purchase card program size, internal controls, training, previous audits, and observations from OIG's Office of Investigations (INV).

Because OIG concluded that risk to the purchase card program was "low," OIG is not recommending that an audit of the USIBWC purchase card program be included in OIG's FY 2027 work plan. However, OIG encourages USIBWC officials to continue prudent oversight of the purchase card program and ensure that internal controls intended to safeguard taxpayer funds are fully implemented and followed by USIBWC purchase card holders.

OBJECTIVE

OIG conducted this risk assessment to establish the risk of illegal, improper, and erroneous purchases and payments within the USIBWC purchase card program and to determine the appropriate scope, frequency, and number of audits that should be conducted on the basis of the aforementioned risk assessment.

BACKGROUND

The Government Charge Card Abuse Prevention Act of 2012, as implemented by OMB Circular A-123, Appendix B, requires OIG to conduct periodic risk assessments of agency purchase and travel card programs. OIG conducts these assessments to identify and analyze the risk of illegal, improper, or erroneous purchases and payments and to determine the appropriate scope, frequency, and number of periodic audits of these programs.⁴ In addition, OMB Circular A-123, Appendix B, outlines OIG risk assessment requirements as well as additional required internal

¹ Public Law 112-194 (October 5, 2012).

² OMB Circular A-123, "Management's Responsibility for Enterprise Risk Management and Internal Control" (July 15, 2016), Appendix B, "A Risk Management Framework for Government Charge Card Programs" (August 27, 2019).

³ Public Law 112-194, Sec. 2 § 1909(d)(1) and Sec. 3 (h)(3), codified at 41 U.S. Code § 1909(d)(1), 5 U.S. Code § 5701, note, "Requiring Use of Travel Charge Card," (h)(3).

⁴ Ibid.

controls for agency charge card programs. Furthermore, OMB issued guidance⁵ that prescribes policies and procedures regarding how agencies should maintain internal controls to reduce the risk of fraud, waste, and error in government charge card programs.

The 2025 risk assessment of the USIBWC purchase card program, which covers FY 2024 spending data, is the 12th risk assessment of USIBWC charge card programs that OIG conducted.⁶ USIBWC officials reported that in FY 2024, 27 purchase card holders made purchases totaling \$1,820,363.

The purpose of this information report is to convey the results of this risk assessment and promote the timely implementation of management practices that will result in the sound stewardship of U.S. taxpayer dollars. See Appendix A for additional details on the purpose, scope, and methodology of this risk assessment.

RESULTS

Criteria Ratings

On the basis of documentation and information that USIBWC officials provided, OIG determined that USIBWC generally complied with required internal controls for the purchase card program. Specifically, 65 percent (51 of 78) of the internal controls that OIG assessed complied with established criteria,⁷ including 74 percent (32 of 43) compliance with internal controls specific to purchase cards. Because most assessed internal controls complied with established criteria, OIG assigned USIBWC a risk rating of “medium” for the internal control criterion.

OIG rated the availability of training and the incorporation of training into USIBWC policies as “low” risk. USIBWC’s “SmartPay Purchase Card Manual”⁸ includes specific guidance related to initial and refresher training for cardholders and approving officials as well as record retention requirements and potential consequences of failure to meet established training requirements.

With respect to the previous audits criterion, OIG has not recently audited the USIBWC purchase card program. However, in FY 2019, USIBWC conducted an internal review of purchase card procurements from May 1, 2018, through December 31, 2018. The results of the FY 2019 internal review generally demonstrated that USIBWC had installed a framework in compliance with agency purchase card policy. The internal review also identified some areas for improvement. Therefore, OIG assigned a “medium” rating for the previous audits criterion.

⁵ OMB Circular A-123, Appendix B.

⁶ Public Law 112-194, Sec. 3 (h)(3), codified at 5 U.S. Code § 5701, note, “Requiring Use of Travel Charge Card,” (h)(3), states that a periodic review is required only for travel card programs with spending of more than \$10 million. In 2025, OIG evaluated only USIBWC’s purchase card program because the travel card program had less than \$10 million in spending in 2024, which is below the threshold requiring an assessment.

⁷ See Appendix A of this report for details on the criteria used.

⁸ USIBWC SD.I.06057-M-1, “SmartPay Purchase Card Manual” (July 20, 2020).

In addition, consultation with OIG’s INV forensic auditors did not identify significant systemic issues related to USIBWC’s purchase card data. As a result, OIG assigned a risk rating of “low” for the INV observation criterion. The individual criterion ratings and overall combined rating are shown in Table 1.

Table 1: 2024 Risk Rating by Criterion

Criterion	2024 Rating
Internal Controls	Medium
Training	Low
Previous Audits	Medium
INV Observation	Low
Combined	Medium*

*OIG assigned numeric values to individual criterion ratings and averaged the total to identify a combined rating. Criteria rated as “low” risk were assigned a numeric value of 1; criteria rated as “medium” risk were assigned a numeric value of 2; criteria rated as “high” risk would have been assigned a numeric value of 3.

Source: OIG-generated based on its analysis of USIBWC FY 2024 purchase card program information and documentation.

Impact and Likelihood Factor

USIBWC officials reported that 27 purchase card holders made purchases totaling \$1,820,363 in FY 2024. Because the dollar value of total purchases made was between \$1 million and \$10 million (“medium” impact) and the number of USIBWC purchase card holders was fewer than 250 (“low” likelihood), OIG determined that the overall impact and likelihood was “low,” as shown in Table 2.⁹

Table 2: Impact and Likelihood Factor

		2024 Rating
Impact	\$1.820 million	Medium
Likelihood	27 cardholders	Low
Impact and Likelihood Factor		Low

Source: OIG-generated based on its analysis of USIBWC purchase card program information and documentation related to total USIBWC purchases in FY 2024 and the number of purchase card holders.

Risk Assessment

OIG determined that the overall risk of illegal, improper, or erroneous purchases and payments within the USIBWC purchase card program was “low.” On the basis of this assessment, OIG is

⁹ Refer to Appendix A of this report, Tables A.1 and A.2, for OIG’s methodology in determining the impact and likelihood factor.

not recommending that an audit of USIBWC's purchase card program be included in OIG's FY 2027 work plan. However, OIG encourages USIBWC officials to continue prudent oversight of the purchase card program and ensure that internal controls intended to safeguard taxpayer funds are fully implemented and followed by USIBWC purchase card holders.

APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

The Office of Inspector General (OIG) performed this risk assessment from July to September 2025. The objectives of this assessment were to establish the risk of illegal, improper, and erroneous purchases and payments within the International Boundary and Water Commission, United States and Mexico, U.S. Section (USIBWC), purchase card program and to determine the appropriate scope, frequency, and number of audits that should be conducted on the basis of the aforementioned risk assessment. To perform the risk assessment, OIG considered the USIBWC purchase card program size, internal controls, training, previous audits, and OIG Office of Investigations (INV) observations. OIG conducted the risk assessment using industry standard principles for risk management.¹

This risk assessment was not an audit and was not conducted in accordance with generally accepted government auditing standards. The results of the risk assessment should not be interpreted to conclude that a purchase card program with lower risk is free of illegal, improper, or erroneous purchases or payments or that internal control deficiencies do not exist. Conversely, a higher risk program may not necessarily signify illegal, improper, or erroneous purchases or payments—only that the program’s conditions are conducive to those activities.

Regardless of the risk assessment results, if the purchase card program were to be audited, an audit team might identify such issues through independent testing of purchase card data. For example, a purchase card program may be found to be “very low” risk on the basis of documentation and other information provided by agency officials, the number of cardholders, and the total amount of purchase card expenditures. However, an audit of that purchase card program may determine that the internal controls outlined in an agency’s policy are not being implemented appropriately and that illegal, improper, or erroneous activity is occurring. This risk assessment was designed to help identify those programs on which the OIG Office of Audits should focus its limited resources.

Assessment Criteria

To conduct the risk assessment, OIG reviewed FY 2024 purchase card data and documentation, as well as information that USIBWC officials provided.² OIG assessed the purchase card program on the basis of four criteria:³ internal controls, training, previous audits, and INV

¹ Committee of Sponsoring Organizations of the Treadway Commission, “Enterprise Risk Management – Integrating with Strategy and Performance Framework Executive Summary” (June 2017); Deloitte & Touche, LLP, “Risk Assessment in Practice” (October 2012).

² In performing this risk assessment, OIG used purchase card data reported by USIBWC without independently verifying the data for accuracy and completeness. USIBWC reported that purchase card holders made purchases totaling \$1,820,363 in FY 2024.

³ Public Law 112-194 (October 5, 2012), Sec. 2 § 1909(c)(3), codified at 41 U.S. Code § 1909(c)(3), states that agencies with more than \$10 million in purchase card spending annually are required to submit “violation reports” on a semiannual basis. Because USIBWC did not have more than \$10 million in purchases, it did not prepare a

observations. OIG assigned a rating of “low,” “medium,” or “high” to identify the risk associated with each criterion.⁴

Internal Controls

OIG used criteria identified in the Government Charge Card Abuse Prevention Act of 2012⁵ and Office of Management and Budget (OMB) Circular A-123, Appendix B,⁶ to assess internal controls associated with the USIBWC purchase card program. OIG assessed the purchase card program for 35 general internal controls and 43 internal controls specific to purchase card programs (a total of 78 internal controls assessed).⁷ An example of a general control, which would apply to both purchase card and travel card programs, is the OMB Circular A-123 requirement that agencies perform periodic reviews of spending and transaction limits to ensure appropriateness.⁸ Purchase card-specific controls apply only to purchase card programs. An example is the requirement that agencies have policies in place to ensure that each cardholder is assigned an approving official with authority to approve or disapprove transactions.⁹ OIG assigned a risk rating of “low,” “medium,” or “high” on the basis of documented compliance with required internal controls. Specifically, OIG assigned a “low” risk rating to programs with a high percentage (above 75 percent) of compliant internal controls. OIG assigned a “medium” risk rating to programs with neither a high percentage of compliant internal controls nor a high percentage of noncompliant internal controls. OIG assigned a “high” risk rating to programs with a high percentage (above 50 percent) of noncompliant internal controls.

Training

OIG assigned the USIBWC purchase card program a risk rating of “low,” “medium,” or “high” based on the availability of training and incorporation of training into its policies for the program. Specifically, OIG assigned a “low” risk rating when training was available and incorporated into policies. OIG assigned a “medium” risk rating when training was available but not incorporated into policies or when training was not available but was incorporated into

violation report. Therefore, OIG did not consider this factor during the USIBWC purchase card program risk assessment.

⁴ OIG team members used professional judgment to determine compliance with requirements in assessing risk ratings for each criterion.

⁵ Public Law 112-194, Sec. 2 § 1909(a)(1)-(13), § 1909(c)(1) and (3)(A) and (B), and § 1909(d)(1)-(3), codified at 41 U.S. Code § 1909.

⁶ OMB Circular A-123, “Management’s Responsibility for Enterprise Risk Management and Internal Control” (July 15, 2016), Appendix B, “A Risk Management Framework for Government Charge Card Programs” (August 27, 2019), and Attachment 5, “Best Practices in Managing Government Charge Card Programs.”

⁷ The requirements for the internal controls varied. OMB required some to be included in the organization’s purchase card program guidance; others were not required by OMB to be documented but were still required. Because OIG reviewed only documented controls, it could not determine whether undocumented controls were compliant or noncompliant.

⁸ OMB Circular A-123, Appendix B, Attachment 5, page 61.

⁹ Public Law 112-194, Sec. 2 § 1909(a)(2), codified at 41 U.S. Code § 1909(a)(2).

policies. OIG assigned a “high” risk rating when training was not available and was not incorporated into the organization’s policies.

Previous Audits

To assess the USIBWC purchase card program, OIG reviewed the results of previous audits and the implementation status of associated recommendations. OIG assigned a “low” risk rating to programs that had been audited in the last 10 years and had fully implemented associated recommendations. OIG assigned a “medium” risk rating to programs that had been audited in the last 10 years but had not fully implemented the associated recommendations. OIG assigned a “high” risk rating to programs that had not been audited within the last 10 years. OIG mitigated the ratings if the program provided documentation of meaningful internal reviews (conducted by the agency).

INV Observations

On the basis of guidance from INV forensic auditors, OIG assigned the USIBWC purchase card program a risk rating of “low,” “medium,” or “high.” Office of Audits personnel met with INV personnel to gain an understanding of the data mining¹⁰ efforts INV was using to review USIBWC purchase card transactions. INV provided information on the results of its data mining analyses and interviews with USIBWC officials responsible for the purchase card program.

Impact and Likelihood

Impact refers to the extent to which a risk event might affect USIBWC, and likelihood represents the possibility that a given event might occur. OIG assigned an impact rating of “low,” “medium,” or “high” based on the dollars spent in the USIBWC purchase card program and assigned a likelihood rating of “low,” “medium,” or “high” based on the number of cardholders in the USIBWC purchase card program. The rating criteria are shown in Table A.1.

Table A.1: Impact and Likelihood Ratings

Rating	Impact	Likelihood
Low	Less than \$1 million	Fewer than 250 cardholders
Medium	\$1 million to \$10 million	250 to 500 cardholders
High	More than \$10 million	More than 500 cardholders

Source: OIG-generated based on multiple sources, including industry standard principles for risk management.

Using the information obtained in Table A.1, OIG plotted the impact and likelihood ratings on a heat map, which depicts the intersections of the ratings, to determine the impact and likelihood factor. The heat map is shown in Table A.2. OIG used this single impact and likelihood combined factor in the final overall risk assessment (Table A.3) for the USIBWC purchase card program.

¹⁰ Data mining is the practice of searching through large amounts of computerized data to find useful patterns or trends.

Table A.2: Impact and Likelihood Factor Heat Map

		Factor		
		Medium	High	Very High
Impact Rating	High	Medium	High	Very High
	Medium	Low	Medium	High
	Low	Very Low	Low	Medium
		Low	Medium	High
		Likelihood Rating		

Source: OIG-generated based on industry standard principles for risk management.

Final Risk Assessment

OIG plotted the combined criteria rating in Table A.1 with the combined impact and likelihood factor in Table A.2 to determine the final risk assessment rating for the USIBWC purchase card program. Specifically, OIG used the final risk assessment heat map shown in Table A.3 to determine the overall risk assessment rating.

Table A.3: Final Risk Assessment Heat Map

		Final Rating		
		Medium	High	Very High
Impact and Likelihood Factor	Very High	Medium	High	Very High
	High	Medium	High	Very High
	Medium	Low	Medium	High
	Low	Very Low	Low	Medium
	Very Low	Very Low	Low	Medium
		Low	Medium	High
		Combined Criteria Rating		

Source: OIG-generated based on industry standard principles for risk management.

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