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Office of Inspector General  
United States Department of State

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AUD-CGI-25-05

Office of Audits

November 2024

# Information Report: Department of State 2024 Purchase Card Risk Assessment

INFORMATION REPORT

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## SUMMARY OF REVIEW

The Government Charge Card Abuse Prevention Act of 2012,<sup>1</sup> as implemented by Office of Management and Budget (OMB) Circular A-123, Appendix B,<sup>2</sup> requires the Office of Inspector General (OIG) to conduct annual risk assessments of agency purchase and travel card programs. The assessments are conducted 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.<sup>3</sup>

To assess risk associated with the Department of State's (Department) purchase card program, OIG reviewed the Department's FY 2023 purchase card data and concluded that the risk of illegal, improper, or erroneous purchases and payments within the Department purchase card program was "medium." OIG based its conclusion on the purchase card program's size, internal controls, training, previous audits, violation reports, and OIG Office of Investigations (INV) observations.

With respect to the criterion related to previous audits, OIG audited the Department's purchase card program and issued a report in March 2019.<sup>4</sup> The five recommendations offered in that report have been implemented and closed. Therefore, OIG is not recommending that an audit of the Department's purchase card program be included in its FY 2026 work plan. However, OIG encourages the Department's purchase card manager to continue prudent oversight of the purchase card program to ensure that internal controls intended to safeguard taxpayer funds are fully implemented and followed by Department purchase card holders.

## OBJECTIVE

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OIG conducted this risk assessment to establish the risk of illegal, improper, and erroneous purchases and payments within the Department's 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

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The Government Charge Card Abuse Prevention Act of 2012, as implemented by OMB Circular A-123, Appendix B, requires OIG to conduct annual periodic risk assessments of agency purchase and travel card programs. The assessments are conducted to identify and analyze the risk of illegal, improper, or erroneous purchases and payments and to determine the

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<sup>1</sup> Public Law 112-194 (October 5, 2012).

<sup>2</sup> 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).

<sup>3</sup> Public Law 112-194, Sec. 2 § 1909(d)(1) and Sec. 3 (h)(3).

<sup>4</sup> OIG, *Audit of Department of State Purchase Card Program* (AUD-CGI-19-24, March 2019).

appropriate scope, frequency, and number of periodic audits of these programs.<sup>5</sup> In addition, OMB Circular A-123, Appendix B, outlines OIG risk assessment requirements as well as additional required internal controls for agency charge card programs. Furthermore, OMB issued guidance<sup>6</sup> 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 2024 risk assessment of the Department's purchase card program, which covers FY 2023 spending data, is the 10th risk assessment of the Department's purchase card program conducted by OIG. Department officials reported that in FY 2023, 2,121 purchase card holders made purchases totaling approximately \$147.7 million.

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

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### Criteria Ratings

On the basis of documentation and information provided by Department officials, OIG determined that the Department complied with required internal controls for the purchase card program. Specifically, 100 percent (78 of 78) of the internal controls OIG assessed complied with established criteria.<sup>7</sup> Because the assessed internal controls complied with established criteria, OIG assigned the Department a risk rating of "low" for the internal control criterion.

OIG rated the availability of training and the incorporation of training into Department policies "low" risk because Department officials provided detailed documentation regarding available training. In addition, Department officials provided policies requiring purchase card holders and approving officials to complete appropriate training related to purchase cards.

With respect to the previous audits criterion, OIG issued a report of the Department's purchase card program in March 2019.<sup>8</sup> That report included five recommendations. All five recommendations have been implemented and closed. Therefore, OIG determined that the risk associated with the previous audits criterion was "low."

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<sup>5</sup> Public Law 112-194, Sec. 2 § 1909(d)(1) and Sec. 3 (h)(3).

<sup>6</sup> OMB Circular A-123, Appendix B.

<sup>7</sup> See Appendix A of this report for details on the criteria used.

<sup>8</sup> AUD-CGI-19-24.

In addition, for FY 2023, the Department’s “Joint Purchase and Integrated Card Violations Reports” to OMB identified four violations.<sup>9</sup> For the purpose of this risk assessment, because the reported violations were not considered abuse or fraud, OIG considers the risk associated with the violation reports criterion to be “low.”

Furthermore, INV forensic auditors stated that INV did not have any current open investigations related to the Department’s purchase card program. Therefore, OIG considers the risk associated with the INV observation criterion to be “low.” The individual criterion ratings and overall combined rating are shown in Table 1.

**Table 1: 2023 Risk Rating by Criterion**

<b>Criterion</b>	<b>2023 Rating</b>
Internal Controls	Low
Training	Low
Previous Audits	Low
Violation Reports	Low
INV Observation	Low
<b>Combined</b>	<b>Low*</b>

\*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 would have been assigned a numeric value of 2; criteria rated as “high” risk would have been assigned a numeric value of 3.

**Source:** Generated by OIG based on its analysis of the Department’s FY 2023 purchase card program information and documentation.

### **Impact and Likelihood Factor**

Department officials reported that 2,121 Department purchase card holders made purchases totaling approximately \$147.7 million in FY 2023. Because the dollar amount of the total purchases made was more than \$10 million and the number of Department purchase card holders was more than 500, OIG determined that the overall impact and likelihood factor was “very high,” as shown in Table 2.<sup>10</sup>

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<sup>9</sup> The violations identified involved loss, waste, or misuse that resulted in temporary suspension and training. The four violations were not considered abuse or fraud.

<sup>10</sup> Refer to Appendix A, Tables A.1 and A.2, for OIG’s methodology in determining the impact and likelihood factor.

**Table 2: Impact and Likelihood Factor**

		<b>2023 Rating</b>
<b>Impact</b>	\$147.7 million	High
<b>Likelihood</b>	2,121 cardholders	High
<b>Impact and Likelihood Factor</b>		<b>Very High</b>

**Source:** Generated by OIG based on its analysis of the Department’s purchase card program information and documentation related to total Department purchases in FY 2023 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 Department purchase card program was “medium.” With that determination, and because the recommendations offered in OIG’s previous audit<sup>11</sup> of the Department’s purchase card program have been implemented and closed, OIG is not recommending that an audit of the Department’s purchase card program be included in OIG’s FY 2026 work plan. However, OIG encourages the Department’s purchase card program manager 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 Department purchase card holders.

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<sup>11</sup> AUD-CGI-19-24.

## APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

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The Office of Inspector General (OIG) performed this risk assessment from July to October 2024. The objectives of this assessment were to establish the risk of illegal, improper, and erroneous purchases and payments within the Department of State (Department) 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 this risk assessment, OIG considered the Department's purchase card program size, internal controls, training, previous audits, violation reports, and OIG Office of Investigations (INV) observations. OIG conducted this risk assessment using industry standard principles for risk management.<sup>1</sup>

This risk assessment was not an audit and was not conducted in accordance with generally accepted government auditing standards. The results of this 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 this risk assessment, OIG reviewed FY 2023 purchase card data and documentation and information provided by Department officials.<sup>2</sup> OIG assessed the purchase card program on the basis of five criteria: internal controls, training, previous audits, violation reports, and INV observations. OIG assigned a rating of "low," "medium," or "high" to identify the risk associated with each criterion.<sup>3</sup>

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<sup>1</sup> Committee of Sponsoring Organizations of the Treadway Commission, "Enterprise Risk Management – Integrated Framework Executive Summary" (September 2004); Deloitte & Touche, LLP, "Risk Assessment in Practice" (October 2012).

<sup>2</sup> In performing this risk assessment, OIG used purchase card data reported by the Department without independently verifying the data for accuracy and completeness. The Department purchase card program manager reported that purchase card holders made purchases totaling approximately \$147.7 million in FY 2023.

<sup>3</sup> OIG team members used professional judgment to determine compliance with requirements in assessing risk ratings for each criterion.

### ***Internal Controls***

OIG used criteria identified in the Government Charge Card Abuse Prevention Act of 2012<sup>4</sup> and Office of Management and Budget (OMB) Circular A-123, Appendix B,<sup>5</sup> to assess internal controls associated with the Department's 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).<sup>6</sup> 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.<sup>7</sup> Purchase card-specific controls apply only to purchase card programs. An example is the requirement that each purchase card holder and each individual issued a convenience check be assigned an approving official other than the cardholder with the authority to approve or disapprove transactions.<sup>8</sup> 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 Department's 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 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 Department's 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

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<sup>4</sup> Public Law 112-194, Sec. 2 § 1909(a)(1)-(13), § 1909(c)(1) and (3)(A) and (B), and § 1909(d)(1)-(3).

<sup>5</sup> 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."

<sup>6</sup> The requirements for the internal controls varied. OMB requires some to be included in the organization's purchase card program guidance; others are not required by OMB to be documented but are still required. Because OIG reviewed only documented controls, it could not determine whether undocumented controls were compliant or noncompliant.

<sup>7</sup> OMB Circular A-123, Appendix B, Attachment 5.

<sup>8</sup> Public Law 112-194, Sec. 2 § 1909(a)(2).

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. The ratings were mitigated if the program provided documentation of meaningful internal reviews (conducted by the agency).

**Violation Reports**

Violation reports are required for purchase card programs that exceed \$10 million in spending annually.<sup>9</sup> OIG assigned a “low” risk rating when a report was provided and a low number of violations had been reported in relation to the total number of purchase card holders. OIG assigned a “medium” risk rating when a report was provided and a medium number of violations had been reported in relation to the total number of purchase card holders. OIG assigned a “high” risk rating when a report was required but not provided or when a high number of violations had been reported in relation to the total number of purchase card holders.

**INV Observations**

On the basis of guidance from INV forensic auditors, OIG assigned the Department’s 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 mining<sup>10</sup> efforts INV was using to review Department purchase card transactions. INV provided information on the results of its data mining analyses and interviews with Department officials responsible for the purchase card program.

**Impact and Likelihood**

Impact refers to the extent to which a risk event might affect the Department, 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 Department’s purchase card program and assigned a likelihood rating of “low,” “medium,” or “high” based on the number of cardholders in the Department’s 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:** Generated by OIG based on multiple sources, including industry standard principles for risk management.

<sup>9</sup> Public Law 112-194, Sec. 2 § 1909(c)(3).

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

Using the information obtained in Table A.1, OIG plotted the impact and likelihood ratings on a chart known as 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 Department’s purchase card program.

**Table A.2: Impact and Likelihood Factor Heat Map**

		<b>Factor</b>		
		Medium	High	Very High
<b>Impact Rating</b>	<b>High</b>	Medium	High	Very High
	<b>Medium</b>	Low	Medium	High
	<b>Low</b>	Very Low	Low	Medium
		<b>Low</b>	<b>Medium</b>	<b>High</b>
		<b>Likelihood Rating</b>		

**Source:** Generated by OIG based on industry standard principles for risk management.

**Final Risk Assessment**

OIG plotted the combined criteria rating in Table 1 with the combined impact and likelihood factor in Table 2 to determine the final risk assessment rating for the Department’s 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**

		<b>Final Rating</b>		
		Medium	High	Very High
<b>Impact and Likelihood Factor</b>	<b>Very High</b>	Medium	High	Very High
	<b>High</b>	Medium	High	Very High
	<b>Medium</b>	Low	Medium	High
	<b>Low</b>	Very Low	Low	Medium
	<b>Very Low</b>	Very Low	Low	Medium
		<b>Low</b>	<b>Medium</b>	<b>High</b>
		<b>Combined Criteria Rating</b>		

**Source:** Generated by OIG based on industry standard principles for risk management.

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