

AR-10-003

**FEDERAL TRADE COMMISSION
OFFICE OF INSPECTOR GENERAL**



**AUDIT OF THE
FEDERAL TRADE COMMISSION
TRAVEL PROGRAM**

FINAL AUDIT REPORT

August 19, 2010



OFFICE OF
INSPECTOR GENERAL

FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

August 19, 2010

MEMORANDUM

To: James D. Baker
Acting Chief Financial Officer

From: John M. Seeba
Inspector General

SUBJECT: Final Audit Report AR 10-003 – Audit of the Federal Trade Commission Travel Program

This report presents the results of our audit of the Federal Trade Commission's (FTC) Travel Program. Management agreed with our recommendations and has initiated corrective actions. A copy of management's written response to the draft report is included as Exhibit B, with excerpts and the Office of Inspector General's (OIG) position incorporated into the relevant sections of the report.

Your response contained sufficient justification to resolve all recommendations. These recommendations will be considered closed when supporting documentation has been provided through the audit liaison.

We appreciate the courtesies and cooperation extended to us by members of your staff during the audit. Should you have any questions, please have contact me or Mary Harmison at 202-326-2622.

cc: Charles Schneider, Executive Director
Chris White, Designated Agency Ethics Officer
Karen Leydon, Director, Human Resources Management Office
Jeffrey Nakrin, Director, Records and Filings Office
Diane Reinertson, Assistant CFO for Policy, Evaluation and Control

Table of Contents

Executive Summary.....	i
Abbreviations Used in This Report.....	iv
Background Scope Objectives and Methodology.....	1
Findings and Recommendations.....	3
Internal Controls Generally Effective, but Opportunities for Improvements Exist	
Reconciliation of the Central Billing Account.....	3
Recommendation 1.....	4
Tracking Reimbursements of Non-Federal Sponsored Travel.....	5
Recommendation 2.1.....	6
Recommendation 2.2.....	6
Timely Cancellation of Travel Cards for Separated Employees.....	7
Recommendation 3.....	7
FTC Travel Card Training – Compliance with OMB Requirements.....	8
Recommendation 4.1.....	9
Recommendation 4.2.....	9
Recommendation 4.3.....	9
Exhibit A – Summary of FTC Travel Card Activity.....	10
Exhibit B – Agency Response.....	11

Executive Summary

Results in Brief

The FTC is the U.S. government's premier agency for "protecting and strengthening free and open markets and promoting informed consumer choice, both in the United States and around the world."¹ To help fulfill its mission, the FTC requires many of its employees to travel throughout the country and the world, to vigorously and effectively pursue law enforcement actions, advance consumers' interest by sharing its expertise with federal and state legislatures, with U.S. and international government agencies², and to perform other functions in furthering FTC's mission.

As a Title 5 Executive Agency, the FTC is required to follow the requirements of the U.S. General Service Administration's (GSA) *Federal Travel Regulations*, but can augment these by implementing its own policies and procedures.

The objective of our audit was to determine if the FTC travel program complies with the Federal Travel Regulations (FTR) and with its own travel policies and procedures. The OIG conducted this audit as part of its annual audit plan.

The FTC charged approximately \$2 million in 15,000 transactions on federal travel cards in FY 2009 and \$1.9 million in 12,000 transactions in FY 2008.

We found that overall, the FTC had followed the policies and procedures promulgated in the FTR for travel. We found that the Financial Management Office (FMO) had a system of internal controls in place to minimize the possibility of unauthorized use of the travel card, correctly reimbursing travelers in accordance with the regulations, and complying with federal regulations limiting premium travel. We did find some improvements are needed to enhance the controls over the FTC travel program:

Finding 1: The FMO does not have a formal review process in place to review the CBA for any potential erroneous activity and unauthorized charges

The FMO relies on an automated payment process to clear charges to the CBA. For the remaining uncleared charges, many are still open due to timing differences and will be cleared in the following

¹ Federal Trade Commission Performance and Accountability Report Fiscal Year 2009 *Mission and Organization*.

² *Id. Our Organization*.

months. However, without a review of the CBA for any unauthorized charges, FTC may be unaware that there are erroneous outstanding charges billed to the CBA. Unpaid charges in the CBA could negatively impact the agency's rebate.

Finding 2: The FTC does not use its tracking system to consistently follow-up on receipt of non-Federal source travel reimbursements to be sure that all sponsors are reimbursing FTC.

The Federal Travel Regulations permit an employee to travel premium class and to exceed maximum per diem and lodging amounts, only if the amounts are paid in full by the non-Federal sponsor. Before FTC staff is allowed to travel for a non-Federal sponsor they must receive a written reimbursement offer from the non-Federal sponsor and approval from the FTC Designated Agency Ethics Official (DAEO). Without a tracking mechanism for all trips, the FTC may be improperly paying for premium travel and/or improperly subsidizing private organizations with taxpayer funds. For the six month reporting period ending September 30, 2009, the FTC Ethics office reported approval of 44 trips and \$112,000 in non-Federal sponsored travel to the Office of Government Ethics.

Finding 3: We found five open travel card accounts to employees who had separated from the FTC in the years 2005, 2007, 2008, 2009; and for one individual who had retired in 1999.

When employees leave the agency, their travel cards should be cancelled at the time of their departure. FMO had been using the Check-In/Check-Out/Moves (CICOM) reports to identify separated employees. The OIG used reports from the Human Resources Management Office (HRMO) to identify separated employees. Failure to cancel travel cards assigned to former employees may subject the agency to potential criticism should these cards be lost, stolen or misused.

Finding 4: We found that the FTC is not meeting the general training requirements of Office of Management and Budget (OMB) Circular A-123, Appendix B, "Improving the Management of Government Charge Cards".

The FTC does not consistently maintain documentation of training prior to issuance of travel cards; does not have a program for refresher training; and does not maintain the training certificates in accordance with National Archives and Records Administration (NARA) General Records Schedule 1. OMB A-123, Appendix B, Chapter 3.4 lists the

general training requirements for all charge card programs. By not maintaining the proper training and training documentation, the FTC is not in compliance with OMB requirements.

Recommendations In Brief

The OIG recommends that the FMO:

Recommendation 1: Implement a procedure to identify and review the CBA for potentially erroneous outstanding charges;

Recommendation 2: Document all reimbursable expenditures for FTC staff approved for non-Federal source travel, and coordinate with the Designated Agency Ethics Official (DAEO) and the travelers' Administrative Officers to ensure follow-up with all sponsors who have not reimbursed the agency in a timely manner.

Recommendation 3: At least annually, compare the Citibank active cardholders list to FTC HRMO's active employee list to ensure that cards are not issued to separated employees.

Recommendation 4: Coordinate with the Human Resources Management Office, and the Records and Filings Office to ensure that FTC's training program is in compliance with OMB A-123, Appendix B; 3.4 general training requirements.

Agency Comments and Our Evaluation

We provided a draft of this report to the FMO for its review and comment. We received written comments from the Acting Chief Financial Officer, which are reprinted in Exhibit B. Management concurred with all of the recommendations and has taken specific steps to address each one. Excerpts from management's response and the OIG's position are included in each relevant section. Management's actions have resolved these recommendations. The recommendations will be closed when supporting documentation has been provided through the audit liaison.

Abbreviations Used in This Report

CBA	Centrally Billed Account (Travel Card)
CICOM	Check-In/Check-Out/Moves
DAEO	Designated Agency Ethics Official
FMO	Financial Management Office
FTC	Federal Trade Commission
FTR	Federal Travel Regulations
FY	Fiscal Year
GSA	General Services Administration
HRMO	Human Resources Management Office
IBA	Individually Billed Account
IG	Inspector General
NARA	National Archives and Record Administration
OIG	Office of Inspector General
OMB	Office of Management and Budget
P.L.	Public Law
TTRA	Travel and Transportation Reform Act of 1998

Background, Scope, Objectives, Methodology

Background

The use of federal travel charge cards was mandated by the Travel and Transportation Reform Act of 1998 (TTRA) (P.L. 105-264) in an effort to reduce travel costs and streamline the process of administering agency travel programs.³ All federal employees must now use federal travel cards for official business travel, if they travel 6 or more times per year. Since the enactment of TTRA, the number of travel card transactions at the FTC increased 94% (from 7,594 to 14,722) and dollar volume increased 67% from \$1.2 million in FY 2000 to approximately \$2 million in FY 2009.

Reports by the General Accountability Office and agency Inspectors General have prompted congressional hearing and press reports with their disclosure of waste, fraud, and abuse. Audits have found that employees have used their travel cards for personal use and have traveled premium class without proper authorization.⁴ Audits have also found that agencies have failed to ensure that they claim reimbursement for unused airline tickets.⁵ These reports have raised serious concerns regarding the internal control systems that monitor the use of the more than 2.6 million Government travel cards in circulation.

Scope

We reviewed the travel card program, and associated transactions, as operated by the Federal Trade Commission for years 2008 and 2009.

Objectives

This report examines the travel program at the FTC to determine if the FTC is properly administering its travel program in accordance with applicable laws and regulations.

Methodology

To address our objective, we obtained an understanding of the FTC's travel process including travel authorizations, payments, reimbursements, and overall travel program management and oversight.

In order to identify requirements we reviewed pertinent federal laws and regulations including

- The Travel and Transportation Reform Act of 1998 (Public Law 105-264)

³ *Waste, Fraud, and Abuse in Agency Travel Card Programs*, Congressional Research Service, July 20, 2009.

⁴ *Id.*

⁵ *DOD TRAVEL CARDS Control Weaknesses Led to Millions in Fraud, Waste, and Improper Payments*, U.S. General Accounting Office, GAO-04-825T.

- The Office of Management and Budget (OMB) Circular A-123, Appendix B (February 2006) *Improving the Management of Government Charge Card Programs*
- The Office of Management and Budget (OMB) Circular A-123, Appendix B (Revised January 2009) *Improving the Management of Government Charge Card Programs*
- Federal Travel Regulations 300-304
- Federal Trade Commission Administrative Manual Chapter 2:
 - Section 400 Temporary Duty Travel Policies and Procedures
 - Section 410 Local Travel Policy
 - Section 430 Restrictions on the Reimbursement of Travel-Related expenses by Non-Government Sources

Reliability of computer based data: we relied on the data obtained from the FedTraveler and Citibank report files. We determined that the data were sufficiently reliable for the purposes of this report.

We conducted this performance audit from September 2008 to March 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Findings and Recommendations - FTC Travel Card Internal Controls Generally Effective, but Opportunities for Improvements Exist

We found that overall, the FTC had followed the policies and procedures promulgated in the FTR for travel. We found that the Financial Management Office (FMO) had a system of internal controls in place to minimize the possibility of unauthorized use of the travel card, correctly reimbursing travelers in accordance with the regulations, and complying with federal regulations limiting premium travel. We did find some improvements are needed to enhance the controls over the FTC travel program; our findings and recommendations are listed below.

The Office of Management and Budget (OMB) issued OMB Circular A-123 Appendix B, Improving the Management of Government Charge Card Programs, as guidance to maximize benefits when using government charge cards to pay for goods and services in support of official Federal missions. Agencies have an ongoing requirement to evaluate the effectiveness of the actions taken to comply with the requirements of this guidance.

For example, pursuant to OMB Circular A-123 Appendix B agencies must implement risk management controls, policies, and practices as a critical tool for ensuring the efficiency and integrity of charge card programs. One specific required control for addressing charge card misuse is requiring charge card statement reconciliation or transaction reconciliation in a timely manner.⁶

Finding 1 Reconciliation of the Central Billing Account

The FMO relies on an automated payment process to clear charges to the CBA and does not review the CBA for any potential erroneous activity.

The CBA is a separate Citibank charge account used by the FTC to accumulate purchased transportation services for FTC travelers. For fiscal years 2008 and 2009, FTC incurred over \$2.4 million in charges to its centrally billed account. Charges to the CBA include:

- FTC staff airline and train tickets
- Invitational travelers airline and hotel reservations

⁶ OMB Circular A-123 Appendix B (Revised February 2006) sections 4.2 and 4.6; and OMB Circular A-123 Appendix B (Revised January 2009) sections 4.2 and 4.8

- Travel agent booking fees

FedTraveler is the web based travel system that allows employees to create travel orders and expense reports that are approved and stored in the system electronically. Air, rail, rental car and hotel reservations can be made using the FedTraveler system.

There are two methods for obtaining a ticket, via FedTraveler using electronic vouchers, and also via paper (manually prepared) travel vouchers. Both methods require an authorization process before FTC's travel agent, National Travel Service, Inc. (National Travel) issues the ticket. Ticket charges and agent fees are charged by National Travel to the FTC Centrally Billed Account.

Payments to the CBA for FTC staff airline/train tickets occur when travel is completed and the employees' approved and audited travel reimbursement request is certified and processed by the National Business Center (NBC) Travel Unit. Payments to the CBA for FTC invitational travelers occur upon receipt by the NBC Travel Unit of a properly approved payment request from Financial Operations (FO). FO matches the individual charges on the CBA bill to submitted and approved travel orders before submission to NBC. Because there is an automated process for charging and reimbursing the CBA, FMO does not review the CBA for any potential erroneous charges that may occur outside of the automated procedures already in place.

Without review of the CBA for any unauthorized charges, FTC may be unaware that there are erroneous outstanding charges billed to the CBA.

Recommendation 1

The OIG recommends that the FMO implement a procedure to review the CBA for unauthorized charges.

Agency Response

Management concurs with the recommendation and has taken several steps to ensure that all transactions posted to the CBA accounts are valid and authorized.

- The Travel Management Service (TMS), is performing a monthly reconciliation of airline tickets billed and refunded to the CBA accounts and providing FTC with exception reports.
- The TMS systematically tracks refunds for cancelled tickets. In addition, their quality control system automatically sweeps the GDS systems daily for unused tickets, cancels them and processes refunds.

- All charges for invitational travelers are now managed on a separate CBA account. These items are directly reconciled to travel authorizations before payment to Citibank.
- The Travel Manager reviews the monthly invoices for erroneous charges (separated employees, unusual merchants, etc.).

OIG Position

The OIG concurs with the Agency Response. This recommendation will be closed when supporting documentation has been provided through the audit liaison.

Finding 2 Tracking Reimbursements of Non-Federal Sponsored Travel

The Financial Management Office does not have a process for tracking all reimbursements from non-Federal sources⁷ for travel and travel-related expenses incurred by FTC personnel on official duty. The reimbursements apply to situations in which private sources invite FTC employees to attend their functions and then reimburse the agency for expenses incurred by FTC employees.

Before FTC staff is allowed to travel for a non-Federal source sponsor they must receive approval from the FTC Designated Agency Ethics Official (DAEO). The approval process includes the completion of a Reimbursement Approval Memorandum to the DAEO Official and a written reimbursement offer from the non-Federal source.

On a semi-annual basis the DAEO prepares a non-Federal source travel report in compliance with 31 USC § 1353.⁸ The report details all payments over \$250 accepted by the Commission for a six month period from non-Federal sources for travel, subsistence and related expenses. For the six month reporting period ending September 30, 2009, the DAEO reported approval of 44 trips and \$112,000 in non-Federal sponsored travel to the Office of Government Ethics.

The Federal Travel Regulations (FTR) permit employees to exceed the maximum per diem and lodging amounts if the amounts are paid by the sponsoring non-Federal source. The FTR also permit the employee to travel in business-class, which is ordinarily prohibited to federal employees with some exceptions.

⁷ A non-Federal source is defined in FTR 304-2.1 as “any person or entity other than the Government of the United States. The term includes any individual, private or commercial entity, nonprofit organization or association, international or multinational organization (irrespective of whether an agency holds membership in the organization or association), or foreign, State or local government (including the government of the District of Columbia).”

⁸ The requirement to report non-Federal source travel is found in section 304-1.9(a) (1) of the GSA's fourth Interim Rule 41 CFR part 304.1 and 31 USC Section 1353 requires submission of the report semiannually

Business-class travel is permitted as long as the-

- (a) non-Federal source makes full payment for such transportation services in advance of travel; and
- (b) transportation accommodations furnished are comparable in value to those offered to, or purchased by, other similarly situated meeting attendees.

We did not specifically review the reimbursements agreements from the non-Federal sponsors in our review, however without a control in place: the FTC may be:

- 1) failing to receive all agreed-upon reimbursements from non-Federal source sponsors
- 2) improperly reimbursing travelers for amounts that are in excess of Federal per diem rates
- 3) improperly paying for premium class travel, thus violating federal rules regarding premium class travel
- 4) reporting reimbursements incorrectly to the US Office of Government Ethics

Recommendation 2

The OIG recommends that the FMO:

- 2.1** document reimbursable expenditures for all FTC staff approved for non-Federal source travel.
- 2.2** coordinate with the DAEO and travelers' Administrative Officers to ensure follow-up with all sponsors who have not reimbursed the agency in a timely manner.

Agency Response

Management concurs with the recommendation. A tracking spreadsheet and procedures have been developed to ensure that all approved non-Federal sponsored travel is timely and properly reported and reimbursed. Travel authorizations will be tracked to ensure that subsequent expense reports properly reflect items to be received "in kind" and/or receipt of reimbursements, as appropriate. A report of unreimbursed travel will be distributed to the travelers, DAEO and agency management on a quarterly basis starting in early FY 2011 reporting for the fourth quarter of FY 2010.

OIG Position

The OIG concurs with the Agency Response. This recommendation will be closed when supporting documentation has been provided through the audit liaison.

Finding 3 Timely Cancellation of Travel Cards for Separated Employees

When we compared the Citibank list of account holders to current FTC employees per HRMO records, we found five open cards for employees who had separated from the agency in 2005, 2007 and 2008, 2009; and one individual who had retired in July 1999. These open accounts should have been detected and closed by the Travel Office.

Cards left open, especially for many years, could lead to vulnerabilities because Citibank will continue to issue new cards to active cardholder names. If a person is deceased or has left the agency and moved, the card may be picked up and used by another individual. Note: During our audit fieldwork the FMO took immediate action to cancel all cards when the OIG brought the specific names to their attention.

The FMO was using the Employee Check-In, Check-Out, and Moves (CICOM) report to check for separated employees. Using the CICOM report was part of the FMO's response to a recommendation from the OIG in its 2005 report "*Review of FTC Credit and Travel Card Active Account Lists - (AR-05-065)*". The April 2006 response stated that the Travel Office had initiated the practice of using the CICOM report and also requesting a separation list from the Human Resource Management Office (HRMO) to check for former employees. Based on the OIG's review, the FMO was using the CICOM report alone, which is not reliable for identifying all separated employees with open cards.

Recommendation 3

The OIG recommends that the FMO at least annually, compare the Citibank open cardholders list to FTC HRMO's active employee list and cancel any cards in the names of former employees

Agency Response

Management concurs with the recommendation. The Travel Office began receiving a monthly report of employee terminations from the Human Resources Management Office (HRMO) in July, 2009. This report is used in addition to the normal check out process to ensure that FedTraveler profiles are disabled and Citibank travel cards are deactivated, as appropriate. The Travel Office will perform an annual comparison of active cardholders to the HRMO listing of current FTC employees.

OIG Position

The OIG concurs with the Agency Response. This recommendation will be closed when supporting documentation has been provided through the audit liaison.

Finding 4 FTC Travel Card Training – Compliance with OMB Requirements

FTC has not established a system of training in compliance with the requirements of OMB A-123 Appendix B.

The FTC does not:

- consistently document training received by travelers prior to issuance of the travel card;
- require card holder re-training every three years;
- maintain training certificates in accordance with National Archives and Records Administration (NARA) General Record Schedule 1. Item 10a (OMB A-123 Appendix B, 3.4)

OMB A-123 Appendix B Chapter 3 requires Federal Travel Card training before a travel card can be issued, refresher training every three years and the retention of a training certificates.

FTC FMO requires new travel card holders to complete an on-line tutorial prior to being issued a travel card. When we reviewed ten cardholder files for training certificates, four of the ten files we reviewed did not have training certificates.

OMB A-123 Appendix B Chapter 3 requires training on the use of federal charge cards as follows:

“3.4 What are the general training requirements for all charge card programs?”

- “All program participants must be trained prior to appointment.
- All program participants must take refresher training a minimum of every three years.
- All program participants must certify that they have received the training, understand the regulations and procedures, and know the consequences of inappropriate actions. Agencies will determine the method of certification; and
- Copies of all training certificates must be maintained pursuant to U.S. National Archives and Records Administration (NARA) requirements, General Records Schedule 1. Item 10a.”

Recommendation 4

The OIG recommends that the FMO coordinate with the Office of the Executive Director, Human Resources Management Office and the Records and Filing Office to:

- 4.1** establish the feasibility of using the FTC e-Train system to track and document the initial charge card training completed prior to issuing a card;
- 4.2** establish a system to track and document the refresher training that is required, at a minimum of every three years; and
- 4.3** maintain copies of all training certificates pursuant to OMB A-123 Appendix B. Copies of all training certificates must be maintained pursuant to NARA requirements, General Records Schedule 1, Item 10a.”

Agency Response

Management concurs with the recommendation. FMO will work with HRMO and the Records and Findings Office to coordinate the collections and required retention of Travel Charge Card training documentation that is in compliance with National Archives and Records Administration General Record Schedule. FMO will establish a system for ensuring that cardholders receive refresher training at least every three years. FMO has contacted the FTC Training Officer to establish whether FTC e-Train system can be used to document training. Additionally, FMO has strengthened procedures to ensure that training documentation is filed appropriately.

OIG Position

The OIG concurs with the Agency Response. This recommendation will be closed when supporting documentation has been provided through the audit liaison.

Exhibit A – Summary of FTC Travel Card Activity

Exhibit A – Page 1 of 1

Fiscal Year	Account	Spend	Transactions	Cardholders
2008	Individually Billed Accounts	\$785,045	5,091	776
2008	Centrally Billed Account	\$1,067,108	6,635	1
Total FY 2008		\$1,852,723	11,726	777

Fiscal Year	Account	Spend	Transactions	Cardholders
2009	Individually Billed Accounts	\$688,155	5,060	748
2009	Centrally Billed Account	\$1,311,555	9,662	2
Total FY 2009		\$1,999,710	14,722	750

These statistics on GSA SmartPay® charge card data are provided by the charge card banks to GSA for informational purposes and are available on the GSA website.

Exhibit B – Agency Response

Exhibit B – Page 1 of 2



Financial Management Office

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D. C. 20580

August 6, 2010

MEMORANDUM

To: John Seeba
Inspector General

From: James D. Baker 
Acting Chief Financial Officer

Subject: FMO Response to Draft Audit Report of the FTC Travel Program

Management has reviewed the Draft Audit Report AR 10-003 – Audit of the Federal Trade Commission Travel Program. In general, we concur with recommendations contained in the draft report. The following is Management’s response to the recommendations resulting from the audit.

Following are the responses to the four recommendations:

Reconciliation of the Central Billing Account – Management concurs with the recommendation. Several steps have been taken to ensure that all transactions posted to the CBA accounts are valid and authorized.

- Our Travel Management Service (TMS), National Travel, is performing a monthly reconciliation of airline tickets billed and refunded to the CBA accounts and providing FTC with exception reports.
- The TMC systematically tracks refunds for cancelled tickets. In addition, their quality control system automatically sweeps the GDS systems daily for unused tickets, cancels them and processes refunds.
- All charges for invitational travelers are now managed on a separate CBA account. These items are directly reconciled to travel authorizations before payment to Citibank.
- The Travel Manager reviews the monthly invoices for erroneous charges (separated employees, unusual merchants, etc.).

Tracking Reimbursements of non-Federal Sponsored Travel – Management concurs with the recommendation. A tracking spreadsheet and procedures have been developed to ensure that all approved non-Federal sponsored travel is timely and properly reported and reimbursed. Travel authorizations will be tracked to ensure that subsequent expense reports properly reflect items to be received “in kind” and/or receipt of reimbursements, as appropriate. A report of unreimbursed travel will be distributed to the travelers,

Exhibit B – Agency Response

Exhibit B – Page 2 of 2

DAEO and agency management on a quarterly basis starting in early FY 2011 reporting for the fourth quarter of FY 2010.

Timely Cancellation of Travel Cards for Separated Employees – Management concurs with the recommendation. The Travel Office began receiving a monthly report of employee terminations from the Human Resources Management Office (HRMO) in July, 2009. This report is used in addition to the normal check out process to ensure that FedTraveler profiles are disabled and Citibank travel cards are deactivated, as appropriate. The Travel Office will perform an annual comparison of active cardholders to the HRMO listing of current FTC employees.

FTC Travel Card Training – Compliance with OMB Requirements – Management concurs with the recommendation. FMO will work with HRMO and Records and Findings Office to coordinate the collections and required retention of Travel Charge Card training documentation that is in compliance with National Archives and Records Administration General Record Schedule. FMO will establish a system for ensuring that cardholders receive refresher training at least every three years. FMO has contacted the FTC Training Officer to establish whether FTC e-Train system can be used to document training. Additionally, FMO has strengthened procedures to ensure that training documentation is filed appropriately.

cc: Charles Schneider, Executive Director
Chris White, Designated Agency Ethics Officer
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Diane Reinertson, Assistant CFO for Policy, Evaluation and Control