Memorandum

To: Heads of Bureaus and Offices
From: Megan Olsen, Director
       Office of Acquisition and Property Management
       Tonya Johnson, Director
       Office of Financial Management

Subject: Travel Charge Card Program Policy

The purpose of this joint memorandum is to establish Department of the Interior Acquisition, Assistance and Asset Policy (DOI-AAAP)-0157, U.S. Department of the Interior (DOI) Travel Card Program Policy as the Departmental policy for the DOI Travel Card Program as required by Office of Management and Budget (OMB) Circular A-123, Appendix B, A Risk Management Framework/or Government Charge Card Programs and by the Federal Travel Regulation. This policy replaces and rescinds travel business line information provided in DOI-AAAP-0027, U.S. Department of the Interior Integrated Charge Card Program Policy. The DOI-AAAP-0157, DOI Travel Card Program Policy is effective immediately and applies to all Travel Card Program participants to include cardholders, approving officials, supervisors, Agency/Organization Program Coordinators (A/OPC), and other stakeholders who support the Travel Card Program.

The DOI Travel Card Program provides a tool to simplify payment of official business travel services and expenses; and to reduce administrative costs for employees and the businesses where the cards are used. The Travel Card Program includes the GSA Tax Advantage travel card, the corporate travel card, and the declining balance travel card. The DOI Travel Card Program allows transactions to be billed directly to the individual cardholder (individually billed) or directly to the government (centrally billed). Charging transactions directly to the government allows for those transactions to be exempt from sales tax in most States, streamlines payment to vendors, helps reduce delinquencies, and reduces the need for the traveler to use personal funds while on official travel.

Bureaus and offices are responsible for adhering to the provisions provided in DOI-AAAP-0157, and for establishing supplemental policies and procedures to comply with the requirements in the policy. Questions regarding the Charge Card Program may be directed to Ken Casey, Charge
Card Program Manager, Office of Acquisition and Property Management, at ken@IIDQth ea§Qy @ ia@,doi.gav. Questions regarding DOI's travel policies may be directed to Robert Smith, Travel and Relocation Program Lead, Office of Financial Management, at robert_smith@ios.doi.gov.

cc: Bureau Assistant Directors - Administration
   Bureau Chief Financial Officers
   Bureau Procurement Chiefs
   Financial Assistance Management Partnership
   Travel Card Agency/Organization Program Coordinators (A/OPCs)
Department of the Interior
Acquisition, Assistance, and Asset Policy (DOI-AAAP)

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Purpose:
This document establishes the Department of the Interior (DOI) policy on the travel card, as described in the following link: DOI Travel Card Policy. This policy replaces and rescinds travel business line information provided in DOI-AAAP-0027, Department of Interior Integrated Charge Card Program Policy.

Scope:
This policy applies to all Travel Card Program participants to include cardholders, approving officials, supervisors, Agency/Organization Program Coordinators (A/OPC), and other stakeholders supporting the Travel Card Program.

Effective date:
This policy is effective upon signature.

Background:

Action:
Bureaus and offices are responsible for implementing the provisions described in the following link: DOI Travel Card Policy.

References:
U.S. Department of the Interior Temporary Duty Travel Policy

Approval Signature:
The signature provided in the table below serves as the digital signature for this document. By replacing the Block 1 with a name and Block 2 with date, the Director, Office of Acquisition and Property Management approves the policy described in this document. (Use the following method to check signature authentication via revision history: on keyboard, press and hold Ctrl+Alt+Shift+H)
The signed joint policy memorandum is provided below.

Joint Policy Memorandum - Travel Card Program
U.S. Department of the Interior
Travel Card Program Policy

Issued by the Office of Acquisition and Property Management and the Office of Financial Management
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### I. Overview and Policy

The purpose of the program overview and policy section is to provide an introduction to the DOI Travel Card Program and describe applicable policies. A summary of the areas covered in this section is provided below.
A. Overview - view this section to be introduced to the DOI Travel Card Program.

B. Program Policy - view this section to access the DOI Acquisition, Assistance, and Asset Policy (DOI-AAAP) which establishes this document as policy. The DOI-AAAP includes the policy purpose, scope, effective date, background, and actions for the DOI Travel Card.

A. Overview

The DOI Travel Card Program is established to provide a tool for simplified paying of official business travel services and expenses at DOI. The travel card program includes the GSA Tax Advantage travel card, the corporate travel card, and the declining balance travel card. The DOI travel card program allows transactions to be billed directly to the individual cardholder (individually billed) or directly to the government (centrally billed). Charging transactions directly to the government allows for those transactions to be exempt from sales tax in most states, streamlines payment to vendors, helps reduce delinquencies and reduces the need for the traveler to use personal funds while on official travel. Overall, the travel card is designed to reduce administrative costs for employees and for the businesses where the cards are used.

For additional information on the use of travel cards, see chapter 8, Travel Charge Card Rules, in the U.S. Department of the Interior Temporary Duty Travel Policy.

The DOI Travel Card Program is supported by a bank vendor through a task order under the General Services Administration's (GSA) SmartPay 3 master contracts, and is administered by internal DOI stakeholders through interfaces with the DOI Financial and Business Management System (FBMS), data from the Federal Personnel Payroll System (FPPS), and the ConcurGov travel management system. Travel card transaction monitoring and reporting are carried out through the use of FBMS functionality and the bank vendor's tools and systems.

The DOI Travel Card Program is established in accordance with the following references:

- The Federal Travel Regulation
- Government Charge Card Abuse and Prevention Act of 2012 (Charge Card Act)
- Fraud Reduction and Data Analytics Act of 2016
- U.S. Department of the Interior Temporary Duty Travel Policy August 2018
- U.S. Department of the Interior Permanent Change of Station Policy, October 2012
- Office of Management and Budget (OMB) Circular A-123, Appendix B, A Risk Management Framework/or Government Charge Card Programs

B. Program Policy

The following document establishes this DOI Travel Card Program document as policy: DOI-AAAP-0157, DOI Travel Card Program Policy.

II. Roles and Responsibilities

A summary of roles and responsibilities as they pertain to the DOI Travel Card Program is located below. Bureaus have the flexibility to organize and manage their travel card programs in a manner that best fits their mission needs; however, the stakeholders listed below must have the role and accountability level described. This section does not dictate supervisory relationships for travel cardholders.
**Separation of Duties.** Separation of duties is key to the success of the DOI Travel Card Program. Duties such as making purchases/reviewing transactions, approving travel vouchers, authorizing payments, and auditing transactions and vouchers shall be assigned to different individuals to maintain the integrity of the program. Some examples include:

- Cardholders are prohibited from approving their own travel vouchers.
- A/OPCs are prohibited from oversight, reviews and audits, or changes to their own card account credit limits, assigned authorization groups, or other account controls. Those duties must be assigned to another A/OPC.

**Description of Roles and Responsibilities**

A. **Assistant Secretary for Policy, Management, and Budget (PMB)**
   This stakeholder has overall responsibility for establishing the DOI Travel Card Program, monitoring program effectiveness, and ensuring the program complies with federal law, OMB directives, GSA guidance and Department regulations and policy.

B. **Director, Office of Acquisition and Property Management**
   This stakeholder is responsible for the following items:
   1. Issuing joint Department-wide Travel Card Program policy in coordination with the Director, Office of Financial Management.
   2. Providing leadership and oversight of the DOI Travel Card Program.
   3. Serving as the DOI point of contact for the GSA, Office of Management and Budget (OMB), and the Government Accountability Office (GAO) regarding the travel Card Program.

C. **Associate Director for Acquisition; Acquisition Team Leader, Office of Acquisition and Property Management**
   These two stakeholders are responsible for assisting the Director, Office of Acquisition and Property Management, with all responsibilities listed above.

D. **Director, Office of Financial Management**
   This stakeholder is responsible for the following items:
1. Developing joint Department-wide Travel Card Program policy in coordination with the Director, Office of Acquisition and Property Management.
2. Ensuring DOI Travel Card Program policy is consistent with DOI Travel and TDY policies.

**E. Travel and Relocation Program Lead, Office of Financial Management**
This stakeholder is responsible for establishing Department-wide policy for temporary duty and relocation travel. In addition, this stakeholder coordinates with the travel Card Program Manager, Office of Acquisition and Property Management to oversee the Travel Card Program.

**F. DOI Bureau or Office Assistant Director for Administration or equivalent**
This stakeholder is responsible for the following items:
1. Providing overall organization oversight for the day-to-day activities of the bureau or office travel card function.
2. Ensuring that organizational changes are communicated to the bureau lead A/OPC, so that changes do not negatively impact the financial system setup for the travel card and structures for review and approval.

**G. Charge Card Program Manager, Office of Acquisition and Property Management**
This stakeholder is responsible for the following items:
1. Coordinating with the Travel and Relocation Program Lead, Office of Financial Management to lead the Travel Card Program.
2. Serving as the lead for DOI's purchase, travel, and fleet card programs.
3. Serving as the Charge Card Program Partnership Chair.
4. Providing advocacy and support to the Charge Card Support Center (CCSC).
5. Collaborating with A/OPCs to manage the DOI Travel Card Program.
6. Developing and communicating policies, procedures, and other guidance in support of DOI's strategic goals and government-wide initiatives.
7. Serving as Contracting Officer Representative (COR) for DOI's task order with the bank vendor.
8. Coordinating all program requirements and issues with the bank vendor.

**H. Bureau Finance Officer**
This stakeholder is the accountable official for the travel card program in her/his bureau or office and is responsible for ensuring compliance with the Travel Card Policy within the bureau or office. This stakeholder is specifically responsible for implementing Department-wide policy for travel and relocation. Bureaus have the flexibility to organize and manage their travel card programs in a manner that best fits their mission needs; however, the Bureau Finance Officer is the accountable individual for the Travel Card Program regardless of how the program is managed in the bureau or office. This stakeholder is also specifically responsible for the following items:
1. Appointing approving officials if other than the employees supervisor on record. This responsibility can be delegated to the Bureau Lead/Alternate A/OPC.
2. Reviewing A/OPC notification of potential fraud, waste, abuse, or misuse of the travel card in collaboration with travel A/OPCs and the DOI OIG.

**I. DOI Charge Card Support Center (CCSC) at the Interior Business Center (IBC)**
This stakeholder serves as the operational arm of the DOI Travel Card Program and is responsible for the following items:
1. Providing operational and customer service support throughout DOI for the DOI Travel Card Program.
2. Implementing and supporting DOI Travel Card Program initiatives.
3. Providing policy and program input as subject matter experts on Charge Cards.
4. Serving as the liaison to the bank vendor for operational and technical bank issues.
5. Serving as the application administrator and hierarchy manager for bank vendor systems and tools.
6. Serving as the application administrator for the brand’s data analytics tool.
7. Coordinating DOI migration and transition activities as necessary with GSA SmartPay 3.
8. Providing or supporting travel card role-based training.
9. Collaborating with stakeholders regarding internal control reviews.

J. Business Integration Office (BIO)
This stakeholder is responsible for the following items:
1. Providing technical support with FBMS as it relates to the Travel Card Program.
2. Providing policy and program input as technical experts.
3. Coordinating travel card interface files delivery to FBMS, ConcurGov travel management system, DOI Talent, and other DOI systems.
4. Providing support to the ConcurGov travel management system as it relates to the travel card program.

K. Bureau Travel Lead Agency/Organization Program Coordinator (A/OPC)
This stakeholder must be an employee of the Department of the Interior and is responsible for the following items:
1. Issuing appointment letters for bureau Travel A/OPCs.
2. Revoking appointment for bureau Travel A/OPCs when responsibilities as described in this policy are not satisfied.
3. Serving as the primary representative for bureau specific technical and policy matters relating to the DOI Travel Card Program.
4. Elevating operational issues as needed with both the bank and the Charge Card Support Center.
5. Serving as a liaison between account holders and the bank vendor.
6. Overseeing online application processing for new card accounts.
7. Overseeing the management of travel card accounts.
8. Managing travel card accounts to include hierarchy maintenance and all other elements of cardholder profile data.
9. Ensuring cardholder/approving official relationships are accurate.
10. Ensuring the travel card internal controls program is implemented and appropriately reported to the Department as described in the Internal Controls section of this policy.
11. Reporting suspected fraud and misuse to the approving official/supervisor, the Charge Card Program Manager, Office of Acquisition and Property Management; and/or the Office of Inspector General.
12. Terminating and suspending accounts when necessary.
13. Using the bank’s electronic access system and the brand’s data analytics tool to perform account management, compliance reviews and oversight, including detecting improper or fraudulent transactions.
14. Providing guidance, ongoing advice, and assistance to approving officials/supervisors and cardholders.
15. Ensuring that mandatory cardholder, approving official and A/OPC training is completed.
16. Assisting with the development of DOI-wide travel card policy.
17. Assisting the CCSC as necessary.
18. Ensuring DOI Travel Card Program stakeholders adhere to federal laws and regulations and DOI policies and procedures.
19. Updating account information with the emergency authorization control set for approved
time period prior to card use in the event of qualified emergency situation.
20. Implementing delinquency management for individually billed travel transactions.
21. Providing input to developing supplemental bureau and office policies and procedures,
as needed. (Bureaus and offices are not required to develop their own travel card manuals; however, if the bureau does have specific travel card policies, the bureau lead A/OPC must be involved in the development, and the Bureau Finance Officer must be the policy approving official. Bureau and office policy may be more restrictive than
Departmental policy, but cannot be less restrictive.)
22. Assisting cardholders with transferring transactions that were erroneously billed from
centrally billed to individually billed or individually billed to centrally billed.

L. Agency/Organization Program Coordinator (A/OPC)
The Bureau Travel Lead A/OPC can delegate certain authorities to A/OPCs in their bureau. This
stakeholder must be an employee of the Department of the Interior, and the following delegated
authorities may be included to this stakeholder:

1. Adhering to the appointment letter designated by the Bureau Travel Lead A/OPC. The
   subsequent responsibilities in this section may or may not apply to each A/OPC, depending on the written appointment letter.
2. Serving as the primary representative for bureau specific technical and policy matters
   relating to the DOI Travel Card Program.
3. Serving as a liaison between account holders and the bank vendor customer service
   representative.
4. Overseeing online application processing for new card accounts.
5. Managing cardholder travel card profile data, accounts to include hierarchy maintenance
   and all other elements of cardholder profile data.
6. Ensuring cardholder/approving official relationships are accurate.
7. Managing program risk through internal controls and oversight.
8. Reporting suspected fraud, collusion, and misuse or abuse to the Supervisor and the
   Bureau Lead A/OPC.
9. Terminating and suspending accounts when necessary.
10. Using the bank's electronic access system and the brand's data analytics tool to perform
    account management and oversight, including detecting improper or fraudulent
    transactions.
11. Providing guidance, ongoing advice, and assistance to approving officials, supervisors,
    and cardholders.
12. Ensuring that mandatory cardholder, approving official and A/OPC training is completed.
13. Ensuring DOI Travel Card Program stakeholders adhere to federal laws and regulations
    and DOI policies and procedures.
14. Providing input to bureau and office supplemental guidance and procedures, as needed.
15. Monitoring delinquency management for individually billed travel transactions.
16. Initiating a bill for collection request for inappropriate centrally billed charges.
17. Assisting cardholders with transferring transactions that were erroneously billed from
centrally billed to individually billed or individually billed to centrally billed.

M. Approving Official
The Approving Official should be the cardholder's first-line or second-line supervisor except in
limited circumstances. One permissible example would be a senior executive (SES) delegating
Approving Official duties to their office Chief of Staff, but only if the Chief of Staff does not have
other conflicting travel card duties. See section II. Roles and Responsibilities above for
Separation of Duties and Section H. Bureau Finance Officer, for appointing Approving Officials other than the employee’s supervisor. This stakeholder is responsible for the following items:

1. Completing mandatory Travel Approving Official training and being appointed as an Approving Official.
2. Overseeing cardholder travel card activity by reviewing cardholder travel vouchers and supporting documentation in the ConcurGov travel management system and by either approving or disapproving travel vouchers.
3. Monitoring cardholder actions to ensure travel cards are only used for official government business and that transactions are appropriate and supported by receipts and other documentation with the cardholder’s travel voucher in the ConcurGov travel management system.
4. Ensuring cardholders within your span of control understand and follow the DOI Charge Card Policy and travel card regulations and laws.
5. Taking appropriate action to address instances of misuse; and ensuring all questionable transactions are resolved in coordination with the A/OPC.
6. Developing and maintaining records showing questioned transactions, the investigation conducted and the resolution of that investigation, including disciplinary action taken or referral to the OIG.
7. Ensuring that cardholder follow the Federal Travel Regulation (FTR) and the DOI Temporary Duty Travel Policy when using their GSA Tax Advantage Travel Card, declining balance card, or the corporate travel card.
8. Ensuring cardholders report lost or stolen travel cards promptly to you, DOI’s servicing bank and the bureau A/OPC.
9. Ensuring cardholders notify their A/OPC if the cardholder is departing the organization, moving to a new organization code, or is going on extended leave, in accordance with Bureau exit procedures.

N. Supervisor
Even in circumstances where the approving official is not the cardholder’s supervisor, this stakeholder will have certain roles and responsibilities as follows:

1. Overseeing travel cardholders and the travel card program in their organization.
2. Counseling account holders within his/her span of control regarding regulations, misuse, and delinquency.
3. Notifying the A/OPC of employee separations (permanent and temporary) and A/O changes in accordance bureau or office procedures.
4. Reviewing and approving cardholder applications and determining the card holder’s need for a travel card.

O. Acting Approving Official
In cases where the approving official will be unavailable for a substantive period of time, there may be an acting approving official. This stakeholder is responsible for completing the approving official training prior to assuming the duties of an acting approving official and approving any travel vouchers. The duration of acting does not matter, but bureaus should avoid naming an acting approving official for short-term absences (for example, due to official travel), because of the administrative burden associated with changing the approving official. The acting approving official must inform the A/OPC regarding the acting duties. The acting approving official is responsible for the actions described in the section titled Approving Official.

P. Cardholder
This stakeholder is responsible for the following items:
1. Completing mandatory cardholder training and applying for the travel card after obtaining supervisor approval.
2. Ensuring the travel card is issued in her or his legal name, as it is recorded in the employee’s electronic Official Personnel File (eOPF).
3. Complying with all spending limitations, federal laws and regulations, and DOI Travel Card policy.
4. Using the ConcurGov travel management system to file their signed travel vouchers and electronically attach their receipts in accordance with DOI's Temporary Duty Travel Policy and the Federal Travel Regulation.
5. Registering an online account with bank electronic access system, CitiManager, for account management and cardholder maintenance and establishing appropriate alerts.
6. Reviewing their cardholder statements of accounts within 30 days of the statement closing date to ensure all transactions are accurate, valid, and properly billed as “individually billed” or “centrally billed”. Statements are available for download from the bank’s electronic access system monthly on the 20th of each month.
7. Contacting the merchant to resolve invalid transactions, within 60 days of the transaction, prior to disputing transactions in the servicing bank’s electronic access system.
8. Disputing suspicious transactions attaching any supporting documents using Citibank’s electronic access system, CitiManager.
9. Notifying the A/OPC and supervisor of any improperly billed transactions.
10. Initiating corrections for centrally billed items within 30 days of the statement closing date which should have been individually billed, e.g. UberEats, hotel restaurant or room service, airplane snacks, etc. The cardholder must submit to the A/OPC, through the AO, the following information:
   a. Last four digits of account number;
   b. Transfer transaction desired;
   c. Transaction and posting date;
   d. Transaction amount;
   e. Vendor name;
   f. Reference number; and
   g. Description of charge and reason for transfer.
11. Initiating corrections for individually billed items within 30 days of the statement closing date which should have been centrally billed, e.g. lodging and transportation.
12. Following bureau/office exit clearance procedures to ensure account closure when leaving the organization.
13. Reporting suspected misuse or abuse of travel cards to their approving official, supervisor, A/OPC, and/or OIG.
14. Paying all undisputed individually billed transactions by the statement due date.
15. Seeking tax exemption at hotels and making good faith attempts to recover any state sales taxes paid.

III. Authorized Use
Information regarding authorized use of the DOI travel card is located in DOI Temporary Duty (TDY) Travel Policy Section 8.1. For information on local travel, please view 347 DM 200. Use of the travel card for local travel may be authorized by bureau or office policy. Cardholders must adhere to bureau or office policy regarding the use of the travel card for local travel. The travel card must only be used by federal employees at DOI who meet the following criteria:

1. Approved by one’s immediate supervisor to apply for the travel card; and
2. Completed mandatory training.

The primary email address associated with the travel card must be the cardholder's official Department of the Interior email address ending in .gov or .edu. The alternate email address associated with the travel card can be a personal email address to facilitate alerts.

IV. Use Restrictions

Information regarding use restrictions of the DOI travel card is located in DOI TDY Policy Sections 8.1.3. The use of the travel card is restricted to official government travel transactions that comply with the Federal Travel Regulation and all Department, bureau, and office policies. Cardholders are prohibited from using the travel card for the following purposes:

1. Fuel for a privately owned vehicle.
2. Unapproved rental vehicles.
3. Travel accommodations or expenses for someone other than the cardholder. Please consult with the Office of Financial Management (PFM) for guidance on the use of a corporate travel or declining balance card for Permanent Change of Duty Station travel.
4. Travel accommodations or expenses for non-government invitational travelers; contact the bureau or office for paying expenses for non-governmental travelers.
5. Procured contractor travel.
6. Conference registration fees are considered a purchase expense and should only be charged to a purchase card.
7. Supplies or services associated with travel (e.g., conference registration fees) that should be charged to the purchase card.
8. Supplies, services, or fuel that should be charged to the fleet card.
9. Cash advances once the traveler has returned from official travel.
11. Personal travel and commuting expenses.
12. Foreign and outside of the continental United States laundry expense, which are already allowed in meals and incidental expense reimbursement (M&IE).
13. Travel not booked through the DOI electronic travel system (ConcurGov) or as justified as an exception in the DOI Travel Policy Guidance document.

Declining balance cards shall not be used to pay an honorarium to an invitational traveler. Honorariums are not travel expenses.

Vendors and Centrally Billed Transactions. Some vendors are designated for the central billing of transactions based on their Merchant Category Code (MCC). There are circumstances when a particular transaction with these vendors could be for a meal or incidental expense while on official travel and the employee's responsibility to pay. For example, meal purchases made for the food delivery service provider "UberEats" uses MCC 4121 (Taxicabs/Limousines), which is designated as a centrally billed transaction. The same thing can happen when a cardholder uses their travel card at a hotel restaurant or for other services provided at a hotel, e.g. drycleaning. In these situations, Cardholders are responsible for ensuring that the transaction is transferred from a centrally billed to an individually billed transaction. Cardholders are responsible for paying individually billed transactions in their Citibank statement.

V. Fraud, Misuse, Abuse, and Collusion

All participants in the DOI Travel Card Program are responsible for preventing fraud, misuse, abuse and collusion. See these sections below to learn more about each topic.
A. Defining Fraud, Misuse, Abuse and Collusion

1. **Fraud.** OMB Circular A-123, Appendix B differentiates between internal and external fraud and provides the below definitions.
   a. Internal Fraud - "Any felonious act of corruption or attempt to cheat the Government or corrupt the Government’s agents by Government Charge Card Program officials. Use of the Government purchase, travel, fleet or integrated charge card(s) to transact business that is not sanctioned, not authorized, not in one’s official government capacity, not for the purpose for which the card was issued, not as part of official government business.” As described in this policy, controls must be established to monitor the following processes: application, transaction, review and approve, and charge card management. See the Internal Controls section for more information on internal controls and see Consequences of Fraud, Collusion, and Misuse or Abuse section to learn about the potential outcomes of fraudulent activity.
   b. External Fraud - "Any felonious act of corruption or attempt to cheat the Government or corrupt the Government’s agents by someone other than Government officials. Otherwise known as third party fraud.” External fraud includes non-account holder fraud which includes:
      i. Account/Card never received – A new or replacement card has been mailed to the account holder but was not received. This may be due to a third party interception.
      ii. Lost or Stolen Account/Card
      iii. Altered or counterfeit cards – This occurs when third parties obtain account information and used that information to make purchases with an altered or counterfeit card.
      iv. Account takeover/ Identity theft – In this case, the account holder’s identity has been compromised and a third party has requested a new account by providing confidential information about the account holder.

2. **Misuse.** OMB Circular A-123, Appendix B defines Misuse as: “Unintentional use of the purchase, travel, fleet and/or integrated charge card in violation of the FAR, DFARS, FTR, Agency Supplements, or Agency Policies/Procedures. These actions are the result of ignorance and/or carelessness, lacking intent, to include honest mistakes.”

   Examples of misuse include:
   a. Mixing up a government travel card with one’s personal credit card and making a charge unintentionally.
   b. Using a purchase card instead of travel card or vice versa.

   See Consequences of Fraud, Collusion, and Misuse or Abuse section to learn about the potential outcomes of activity that involves misuse and abuse.

3. **Abuse.** OMB Circular A-123, Appendix B defines abuse as: “Intentional use of the purchase, travel, fleet and/or integrated charge card in violation of the FAR, DFARS,
Agency Supplements, [FTR] or activity . . . [Government Travel Card] policies/procedures. Evidence of intentionality shall be inferred from repeat offenses of the same violation, following administrative and/or disciplinary action taken for this violation.” Examples of abuse include using the travel card to purchase fuel for privately-owned vehicle or taking cash advances (ATM withdrawals) taken after while not preparing to travel or in a travel status.

See Consequences of Fraud, Collusion, and Misuse or Abuse section to learn about the potential outcomes of activity that involves misuse and abuse.

4. Collusion. Collusion occurs when individuals illegally cooperate or conspire in order to cheat or deceive others. For the purposes of travel cards, collusion occurs when two or more persons cooperating or conspiring to commit fraud or to intentionally misuse or abuse a travel card. See Consequences of Fraud, Collusion, and Misuse or Abuse section to learn about the potential outcomes of activity that involves collusion.

B. Consequences of Fraud, Misuse, Abuse and Collusion

Consequences of acts of fraud, misuse, abuse and collusion are described below.

1. Acts of fraud, misuse, abuse and collusion with the travel card may result in immediate cancellation of the card and disciplinary action against the involved stakeholder(s) as required by the Government Charge Card Abuse Prevention Act. The range of disciplinary actions varies with the severity of the infraction and will be applied in accordance with Departmental and bureau/office guidelines. Part 370 of the Departmental Manual (370 DM 752) addresses discipline and adverse actions.

2. Intentional misuse of the card will be considered an attempt to commit fraud against the United States Government. As described in 18 U.S.C. 287, the individual may be subject to a fine of not more than $10,000, or imprisonment for not more than five years, or both. Cardholders may be held personally liable to the government for the amount of unauthorized transactions, plus interest and debt collection fees for intentional misuse or abuse of the travel card. Supervisors, approving officials, individuals that collude to misuse or abuse the travel card or to commit fraud, or individuals who use his or her position or authority to cause misuse or abuse of the travel card, may be subject to fines and imprisonment as well as the disciplinary actions and prosecution described below. The following actions are possible administrative and legal consequences for travel card infractions:

   a. Counseling employee
   b. Removing travel card privileges (e.g. ATM privileges)
   c. Suspending card
   d. Cancelling card
   e. Issuing a written reprimand
   f. Offsetting the individual’s salary to collect full cost of unauthorized purchases including administrative expenses
   g. Suspending employee
   h. Terminating employee
   i. Referral to legal authorities for additional civil action and/or criminal prosecution.
C. Roles and Responsibilities for Reporting Fraud, Misuse, Abuse and Collusion

Roles and responsibilities described below apply to reporting suspected fraud, misuse, abuse and collusion in the Travel Card Program.

1. Employees are responsible for immediately reporting suspected fraud, misuse, abuse, and collusion of travel cards to the A/OPC and elevating unresolved questionable purchases to the A/OPC in the event an unauthorized purchase is suspected or observed, or there is a purchase that is still in question after review of supporting account holder documentation.

2. Employees with knowledge of fraud, waste, abuse, misconduct, or mismanagement involving the U.S. Department of the Interior can also contact the Office of Inspector General's hotline. See https://www.doioig.gov/oig-hotline-forms for more information.

3. The A/OPC will initially notify the Bureau Travel Lead A/OPC and the supervisor and approving official of unresolved questionable purchases.

4. The supervisor and approving official are responsible for taking the following actions:
   a. Immediately gather facts and discuss the incident with the employee.
   b. Notify the A/OPC (if not already notified) and other appropriate personnel in accordance with DOI and bureau policy.
   c. Follow one of the two processes described below depending on the outcome of the facts gathered.
      i. If facts indicate the incident was unintentional and did not result in loss to the government, provide counsel to the employee and report to Agency/Organization Program Coordinator to ensure the employee reimburses the government for the unauthorized transaction or purchase.
      ii. If facts indicate the incident is intentional, inform the Office of Human Resources and report the incident to the Office of the Inspector General by following instructions for reporting suspected fraud at the following link: Office of Inspector General Hotline or calling 1-800-424-5081.

5. In accordance with OMB Circular A-123, Appendix B, in cases of suspected fraud, charge card managers must refer these instances to independent organizations (e.g., the agency’s Office of Inspector General (OIG) or the Department of Justice) for investigation.

6. If the supervisor or approving official completes their review of the facts and circumstances and determines the incident was intentional, the Bureau Travel Lead A/OPC will notify the following stakeholders:
   a. Bureau Finance Officer (or manager equivalent who oversees the program)
   b. DOI Charge Card Program Manager
   c. Servicing Human Resource Employee Relations Office
   d. Servicing Bank
   e. Office of Inspector General (in coordination with the supervisor and approving official)

6. The A/OPC will also conduct the following actions as necessary and prescribed above:
   a. Temporarily limit, suspend, or cancel travel card privileges in coordination with the employee’s supervisor.
   b. Monitor the situation to ensure all steps are completed and the issue is resolved.
   c. Document all cases of card misuse or abuse in the servicing bank’s data mining system
   d. Provide consultation to stakeholders as necessary.
VI. Internal Controls
The purpose of the internal control section is to provide stakeholders with information regarding the system of internal controls for the DOI Travel Card Program. Information provided in this section is considered mandatory; bureaus and offices must implement information provided in this policy section. A summary of the areas covered in this section is provided below.

A. Overview of Requirements - view this section to learn more about the policy governing internal controls at the DOI and overall bureau and office requirements.

B. Description of Controls - view this section to learn more about the controls required to be tested annually by bureaus and offices.

C. Execution of Internal Controls - view this section to learn more about the required use of Citibank's CitiManager and Visa IntelliLink Compliance Management System.

A. Overview of Requirements
Internal Controls are tools to help program and financial managers achieve results and safeguard the integrity of their programs. Effective internal control provides reasonable assurance that significant risks or weaknesses that could adversely affect the agency's ability to meet its objectives would be prevented or detected in a timely manner.

A system of internal controls over the DOI Travel Card Program is a process that includes measures such as policies and procedures, checks and balances, monitoring and reviews to prevent waste, fraud and misuse associated with DOI travel cards. Internal controls are necessary to ensure the achievement of organizational objectives; operational effectiveness and efficiency; reliable financial reporting; and compliance with laws, regulations and policies.

The Government Charge Card Abuse and Prevention Act of 2012 (Pub.L.112-194) (Charge Card Act) requires all Executive Branch agencies to establish and maintain safeguards and internal controls to prevent waste, fraud, and abuse of purchase cards, travel cards, fleet cards, and other centrally billed accounts. Appendix B of OMB Circular A-123, A Risk Management Framework/or Government Charge Card Programs, prescribes policies and procedures to agencies regarding how to maintain internal controls that reduce the risk of fraud, waste, and error in government travel card programs.

The information provided in the internal control section is designed to create specific controls which complement the annual requirements established in the fiscal year internal controls guidance by the Office of Acquisition and Property Management and the Office of Financial Management and meet the requirements of Appendix B of OMB Circular A-123.

Bureaus and offices will establish, monitor, assess and periodically review their controls to ensure cardholders, approving officials, A/OPCs and others with Travel Card Program responsibilities adhere to applicable requirements. Bureaus and offices are required to provide annual assurance to the Office of Acquisition and Property Management (PAM) that controls described in the Description of Controls section exist and are regularly monitored. Assurance shall be demonstrated by testing the controls using data sampling, system reports, and other types of information gathering and verification as necessary.

Bureaus and offices are encouraged to share best practices regarding established internal controls for the DOI Charge Card Program with the Office of Acquisition and Property Management for possible Department-wide adoption.
B. Description of Controls

The controls provided below are separated into the following four processes: application, transaction, review and approval, and travel card management. These controls are required to be established and monitored by bureaus and offices to provide annual assurance to the Office of Acquisition and Property Management.

1. Application Process (see section VII. Account Establishment)
   a. Control must exist to ensure cardholders and approving officials complete the required travel card training in DOI Talent.
   b. Control must exist to ensure the application for a government issued travel card is completed by trained employee who has been approved by her or his supervisor and documentation of supervisory approval is maintained.
   c. Control must exist to ensure the A/OPC assigned to the office reviews and processes each travel card application accurately.
   d. Control must exist to ensure A/OPCs are the only individuals authorized to process travel card applications.

2. Transaction Process
   a. Control must exist to ensure that travel cards are not being improperly used for the purposes listed in section V. Use Restrictions.
   b. Control must exist to ensure disputed transactions and discrepancies between receipts and other supporting documentation and the statement of account are resolved.
   c. Control must exist to ensure transactions are transferred from individually billed to centrally billed, and vice versa, as necessary within 90 days of the transaction.
   d. Control must exist to ensure cardholders are seeking tax exemption at hotels and making good faith attempts to recover any state sales taxes paid.

3. Review and Approve Process (see section VIII. Review and Approve)
   a. Control must exist to ensure cardholders review transactions within 30 days of the statement date. Statements are produced on the 20th of each month
   b. Control must exist to ensure proper supporting documentation is uploaded in ConcurGov and is attached to the travel voucher for approving official review and approval.
   c. Control must exist to identify, flag and investigate travel card transactions that are not claimed on a travel voucher.
   d. Control must exist to ensure a cardholder is not the approver of her or his own transactions, regardless of review and approve methodology.

4. Charge Card Management Process
   a. Control must exist to detect and deter fraud, abuse and misuse and to ensure appropriate actions are taken in instances of fraud, abuse or misuse.
   b. Control must exist to ensure that travel card balances are paid, and accounts are closed as required.
   c. Control must exist to ensure lost, damaged, or stolen cards are properly addressed.
   d. Control must exist to ensure travel card delinquency is addressed, including as necessary, through salary offsets.
   e. Controls must exist to ensure steps are taken to recover the cost of any illegal, improper, or erroneous purchases or payments, including as necessary, through salary offsets.
   f. Control must exist to ensure the number of cardholders and approving officials assigned to an A/OPC is reasonable based on the volume of cardholder activity and organizational structure.
g. Control must exist to ensure that responsibilities of an approving official and A/OPC do not overlap.

h. Control must exist to ensure the assignment of duties is separated by individuals; this may include the following duties: filling out and submitting a travel voucher, approving travel vouchers, paying travel vouchers and auditing travel vouchers.

i. Control must exist to ensure cardholders, approving officials and A/OPCs take initial travel card training prior to receiving a card or assuming their duties and take refresher fleet card training at least every three years.

C. Execution of Internal Controls.
Bureaus and offices must use Citibank’s CitiManager reports and Visa Intellilink Compliance Management System’s analytics, rules, reports, and case management functionality to identify, flag and review suspicious transactions, create cases as appropriate, track responses and corrective actions, and record them in Intellilink for auditor review. Bureaus and offices should execute and take action on the results of the Department-level rules, at a minimum, on a monthly basis. See section XII. System Resources for more information on these systems. Please refer to the annual Internal Control Guidance for more detailed instructions and due dates.

VII. Account Establishment
To establish a new account and apply for a travel card, cardholders must follow the steps provided below.
1. Obtain supervisor approval prior to being issued a travel card;
2. In DOI Talent, complete the GSA SmartPay mandatory travel card training, review the DOI Charge Card Program Agreement of Responsibility, and certify compliance with the Agreement. (see Training Requirements section for more information);
3. Upload the training certificate from the GSA SmartPay training into DOI Talent;
4. Contact the bureau or office A/OPC to determine the application process to be used, e.g. bulk upload or online application.
5. If using the online application, the bureau or office A/OPC will provide the bank vendor system access code and passcode; and
6. Complete the bank vendor online application process.

Bureaus should retain documentation of the supervisor’s approval in accordance with bureau processes.

VIII. Review and Approve
A. Cardholders
Cardholders will use the ConcurGov travel management system to file their signed travel vouchers and electronically attach their receipts in accordance with DOI’s Temporary Duty Travel Policy and the Federal Travel Regulation. Cardholders shall also review their cardholder statements of accounts within 30 days of the statement date to ensure all transactions are accurate, valid, and properly billed as “individually billed” or “centrally billed”. Statements are generally produced on the 20th of each month. Cardholders who identify suspicious transactions shall dispute them and attach any supporting documents using Citibank’s electronic access system, CitiManager. Cardholders who identify improperly billed transactions will notify their A/OPC and supervisor. Cardholders can review transactions in CitiManager Transaction Management System (CTMS) prior to a statement being issued.
While completing these reviews within 30 days is the minimum standard, a best practice is for Cardholders to review their transactions online in CitiManager’s Transaction Management module at the same time they are completing their travel vouchers and prior to statement issuance to expedite transaction disputes and transactions that need to be transferred. Cardholders will notify their A/OPC to perform any needed transfers of transactions to individually billed or to centrally billed.

In addition to the review process in ConcurGov and Cardholder statement review, bureaus and offices must implement supplemental internal controls to monitor travel card transactions for inappropriate or unauthorized transactions to address the internal control listed in Section VI Internal Controls, Description of Controls, Review and Approve Process, “Control must exist to identify, flag and investigate travel card transactions that are not claimed on a travel voucher.”

Use of VISA IntelliLink rules designed to identify questionable travel transactions, like the ones listed below, at least monthly shall constitute an adequate control for the purposes of this section:

- Airline Transactions without Associated Hotel or Car Rental Transactions
- Cash Withdrawal with No associated Travel
- Local Transactions Rule
- Weekend Purchase Activity

Bureaus and offices may consider alternative control mechanisms, such as audits that compare ConcurGov travel transactions with travel card transactions and the use of exception and delinquency reports, but they must always assess the costs and benefits of any additional controls.

**B. Approving Officials**

Approving officials shall review the cardholder’s travel voucher and supporting documentation in the ConcurGov travel management system for accuracy and to identify any suspicious transactions and approve or disapprove the travel voucher. If the Approving Official approves the travel voucher, they will electronically sign the travel voucher indicating approval for payment and for its content.

**C. Consequences for not Conducting Review and Approve.**

The proper and timely execution of the Review and Approve process is an integral part of cardholder and approving official responsibilities under DOI’s Charge Card Program and an essential part of DOI’s internal controls. The failure of a cardholder or approving official to complete one’s responsibility to review and approve transactions as outlined above can result in:

1. Suspending or cancelling the travel card
2. Suspending an Approving Official from serving as an Approving Official
3. Revoking an Approving Official’s Appointment as an Approving Official

In addition to these DOI Charge Card Program penalties, Part 370 of the Departmental Manual (370 DM 752) addresses additional potential discipline and adverse actions that can be taken.

**IX. Methodology and Record Keeping**

The Review and Approve requirements will be conducted in the ConcurGov travel management system along with a cardholder review of their electronic statement in CitiManager, in the
Citibank Transaction Management System (CTMS) module. Because required receipts will be uploaded into ConcurGov, there is no DOI requirement to upload them in CitiManager also or maintain with the cardholder monthly statement. Cardholders will have to use the CitiManager dispute any transactions and CTMS to upload any supporting documentation. Using ConcurGov as the repository for travel receipts and vouchers meets the guidance in OMB Managing Government Records Directive M-12-18, which requires that to the fullest extent possible, agencies eliminate paper and use electronic recordkeeping. The retention period shall be in accordance with the relevant Federal regulations, including National Archives and Record Administration regulations.

X. Account Reallocation
The Financial and Business Management System (FBMS) is the system of record for tracking cost allocation of charge card transactions. Bureaus and offices must ensure that charges are reallocated to the correct account in FBMS. Sufficient information must be provided to the appropriate bureau or office reallocation team to ensure accuracy in financial reporting by associating charges to the appropriate account assignment (funding, responsible cost center, object class, etc.) or travel-related relevant referencing obligation. This information is communicated as hand-written instructions on a statement copy, electronically on a PDF copy of the statement, or through email correspondence to an individual with reallocation capability (role-based authority) in FBMS.

XI. Other Payment Tools
Declining Balance Travel Card. Declining balance travel card accounts are established in the name of the cardholder and used for a limited time and for an authorized dollar amount. All transactions are centrally billed, and the available balance declines as the card is used. While an account may be reused by adjusting the card’s cycle limit, the best practice is to not refresh limits on the declining balance card, but rather to issue a card for each instance of need.

Declining balance cards for travel may be used by both DOI employees and invitational travelers. DOI employees must receive approval from their immediate supervisor to use the declining balance card. Invitational travelers must receive approval from an authorized DOI employee to use the declining balance card for travel. See the DOI Temporary Duty Travel Policy, amended August 31, 2018, for additional policy guidance.

A declining balance card can be used to cover official travel allowances and other related fees for the following individuals:

1. Employees serving without an appointment;
2. Employees and their immediate family members in the course of relocation (PCS) travel (See DOI Permanent Change of Station Policy, Section 2.2.DOI Government-Issued Charge Card);
3. Employees who have lost their charge card privileges;
4. Interviewees performing pre-employment interview travel;
5. Invitational travelers on official government business; and
6. Temporary employees serving under retired annuitant or occupational safety and health programs.

The declining balance card may be used for expenses related to official government travel, invitational travel, and relocation. Examples of declining balance card uses are:
1. Transportation and lodging;
2. Rental car and other modes of ground transportation; and
3. Meals and incidental expenses and other authorized reimbursable expenses.

Per section 4, Use Restrictions, declining balance cards shall not be used to pay an honorarium to an invitational traveler. Honorariums are not travel expenses.

**Corporate Travel Card.** A corporate Travel Card is an account issued in the name of the organizational unit and is used to pay only the transportation expenses and associated systems generated reservation and document submission fees for individuals who do not have a DOI travel card. In addition, the card can be used of lodging expenses or reservations. Corporate Travel Cards may be used by individuals at the DOI who meet the following criteria:

1. Approved by the immediate supervisor or DOI employee to apply for a corporate account for travel;
2. Completed mandatory travel card training in DOI Talent (see Training Requirements section);

A corporate account can be used for transportation expenses when an authorized traveler does not have a Government issued travel card to pay for major transportation expenses, such as rail or airfare. This can include individuals who have applied for but not yet received their Travel Card, individuals who have lost their travel card privileges, interviewees and invitational travelers, employees serving without an appointment, and employees and their immediate family members performing PCS travel.

**Sponsor Travel Card.** The Sponsor card is a centrally-billed, travel card issued only in the name of a DOI employee. It will have a monthly, refreshing credit limit. It is primarily for use for out-of-country travel, in countries where many, or most, purchases will be transacted in cash. The purpose of the foreign travel must directly benefit the Bureau’s mission. The card will have a full range of MCCs authorized to accommodate any possible circumstance the traveler encounters, and the cardholder will be able to obtain the full credit limit of the card in cash, if needed.

The card will only be issued in circumstances where the Bureau is willing to perform 100% audit of all card transactions. The card will be active only for a limited time and for the specific purpose of accommodating the sponsorship of foreign nationals. When the card is not in use, the bureau or office will reduce the credit limit to $1.00 to preclude it being used.

The Bureau will ensure adequate and appropriate travel documentation for each sponsoring employee, and the transactions of the foreign travelers documented on public voucher forms, in accordance with DOI Travel Policy.

**XII. Training Requirements**
DOI uses the GSA-developed training to meet the OMB training requirements for both initial and refresher training. This training is located in DOI Talent. The training consists of separate courses for the purchase, travel, and fleet card. In addition, there are designated courses for cardholders, approving officials and A/OPCs.
All travel cardholders, approving officials, supervisors, and A/OPCs are required to complete the following actions, at a minimum, prior to appointment or card issuance:

- Complete the Travel Card Training course for their role(s) (cardholder, Approving Official, A/OPC) in DOI Talent.
- Complete refresher training in DOI Talent every three years to continue to participate in the DOI Travel Card Program.
- Cardholders: Certify that they have read and will comply with the Charge Card Agreement of Responsibility in DOI Talent. During refresher training, recertify that they have read and will comply with the Charge Card Agreement of Responsibility.
- Approving Officials: Download and retain the Approving Official Appointment Letter.
- A/OPCs: Read the Travel Card Policy and thoroughly understand Cardholder and AO responsibilities and procedures for identifying and reporting fraud, abuse and misuse.

A/OPCs are also required to participate in training on:

- CitiManager to include the CitiManager Transaction Management (CTMS) module and CitiManager Custom Reporting System (CCRS) module.
- Proper card management (account set-up, authorization controls, account close-out)
- VISA Intellilink Compliance Management System (rules, reports, case management)

Training can consist of participation in on-site classes, webinars, on-demand web-based content, review of job aids, and attendance at the annual GSA SmartPay Training Forum.

XIII. System Resources
The purpose of the system resources section is to provide users with a single reference point for system resources as they pertain to the DOI Travel Card.

A. Bank Vendor Systems and Resources - view this section for bank vendor systems and resources for the DOI Travel Card.
B. Financial and Business Management System (FBMS) - view this section for FBMS resources for the DOI Travel Card.
C. Federal Personnel Payroll System (FPPS) - view this section for FPPS resources as they pertain to the DOI Travel Card.
D. Travel Management System - view this section for travel management system resources as they pertain to the DOI Travel authorization and vouchering.

A. Bank Vendor Systems and Resources
The DOI Travel Card Program is supported by Citibank through a task order under the General Services Administration's SmartPay 3 master contract. Citibank and Visa manage the systems which interface with a variety of DOI systems. The links below have a variety of resource information.

1. CitiManager and the Citibank Transaction Management (CTMS) module allows Cardholders to access account information, review statements and transactions, manage alerts, dispute transactions and upload receipts. CitiManager and CTMS allows A/OPCs to efficiently manage the travel card program. A/OPCs have varying entitlements in the CitiManager to perform the following functions:

   a. View accounts, statements, balances, and transactions.
   b. Dispute transactions.
   c. Transfer Transactions from individually billed to centrally billed and vice versa.
   d. View authorizations and declines.
   e. Review, approve, or reject new cardholder applications.
f. Perform account maintenance.
g. Create, activate and deactivate users.
h. Assign applications and companies.
i. Set passcodes.
j. Manage alerts.
k. Manage the account profile.
l. View and print reports.

2. Citibank Custom Reporting System (CCRS). In addition to CitiManager and CTMS, CCRS is another module available through CitiManager that allows A/OPCs to create queries with wizards and download data into spreadsheet, database or word processing format. CCRS can provide:
   a. Online access to over 600 data elements, including level III detail
   b. Stored customizations by user for faster report set-up
   c. E-mail notification so you can retrieve reports at your convenience
   d. The ability to schedule reports to run when you need them
   e. The capability to “drill down” to deeper levels of detail

3. Visa Intellilink Compliance Management is DOI’s data-analytic, web-based data mining system for the DOI Charge Card Program. DOI will use the system as an essential part of the Charge Card Program internal controls. Primary users are the Charge Card Support Center and Bureau Lead A/OPCs. Visa Intellilink provides the following capabilities:
   a. Allows rules to be set tracking certain types of transactions;
   b. Generates a sample transaction data set for review;
   c. Employs predictive and analytical capabilities to identify card program misuse and abuse;
   d. Identifies transactions that may need further investigation;
   e. Offers reporting on, and analysis of, travel card transactions; and
   f. Combines rules and predictor scores to provide a “one-stop-shop” to manage each program.

B. Financial and Business Management System
The Financial and Business Management System (FBMS) interfaces with the bank’s charge card system on a daily basis to capture card transaction activity. Training is required as a prerequisite to gain access to the FBMS charge card data and business processes. This training is dependent on the end-users capability and role in FBMS. Only identified A/OPCs and necessary financial management staff will be granted the roles necessary to access this information. See FBMS training on the FBMS Hub.
   1. Financial and Business Management System - use this link to access the proprietary system which integrates acquisition and financial data. Note, this link is only accessible inside the DOI firewall.
   2. FBMS Hub - use this link to access FBMS resources and additional information. Note, this link is only accessible inside the DOI firewall.

C. Federal Personnel Payroll System
The Federal Personnel Payroll System (FPPS) data is used to help manage the bank’s hierarchy system to closely match DOI’s organizational structure. This allows for proper scope of view and responsibilities in the bank’s system.
D. Travel Management System
The travel management system currently used by the DOI is ConcurGov. Travelers build their travel authorizations, make reservations, and file their travel vouchers in ConcurGov. Supervisors and supporting administrative staff can approve authorizations and travel vouchers in ConcurGov.

- Concur Account Log-in - use this link to access and manage travel at the DOI.