

**AUDIT OF THE
TRAVEL CARD PROGRAM**

National Transportation Safety Board

Report Number: FI-2007-003

Date Issued: November 1, 2006



**U.S. Department of
Transportation**

Office of the Secretary
of Transportation

Office of Inspector General
Washington, D.C. 20590

November 1, 2006

The Honorable Mark V. Rosenker
Chairman
National Transportation Safety Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Dear Chairman Rosenker:

This report presents the results of our audit of the National Transportation Safety Board's (NTSB) Travel Card Program. As reported by the Government Accountability Office, proper use of Government-issued travel cards and timely payment of credit card charges are Governmentwide concerns. The Travel Card Program is highly visible, and abuses of travel card privileges by a small minority of employees can reflect negatively on the entire organization.

NTSB incurs about \$2 million in travel costs annually, most of which are associated with accident investigations. NTSB investigates more than 2,000 accidents each year in all modes of transportation, including aviation, highway, marine, rail, and pipeline. According to NTSB officials, no major accidents occurred during the period of our audit—July 1, 2004, through June 30, 2005.

In addition to supporting accident investigations, travel funds are used to support advocacy-related functions conducted by Board members and NTSB officials and administrative activities such as training. Each office director determines which employees in his or her organization will receive travel cards and is responsible for managing all travel funds. Each Board member is also provided with designated travel funds for the use of nonaccident travel by his or her immediate office.¹ Section 9 of Public Law 106-424, the National Transportation Safety Board Amendments Act of 2000, requires NTSB to provide an annual report to Congress detailing the nonaccident-related travel of each Board member.

¹ For fiscal year 2005, the travel budget was \$52,707 for the Chairman, \$26,353 for the Vice Chairman, and \$21,083 for other Board members.

NTSB has been using Citibank travel card services since 2000 and has cross-servicing agreements to use the Department of the Interior's National Business Center financial and travel management systems to process travel reimbursements to employees. As of the end of our audit period, 355 of the 432 NTSB employees were provided with individual travel cards. In addition, 25 employees were given centrally billed travel cards, which were used to reserve and charge transportation costs for invitational travelers² and NTSB employees whose applications for individually billed cards were pending.

Between July 1, 2004, and June 30, 2005, 293 individual NTSB cardholders used Government-issued travel cards for total expenditures of about \$1.8 million (see Table 1).

**Table 1. NTSB Travel Card Transactions
July 1, 2004–June 30, 2005**

Billing Type	Number of Cardholders as of June 30, 2005	Cardholders Making Transactions	Number of Transactions Made	Value of Transactions (rounded)
Individual	355	293	12,921	\$1,800,000
Central	25	10	112	\$30,000

Our objectives were to determine whether (1) internal controls are adequate to safeguard against unauthorized card use for other than official Government business, (2) NTSB employees used travel cards for official Government business and Board members' travel was properly reported to Congress, and (3) delinquent travel charge accounts are identified and monitored sufficiently to ensure timely payment resolution. We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards prescribed by the Comptroller General of the United States and performed such tests as we considered necessary to detect fraud, waste, and abuse. Our scope and methodology are described in more detail in Enclosure 1.

RESULTS IN BRIEF

NTSB's internal controls are generally adequate to safeguard against unauthorized use of Government travel cards and to prevent delinquencies. Our detailed

² Invitational travelers are non-NTSB Training Center course instructors, interviewees for NTSB job openings, witnesses for public hearings, and those who serve NTSB without pay or at \$1 a year.

testing³ did not identify any improper use of the cards or delinquent card accounts between July 1, 2004, and June 30, 2005.⁴

We did, however, identify opportunities to strengthen controls in several areas. These include ensuring that NTSB maintains an accurate roster of travel cardholders, closing separated employees' accounts in a timely manner, reducing travel card dollar limits for staff who rarely travel, documenting management overrides of system controls designed to prevent the use of travel cards for certain activities, and tracking cardholders' acknowledgment of responsibility for proper use of Government-issued cards. We are making recommendations to strengthen internal controls in these areas.

During FY 2005, there were five members serving on the NTSB Board, including the Chairman and Vice Chairman. On October 27, 2005, NTSB properly reported to Congress the Board members' travel not related to accident investigations, except for one member. The report omitted the last three trips the member made before his resignation on August 1, 2005.

According to the NTSB Chief Financial Officer (CFO), his office was told that this member was leaving on July 11, 2005. Accordingly, the office only included the member's travel between October 1, 2004 and July 11, 2005 in the report submitted to Congress. The member made three trips after July 11, 2005 before his resignation, which were all recorded in the Travel Manager system. NTSB plans to include these additional trips in the report to Congress on fiscal year (FY) 2006 Board member travel. We are recommending that NTSB submit a revised report to Congress and prepare future reports based on all travel recorded in the Travel Manager system for the whole fiscal year, regardless of when members are separated from the Board.

FINDINGS

Controls To Prevent Unauthorized Use of Travel Cards Are Generally Adequate but Could Be Improved

While NTSB internal controls are generally adequate, they could be strengthened in the following areas:

³ We judgmentally selected 8 NTSB employees and reviewed all 36 travel vouchers submitted by these employees during our audit period. In addition, we selected a statistical sample of 68 transactions from the Citibank credit card usage reports for review.

⁴ According to revised Appendix B of Office of Management and Budget Circular A-123, *delinquency* is defined as a charge card account balance that is unpaid for more than 61 days past the statement date; we found none in this category. The total amount of bills that were 30 days or more past due ranged from a high of about \$3,700 during July 2004 to a low of about \$400 during January 2005.

- **NTSB did not independently validate Citibank’s list of active travel card accounts.** The Agency received a monthly listing of active NTSB cardholder accounts from Citibank. Because NTSB did not keep a listing of authorized travel cardholders, it could not cross-check the accuracy of the account listing. As a result, NTSB had no assurance that all active accounts belonged to authorized cardholders. NTSB officials have agreed to develop a list of employees with an authorized travel card account and periodically reconcile that list with Citibank’s list of active travel card accounts.
- **Closing separated employees’ accounts took too long.** Upon separation from the Agency, cardholders are required to turn in their Government travel cards to their office directors. The Human Resources Division is required to notify the Travel Card Program coordinator when a cardholder separates from the Agency so that the program coordinator can notify Citibank to close that account immediately. Twenty-two cardholders were separated from NTSB during our audit period, nine of whom did not have their accounts closed by Citibank until after their separation—in one case 36 days after separation (see Enclosure 2). According to an NTSB official, this happened because the program coordinator had no control over when the notification from the Human Resources Division was sent, and the notifications were not always sent promptly. Until an account is closed, however, a cardholder can still make purchases over the telephone or online with the account number and an active expiration date. In our review, however, no purchases were made by the nine cardholders after their separation.
- **Travel card dollar limits were higher than needed.** Both the centrally billed and individually billed cards had high dollar limits. Specifically, the total monthly dollar limit for the 25 centrally billed cards was about \$1.4 million as of June 30, 2005.⁵ However, NTSB’s centrally billed transactions totaled only about \$30,000 for the entire year of our audit, with the highest monthly total being about \$6,500. After bringing this information to NTSB officials’ attention, they reviewed the card limits and reduced the total monthly limit for the centrally billed cards from \$1.4 million to about \$57,500 as of April 24, 2006—a 96-percent reduction.

As for the individually billed cards, 11 cardholders had administrative positions and did not travel at all during our audit period.⁶ For 10 of these 11, the travel card dollar limit was \$5,000. According to NTSB officials, they plan to review all individually billed card limits and determine if any should be reduced. Unnecessarily high dollar limits needlessly expose NTSB and its

⁵ Twelve of these 25 had monthly limits of \$100,000 each.

⁶ In a follow-up review, we found that none of these administrative staff traveled between July 1, 2005, and May 31, 2006, either.

employees to greater losses if the cards are lost, stolen, or used for other than official Government business.

- **NTSB did not keep records of management overrides of system controls designed to block inappropriate purchases.** NTSB had established blocked merchant category codes to prevent certain types of inappropriate purchases, such as those from jewelry stores, gambling facilities, or theaters. While most of the travel card transactions we reviewed were for travel-related expenditures (see Enclosure 3), 32 transactions were made for blocked purchase items. The staff of the CFO approved employee requests to make these purchases and notified Citibank to override system controls to allow these transactions to go through. For example, in April 2005, the program coordinator lifted the blocked merchant category code for six charges for \$2,200 at the Marine Engineers' Beneficial Association Engineering School. This Association is a training organization that also provides housing. The blocked merchant category code was lifted in order to allow lodging charges to go through. Other examples included lifting blocked merchant category codes for business services such as photocopying, packaging, faxing, and internet access.

While these override transactions did not appear excessive and we acknowledge that some occasions justify overrides of this system control, we have two concerns with the current process. First, we found no guidance provided to CFO staff to ensure consistent decisionmaking for approving override requests. Second, no documentation could be found detailing employee requests, reasons for system overrides, or responses from approving officials. According to an NTSB official, the Agency does not require a written justification for such overrides due to the limited number of such requests. While the amounts were small, totaling about \$4,900 during our audit period (see Table 2), a record justifying the override is needed for proper accountability. Incorporating this control into normal business operations is important to NTSB because its travel costs and the need for system overrides could increase significantly whenever major accidents occur.

**Table 2. Breakdown of Travel Card Purchases Made
in Blocked Categories,
July 1, 2004 – June 30, 2005**

Transaction Type^a	Number of Transactions	Total Value
Schools, trade, vocational	6	\$2,200
Schools and educational services	2	1,113
Business services, other	15	726
Equipment rentals, furniture	2	258
Miscellaneous and specialty	3	233
Manual cash disbursements	1	200
Automobile, truck dealers, sales	2	180
Equipment, furniture stores	1	13
Total	32	\$4,923

a These blocked transaction types are not all-inclusive; they represent only the ones authorized to be overridden during our audit period.

- **NTSB could not locate acknowledgment forms signed by all employees with travel cards.** Travel cardholders are required to sign an acknowledgment form certifying that they have read, understood, and will abide by the policies and procedures issued by NTSB and Citibank. By signing the acknowledgment form, the cardholder also agrees that the unauthorized use of the travel card or the failure to pay charges in accordance with the terms of the program may result in disciplinary action. For the 25 travel cardholders for whom we requested acknowledgment forms, NTSB could not locate the signed form for 13 cardholders.

NTSB officials did not realize that these forms were missing until they received our request. The former program coordinator had left the Agency, and other NTSB officials were unable to locate the acknowledgment forms. The forms that were missing have been replaced with newly signed forms. NTSB should pay closer attention to recordkeeping for the acknowledgment forms because they are evidence of a cardholder's accountability should the cardholder misuse the travel card.

Travel Cards Were Used for Official Business Only, but the Report on Board Members' Travel Was Incomplete

Our detailed testing of travel card transactions found that they were used only for official Government business, supported with original receipts, and properly reviewed and approved by management in the automated Travel Manager system. In addition, the Office of CFO reviewed the monthly travel card transaction reports from Citibank for atypical transactions, such as cash advances without associated travel activity, nontravel expenses, and lodging and restaurant expenses within the commuting area.

The FY 2005 report submitted to Congress for Board members' travel costs was incomplete. In October 2005, NTSB submitted the report to the required congressional committees for all travel costs for four of the five Board members. However, for one Board member, \$1,210 in costs for three nonaccident-related trips was not included, as shown in Table 3. These additional trips did not, however, result in travel costs exceeding the budget that was submitted for congressional committees review in November 2004.

Table 3. FY 2005 Board Members' Travel Costs

Board Member	Travel Cost Budget	Travel Cost Reported	Travel Cost Not Reported
Chairman	\$52,707	\$16,854	\$0
Vice Chairman	26,353	10,752	0
Board Member 3	21,083	11,686	0
Board Member 4	21,083	2,247	0
Board Member 5	21,083	19,870	1,210

According to the CFO, his office was told that this member was leaving on July 11, 2005. In fact, he resigned from the Board on August 1, 2005. Accordingly, the office only included the member's travel between October 1, 2004, and July 11, 2005, in the report to Congress, even though three trips taken after July 11 were recorded in the Travel Manager system. NTSB plans to include these additional trips in its report to Congress for Board members' FY 2006 travel. We believe, and are recommending, that a more appropriate action would be for NTSB to submit a revised report for Board members' FY 2005 travel costs to Congress.

RECOMMENDATIONS

We recommend that the Chairman, National Transportation Safety Board, direct the Chief Financial Officer to:

1. Direct the program coordinator to develop a list of authorized travel cardholders and periodically reconcile that list with Citibank's list of active travel card accounts.
2. Require office directors to notify the Travel Card Program coordinator of the separation of travel cardholders at least by the date of separation to ensure timely closeout of their accounts at Citibank.
3. Reduce dollar limits on cards of individuals who travel infrequently.
4. Develop guidance for granting employee requests to override system controls for blocked purchases and maintain a record of approved requests for system overrides.
5. Direct the program coordinator to periodically inventory acknowledgment forms signed by travel cardholders.
6. Ensure that all Board members' travel costs reported in the Travel Manager system for the entire fiscal year are included in the annual report to congressional committees, regardless of when members are separated from the Board.
7. Submit a revised report to congressional committees on Board members' FY 2005 travel costs.

AGENCY COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE

A draft of this report was provided to NTSB for comments on September 20, 2006. The NTSB Acting Chairman responded on September 25, 2006, and concurred with six of seven recommendations (see Enclosure 4).

Specific actions taken or planned by NTSB on our recommendations are summarized below:

Recommendation 1: NTSB concurred. Beginning in FY 2007, the program coordinator plans to reconcile the monthly Citibank listing with any activity

during the period to ensure that additions, separations, or account changes to the listing are accurately updated.

OIG Response: NTSB's actions meet the intent of our recommendation.

Recommendation 2: NTSB concurred with an alternative course of action. All employees who separate from the Agency have to go through a clearance process, which includes clearance from the Office of CFO. This office has implemented a procedural change whereby CFO employees notify the Travel Card program coordinator by e-mail that an employee is leaving the Agency. The program coordinator then notifies Citibank to close the employee's account.

OIG Response: NTSB's alternative corrective actions meet the intent of our recommendation.

Recommendation 3: NTSB concurred. Employees who travel infrequently have their credit limits set to one dollar.

OIG Response: NTSB's actions meet the intent of our recommendation.

Recommendation 4: NTSB did not concur. NTSB noted that the override transactions represented a small number of the total number of transactions and that some of the dollar amounts were small. NTSB also stated that the risk associated with this issue does not warrant additional compensating controls because NTSB does not bear any financial responsibility for the individually billed travel card charges.

OIG Response: We agree that the number of override transactions was small, but there is no assurance the numbers will be small every year. NTSB travel costs and the need for system override could increase significantly whenever major accidents occur. As for the small dollar amounts, NTSB can set a minimum dollar threshold above which written justification for approving the override will be kept. The blocked merchant category codes were implemented to prevent employees from using Government-issued cards to make purchases that would embarrass the Agency, even if NTSB bears no financial responsibility. Accordingly, we believe NTSB should develop a policy requiring written justification and a record of who approved the override when a blocked merchant category code is removed for purchases above the minimum dollar threshold.

Recommendation 5: NTSB concurred. The procedure is already operational. The records are reviewed at least annually to ensure their completeness.

OIG Response: NTSB's actions meet the intent of our recommendation.

Recommendation 6: NTSB concurred. Beginning with the submission of the report to Congress for Board members' FY 2006 travel costs, NTSB will use information from the Travel Manager system to prepare the report.

OIG Response: NTSB's actions meet the intent of our recommendation.

Recommendation 7: NTSB concurred. NTSB plans to include the three missing trips from the one Member's travel costs in the FY 2006 travel cost report.

OIG Response: NTSB's alternative corrective action meets the intent of our recommendation. On October 31, 2006, NTSB management provided us with a draft copy of the report to be submitted to Congress for this particular member's travel costs. The full report is for all Board members' FY 2006 travel. However, it will also include all trips made by this particular member during FY 2005 with a full disclosure of the three trips omitted from last year's submission.

Actions taken or planned by NTSB are responsive except for recommendation 4. We request that NTSB re-evaluate its response. We would appreciate receiving your written response to recommendation 4 within 30 days.

We appreciate the courtesies and cooperation of NTSB representatives during this audit. If you have any questions concerning this report, please call me at (202) 366-1496 or Gary B. Fishbein, Project Manager, at (202) 366-9708.

Sincerely,



Rebecca C. Leng
Assistant Inspector General
for Financial and Information Technology Audits

Enclosures (5)

SCOPE AND METHODOLOGY

This audit focused on travel card transactions between July 1, 2004, and June 30, 2005, which were valued at about \$1.8 million. The majority of the transactions were made by the Office of Aviation Safety; Office of Highway Safety; and Office of Railroad, Pipeline and Hazardous Materials Safety. The total travel costs for these three offices were about \$1.3 million. We also reviewed the travel of Board members during FY 2005 and individually billed travel cardholders who had administrative positions through May 31, 2006.

We reviewed Citibank's account listing reports dated June 15, 2004, and June 15, 2005. As of June 2005, there were 355 individually billed cardholders and 25 centrally billed cardholders.

We selected both judgmental and statistical samples of Citibank cardholders' transactions. We judgmentally selected 10 individually billed travel cardholders. However, the Travel Manager system contains only travel vouchers processed between October 1, 2004, and September 30, 2005.⁷ As a result, we were able to review only 8 individually billed travel cardholders, with a total of 36 travel vouchers. We reviewed the appropriateness of, and support for, expenses claimed on each voucher. For the statistical sample, we compared 68 Citibank transactions with the authorized expenses on the travel vouchers in the Travel Manager system. During the audit, we became aware of the requirement that NTSB provide an annual report to Congress detailing the nonaccident-related travel of each Board member. As a result, we expanded our scope to include the reconciliation between each Board member's budget and the nonaccident-related travel costs reported in the Travel Manager system for FY 2005.

We interviewed program officials in the Office of CFO to obtain an understanding of NTSB's travel card policies and procedures and related internal controls. We also interviewed NTSB administration officials in the Office of Aviation Safety; Office of Railroad, Pipeline and Hazardous Materials Safety; and Office of Research and Engineering, to determine whether the travel vouchers with supporting documentation were maintained by the offices, as required by Office of CFO travel bulletin. In addition, we contacted appropriate officials at Citibank to obtain credit card usage information.

We performed our audit work from September 2005 through August 2006 at NTSB Headquarters in Washington, DC. The audit was conducted in accordance with Generally Accepted Government Auditing Standards prescribed by the Comptroller General of the United States and included such tests as we considered necessary to provide reasonable assurance of detecting abuse or illegal acts.

⁷ At the end of each fiscal year, the travel vouchers from the previous fiscal year are archived at the Department of the Interior.

**NUMBER OF DAYS ELAPSED BETWEEN EMPLOYEE
SEPARATION AND CLOSING OF TRAVEL CARD ACCOUNTS**

Separated NTSB Employee^a	Date Separated From NTSB	Date Citibank Closed the Account	Number of Days Between Date Separated and Date Account Was Closed
Employee A	04/30/05	03/22/05	-39 days
Employee B	10/30/04	10/06/04	-24 days
Employee C	05/06/05	04/15/05	-21 days
Employee D	01/03/05	12/20/04	-14 days
Employee E	11/27/04	11/19/04	-8 days
Employee F	05/28/05	05/20/05	-8 days
Employee G	04/02/05	03/29/05	-4 days
Employee H	07/01/05	06/27/05	-4 days
Employee I	02/19/05	02/17/05	-2 days
Employee J	08/07/04	08/06/04	-1 days
Employee K	10/04/04	10/04/04	0 days
Employee L	07/01/05	07/01/05	0 days
Employee M	02/22/05	02/23/05	1 day
Employee N	05/14/05	05/17/05	3 days
Employee O	07/31/04	08/04/04	4 days
Employee P	09/18/04	09/23/04	5 days
Employee Q	02/16/05	02/23/05	7 days
Employee R	06/03/05	06/11/05	8 days
Employee S	06/03/05	06/20/05	17 days
Employee T	10/02/04	10/20/04	18 days
Employee U	05/11/05	06/16/05	36 days

a In addition to the employees in the table, another former employee separated from NTSB during our audit period. However, NTSB and Citibank could not provide the information needed to determine when this employee's travel card account was closed.

CITIBANK TRANSACTIONS DURING AUDIT PERIOD

Transaction Description	Number of Transactions
Cash advance fees, disbursements, and payments	2,716
Airlines, railroad, and other transportation	2,649
Hotels, motels, and other lodging facilities	2,300
Travel agency fees	1,949
Restaurants, bars	1,323
Car rentals	845
Service stations	576
Parking lots and garages	482
Grocery and drug stores	25
Internet and telecommunications services	16
Government services	12
Schools, trade, vocational, and educational services	8
Office supply and copy reproduction	8
Duty-free stores	3
Miscellaneous and specialty retail stores	3
Furniture and furniture rental	3
Automobile, truck dealers, sales, service	2
Cable, satellite, and other pay TV/radio	1
Total	12,921

MANAGEMENT COMMENTS



Office of the Chairman

National Transportation Safety Board
Washington, D.C. 20594

September 25, 2006

Mr. Todd Zinser
Acting Inspector General
Department of Transportation
400 7th Street, S.W., Room 9210
Washington, D.C. 20590

Dear Mr. Zinser:

I am in receipt of a letter dated September 19, 2006, from Rebecca Leng, Assistant Inspector General for Financial and Information Technology Audits. Her letter transmitted the Draft Report, Audit of the Travel Card Program.

I am gratified that your audit found that there were no instances of improper use of the Government –issued travel card and that NTSB did not have any delinquent accounts. I also am very pleased to note that, overall, you found the NTSB internal controls to be adequate. In our continuing effort to improve on this already successful travel card program, since the end of the audit period, we have made a number of changes, including assigning a new program coordinator, and strengthening the retention of our base-line documentation.

As a point of clarification, the NTSB does not, as a matter of routine, request a supplemental appropriation for a major accident investigation. In fact, NTSB has requested and received only 2 supplemental appropriations in the past 20 years. NTSB did not request a supplemental appropriation for the last two major aviation accident investigations.

Our responses to your recommendations are attached.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark V. Rosenker".

Mark V. Rosenker
Chairman

Attachment

Attachment

Recommendations

1. Direct the program coordinator to develop a list of authorized travel cardholder accounts and periodically reconcile that list to the Citibank's list of active travel card accounts.

Concur. The program coordinator receives a monthly listing of all active cardholders and corresponding account numbers. This list will be reconciled periodically with any activity during the period to ensure any additions, separations, or account changes have been completed accurately. This process will be in operation at the beginning of FY 2007.

2. Require office directors to notify the Travel Card Program coordinator of the separation of travel cardholders at least by the date of separation to ensure timely closeout of their accounts at Citibank.

Concur with an Alternative Course of Action. Since September 30, 2005, all of the accounts have been closed in 2 business days or less. Generally, the employees' separation date was the last day of a pay period, which is a weekend. Staff would not be available on the separation date to process the account closing. All employees who separate have to go through a clearance process, which includes receiving clearance from the CFO office. CFO employees notify the Travel Card Program Coordinator and the alternate Coordinators by email that an employee is leaving the Board. The Travel Card Program Coordinator and notifies Citibank to close the account. We have already implemented this procedural change. Also, from the risk perspective, your review did not find any transactions by employees who separated with an active travel card. Further, there is no financial risk to NTSB because any charges made with the individually-billed travel card are the responsibility of the cardholder and not the agency.

3. Reduce dollar limits on cards of individuals who travel infrequently.

Concur. This program is already operational. Employees who travel infrequently have their credit limit set to one dollar.

4. Develop guidance for granting employee requests to override system controls for blocked purchases and maintain a record of approved requests for system overrides.

Do not concur. The associated risk of this issue does not merit additional compensating controls. Override authority is limited to four individuals at the Board, including the Chief Financial Officer. The four individuals are all within the Chief Financial Office organization. In addition, all of the travel card charges are reviewed by the responsible office director and CFO staff. The DOT-OIG did not find any improper transactions by NTSB employees. It should be noted that NTSB does not bear any financial responsibility for the individually-billed travel card charges. Further, the review by the DOT-OIG audit staff found that the override transactions represented .002% of the total transactions and some of the dollar amounts were as small as \$1.38. As noted in the report, larger dollar override transactions were documented. In fact, 46% of the dollar value for override transactions had supporting documentation.

5. Direct the program coordinator to periodically inventory acknowledgment forms by travel cardholders.

Concur. This procedure is already operational. The records are reviewed at least annually to ensure their completeness.

6. Ensure that all Board members' travel costs reported in the Travel Manager System for the entire fiscal year are included in the annual report to the congressional committees, regardless of when members separated from the Board.

Concur. One of the procedures during the preparation phase of the report will include a review of the travel data from the Travel Manager system. This procedure is in place for the FY 2006 report, which is due to Congress during the first fiscal quarter 2007.

7. Submit a revised report to congressional committees on Board members' FY 2005 travel costs.

Concur. We have already planned to submit a report with the Member's travel including the three trips totaling \$1,210 on the next reporting cycle, which is the fiscal first quarter 2007.

MAJOR CONTRIBUTORS TO THIS REPORT

<u>Name</u>	<u>Title</u>
Gary B. Fishbein	Project Manager
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