



Office of Inspector General

Board of Governors of the Federal Reserve System
Consumer Financial Protection Bureau

MEMORANDUM

DATE: March 10, 2026

TO: The Honorable Russell Vought
Acting Director
Consumer Financial Protection Bureau

FROM: Khalid Hasan 
Assistant Inspector General for Information Technology

SUBJECT: *Fiscal Years 2023–2024 Risk Assessment of the CFPB’s Government Travel Card Program*

Executive Summary

In accordance with the Government Charge Card Abuse Prevention Act of 2012, we have conducted a risk assessment of the Consumer Financial Protection Bureau’s government travel card (GTC) program for fiscal years 2023–2024 to inform the necessary frequency and scope of GTC audits. The results of the risk assessment show that the risk of illegal, improper, or erroneous use in the CFPB’s GTC program remains *low*. This means that illegal, improper, or erroneous use of the CFPB’s GTCs is unlikely to occur and that such an occurrence would be expected to have a minimal effect on current operations and long-term objectives.

While we assigned an overall risk level of *low* to the CFPB’s GTC program, we identified six transactions made with international merchants that could not be traced to official travel. However, because of the relatively immaterial amount of these charges, we do not believe this warrants the overall risk level to be raised above *low*.

Since our review, the CFPB has changed its approach to official travel, including centralizing GTC program elements and significantly reducing travel in calendar year 2025. We plan to assess the effect of these changes in future GTC risk assessments.

Background

The Government Charge Card Abuse Prevention Act of 2012 requires the inspector general of each executive agency to conduct periodic assessments or audits of travel card programs to identify and analyze the risks of illegal, improper, or erroneous purchases and payments. Additionally, Office of Management and Budget Circular A-123, Appendix B, “A Risk Management Framework for Government

Charge Card Programs,” states that inspectors general will conduct periodic risk assessments of agency travel card programs to analyze the risks of illegal, improper, or erroneous purchases.¹

The CFPB’s GTC program is coordinated by the Travel and Relocation Office, which is part of the Office of Finance and Procurement. The Travel and Relocation Office is responsible for oversight of cardholders’ activity and program compliance with GTC controls in the CFPB’s “Travel and Travel Card Process Narrative.”

Cardholders who are part of the GTC program must abide by the agency’s travel policies and procedures. During fiscal years 2023–2024, all CFPB employees traveling on official government business were required to obtain and use an individually billed GTC for travel expenses, unless those expenses were charged to a centrally billed account.² Cardholders are required to pay statement balances promptly, keep accounts current, and reconcile GTC statements to ensure that proper payments are received by the bank and to allow for the detection of unauthorized transactions.

During fiscal years 2023–2024, cardholders made 44,166 GTC purchases totaling about \$10.5 million (table 1).³ Lodging expenses accounted for most spending, followed by transportation and other expenses (figure 1).

Table 1. GTC Purchases, Fiscal Years 2023–2024

Fiscal year	Number of purchases	Value of purchases
2023	18,734	\$4,292,747
2024	25,432	\$6,234,409
Total	44,166	\$10,527,156

Source: OIG analysis.

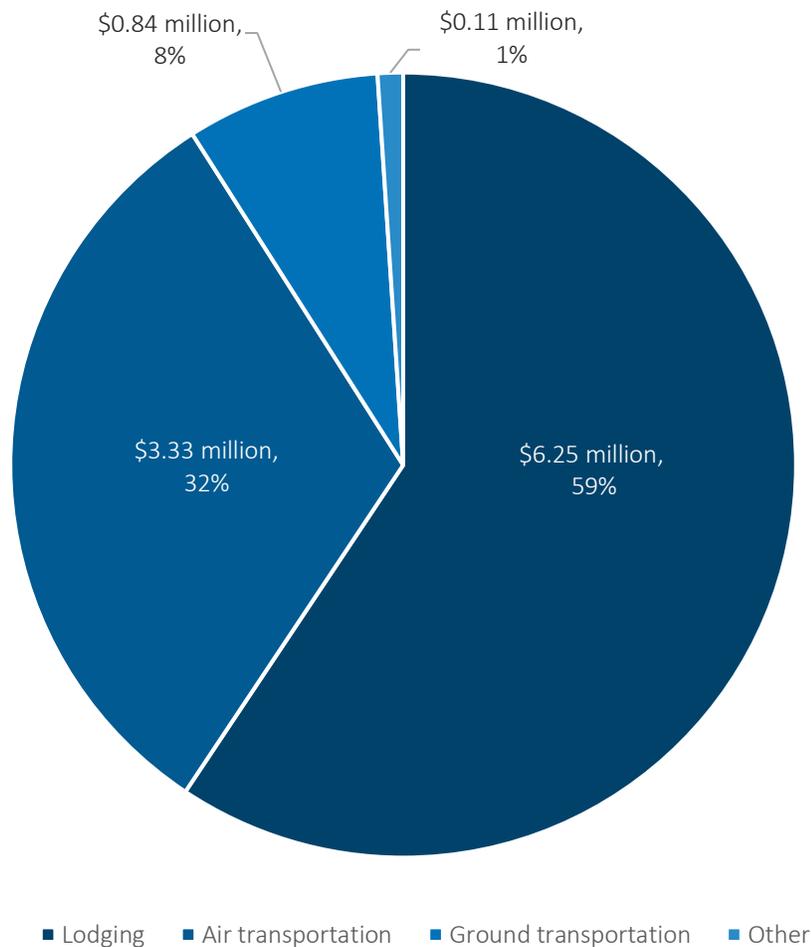
Note: Only transactions above \$0 are included; refunds, payments, credits, and other transactions less than \$0 are not included.

¹ Our previous risk assessment of the CFPB GTC program covered fiscal years 2020–2022. That assessment also found that the risk of illegal, improper, or erroneous use of the CFPB’s GTCs was *low*. Office of Inspector General, *Fiscal Years 2020–2022 Risk Assessment of the CFPB’s Government Travel Card Program*, [Memorandum](#), September 13, 2023.

² Travelers are required to use their GTC for common carrier transportation to and from their temporary duty location as well as for lodging and car rentals. They may also use their GTC for other reimbursable expenses while on official travel, such as meals, gas for rental cars, taxis, car services, ridesharing services, carsharing services, and parking.

³ These figures include only transactions above \$0; transactions less than \$0 are for refunds, payments, credits, and so on. The total number of all transactions is 57,929.

Figure 1. GTC Purchases by Category, Fiscal Years 2023–2024



Source: OIG analysis.

Note: Totals are rounded to the nearest \$10,000. Only transactions above \$0 are included; refunds, payments, credits, and other transactions less than \$0 are not included.

Objective, Scope, and Methodology

Our objective was to analyze the risk of illegal, improper, or erroneous purchases and payments associated with the CFPB’s GTC program to determine an overall risk level.⁴ Our risk assessment covered transactions made during fiscal years 2023–2024 (October 1, 2022–September 30, 2024). To conduct our risk assessment, we performed controls testing, data analytics testing, and a trend analysis.

⁴ Risk level was determined on a *low-medium-high* scale using Federal Reserve Bank of Cleveland, *Enterprise Risk Management Toolkit for Functional Risk Assessments*, November 2009.

For controls testing, we tested three GTC controls against the relevant data files to determine whether the controls were operating effectively:

- **Separated employees on the cardholder list**—Identify separated employees and determine whether any remain on the active cardholder list.
- **ATM withdrawal limits**—Identify ATM cash advance withdrawals and determine whether any cardholder exceeded the \$500 monthly threshold for these transactions.
- **Employee Relocation Services form approvals**—Identify employees who requested relocation assistance and determine whether they completed the necessary form.

For data analytics testing, we created algorithms to review all GTC transactions for high-risk transactions.⁵ Specifically, we tested for the following:

- **Nonemployee cardholders**—Identify use of a GTC by cardholders who were not employees during our review period.
- **Transactions after separation**—Identify transactions that occurred more than 7 days after an employee's date of separation.

For the trend analysis, we identified trends in GTC activity and analyzed the following areas:

- **Total agency spending**—Compare total agency spending to identify any significant changes.
- **Spending by cardholder**—Compare the highest-spending cardholders to identify any significant outliers.
- **Spending by merchant state**—Compare domestic merchant locations across the United States to identify any significant trends or outliers.
- **Spending by merchant country**—Compare international merchant locations to identify any significant trends or outliers.

We conducted this risk assessment in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. We conducted our risk assessment work from April 2025 through October 2025.

Results of Controls Testing

The results of our travel card controls testing are as follows:

- **Separated employees on the cardholder list**—We identified 103 instances of separated employees appearing on the cardholder list. However, these employees were listed as having closed GTCs.
- **ATM withdrawal limits**—We identified nine cardholders who appeared to exceed the \$500 monthly threshold for ATM cash advance withdrawals. We selected a sample of three for additional analysis. Travel and Relocation Office staff informed us that two of these three

⁵ We originally planned to include tests for timely closure of accounts and the payment of taxes in tax-exempt states, but we were unable to complete these tests because of operational constraints.

occurred while the monthly threshold was still \$1,000 and provided documentation showing the final cardholder did not actually exceed the \$500 threshold. Because of the timing of the bank's monthly billing cycle resetting, the cardholder's transactions were appropriately split into smaller withdrawals that did not exceed the threshold.

- **Employee Relocation Services form approvals**—Travel and Relocation Office staff informed us that no employees requested relocation services during the scope of the risk assessment review.

Results of Data Analytics Testing

The results of our data analytics testing include the following:

- **Nonemployee cardholders**—We identified no use of a GTC by a cardholder who was not an employee during our review period.
- **Transactions after separation**—We did not identify any instances of transactions made more than 7 days after an employee's date of separation.

Results of Trend Analysis

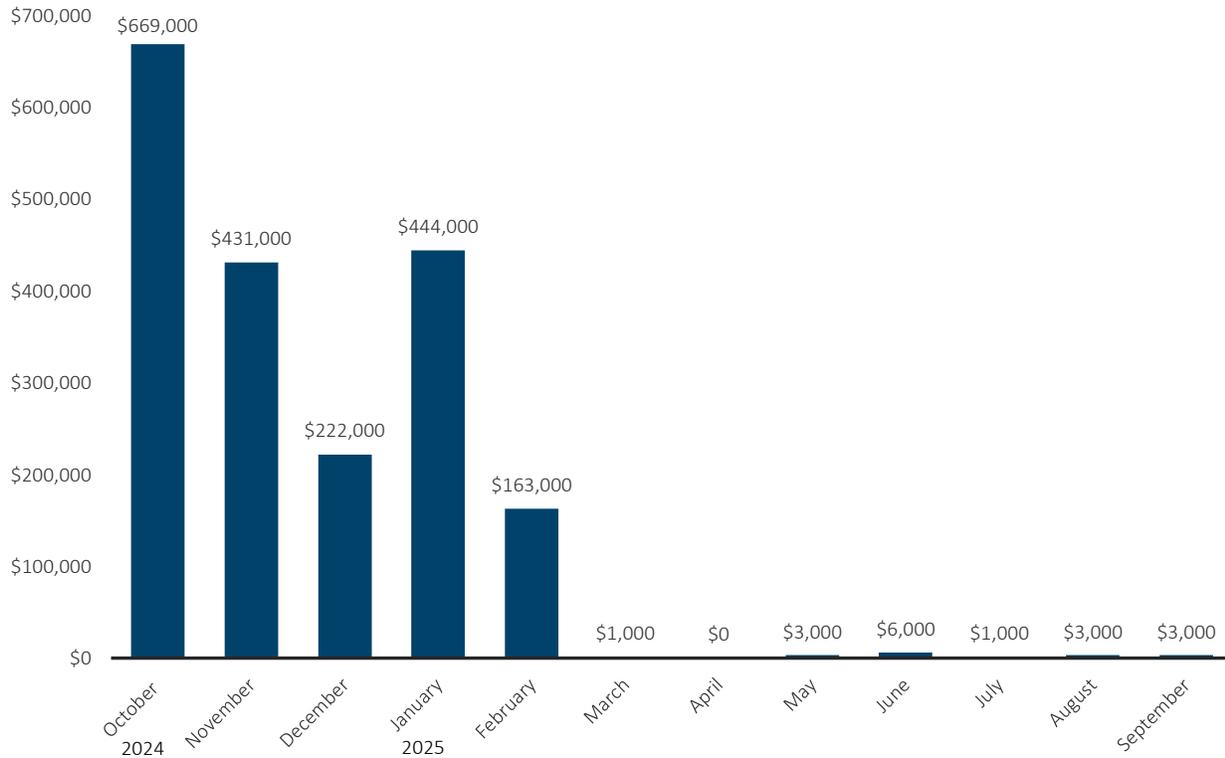
We noted no unusual activity from the trend analysis on total agency spending, top-spending cardholders, or spending by domestic merchant. However, we identified 17 transactions that were made with international merchants. Of these 17 transactions, 11 were adequately supported by cardholder documentation. The remaining 6 transactions were unable to be traced by the Travel and Relocation Office to official CFPB travel. These 6 transactions were made with merchants in the Netherlands and Barbados for transportation, lodging, and professional services. As no reimbursement was submitted for these 6 transactions, it is possible that these charges were paid by the cardholders rather than the CFPB.

Changes to the CFPB's GTC Program Since January 2025

Since January 2025, the CFPB's GTC program has undergone several changes. In response to Executive Order 14222, *Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative*, and a directive from the General Services Administration, the CFPB has closed all cardholders' individually billed accounts, prioritized the use of centrally billed accounts, and updated its travel approval process with the intention of enhancing program oversight. Further, CFPB travel has significantly declined in fiscal year 2025 (figure 2).⁶ As these changes occurred outside the scope period of this risk assessment, we will assess their impact in future risk assessments.

⁶ Because of the CFPB's emphasis on using centrally billed accounts, there has been no purchase activity on individually billed GTCs from February 21, 2025, to October 20, 2025.

Figure 2. Total Dollar Value of GTC Purchases by Month, Fiscal Year 2025



Source: OIG analysis.

Note: Totals are rounded to the nearest \$1,000. Only transactions above \$0 are included; refunds, payments, credits, and other transactions less than \$0 are not included.

Conclusion

The results of the risk assessment show that the risk of illegal, improper, or erroneous use in the CFPB’s GTC program remains *low*. While we identified six transactions made with international merchants that could not be traced to official travel, because of the relatively immaterial amount of these charges, we do not believe they warrant changes to the overall risk level.

This report is provided for informational purposes, and a response is not required. We appreciate the cooperation and assistance provided by your staff during this risk assessment. Please contact me if you would like to discuss this report or any related issues.

- cc: Adam Martinez
- Jean Chang
- Mark Paoletta
- Daniel Shapiro
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- Mark Beaudette
- Richard Austin
- Regina Braham