OFFICE OF INSPECTOR GENERAL

U.S. International Development Finance Corporation

DFC Implemented an Effective Government Charge Card Program for Fiscal Year 2025

August 13, 2026

Audit Report DFC-26-004-C

1100 New York Avenue NW
Washington, D.C. 20527
https://www.dfc.gov/oig

Report Highlights

Office of Inspector General
International Development Finance Corporation

DFC Implemented an Effective Government Charge Card Program for Fiscal Year 2025

What Was Reviewed

The U.S. International Development Finance Corporation Office of Inspector General (OIG) contracted with the independent public accounting firm RMA Associates, LLC (RMA) to audit DFC's charge card program in accordance with the Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act). The Charge Card Act requires the OIG to conduct periodic reviews of DFC's charge card program for illegal, improper, or erroneous transactions to prevent fraud, delinquency, or misuse.

The objectives of this audit were as follows:

1. Determine the scope, frequency, and number of audits or reviews and conduct a risk assessment to assess, identify, and analyze the risks of illegal, improper, or erroneous purchases and payments within DFC's charge card program.
2. Address the Charge Card Act, Office of Management and Budget (OMB), and General Services Administration (GSA) requirements and standards.

What Was Found

DFC implemented an effective Government Charge Card Program for FY 2025. RMA's test work resulted in two findings and concluded that the next charge card program audit should occur in FY 2027 with the auditing of FY 2026 transactions. RMA's Finding 1 identified missing travel card training documentation. RMA's Finding 2 identified instances where purchase card preapprovals were late and not in compliance with existing policy.

Recommendations

RMA made three recommendations to DFC's Vice President and Senior Procurement Executive that will help DFC reduce the risk of government charge payment delinquencies, misuse, fraud and other forms of waste and abuse.

MEMORANDUM:

Date: August 13, 2026

To: Ms. Courtney Holbrook
Vice President and Senior Procurement Executive

From: Ms. Erika Ersland
Acting Supervisor Auditor, Office of Inspector General

Subject: Final Report – DFC Implemented an Effective Charge Card Program for Fiscal Year 2025 (Audit Report DFC-26-04-C)

We contracted with the independent public accounting firm of RMA Associates LLC (RMA) to audit the Government Charge Card Program of the U.S. International Development Finance Corporation for fiscal year (FY) 2025. The contract required RMA to perform the engagement in accordance with generally accepted government auditing standards; Government Charge Card Abuse Prevention Act of 2012, Public Law No. 112-194; and Office of Management and Budget (OMB) Circular No. A-123, Appendix B, a Risk Management Framework for Government Charge Card Programs (Aug. 27, 2019).

In its audit of DFC, RMA recommended that the next audit of the charge card program occur in FY 2027 with the auditing of FY 2026 transactions. RMA identified instances of travel card training evidence being unavailable for certain travelers and instances where purchase card preapprovals were late and not in compliance with existing policy. Otherwise, RMA determined that the DFC charge card program addressed the requirements of the Charge Card Act, OMB, and GSA requirements. There were no prior year findings and all recommendations prior to FY 2024 were closed.

RMA is responsible for the attached auditor's report, dated August 10, 2026, and the conclusions expressed therein. We do not express opinions or conclusions on whether DFC's government charge card program complied substantially with applicable laws and regulations or when the next audit should be conducted.

We appreciate the cooperation and courtesy provided by your staff. If you have any questions or need additional information, please contact me at 202-641-2614.

CC: Ben Black (CEO)
Conor Coleman (Chief of Staff)

Frank Esquivel (Senior VP for Operations)
Allan Villabroza (Deputy VP and Treasurer)
Managing Director, Corporate Administrative Services
Chief of Staff to the VP of Office of Contracting and Corporate Services (OCCS)
Managing Director and Travel Officer, OCCS
Managing Director, Office of the Chief Financial Officer
RMA Associates

U.S. International Development Finance Corporation

DFC Implemented an Effective Government Charge Card Program for Fiscal Year 2025

Final Report

Date: August 10, 2026

RMA Associates, LLC
4121 Wilson Blvd, Suite 1100
Arlington, VA 22203
Phone: (571) 429-6600
Fax: (703) 852-7272
www.rmafed.com

RMA | Associates
Auditors. Consultants. Advisors.

4121 Wilson Blvd, Suite 1100
Arlington, VA 22203
Phone: (571) 429-6600
www.rmafed.com

August 10, 2026

Ms. Erika Ersland
Contracting Officer Representative
Office of Inspector General
U.S. International Development Finance Corporation

Dear Ms. Ersland,

RMA Associates, LLC (RMA) is pleased to submit our performance audit report for the fiscal year 2025 for DFC's government charge card program.

Our scope included testing management plans, testing samples of charge card (purchase and travel) transactions for completeness and accuracy, and conducting a risk assessment.

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

We very much appreciate the opportunity to serve you and will be pleased to discuss any questions you may have.

Sincerely,

RMA Associates

RMA Associates, LLC
Arlington VA

4121 Wilson Blvd, Suite 1100
Arlington, VA 22203
Phone: (571) 429-6600
www.rmafed.com

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Arlington, VA 22203
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Background

The U.S. International Development Finance Corporation (DFC) helps bring private capital to the developing world. DFC was created by the Better Utilization of Investments Leading to Development Act of 2018 (BUILD Act). DFC began operations in January 2020, consolidating the functions of its predecessor agencies, the Overseas Private Investment Corporation (OPIC) and the U.S. Agency for International Development's (USAID) Development Credit Authority (DCA).

The Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act) requires the Office of Inspector General (OIG) to conduct annual risk assessments of Federal agencies' purchase and travel card programs to mitigate the risk of fraud, misuse, and delinquency. Furthermore, the Office of Management and Budget (OMB) issued guidance that prescribes the policies and procedures regarding how Executive Branch agencies establish and maintain safeguards and internal controls to prevent waste, fraud, and abuse of purchase cards, travel cards, fleet cards, integrated cards, and centrally billed accounts while enhancing program integrity through increased opportunities for community collaboration and transparency. Effective internal controls provide reasonable assurance that significant risks or weaknesses that could adversely impact the agency's ability to meet its objectives are prevented, minimized, or detected in a timely manner.

OMB Circular A-123, Appendix B, addresses controls, policies, and practices for the Purchase Card Program. Risk Management controls, policies, and procedures are critical tools for ensuring the efficiency and integrity of the Charge Card Program. These controls, policies, and practices are in place to eliminate payment delinquencies, charge card misuse, fraud, and other forms of waste and abuse. In addition, the OMB Circular provides definitions of misuse, fraud, waste, and abuse.

1. Misuse: Unintentional use of a federal charge card for other than the official Government purpose for which it is intended.
2. Fraud: Felonious act of corruption or attempt to cheat the Government or corrupt the Government's agent.
3. Waste: Activity taken with respect to a government charge card that fosters or results in unnecessary costs or other program inefficiencies.
4. Abuse: Intentional use of a government charge card in violation of the Federal Acquisition Regulation (FAR), Defense Federal Acquisition Regulation Supplement (DFARS), Agency Supplements, or Government Purchase Card (GPC) policies/procedures.

According to the OMB Circular, charge card officials are responsible for:

- Implementing controls 1) to comply with Federal laws, Federal and agency regulations and 2) for monitoring program effectiveness.
- Ensuring that risk management policies and practices established in the agency's charge card management plan are conducted effectively and that the charge card management plan is updated with enhanced risk management policies and practices, as applicable.

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- Implementing policies consistent with requirements outlined in OMB A-123, Appendix B, Section 2.8.
- Ensuring that the purchase transaction reconciliation (Monthly Statement Reconciliation) is completed in a timely manner.
- Routinely reviewing charge card reports and closely monitoring and addressing delinquencies.
- Coordinating with the agency's Office of Human Resources Management and Office of Contracting and Corporate Services to ensure policy is issued addressing administrative and/or disciplinary actions for occurrences of charge card misuse.

OMB Circular A-123, Appendix B, also sets general training requirements for charge card program participants. Specifically, participants must be trained prior to appointment or receiving a charge card; must take refresher training, at a minimum, every three years; and must certify receiving the training, understanding the regulations and procedures, and knowing the consequences of inappropriate actions.

During the audit, RMA obtained the universe and evaluated data transactions for both purchase cards and travel cards over fiscal year (FY) 2025 to assess the risk level associated with DFC's charge card program (**Table 1**).

Table 1: Size of DFC's Charge Card Program for FY 2025

Category	Purchase Card	Travel Card[1]
Dollar value of transactions	$1,083,181.50	$6,770,820.37
Number of transactions	627	11,576

Objectives

This report presents the results of work conducted by RMA to address performance audit objectives related to DFC's FY 2025 audit of the government charge card program and risk assessment.

Our objectives for this audit are as follows:

1. **Objective 1**: Determine the scope, frequency, and number of audits or reviews, conduct a risk assessment to assess, identify, and analyze the risks of illegal, improper, or erroneous purchases and payments within DFC's charge card program.
2. **Objective 2**: Address the Charge Card Act, OMB, and GSA requirements and standards.

Scope

RMA conducted a charge card audit for FY 2025 and applicable procedures, certifications, documentation, and controls to achieve this process. Specifically, RMA reviewed the evidence

[1] Includes the Centrally Billed Account.

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Arlington, VA 22203
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used to 1) support purchases; 2) reconcile monthly statements; and 3) identify and quantify questioned purchases.

Criteria

Provided below are the relevant criteria upon which the results of our testing are based:

- Government Charge Card Abuse Prevention Act of 2012 (Charge Card Act);
- Travel and Transportation Reform Act of 1998 (P.L. 105-264);
- Chief Financial Officers Act of 1990 (P.L. 101-576);
- 31 United States Code (USC) §1111;
- 41 USC §1909;
- 10 USC § 2784;
- OMB Circular A-123, Appendix B, A Risk Management Framework for Government Charge Card Programs, August 27, 2019; and
- Generally Accepted Government Auditing Standards (GAGAS), 2018 Revision, April 2021 Technical Update.

Summary of Results

DFC implemented an effective Government Charge Card Program for FY 2025. Per Appendix B to OMB Circular No. A-123, an annual audit is required for executive agencies with more than $10 million in annual purchases under the charge card program. DFC's charge card program did not surpass the $10 million threshold for FY 2025. If DFC's charge card program surpasses this amount in future years, an annual audit will be required.

Objective 1: To determine the scope, frequency, and number of audits or reviews. RMA conducted a risk assessment to assess, identify, and analyze the risks of illegal, improper, or erroneous purchases and payments within DFC's charge card program. Given the review of the current information, the results of our sample testing, and Appendix B guidance, we recommend the next audit of the charge card program occur in FY 2027 with the auditing of FY 2026 transactions. Refer to Appendix B for testing methodology and details.

Objective 2: To address the Charge Card Act, OMB, and GSA requirements and standards. RMA obtained an understanding of DFC's internal controls over applications, transactions, review and approval, and charge card management. During our testing, RMA identified instances of travel card training evidence not available for certain travelers. Refer to the Summary of Findings section of this report for further details. Otherwise, RMA determined that the DFC charge card program addresses the requirements of the Charge Card Act, OMB, and GSA requirements. Refer to Appendix B for testing methodology and details.

For DFC's FY 2025 OMB A-123 Appendix B assessment, as mentioned above, RMA identified instances of travel card training evidence documentation not available for certain travelers. Refer to the Summary of Findings section of this report for further details. There were no prior year

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Arlington, VA 22203
Phone: (571) 429-6600
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recommendations, and all recommendations prior to 2022 were closed. Appendix B contains a more detailed description of our methodology for achieving our audit objectives.

Summary of Findings

Finding 1: Missing Travel Card Training Documentation

RMA verified whether training documentation was on file for vouchers submitted for payment as part of our test work on Individually Billed Account (IBA) transactions. We identified that six of the twenty transactions tested, 30%, did not include training documentation. DFC's policy states, "All government travel card cardholders are required to complete the GSA government travel card training at GSA SmartPay Training during the initial application and to continue to maintain the use of their cards. The applicant is required to pass with a score of 75 percent or higher. The applicant must provide proof of course completion to the A/OPC."

RMA recommends that DFC:

1. Implement a document repository for Travel Card Holder training evidence to verify completed training.
2. Remove travel card privileges from those who have not completed the training refreshers in a sufficient time period, as defined by management.

Finding 2: Late Purchase Card Preapproval

While testing pre-approvals of purchase card transactions, RMA identified that two of the twenty pre-approval forms tested were completed after the transaction date. Specifically, the identified GPC Government Purchase Card pre-approval forms were signed by the Approving Official 55 and 52 days after the purchase card transaction date. DFC's policy states, "A cardholder must submit for each purchase a GPC Pre-Approval Form to be approved by the Approving Official before the purchase transaction is processed on the purchase card."

RMA recommends that DFC update its purchase card policy to accurately reflect the preapproval process. The policy update should align with DFC needs while addressing risks and remaining compliant with purchase card requirements.

4121 Wilson Blvd, Suite 1100
Arlington, VA 22203
Phone: (571) 429-6600
www.rmafed.com

Appendix A: Management Comments

DFC U.S. International Development Finance Corporation

1100 New York Avenue, NW
Washington, DC 20527
Office +1 202.336.8400
dfc.gov

Memorandum August 10, 2026

To: Ms. Erika Ersland
Acting Supervisor Auditor
DFC – Office of the Inspector General

From: Courtney Holbrook
Vice President and Senior Procurement Official
Office of Contracting and Corporate Services

The U.S. International Development Finance Corporation (DFC) thanks its Office of Inspector General (OIG) for the opportunity to respond to its report entitled "DFC Implemented an Effective Charge Card Program for Fiscal Year 2025." DFC concurs with the OIG's three recommendations and is in the process of implementing corrective actions to address each matter:

OIG Recommendation No. 1: Implement a document repository for Travel Card Holder training evidence to verify completed training.

> **Management Response:** DFC concurs with the recommendation and will develop and implement a Travel Card Holder training within its FedTalent system; this will give DFC a centralized tracking system for training completion and repository of training completion evidence.
>
> **Target Resolution Date:** 4th Quarter of FY26

OIG Recommendation No. 2: Remove travel card privileges from those who have not completed the training refreshers in a sufficient time period, defined by management.

> **Management Response:** DFC concurs with this recommendation; with the creation of a new training in FedTalent to address recommendation no. 1, DFC will be able to implement new monitoring procedures to timely remove card privileges from employees who are delinquent on refresher training.
>
> **Target Resolution Date:** 4th Quarter of FY26

OIG Recommendation No. 3: Update DFC purchase card policy to accurately reflect the preapproval process. The policy update should align with DFC needs while addressing risks and remaining compliant with purchase card requirements.

Management Response: DFC concurs with this recommendation and will update the policy, and associated preapproval forms, to accurately reflect DFC's preapproval process and contemplate instances where a purchase preapproval is obtained by a different individual than the cardholder.

Target Resolution Date: 4th Quarter of FY26

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Appendix B: Methodology

In accordance with GAGAS, 2018 Revision and April 2021 Technical Update, RMA reviewed DFC's management charge card plans and policies for FY 2025. We analyzed the purchase card and travel card transactions occurring in FY 2025 and selected samples to test the effectiveness of controls. To select our test sample, RMA used our proprietary Data Extraction and Analysis Procedures system (DEAPs). DEAPs, designed jointly by our in-house team of data scientists, statisticians, auditors, and CPAs, is a statistical sampling tool that uses mathematical algorithms to extract statistical data from a variety of information systems and stratifies the population into homogeneous groups. This allows our team to effectively select samples based on the nature of testing performed (i.e., control testing). Stratification also increases the reliability of the samples and minimizes the risk that the sample is not representative of the population. After selecting a sample, we requested documentation to verify that DFC's purchase and travel card cardholders complied with DFC's policies and procedures and applicable laws and regulations.

We also assessed reliability by 1) reconciling the data to support documentation, 2) reviewing the systems that produced the data, and 3) conducting a walkthrough with DFC personnel knowledgeable about the data. We determined that the data was sufficiently reliable for the purposes of this report.

The sampling plan and methodology for each area tested and examined are described below.

Sampling Plan and Monetary Impact Projection

Our sample was selected from the population of purchase card and travel card transactions made in FY 2025, excluding negative amounts that indicate reversals. For travel card transactions, samples were selected from travelers with high dollar value associated with their total and average transaction amounts.

Table 2 details the population of records and the resulting sample sizes for each charge card program.

Table 2: Resulting Sample Size for FY 2025

Category	Purchase Card	Travel Cards	Centrally Billed Accounts
Population	627	8,229	3,347
Sample Size	20	20	20

Assessment of Management Plans and Internal Controls

RMA assessed DFC management plans for FY 2025 against required elements from OMB Circular A-123, Appendix B and whether the policy outlined in the plans were followed.

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Additionally, our team assessed DFC's internal controls for the purchase card and travel card program for FY 2025. The purpose was to assess the following controls:

- Application;
- Transaction;
- Review and approval; and
- Charge card management.

Travel Card Testing

RMA obtained the universe and evaluated data transactions for travel cards for FY 2025 to assess the risk level associated with this area of DFC's charge card program. The $242,367.49 value of travel card transactions selected for FY 2025 consists of $198,605.45 worth of Centrally Billed Account transactions and $43,762.04 worth of individual travel card transactions for selected travelers with the highest dollar value of total transaction amounts and average transaction amounts.

RMA tested travel approvals, travel vouchers, and monthly bank statements for selected samples to evaluate accuracy, completeness, and timeliness against the required elements per OMB Circular A-123, Appendix B, and DFC management plans. Sample testing of travel vouchers and monthly statements for the centrally billed account was also performed for FY 2025.

In testing training compliance, we reviewed DFC's travel card policies and procedures, travel card management plans, and certificates of completion for selected samples.

Purchase Card Testing

RMA obtained the universe and evaluated data transactions for purchase cards to assess the risk level. The dollar value of purchase card transactions selected for FY 2025 is $196,281.51.

RMA tested approvals, receipts, monthly reconciliation cover sheets, monthly bank statements, and confirmation packages for selected samples to evaluate accuracy, completeness, and timeliness.

Purchase card training was also tested. We reviewed DFC's purchase card policies, procedures, purchase card management plans, and certificates of completion for selected samples.

Risk Assessment

RMA conducted a risk assessment of DFC's charge card program by reviewing applicable policies, procedures, and other controls. Comparison of charge card documentation to monthly statements was used to identify patterns of improper, erroneous, or illegal charge card use in FY 2025.

4121 Wilson Blvd, Suite 1100
Arlington, VA 22203
Phone: (571) 429-6600
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Appendix C: Glossary of Acronyms and Abbreviations

Table 3 contains definitions of all acronyms and abbreviations used in this report.

Table 3: Acronyms and Abbreviations

Acronym	Definition
DFC	U.S. International Development Finance Corporation
RMA	RMA Associates, LLC
OPIC	Overseas Private Investment Corporation
USAID	U.S. Agency for International Development
DCA	Development Credit Authority
OIG	Office of Inspector General
OMB	Office of Management and Budget
FAR	Federal Acquisition Regulation
DFARS	Defense Federal Acquisition Regulation Supplement
GPC	Government Purchase Card
FY	Fiscal Year
GSA	General Services Administration
GAGAS	Generally Accepted Government Auditing Standards
DEAPs	Data Extraction and Analysis Procedures system