

*U.S. DEPARTMENT OF COMMERCE
Office of Inspector General*



Office of the Secretary

*Commerce Should Strengthen
Accountability and Internal Controls
in Its Motor Pool Operations*

Final Report No. OIG-11-004-A

October 27, 2010

FOR PUBLIC RELEASE

Office of Audit and Evaluation





October 27, 2010

MEMORANDUM FOR: Scott B. Quehl, Chief Financial Officer and Assistant Secretary
for Administration

FROM: 
Ann C. Eilers, Principal Assistant Inspector General for Audit
and Evaluation

SUBJECT: Final Audit Report No. OIG-11-004-A, *Commerce Should
Strengthen Accountability and Internal Controls in Its Motor
Pool Operations*

This memorandum transmits our final audit report detailing the results of our audit of the Department of Commerce's motor pool operations. The audit included a review of the Department's policies, fleet card transactions, logs for scheduling and tracking vehicle usage, monitoring of vehicle expenses, and motor pool program oversight. We focused on motor vehicles used by the Department during fiscal year 2009. In brief, due to the lack of adequate policies and procedures and a fleet management information system, we were unable to determine whether government motor vehicles and fleet credit cards were used only for allowable purposes.

The Office of Administrative Services (OAS) response to our report, included as Appendix B, concurs with our findings and recommendations. OAS indicated in its response the steps already taken, as well as the actions planned, to correct internal control deficiencies and implement accountability over motor pool operations. We will evaluate the corrective action plan and assess whether the actions taken or planned, if properly implemented, address the findings and recommendations reported.

We thank the Department and bureau staff for their assistance during this audit. If you have any questions, please contact me at (202) 482-2754 or Patty McBarnette, Director, Financial Statement Audits, at (202) 482-3391.

cc: Mary C. Pleffner, Director, Office of Administrative Services
Douglas F. Elznic, Deputy Director, Office of Administrative Services
Greg Falzetta, Chief, Energy, Environmental & Transportation Division
Terry Jackson, Chief, Transportation Division
Trudy Gallic, Audit Liaison, Office of Management & Organization



Report In Brief

U.S. Department of Commerce, Office of Inspector General

October 27, 2010



Why We Did This Review

The Department of Commerce acquires and operates motor vehicles to carry out official government business; such vehicles may also be used by officers or employees as authorized. The Department's primary source of vehicles is the General Services Administration (GSA); the Department also purchases and leases motor vehicles from commercial sources. The objective of this audit was to determine whether the Department and bureaus were operating motor pool vehicle in compliance with regulations.

Background

During FY 2009, the Department owned about 700 vehicles, leased about 100 commercial vehicles, and leased over 1,400 GSA vehicles at a total cost of approximately \$9.6 million. The Department pays GSA a monthly lease fee plus mileage costs. Motor vehicles that are owned or commercially leased are assigned a JPMorgan Chase fleet credit card that is used to purchase fuel and pay vehicle maintenance and repair costs. The Department is responsible for monitoring transactions posted to the card, and pays these costs directly to JPMorgan Chase. GSA monitors transactions and pays the costs associated with its leased vehicles.

Office of the Secretary

Commerce Should Strengthen Accountability and Internal Controls in Its Motor Pool Operations (OIG-11-004-A)

What We Found

Because documentation supporting vehicle use and fleet credit card transactions is either inconsistent or nonexistent, we were unable to assess the Department's compliance with applicable regulations; we could not determine whether government motor vehicles and fleet credit cards were used only for allowable purposes. This resulted from inadequate policies and procedures and the lack of a centralized fleet management system.

The Department does not provide adequate oversight of motor pool vehicle inventory, activity, or cost. Further, the Department has not developed or implemented internal controls over motor pool operations. As a result, significant unreconcilable differences were found between Commerce records and those of JPMorgan Chase and the GSA vendor. Specifically,

- 733 JPMorgan Chase fleet credit cards could not be matched with a vehicle. Transactions on these cards totaled over \$1 million.
- 339 bureau vehicles could not be matched with a JPMorgan Chase fleet credit card.
- 381 credit cards from the GSA vendor could not be matched with a vehicle.
- 89 vehicles reported by GSA could not be matched with bureau inventory listings.
- 52 vehicles had multiple JPMorgan Chase fleet credit cards.

What We Recommend

We recommend that the Department (1) develop a centralized fleet management information system to oversee the use of motor pool vehicles and costs associated with each; (2) implement available JPMorgan Chase fraud training and monitoring tools, (3) update policies and procedures to ensure that credit cards are used appropriately, bureaus maintain adequate documentation, home-to-work transportation is supported, premium-grade fuel is used only when required in the particular vehicle, accurate odometer readings are recorded when fuel is purchased, and fleet managers and employees receive formal training on the use of government vehicles; and (4) revise its charge card management plan to comply with OMB regulations.

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Introduction

The Department of Commerce acquires and operates motor vehicles to carry out official government business, including carrying out authorized programs and rendering assistance in major disasters or emergency situations; such vehicles may also be used by officers or employees as authorized. The Department's primary source of vehicles is the General Services Administration's (GSA) Interagency Fleet Management System Services; the Department also purchases and leases motor vehicles from commercial sources.

During FY 2009, the Department owned 709 vehicles, leased 111 commercial vehicles, and leased 1,478 GSA vehicles at a total cost of approximately \$9.6 million. The Department pays GSA a monthly lease fee plus mileage costs. Motor vehicles that are owned or commercially leased are assigned a JPMorgan Chase fleet credit card that is used to purchase fuel and pay vehicle maintenance and repair costs. The Department's Energy, Environmental & Transportation Division (EETD) and bureau fleet managers are responsible for monitoring transactions posted to the JPMorgan Chase fleet credit card; the Department pays these costs directly to JPMorgan Chase. Vehicles leased from GSA are assigned a Wright Express fleet credit card; GSA is responsible for monitoring these transactions, which are centrally billed to GSA.

The objective of our audit was to determine whether the Department and bureaus were operating motor pool vehicles in compliance with regulations, including those related to home-to-work transportation. However, because the documentation supporting vehicle use and fleet credit card transactions is inconsistent or nonexistent, we were unable to assess the Department's compliance with applicable regulations. Specifically, we could not determine whether government motor vehicles and fleet credit cards were used only for allowable purposes. This resulted from inadequate policies and procedures and the lack of a centralized fleet management system. Although EETD is responsible for oversight,¹ EETD management was unable to assist us because the division actually provides only minimal oversight of motor pool operations and is not utilizing monitoring tools currently available. Not utilizing such oversight tools leaves Commerce at risk for fraud and/or misuse of government vehicles and fleet credit cards. Appendix A describes the scope and methodology of our audit.

¹ Department Organization Order 20-1 section 4 states, "The Office of Administrative Operations (OAO) shall ...oversee the motor vehicle fleet management program for the Department and serve as liaison with GSA on operational programs relating to federal motor vehicle fleet management." Pursuant to Section 3 of DOO 20-1, EETD is a division within OAO that has been delegated responsibility for motor vehicle fleet management.

Findings and Recommendations

I. The Department Does Not Provide Adequate Oversight of Motor Pool Vehicle Inventory, Activity, or Cost

Commerce management—through its Energy, Environmental, & Transportation Division (EETD)—was unable to resolve discrepancies identified because it does not have in place a centralized fleet management information system, as required by federal law.² Instead, EETD relies on the Department’s individual bureaus to correctly track and monitor motor pool vehicle inventory and usage. As a result of not utilizing a fleet management information system, we noted the following issues:

A. Vehicle Inventory and Fleet Credit Card Records are Incomplete

Lacking a fleet management information system, EETD had to collect inventory data from each Commerce bureau, in response to our audit request for an inventory of all motor pool fleet vehicles held during Fiscal Year (FY) 2009. The bureaus provided inventory information from different sources, in varying formats, and with inconsistent information. Complete vehicle information, including vehicle identification number (VIN) and tag number, are required to match a motor pool vehicle with a fleet credit card. However, some bureaus provided VINs while others provided only vehicle license numbers.

To verify the accuracy of information provided by bureaus, we attempted to reconcile the vehicle inventory records provided with the FY 2009 GSA Federal Automotive Statistical Tool (FAST) report. This report is produced by GSA based on fleet-related data collected from federal agencies. The FAST report contained a motor pool vehicle inventory at September 30, 2009, of 2,298, whereas the inventory provided by bureaus totaled 2,209 vehicles. EETD was unable to resolve the difference because it lacks a centralized fleet management information system.

Unreconciled differences between Commerce, JPMorgan Chase, and Wright Express records:

- ▶ **733 JPMorgan Chase fleet credit cards** (with transactions totaling over \$1 million) could not be matched with a vehicle.
 - ▶ **339 bureau vehicles** could not be matched with a JPMorgan fleet credit card.
 - ▶ **381 Wright Express credit cards** could not be matched with a vehicle.
 - ▶ **40 GSA-leased vehicles** could not be matched with a Wright Express credit card.
 - ▶ **89 vehicles** reported on the FAST report were not included on bureau inventory listings
 - ▶ **52 vehicles** were found to have multiple JPMorgan fleet credit cards
-

² Executive agency motor pool fleets are required to have a centralized system to identify, collect, and analyze motor vehicle data with respect to all costs incurred for the operation, maintenance, acquisition, and disposition of motor vehicles. See 40 U.S.C. § 17502, 41 C.F.R. § 102-34.340, and 41 CFR § 102-34.347.

We then attempted to match vehicles reported by bureaus to a listing of JPMorgan Chase fleet credit card transactions covering October 1, 2008 through December 31, 2009 (obtained directly from JPMorgan). We identified 339 vehicles that could not be matched to a JPMorgan credit card, and 733 JPMorgan credit cards—with 14,310 transactions ranging from \$0.04 to \$7,616 and totaling \$1,052,843—that could not be matched to a departmental vehicle. Neither EETD nor JPMorgan could resolve the discrepancy.

Similarly, in comparing bureau inventory listings of GSA-leased vehicles against the Wright Express fleet credit card database of transactions, our analysis identified 40 GSA vehicles on the bureau inventory vehicle listing that could not be matched with the Wright Express database of transactions. We also identified 381 vehicles in the Wright Express database that were not included in the bureau inventory listings of GSA vehicles. An EETD official was unable to resolve the discrepancy.

Finally, our analysis also identified 52 vehicles with multiple fleet credit cards. Of these, 47 vehicles were issued two credit cards, and five vehicles were issued three cards. EETD management was unaware of this and could not explain it. According to EETD officials, while they do not dispute our findings, they attributed the lack of a centralized fleet information system to budget constraints.

Based on the results of our data analysis, we have requested follow-up by our Office of Investigations for several questionable trends we noted regarding vehicle and/or credit card use.

B. Fraud Monitoring Tools to Prevent or Detect Credit Card Abuse are Not Used

Neither EETD nor the bureaus utilize fraud monitoring tools to prevent or detect credit card abuse. Tools such as the PaymentNetG Electronic Access System and Expert Monitoring System are available to the Department. These tools permit queries of fleet credit card databases to identify unusual transactions that may indicate fraud; once identified, suspicious transactions can then be researched to determine if the purchase is allowable. According to both EETD management and bureau fleet managers, available fraud detection tools are not currently used because fleet managers have not been sufficiently trained to implement the tools and develop monitoring queries.

We analyzed the JPMorgan credit card transactions database to identify unusual transactions—such as credit card charges on federal holidays or weekends, multiple daily transactions, and transactions with unusual vendors—to determine if vehicles or fleet credit cards are being used for unallowable purposes. EETD, bureaus, and line offices could similarly utilize these fraud monitoring tools to identify these types of questionable activities in its monitoring of motor pool operations. However, according to EETD officials, fleet managers have limited resources, and motor pool responsibilities at the regional offices and centers are usually auxiliary duties. As a result, fleet managers do not focus full-time on motor pool operations.

II. The Department Has Not Developed or Implemented Internal Controls Over Motor Pool Operations

Although EETD is required to develop motor pool policies and procedures, our review of its personal property management manual indicates that the manual does not identify documentation requirements or standardized forms to be used in motor pool operations. Further, it does not identify records-retention requirements or internal controls that should be implemented to prevent or detect misuse of government vehicles or fleet credit cards. The manual was issued in October 2007, prior to the Department's contracting with JPMorgan Chase for fleet credit card services. According to EETD officials, the fleet manager has not updated the policies and procedures due to time constraints. In addition, EETD officials say, it is difficult for them to get bureau and line office fleet managers—who perform fleet management tasks as an auxiliary duty—to comply with policies and procedures. As a result, we noted the following internal control problems:

A. Documentation and Records-Retention Policies are Inadequate

Documents supporting use of motor pool vehicles and fleet credit card transactions are not prepared and retained by the Department and bureaus; fleet managers were unable to demonstrate that all transactions selected for testing were allowable government costs. We selected 200 transactions out of 73,054 that occurred during the period under audit. Of the transactions selected, we received documentation supporting only 11. However, the information provided was inadequate. Interviews with bureau and operating unit fleet managers revealed that no standard forms are required to request use of a motor pool vehicle or to record costs associated with motor pool vehicles. Receipts supporting vehicle usage and fleet credit card transactions were not consistently provided to fleet managers by motor pool vehicle drivers. In addition, a fleet manager within the National Oceanic and Atmospheric Administration informed auditors that motor vehicle records that are prepared need only be kept for 3 months, according to National Archives and Records Administration General Records Schedule 10, Section 2(a). However, sections 3 and 4 of the same schedule state that motor vehicle cost and report files may only be destroyed 3 years after the discontinuance of the ledger, date of the worksheet, or date of the report. As a result, the risk exists that Department or bureau fleet managers would not be able to ascertain whether suspected fraud or misuse occurred due to lack of documentary evidence after just 3 months.

We further found that the Department's charge card management plan, section 3.5, *Record Keeping*, is not in compliance with Office of Management and Budget (OMB) Circular A-123, Appendix B Revised, *Improving the Management of Government Charge Card Programs*, section 2.3, which requires the agency plan to include documentation and records-retention requirements. While retention requirements are listed in the plan for purchase cards, they are not listed for fleet credit card records.

B. Government Vehicles Could be Used for Unauthorized Home-to-Work Transportation

Some bureau officials appear to have used government vehicles for transportation between their homes and work locations, as well as for other unofficial purposes. However, we were unable to confirm that any violations of departmental policies occurred because bureaus did not prepare mileage logs or other vehicle records that auditors could review. Bureau officials interviewed

indicated that they do not use government motor pool vehicles for transportation between an employee's home and work location. Without the use of mileage logs or records, government vehicles could have been used for home-to-work or for personal transportation without being detected.

C. Premium-Grade Fuel Purchases May Have Been Unauthorized

We also found that 1,776 JPMorgan Chase credit card transactions—valued at \$97,514—engaged in potentially unauthorized premium-grade fuel purchases, at a greater cost to the government. Such use is prohibited unless specifically required by the vehicle. EETD officials were unable to provide us with a listing of vehicles that must use premium-grade fuel. As a result, such purchases may have been unauthorized.

D. Erroneous Odometer Readings Recorded during Fuel Purchases

Both Wright Express and JPMorgan fleet credit cards require that odometer readings be recorded at the time fuel is purchased. The odometer reading provides a record of vehicle mileage and, because EETD has not developed a policy requiring mileage logs, the odometer reading may be the only method of tracking vehicle use. We found that 846 out of 12,567 JPMorgan fleet credit card transactions—having a total dollar amount of \$45,435—had erroneous “0” or “999999” odometer readings recorded during fuel transactions. As a result of erroneous odometer readings and lack of mileage logs, motor vehicle usage cannot be effectively monitored by management for impropriety.

E. Neither Fleet Managers nor New Employees Receive Formal Training

While no formal training on motor pool operating policies and procedures exists for fleet managers or new employees, according to EETD officials, fleet managers are trained annually at the Federal Fleet Training Conference. At one regional office, we were told that the administrative staff instructs new employees that “GSA vehicles are available for official use only and have to be approved for use and show a valid driver's license.” However, staff could not provide us with formal training material used for new employees during orientation. The current departmental personal property management manual, dated October 2007, also lacks a formal training policy for fleet managers and new employees.

Recommendations

To strengthen the Department's motor pool operations, we recommend that the Secretary direct the Assistant Secretary for Administration to take the following actions:

1. Develop a centralized fleet management information system as required by 40 U.S.C. § 17503 for all fleet vehicle inventory that enables EETD management to monitor and provide adequate oversight over the usage of motor pool vehicles and costs associated with each vehicle, whether agency-owned or GSA- or commercially-leased.
2. Implement available JPMorgan Chase fraud training and monitoring tools for preventing or detecting fraud in fleet card transactions.

3. Update policies and procedures to ensure that
 - a. motor pool vehicles and fleet credit cards are only used for official government purposes;
 - b. bureaus and operating units maintain adequate documentation—such as standard forms required to request a motor vehicle, mileage logs, and records to support official government use—for a consistent period of time;
 - c. all home-to-work transportation via government vehicle is adequately supported;
 - d. operators of government vehicles do not use premium-grade gasoline fuel unless the motor vehicle specifically requires it;
 - e. all government vehicle operators and employees enter accurate odometer readings at the time of fuel purchases; and that
 - f. fleet managers and new employees receive formal training on the proper use of government vehicles.
4. Revise the Department's charge card management plan, section 3.5, *Record Keeping*, to comply with OMB Circular A-123, Appendix B Revised, *Improving the Management of Government Charge Card Programs*, section 2.3, and include records-retention requirements for fleet credit card transactions.

Summary of Office of Administrative Services Comments and OIG Response

In response to our draft report, the Office of Administrative Services (OAS) concurred with our findings and recommendations. As described in Appendix B, OAS has developed a corrective action plan and has started taking steps to implement accountability and internal controls over motor pool operations. OAS anticipates that initial corrective measures will be completed in January 2011, and that longer range steps, such as implementing a fleet management information system and internal control review program, will be completed in July 2011.

We appreciate OAS' efforts to quickly identify steps needed to correct the significant deficiencies noted during our audit of motor pool operations. We will review the corrective action plan and assess whether the actions, taken or planned, if properly implemented, will address the findings and recommendations reported.

Appendix A: Objectives, Scope, and Methodology

Our audit included a review of the General Services Administration's (GSA) and Department's regulations and policies, fleet card transactions, logs for scheduling and tracking vehicle usage, monitoring of vehicle expenses, and Department motor pool program oversight. We focused on motor vehicles used by the Department during fiscal year 2009.

We obtained an understanding of internal controls by interviewing Department and bureau fleet managers with motor pool program and JPMorgan Chase credit card oversight responsibilities, as well as GSA representatives about the leased vehicles program and Wright Express system. We reviewed Department Organizational Order 20-1, *GSA Guide to Federal Fleet Management*, *OMB Circular A-123, Appendix B Revised*, *Department Personal Property Management Manual*, *U.S. Department of Commerce Charge Card Management Plan*, and *Commerce Acquisition Manual*. We collected credit card transaction data occurring between October 1, 2008 and December 31, 2009, from JPMorgan and between October 1, 2008 and September 30, 2009, from Wright Express. We selected a nonstatistical, judgmental sample of fleet credit card transactions using unique fraud indicators. Specifically, we identified unusual and/or questionable credit card transactions, such as charges made on federal holidays, weekends, and multiple transactions on the same day.

We reviewed the Department's compliance with provisions of the following regulations: Code of Federal Regulations (CFR) Section 41 CFR 102-34.347 and 102-34.335(b); and 31 United States Code § 1344. Because of the lack of available data, we were unable to determine whether government vehicles were used to provide unauthorized home-to-work transportation and whether government vehicles and credit cards were used only for official purposes.

To assess the reliability of computer-generated data, we attempted to reconcile the JPMorgan and Wright Express vehicle transactions with the vehicle inventory database provided by the Department and its bureaus. However, as we were unable to reconcile the data and determine its completeness, we did not rely on the computer-generated information.

We conducted this audit from October 2009 through July 2010 at the Department's headquarters in Washington, D.C., under the authority of the Inspector General Act of 1978, as amended, and Department Organization Order 10-13, dated August 31, 2006. In addition, we conducted this audit in accordance with generally accepted government auditing standards, which 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 objective. We believe the evidence obtained does provide a reasonable basis for our findings and conclusions.

Appendix B: Agency Response



UNITED STATES DEPARTMENT OF COMMERCE
Chief Financial Officer
Assistant Secretary for Administration
Washington, D.C. 20230

OCT 7 2010

MEMORANDUM FOR Ann C. Eilers
Principal Assistant Inspector General
for Audit and Evaluation

FROM: Mary C. Pleffner *Mary C. Pleffner*
Director for Administrative Services

SUBJECT: Action Plan for OIG Draft Audit Report OAE-19880, *Commerce Should Strengthen Accountability and Internal Controls in Its Motor Pool Operations*

The Office of Administrative Services (OAS) concurs with the findings and recommendations in the above-referenced report. This memorandum describes the actions that OAS proposes to take in response to these findings. Please provide any comments on our proposed actions.

Finding: The Department does not provide adequate oversight of motor pool vehicle inventory, activity, or cost.

Recommendation: The OIG recommended DOC develop a centralized fleet management system for all fleet vehicle inventory that enables management to monitor and provide adequate oversight over the usage of motor pool vehicles and costs associated with each vehicle.

Actions Taken

The Director for Administrative Services, in coordination with the Associate Director for the Office of Commerce Services (OCS), has taken and is continuing to take steps toward rectifying the motor pool issues described in the OIG Audit.

OCS is currently in the middle of a recruitment action to hire a dedicated Fleet Manager for the Department. The intent of this position is to provide expert guidance and knowledge throughout the Department regarding fleet management and appropriate use of government vehicles. It is anticipated that a highly qualified candidate will be identified by October 29, 2010.

OCS staff is already in the process of conducting a thorough, Department-wide analysis on all domestic vehicles, with the intent of matching each vehicle to the appropriate fleet card. This analysis will enable OCS staff to identify and correct all questionable fleet card-related questions raised in the OIG audit.

Finding: The Department has not developed or implemented internal controls over motor pool operations.

Recommendation: Implement available JPMorgan Chase fraud training and monitoring tools for preventing or detecting fraud in fleet card transactions. Update Standard Operating Procedures to ensure motor pool vehicles and fleet credit cards are only used for official government purposes. Ensure bureaus/operating units maintain adequate documentation such as standard forms required to request a motor vehicle, mileage logs, and records to support official government use for a consistent period of time. Ensure home-to-work transportation via government vehicle is adequately supported. Provide instruction to government vehicle operators regarding the use of premium-grade gasoline and ensure that employees are entering accurate odometer readings at the time of fuel purchase. Provide training for fleet managers and new employees on the proper use of government vehicles. Update the Department's charge card management plan to be in compliance with OMB Circular A-123, making sure to include records-retention requirements for fleet card transactions.

Actions Taken

OCS has already implemented the use of fraud monitoring tools available through GSA and JPMorgan Chase. A process on how to utilize these tools across the Department is being developed. It is anticipated that this process will be completed and disseminated to all bureau fleet coordinators by the end of October 2010.

Additionally, OCS has obtained copies of Standard Operating Procedures for fleet management from other federal agencies and will utilize these "best practices" to develop a DOC procedure for fleet.

Actions Planned

An action plan with associated deliverables is attached to this memorandum. It clearly details the actions that OCS staff is and will be taking in the coming months to ensure that DOC has a robust fleet management program that has been implemented across all bureaus.

Please contact me at 202-482-1200 or at mpleffner@doc.gov if you have any questions or concerns regarding the proposed plans.

Attachment

cc: Patty McBarnette, OIG
Trudy Gallic, OMO



US DEPARTMENT OF COMMERCE

Office of Administrative Services

Action Plan/Deliverables

- Hire dedicated Fleet Manager (October 2010)
 - Assess fleet management across the Department (Sept – Oct 2010)
- Finalize Fleet Inventory
 - Reconcile fleet records between systems (Oct 2010)
 - Reconcile fleet credit cards to vehicles (Oct - Nov 2010)
 - Capture fuel usage data / location of vehicles (Oct – Nov 2010)
- Develop Policies and Procedures
 - Direct use of fraud protection tools (Sept 2010)
 - Develop/issue interim Standard Operating Procedures (Oct 2010 – Jan 2011)
 - Update Fleet Charge Card Management Plan (Dec 2010)



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Action Plan/Deliverables, con't.

- Acquire and Implement a Fleet Management Information System
 - Issue RFP (Jan 2011)
 - Implement System (July-Aug 2011)
- Implement Training Program Across Department
 - Fleet management (January 2011)
 - Fraud detection (January 2011)
- Implement Internal Control Review Program
 - Execute first internal control review (June 2011)



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DOC Fleet Management Program

- Tracking/Reporting
 - Fleet Manager hired (Oct 2010)
 - Audit Action Plan submitted (Oct 8, 2010)
 - Audit action plan bi-weekly status report to OAS Director (Nov 2010)
 - Report on results of fleet analyses (Nov 2010)
 - Monthly report on use/misuse of fleet cards (Nov 2010)
 - Reports of Internal Control Reviews (July 2011)



US DEPARTMENT OF COMMERCE
Office of Administrative Services

DOC Fleet Management Program Action Plan September 2010

Lead: Marilyn Stoll, OCS Oversight: Mary Pleffner, OAS

