NATIONAL SECURITY AGENCY/CENTRAL SECURITY SERVICE



INSPECTOR GENERAL

REPORT OF INVESTIGATION

2 May 2013

IV-12-0110

Misuse of GTCC

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(U) OFFICE OF THE INSPECTOR GENERAL

(U) Chartered by the NSA Director and by statute, the Office of the Inspector General conducts audits, investigations, inspections, and special studies. Its mission is to ensure the integrity, efficiency, and effectiveness of NSA operations, provide intelligence oversight, protect against fraud, waste, and mismanagement of resources by the Agency and its affiliates, and ensure that NSA activities comply with the law. The OIG also serves as an ombudsman, assisting NSA/CSS employees, civilian and military.

(U) AUDITS

(U) The audit function provides independent assessments of programs and organizations. Performance audits evaluate the effectiveness and efficiency of entities and programs and their internal controls. Financial audits determine the accuracy of the Agency's financial statements. All audits are conducted in accordance with standards established by the Comptroller General of the United States.

(U) INVESTIGATIONS

(U) The OIG administers a system for receiving complaints (including anonymous tips) about fraud, waste, and mismanagement. Investigations may be undertaken in response to those complaints, at the request of management, as the result of irregularities that surface during inspections and audits, or at the initiative of the Inspector General.

(U) INTELLIGENCE OVERSIGHT

(U) Intelligence oversight is designed to insure that Agency intelligence functions comply with federal law, executive orders, and DoD and NSA policies. The IO mission is grounded in Executive Order 12333, which establishes broad principles under which IC components must accomplish their missions.

(U) FIELD INSPECTIONS

(U) Inspections are organizational reviews that assess the effectiveness and efficiency of Agency components. The Field Inspections Division also partners with Inspectors General of the Service Cryptologic Elements and other IC entities to jointly inspect consolidated cryptologic facilities.

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| (b) (3) - P.L. 86-36 I. (U) SUMMARY (b) (3) - P.L. 86-36 (b) (6) | |
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| (U//FOUC) The NSA Office of Inspector General (OIG) opened an investigation | |
| regarding the allegation that a former NSA civilian employee assigned to | |
| the misused his | |
| Government travel credit card (GTCC). Specifically, it was alleged that used the | |
| GTCC for personal purchases and cash advances not related to any approved Government | |
| purpose and failed to pay the balance of his issued GTCC in a timely manner. | |
| | |
| (U//FOUO) The OIG investigation included an interview of contact with | |
| his supervisor and representatives from Travel Entitlements (BF212) analysis of his GTCC | |
| statements for the period 24 August 2011 to 23 April 2013, and review of his training profile. | |
| Analysis of GICC statements revealed an unpaid balance of \$6725 67 as of | |
| rebruary 2012. acknowledged that he used his GTCC for personal expenses | |
| between August 2011 and February 2012 | |
| also acknowledged that he intentionally failed to pay the balance of his GTCC in a timely | |
| manner In April 2012, the account was canceled and was | |
| placed on an involuntary salary offset plan, wherein approximately \$200 was deducted from each | |
| paycheck to pay off the balance. | |
| which time the balance on his assigned GTCC was \$4710.78 continued to make | |
| payments on the account balance after his resignation. In February 2013, he entered into a | |
| reduced payment plan with Citibank wherein he agreed to make monthly payments of \$285.84 As of 11 April 2013, the balance on assigned GTCC was \$2894.10. | |
| As of 11 April 2013, the balance on assigned GTCC was \$2894.10. (b) last made a \$285.84 payment on the GTCC on 14 March 2013. |) (6) |
| Last made a \$283.84 payment on the GTCC on 14 March 2013. | |
| (U//FOUO) The preponderance of the evidence supports the conclusion that | |
| misused his GTCC by using it to make purchases and obtain cash advances that were not related | |
| to Government travel. Additionally, he repeatedly failed to pay his GTCC balance in a timely | |
| manner. His actions were in violation of 5 C.F.R. § 2635.101 (b), Basic Obligation of Public | |
| Service, Subpart A: General Provisions; 5 C.F.R. § 2635.704, (a), Use of Government Property; | |
| DoD Financial Management Regulation (FMR) §7004.14-R. Volume 9. Chapter 3. Subparagraph | |
| 031003, Misuse; and NSA/CSS PMM, Chapter 366, § 1-3, (h), General Principles for On-The- | |
| Job Conduct. | |
| | |
| (U//FOUO) Copies of the OIG report will be forwarded to the Office of General Counsel | |

(Administrative Law) for information. A summary of the investigative findings will be forwarded to the Associate Directorate for Security and Counterintelligence (ADS&CI), Q234 (Special Actions) for information.

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| (b) (3) - P.L. 86-36 (b) (6) II. (U) BACKGROUND (b) (6) | |
|---|----|
| (U) Introduction (U// FOUO) entered on duty at NSA on Prior to his resignation on he was employed as | |
| resignation on he was employed as (U// FOUO) On 14 March 2012, the OIG received a complaint originating from Travel Entitlements, BF212, alleging that had misused his GTCC. Specifically, it was alleged that used the GTCC for personal purchases and cash advances not related to any approved Government purpose. On 13 April 2012 notified via e-mail that his GTCC account was over 90 days past due and; therefore, the account | |
| would be canceled on 17 April 2012, when it reached 120 days past due. (U//FOUO) An initial review of GTCC statements for the period | 36 |
| 24 August 2011 through 23 February 2012, revealed multiple charges every month, except in September 2011, when did not use the card: The charges included 14 cash advance fees and one late payment charge. Additionally, the statements show only two payments were made to the account during the period in question. The first payment of \$342.23, made in October 2011, was returned and a \$29.00 returned check fee was charged. The second payment of \$31.00 was made by split disbursement. The \$31 payment was made by BF212 after airfare was purchased, then refunded, for a canceled | |

(U) Applicable Authorities

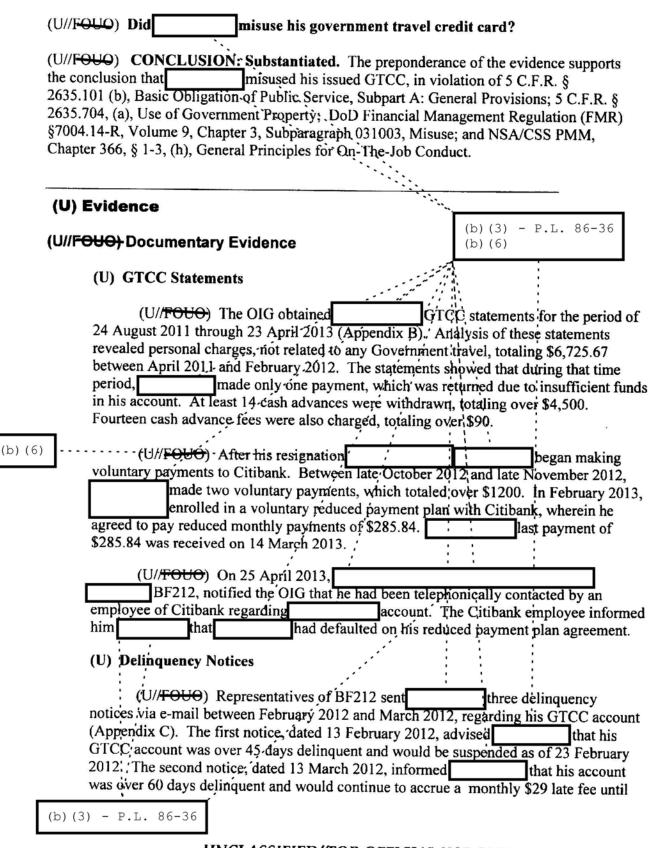
(U//FOUO) The investigation looked at possible violations of the following authorities. Full citations are contained in Appendix A.

- (U) 5 C.F.R. § 2635.101 (b), Basic Obligation of Public Service, Subpart A: General Provisions
- (U) 5 C.F.R. § 2635.704, (a), Use of Government Property
- (U) DoD Financial Management Regulation (FMR) §7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse
- (U//FOUO) NSA/CSS PMM, Chapter 366, § 1-3, (h), General Principles for On-The-Job Conduct

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III. (U) FINDINGS



| the account was paid in-full. Additionally, was advised that if his account became 120 days delinquent, the information would be forwarded to Employee Relations for appropriate disciplinary action. The third notice, dated 13 April 2012, informed that his account was over 90 days delinquent and would be canceled on 17 April 2012, when it became 120 days delinquent. He was also advised of an alternative to paying the entire balance in-full, which involved contacting Citibank directly and agreeing to a voluntary monthly payment plan to avoid participation in an involuntary salary offset program. (U) Salary Offset Notice (U//FOUO) On 19 April 2012, (BF212) sent a notice of initiation of the involuntary salary offset plan via e-mail (Appendix D). The message advised that the salary offset plan was scheduled to begin on 19 April 2012, if the balance on his GTCC was not paid in full immediately. |
|--|
| was not paid in full miniculatery. |
| (U//F OUO) NSA/CSS Corporate Travel Gram Issue 01- 2008 (Revision to Issue 01-2008) July 2009, Department of Defense Government Travel Card Procedures. |
| (U//FOUQ) This guidance is published on the BF212 web page and it details the basic NSA/CSS policy and procedures for mandatory use of the GTCC (Appendix E). |
| (b) (5) - P.L. 88-58 |
| (U//FOUO) was contacted and responded via e- mail on 10 October 2012. She provided the following information: |
| (U//FOUO) verified that she was direct supervisor from 10 June 2011 until the time of his resignation. did not travel on any TDY assignments from 24 August 2011 through 23 April 2013: Additionally, he was not authorized to use his GTCC for local travel or for any other purposes. |
| (U// FOUO) Testimonial Evidence |
| (U// FOUO) |
| was interviewed, under oath, by the OIG on 24 October 2012 and provided the following |
| testimony. |
| |
| (U//F OUO) |
| due to a change in his work schedule. Prior to that time period, |
| worked four nights per week, on a schedule that included extra pay for working nights and Sundays. which |
| nights and Sundays |
| lost a significant amount of pay and additionally had to drive to work five days per |
| week. This loss in pay, in addition to the extra gas he had to purchase, negatively affected his |
| financial situation |
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| (U/FOUO) In September 2011, was on leave when he received |
|---|
| a phone call from an unrecalled individual employed at either the office. This individual informed that he was |
| office. This individual informed that he was which was a surprise to him. |
| He explained to the individual on the phone that he did not have |
| enough money to pay for gas for the trip back to Maryland and was <u>advised to use his GTCC</u> for |
| gas and pay the entire balance on the card by the end of the month. Used the card for |
| gas and paid the \$342.23 balance on 28 October 2011. However, due to insufficient funds in his |
| account, check was returned and the balance remained unpaid. Not only did |
| have insufficient funds in his checking account to pay the balance on his GTCC, but |
| the balance on his personal credit card exceeded the limit; therefore, he was unable to charge any |
| purchases on that credit card. |
| (b) (6) |
| (U//FOUO) After using his GTCC to purchase gas in September 2011, |
| began using the card regularly for personal purchases and cash advances. Initially |
| acknowledged that the training he received was personally initiated and not funded or supported |
| by the Government; therefore, he was not authorized to use the GTCC for any telated expenses. |
| Additionally, he explained that he is a home owner and in the fall of 2011, his roommate ceased |
| paying rent. was then responsible for paying the entire mortgage payment, which he |
| could not afford. At that time, he began withdrawing cash advances using his GTCC to pay his |
| mortgage. acknowledged that in doing so he was in violation of policies governing |
| the use of a GTCC; however, he did not think he had another option. He assumed he would be |
| able to pay the account balance |
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| stated, " I figured by the time those advances even registered,and they'd be paid off." |
| stated, " I figured by the time those advances even registered,and they'd be paid off." (U/4FOUO) Another factor that contributed tofinancial dilemma involved used his GTCC to pay for gas to get to and from work and rationalized that because he was traveling |
| stated, " I figured by the time those advances even registered, |
| stated, " I figured by the time those advances even registered, and they'd be paid off." (U/4FOUO) Another factor that contributed to financial dilemma involved used his GTCC to pay for gas to get to and from work and rationalized that because he was traveling to he was authorized to use the GTCC for gas. "I think I just justified it in my mind as being for official business." He further explained that he also used the card to |
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(U) Analysis and Conclusions

(b)(3) - P.L. 86-36

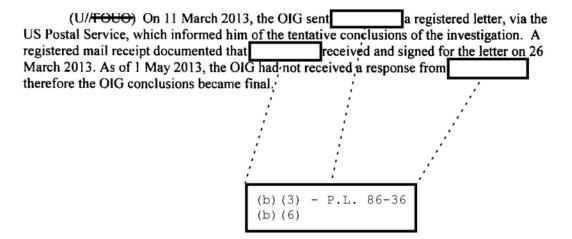
(U//FOUO) An analysis of ______GTCC statements from 24 August 2011 through 23 February 2012 revealed unauthorized personal purchases and cash advances in the amount of \$6725.67. During that time period, ______did not travel on any TDY assignments, nor was he authorized to use a GTCC for any other reason. _______ acknowledged he should not have used the GTCC to pay his mortgage; however, out of what he felt was financial desperation, he did not believe he had any other options. ______also admitted to rationalizing other personal purchases, including gas and clothing, by telling himself and thus acceptable to charge to his GTCC.

(U//FOUO) Between 24 August 2011 and 23 February 2012, _____ made only one attempt to make a payment on his GTCC and that payment was returned due to insufficient funds. Beginning in February 2012 ______ received delinquency notices via e-mail from representatives of BF212. Included in the delinquency notices were suggested alternatives to repaying the entire balance at one time. One notice advised ______ that he could contact Citibank directly and agree to a voluntary monthly payment plan to avoid participation in an involuntary salary offset program. ______ failed to make any attempt to repay his debt until he was placed on the involuntary salary offset program.

(U//FOUO) The preponderance of the evidence supports the conclusion that misused his issued GTCC. The OIG's analysis of GTCC statements for the period in question revealed that he consistently used his assigned GTCC for personal purchases and cash advances, with almost no attempt to make payments on the balance. His actions were in violation of 5 C.F.R. § 2635.101 (b), Basic Obligation of Public Service, Subpart A: General Provisions; 5 C.F.R. § 2635.704, (a), Use of Government Property; DoD Financial Management Regulation (FMR) §7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse; and NSA/CSS PMM. Chapter 366, § 1-3, (h), General Principles for On-The-Job Conduct.

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IV. (U) RESPONSE TO TENTATIVE CONCLUSION



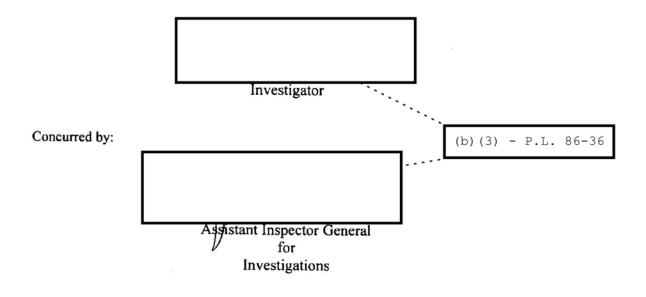
V. (U) CONCLUSION

(U//TOUO) The preponderance of the evidence supports the conclusion that misused his issued GTCC, in violation of 5 C.F.R. § 2635.101 (b), Basic Obligation of Public Service, Subpart A: General Provisions; 5 C.F.R. § 2635.704, (a), Use of Government Property; DoD Financial Management Regulation (FMR) §7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse; and NSA/CSS PMM, Chapter 366, § 1-3, (h), General Principles for On-The-Job Conduct.

(b) (3) - P.L. 86-36 (b) (6)

VI. (U) DISTRIBUTION OF RESULTS

(U//FOUO) A copy of this report of investigation will be provided to the ADS&CI for information.



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APPENDIX A

(U) Applicable Authorities

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(U) 5 C.F.R. § 2635.101 (b), Basic Obligation of Public Service, Subpart A: General Provisions

b. 9. (U) Employees shall protect and conserve Federal property and shall not use it for other than authorized activities.

(U) 5 C.F.R. § 2635.704, (a), Use of Government Property

a. (U) Standard. An employee has a duty to protect and conserve Government property and shall not use such property, or allow its use, for other than authorized purposes.

(U//FOUQ) NSA/CSS PMM, Chapter 366, Section 1-3, (h), General Principles for On-The-Job Conduct

1-3. (U//FOUO) Generally, every employee is expected to:

H. (U//FOUO) Conserve, protect, and properly use Federal funds, property, equipment, and materials.

(U) DoD Financial Management Regulation (FMR) §7004.14-R, Volume 9, Chapter 3, Subparagraph 031003, Misuse

Misuse of the GTCC will not be tolerated. Commanders/supervisors will ensure GTCCs are issued only for official travel related expenses. Examples of misuse include, but are not limited to:

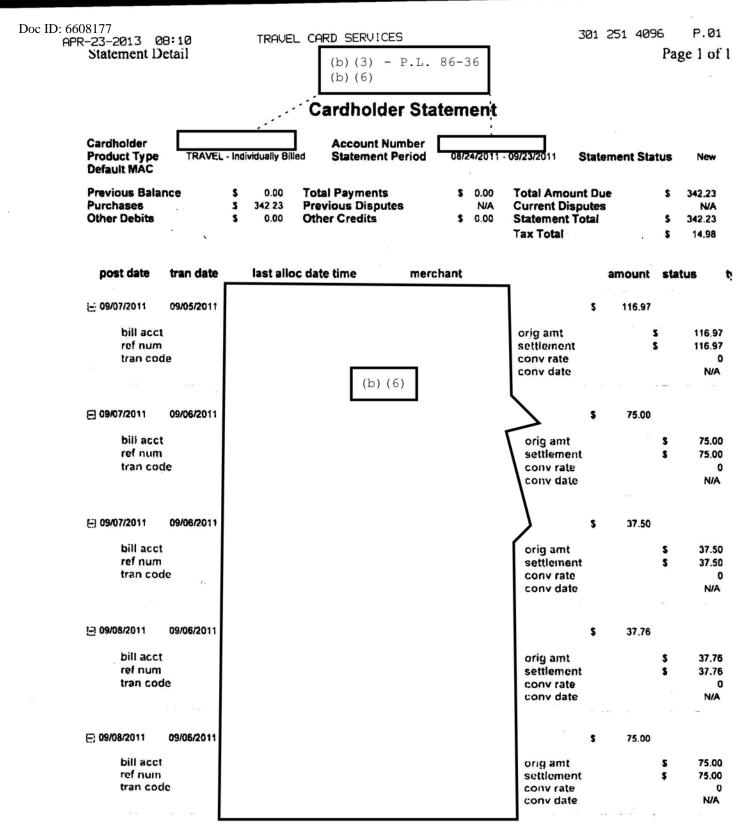
- (a) expenses related to personal, family, or household purposes,
- (b) cash withdrawals from ATMs or banks when not related to official Government travel requirements,
- (c) intentional failure to pay undisputed charges in a timely manner, and
- (d) ATM cash withdrawals taken more than three days prior to the official Government travel.

Cardholders who misuse their GTCC may be subject to administrative or disciplinary action, as appropriate.

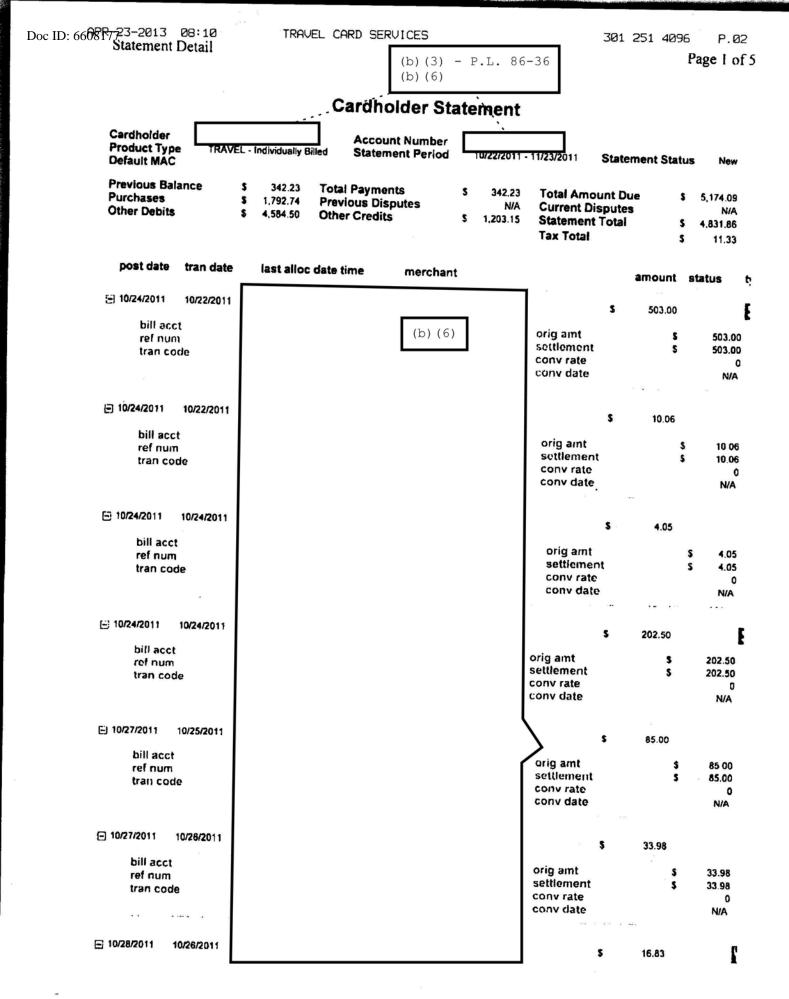
APPENDIX B

(U) GTCC Statements

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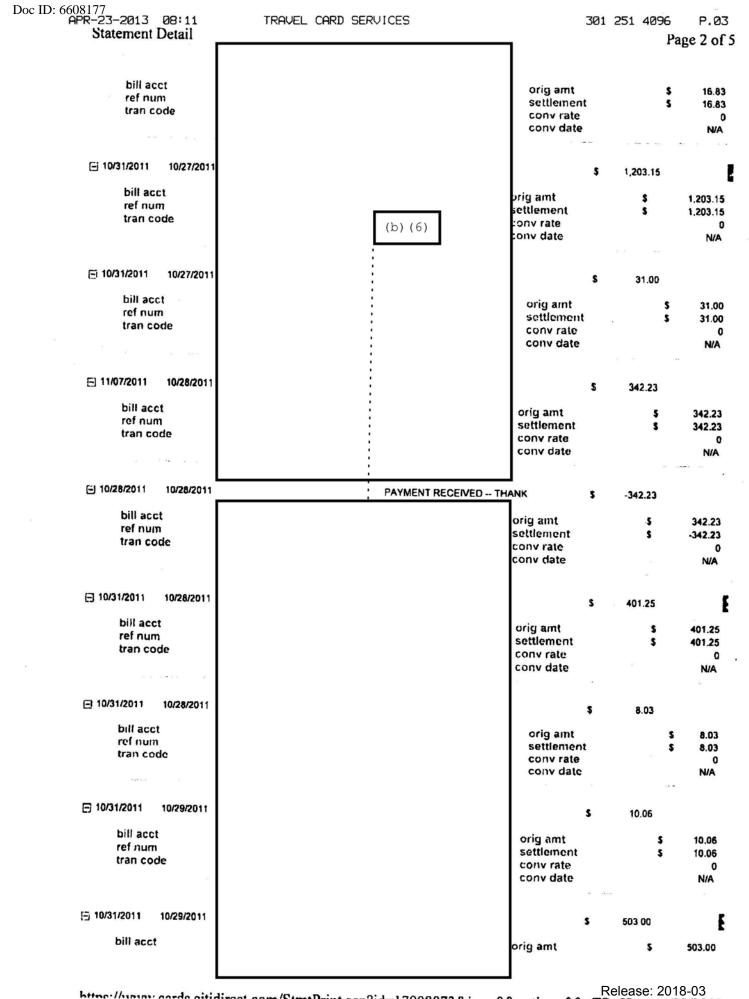
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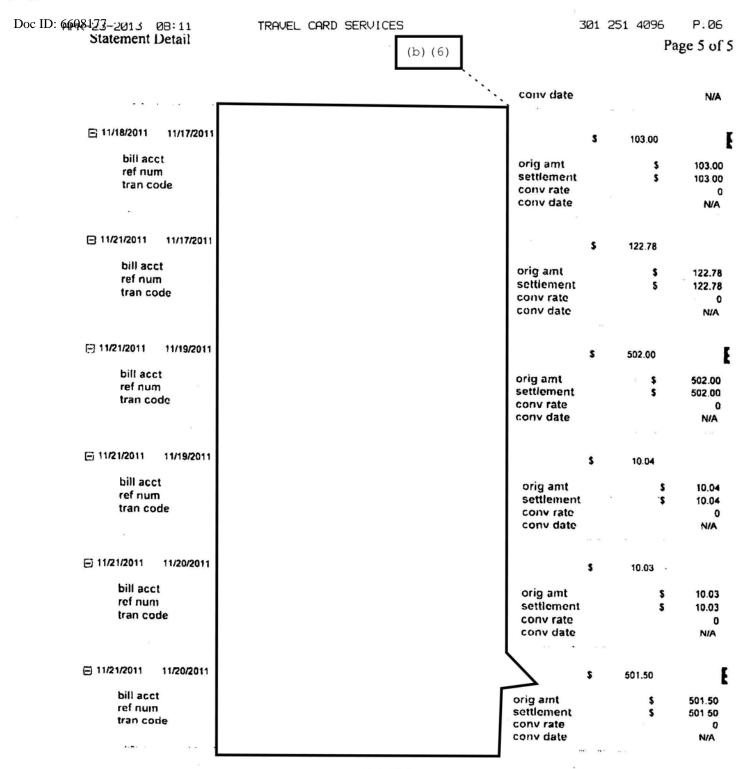
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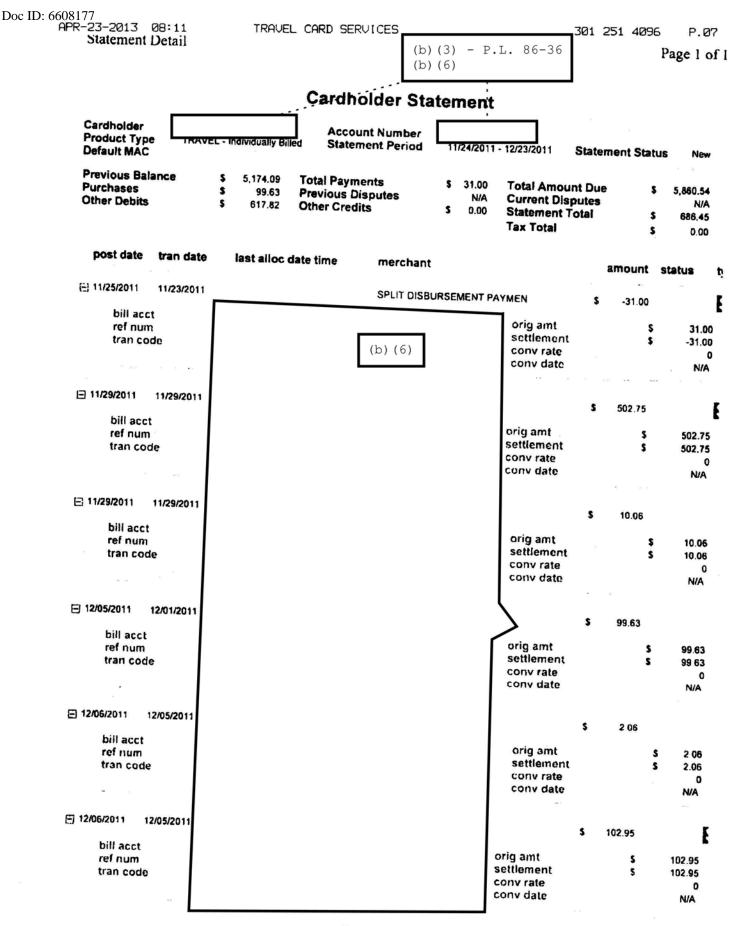
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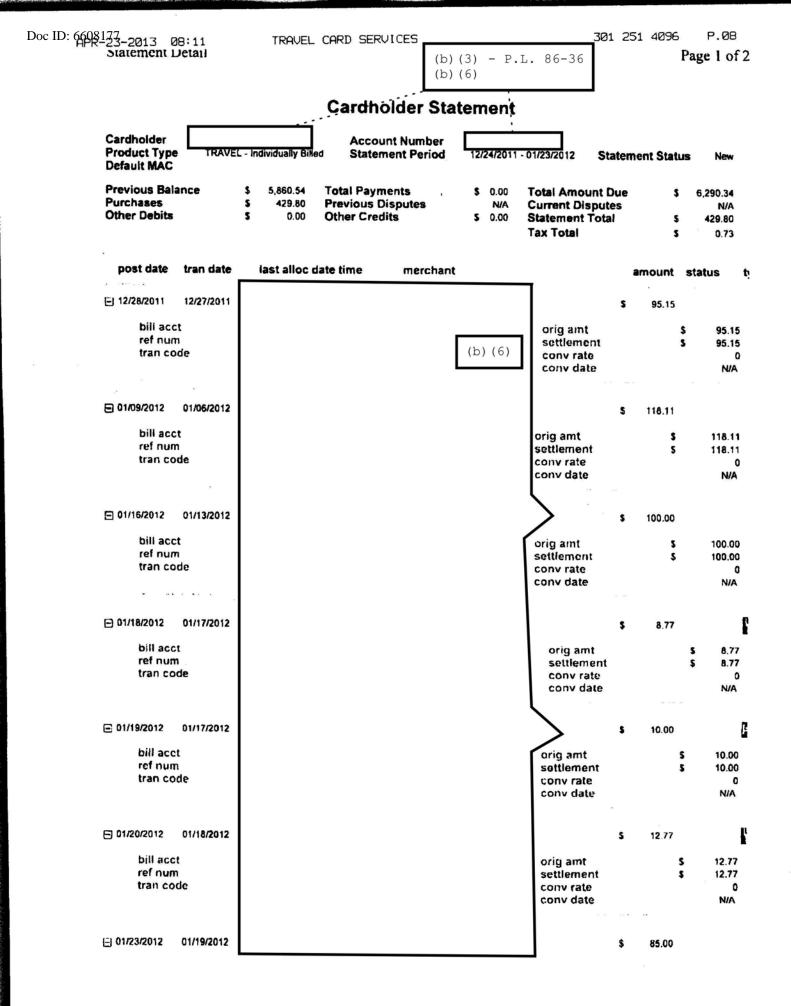
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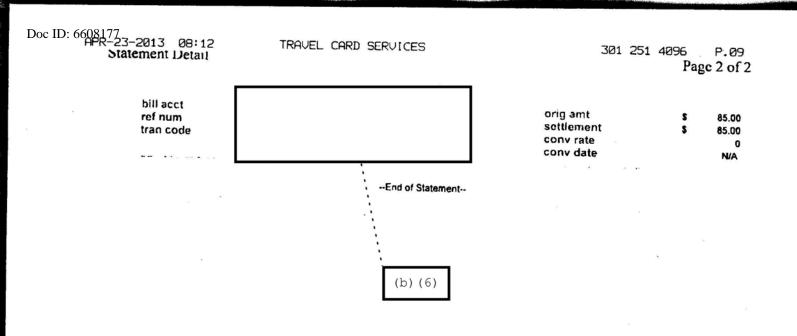
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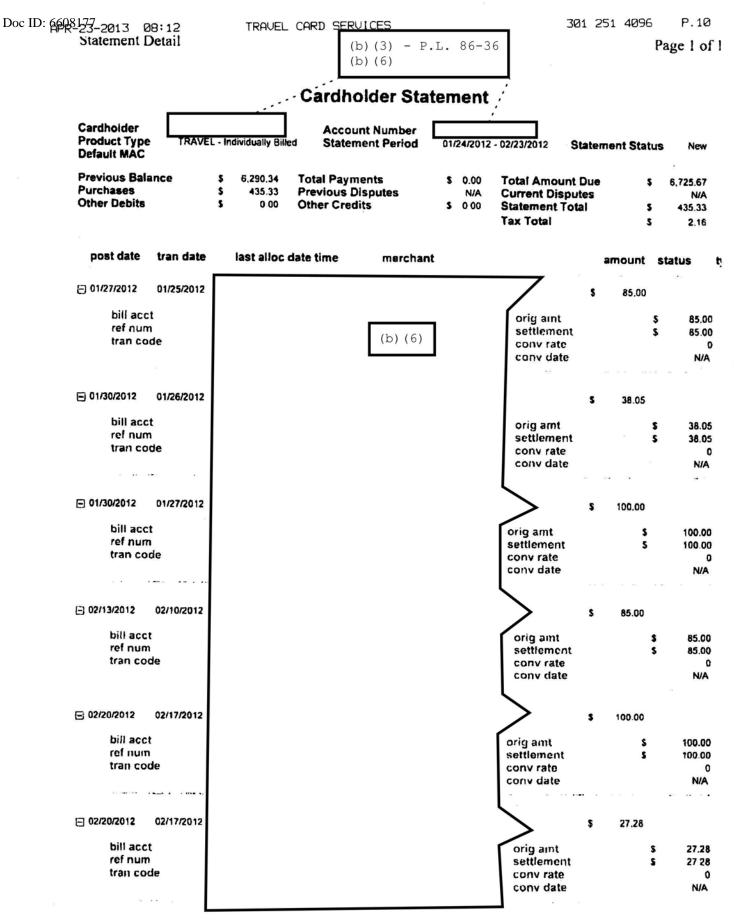
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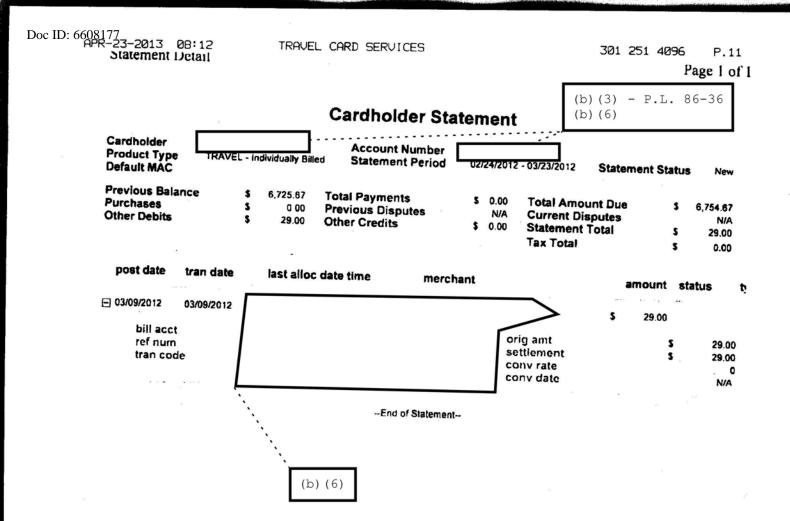


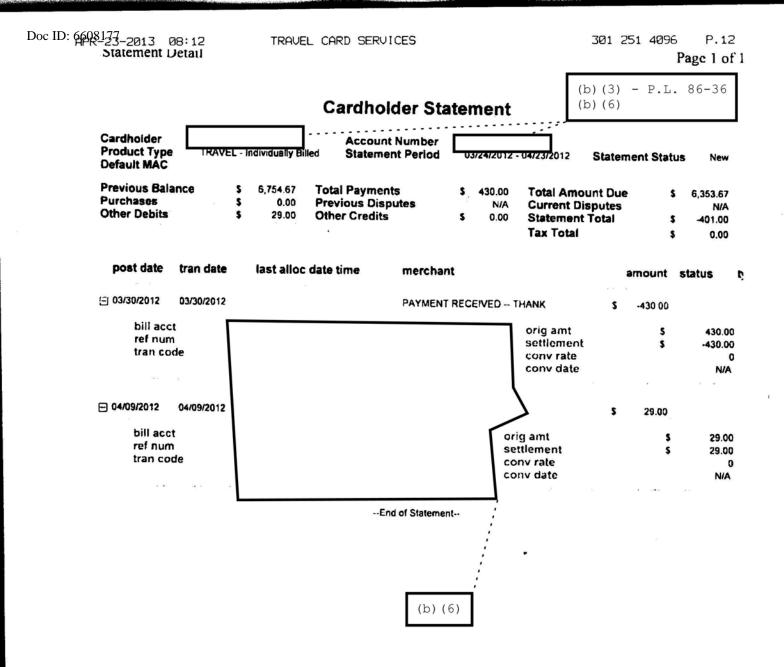


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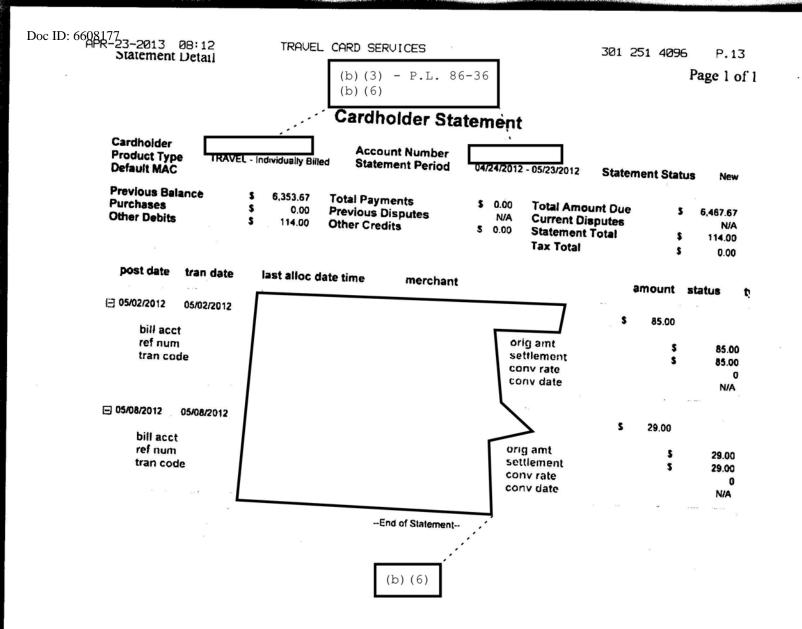
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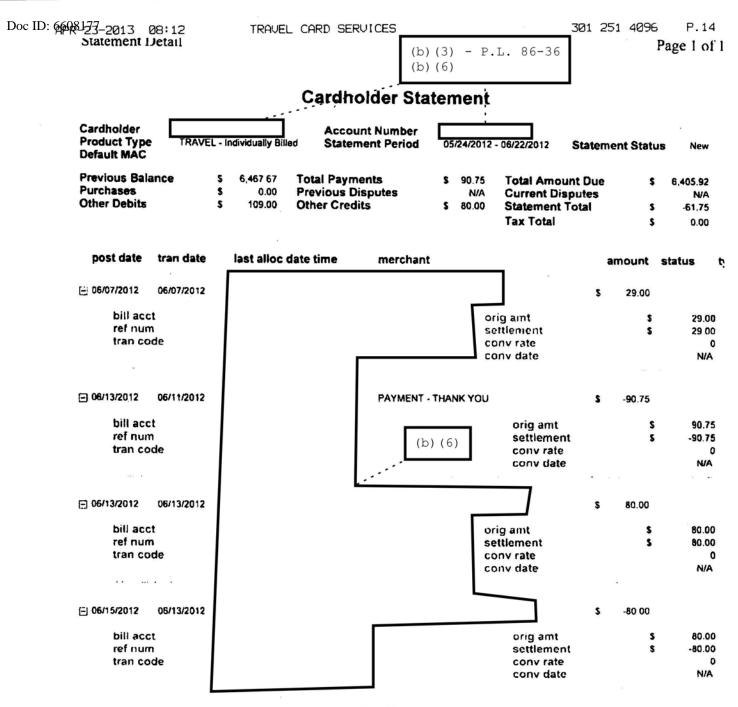




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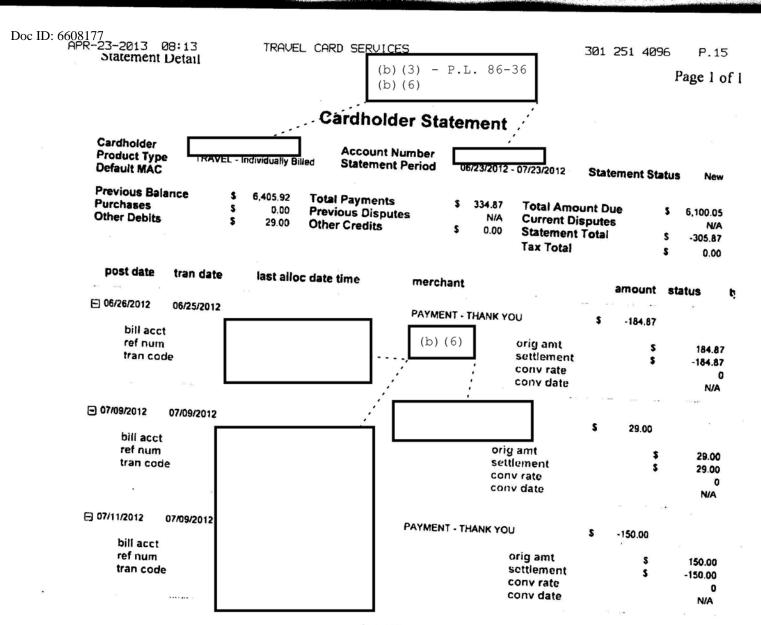
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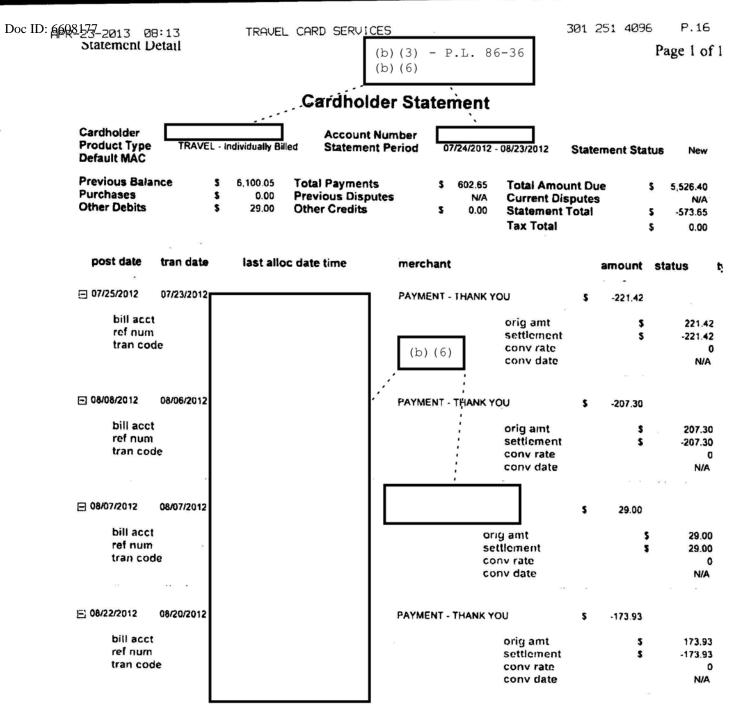




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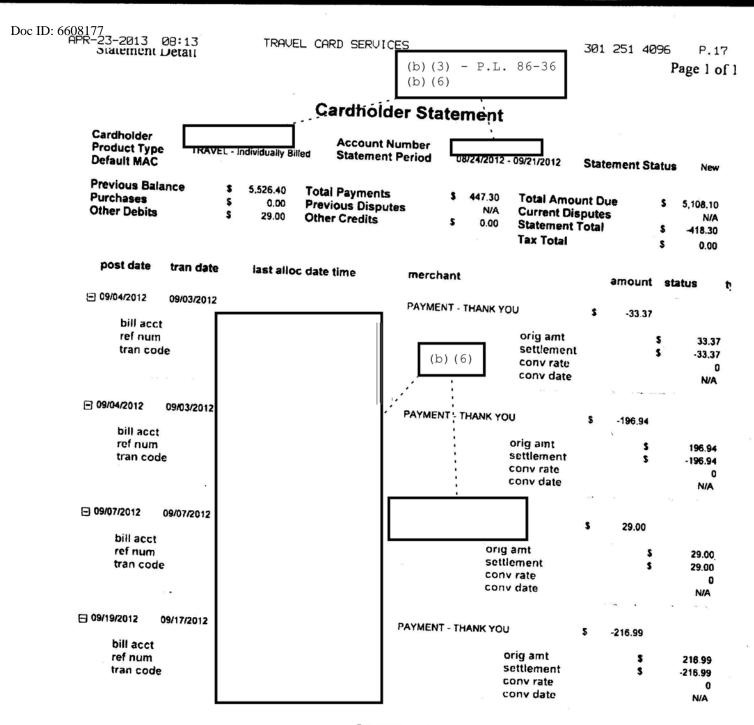




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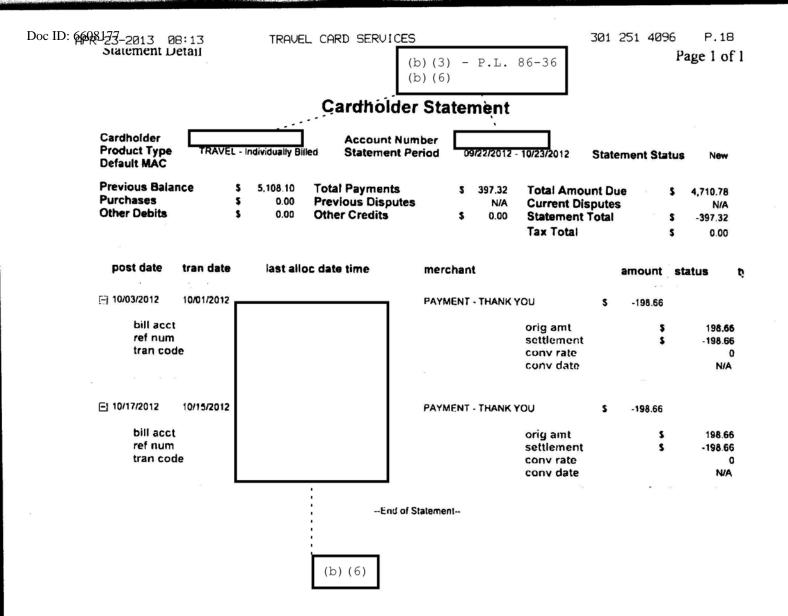
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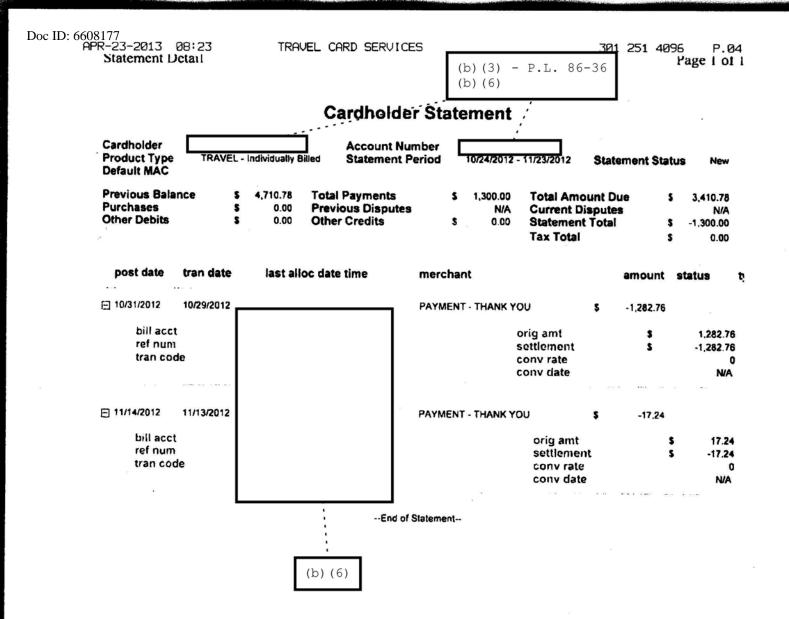
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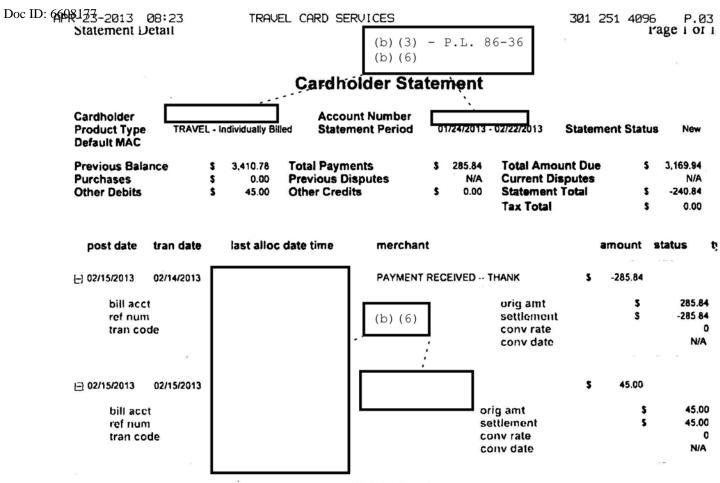


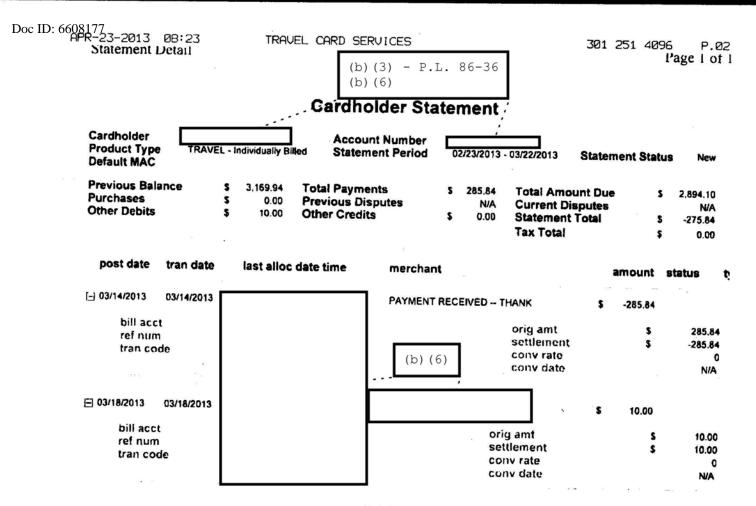
__ Release: 2018-03 NSA: 02138

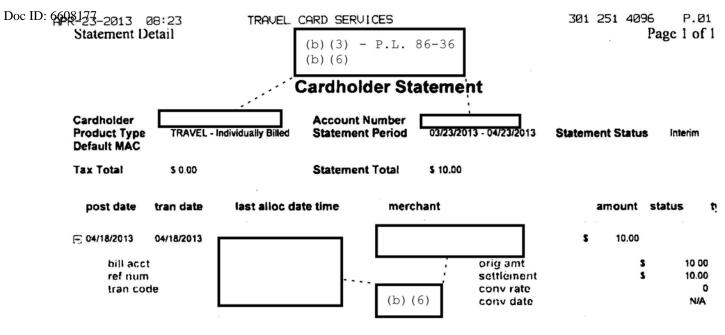
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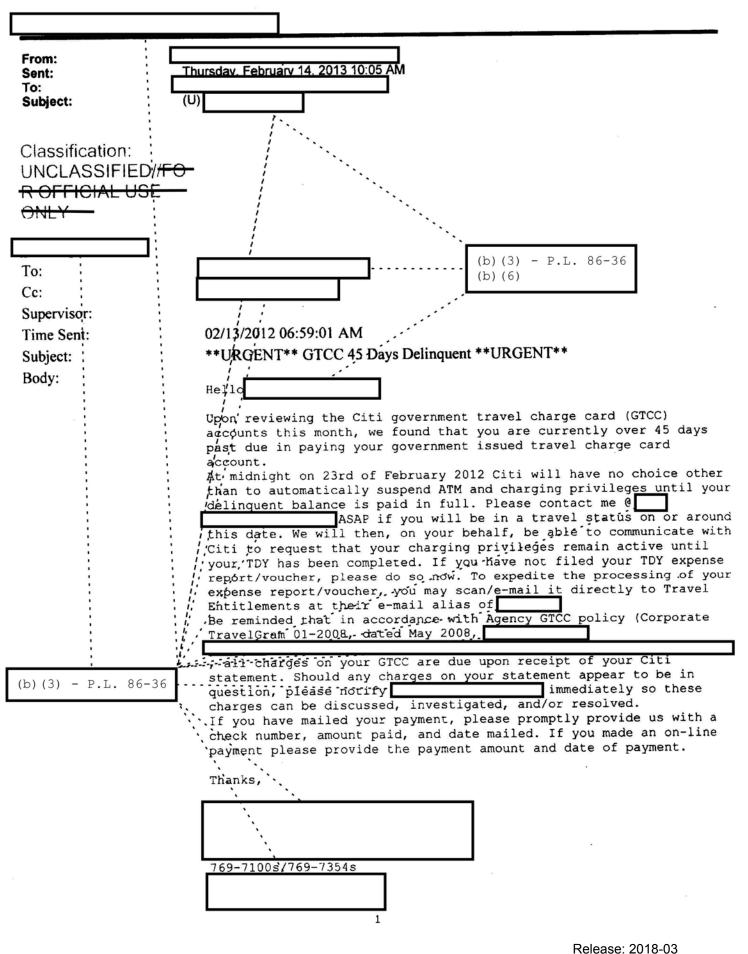
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APPENDIX C

(U) Delinquency Notices

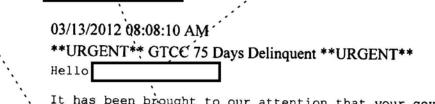
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NSA: 02145

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To: ``` Cc: Supervisor: Time Sent: Subject: Body:



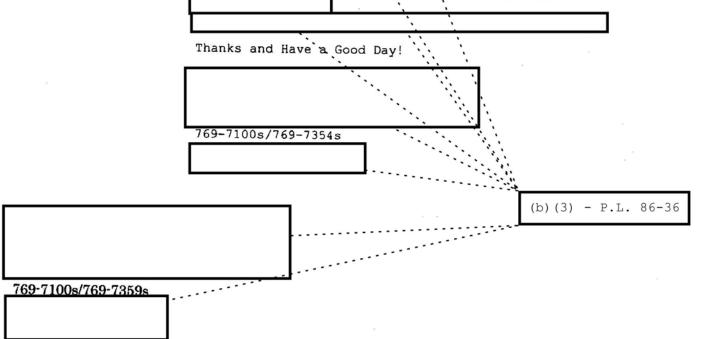
It has been brought to our attention that your government issued travel charge gard has a balance of \$6,754.67 of which \$5,860.54 is over 60 days past due and \$429.80 is over 30 days past due. After reviewing your TDY history, we found that:

You do not have any recent trips in the travel database. If you traveled for another organization, please track your reimbursement and promptly advise this office regarding the status. Failure to submit an expense report does not excuse you from paying your bill in accordance with Agency travel card policy (Corporate TravelGram 01-2003, dated January 2003).

Your ATM and charging privileges have been suspended. Please be advised that your account will continue to accrue a \$29 late fee each month your outstanding balance remains unpaid. The late fee is not reimbursable by the Agency. At 120 days delinquent, your case will also be forwarded to Employee Relations for appropriate disciplinary action, unless you can establish that you have timely filed your claim and have not yet been reimbursed. Furthermore, if your account remains delinquent, involuntary salary offset will be implemented.

You must pay Citi Bank in full immediately. Please contact me by email NLT 22 March 2012 to inform me of the method that was used to pay your bill.

Please refer to Corporate Travel Gram 01-2003 dated January 2003 for additional Agency policy on the travel card at:



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|---|--|--|--|
| From: Sent: | Friday, April 13, 2012 8:4 | 9 AM | |
| To: Cc: Subject: | **Action Required** Acc | | |
| | ASSIFIED// FOR OFFICE | NL USE ONLY | |
| MANAGEMENT REGULATIO | ONS. | NOTIFICATION SENT I | N ACCORDANCE WITH DOD FINAN |
| ***** | | | |
| As of 04/13/2012, a indicates that you | review of the Citi g are now over 90-days | overnment travel cha delinquent in the pa | rge card (GTCC) database yment of your GTCC. |
| Total amount due is | | uill be concelled a | n 01/17/2012/120-dave dalir |
| and any outstanding and Account Office | balance which is not | formally disputed w y offset. The GTCC | on 04/17/2012(120-days delin will be submitted to the Fir and Agency travel card poli |
| outstanding charges statement. | to be paid by the sp | ecified due date as | requires all undis stated on the Citi monthly |
| with no reinstateme future you will not rates. All costs wi for which you trave an expense report/w | nt privileges. You ar receive a cash advar ll be borne by you, t eled. Reimbursement by roucher and the applic | e reminded that if y ice for the benefit (the traveler, until y the Agency will not cable receipts. | the 120-day delinquency may you are required to travel a of government transportation you are reimbursed by the ap t occur until you have subma |
| with no reinstateme future you will not rates. All costs wi for which you trave an expense report/w Non-compliance, or disciplinary action Credit/Charge Cards you may conduct a r | nt privileges. You ar receive a cash advar ll be borne by you, f eled. Reimbursement by roucher and the applic failure to adhere to in accordance with f boome payment by call; | the feminded that if y ince for the benefit of the traveler, until y the Agency will not able receipts. the guidelines for MM 30-2, Chapter 36 ing the 800 number of | you are required to travel a of government transportation you are reimbursed by the ap |
| with no reinstateme future you will not rates. All costs wi for which you trave an expense report/w Non-compliance, or disciplinary action Credit/Charge Cards you may conduct a p NOTE: You MUST cont contact Citi. If you are financia agreement with Citi immediately contact | int privileges. You ar receive a cash advar ll be borne by you, t eled. Reimbursement by youcher and the applic failure to adhere to in accordance with f in accordance with f bhone payment by call: cact Citi from a home ally unable to make a i to make voluntary m | the traveler, until y the traveler, until y the Agency will not able receipts. the guidelines for MM 30-2, Chapter 36 ing the 800 number of phone, DO NOT use a full payment, and w onthly payments and he back of your GTCC | you are required to travel : of government transportation you are reimbursed by the ap t occur until you have submit the GTCC, can result in 5. Section 3.1D Government . To resolve this delin n the back of your Citi GTC government phone exchange ish to enter into a written avoid involuntary salary of to make the necessary |

mail alias of: You have the right to inspect and request copies of records related to your debt. You also have the right to request, in writing, a hearing concerning the amount and validity of the debt or the amount of involuntary deductions. To request a hearing, you must complete the Petition for Hearing Request form, which can be found at:

Thank You

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APPENDIX D

(U) Salary Offset Notice

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| To: Subject: RE: (U) Citibank | Salary Offsetresponse |
|--|---|
| From: Sent: Thursday, April 19, 2012 1:48 PM To: Cc: Subject: (U) Citibank Salary Offset | (b)(3) - P.L. 86-36 |
| Classification: UNCLASSIFIED//FOR- | OFFICIAL USE ONLY |
| | |
| provide proof that payments have been made salary offset for pay period 9-21, pay period b | will be initiated if past due payments are not made. According to Citibank ur delinquent account since 12/08/11 in the amount of \$275.00. Please e or your account will be forwarded to the Finance Office for involuntary beginning date of 04/08/12 and ending date of 04/21/12 (pay date of % of your disposable pay \$223.00 and will continue until the outstanding |
| | (b)(3) - P.L. 86-36 (b)(6) |
| 769-7100s/769:7359s | |
| Classification: UNCLASSIFIED//FOR (| DEFICIAL USE ONLY |
| Classification: UNCLASSIFIED// | OR OFFICIAL USE ONLY |

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APPENDIX E

(U//FOUO) NSA/CSS Corporate Travel Gram Issue 01-2008 (Revision to Issue 01-2008) July 2009, Department of Defense Government Travel Card Procedures

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Issue 01-2008 (Revision to Issue 01-2008) July 2009

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(U) DEPARTMENT OF DEFENSE GOVERNMENT TRAVEL CARD PROCEDURES

(U) This Corporate TravelGram details the procedures for mandatory use of the Government travel charge card (travel card) under the "Travel and Transportation Reform Act of 1998" (TTRA), Public Law 105-264.

I. (U) PURPOSE:

(U//FOUO) The purpose of this Travel Gram is to inform National Security

Agency employees (civilian and military of the basic NSA/CSS policy and procedures for using a government travel card, while traveling internationally (OCONUS) and in the continental United States (CONUS). Effective 1 October 1995, the individual Government travel card program was instituted agency wide for the payment of official travel related expenses. NSA's employees should use the travel card for all official travel expenses are otherwise exempted. (See section VIII of this Travel Gram)

(U//POUO)

II. (U) PROCEDURES FOR OBTAINING A TRAVEL CARD:

(U//FOUO) The Citibank charge card application form may be printed from, go travelcard. The following sections must be completed: (Email address is not needed)

- 1. Name
- 2. Address
- 3. Social Security Number
- 4. Date of Birth
- 5. Cardholder's signature
- 6. Date
- 7. Credit Report Authorization
- 8. Supervisor's signature
- 9. Date

The remaining sections will be completed for you by the Agency Program Coordinator (APC).

(U//FOUO) Military personnel must complete and submit a direct deposit form and a military point-of-contact sheet (POC) with their Citibank charge card application. All of the forms can be accessed on the and BF212 websites.

(U//FOUO) Applicants must read, initial, and sign the Statement of Understanding Government Travel Card Program form (SOU). A supervisor's approval signature is required on the SOU form for both civilian and military personnel.

(U//FOUO) A listing of all APCs and additional points-of-contact for the Citibank travel card program can be found by typing "Go Travel" or "Go Travelcard" in the intranet browser.

(U//FOUG) Applicants will receive their travel cards usually within 7-10 business days. The travel cards will be mailed to the applicant's home addresses. If a travel card is not received within the 7-10 period the APC should be contacted.

(U//FOUG) EXPEDITED CARD PROCESSING: If an employee is required to perform a mission critical TDY and does not have a valid travel card, they must have their Request for Travel Authorization (RTA) processed through

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Corporate Travel Services, prior to submitting the completed travel charge card application to the APC. Upon receipt of the application, the APC will initiate action with Citibank to expedite delivery of a travel card. There is an additional processing fee for the expedited card service which is reimbursable by the funding organization. Please note that someone must be available to sign for the card at the mailing or home address, or the card may be sent to either of the travel offices for pick-up.

III. (U) PROPER USE OF THE CITIBANK TRAVEL CARD:

(U//FOUO) Authorized use of the travel card is reserved for purchases related to and made during official Government travel only and which will be reimbursed using travel funds. Expenses to support travel mission should be not charged using this card. The travel card must be used for purchases such as the following:

air travel rail travel lodging transportation services conference fees auto rental fuel ATM access service fee/agent fee/transaction fees

The travel card may be used at food service establishments. Use of the card for meals & incidentals expenses is not mandatory.

(U) Permanent Change of Station (PCS)

(U//FOUO) Use of the travel card is required for purchases related to and made during official Government travel for a Permanent Change of Station. Examples of these expenses would include lodging rental cars, airfare and taxis. The card may also be used for meals.

(U//FOUO) The travel card should be used for purchases relating to the following entitlements: Temporary Quarters Subsistence Expense (TQSE) House Hunting Trip (HHT), including Airfare. Mileage and Per Diem (MIPD), including Airfare Temporary Quarters Subsistence Allowance (TQSA) Foreign Transfer Allowance (FTA)

(U//FOUO) The Travel Voucher Summary, Form DD 1351-2, should be submitted within five days of the completion of each entitlement. All necessary receipts should be attached to the signed travel voucher summary. Both the employee's signature and the Approving Official's (AO) signature are necessary on this form.

IV. (U) When the Employee Requires Cash:

(U//FOUO) Employees in preparation for official travel may need to withdraw cash from an ATM for incidental expenses, or in instances when a vendor will not accept the government travel card. Cardholders will be provided personal identification numbers (PIN), which will allow access to ATMs. The employee can always "customize" their pin number. The use of a travel card for cash withdrawals is limited to \$1,000 during a seven-day period. In circumstances where the cash limit is insufficient, the employee should contact the Agency Card Program Manager (CPM). Employees will be reimbursed for any fees associated with ATM withdrawals made using this card. Reimbursement of the ATM charge is only authorized for withdrawals made in conjunction with official travel. ATM withdrawals should not be made more than 3 working days prior to the start of the travel.

V. (U) EMPLOYEE REIMBURSEMENT:

(U//FOUO) DoD has mandated that all civilian employees and Military members must designate the portion of their reimbursement for charges made to the official travel card, be sent to Citibank to liqudate their bill. This amount

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should be recorded on the top of the RTA under the Split Disbursing area. If the outstanding balance is unknown, the employee may contact their APC for the correct amount. If an amount is not indicated on the RTA (except for sensitive TDYs), the following expenses will automatically be split disbursed to Citibank: air/train fare and service fee; lodging and lodging tax, rental car and conference fee. If the total balance of the bill is not paid through split disbursement, the traveler is responsible for any remaining balance owed to the Bank.

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(U//FOUG) All TDY travel claims must be submitted to BF 212 (NSA Travel entitlements, within five (5) working days after the completion of each trip. Failure to submit a claim does not excuse the employee from paying the Citibank by the due date posted on the billing statement.

(U//FOLIO) All PCS travel claims must be submitted to BF212 (NSA Travel, within five (5) working days after the completion of the entitlement. Failure to submit a claim does not excuse the employee from paying the Citibank by the due date posted on the billing statement.

(U//FOUG) During long-term TDYs, those in excess of 45 days, the employee is required to submit a claim for each 30-day period. The claim must be submitted within 5 days after the end of each 30-day period. While in an extended TDY status, it is important that employees ensure their travel card bill is paid by the due date specified on the Citibank billing statement. To help facilitate this, employees are required to contact their APC or Field Site POC prior to departing on the extended TDY.

(U//FOUO) Employees shall be reimbursed no later than 30 days after submitting to the Travel Entitlements Branch, a properly completed claim for reimbursement.

(U//FOLIO)Each claim must include: RTA with AO's signature and employee's signature, as well as paid receipts for lodging, transportation tickets, rental car, conference fees and any item \$75.00 or more. Claims must be submitted to BF212 the Travel Entitlements Branch, located in

(U//FOUO) If reimbursement takes longer than 30 days, the Government may be required to pay the employee interest. Interest is payable, using the "Prompt Payment Act" interest rate, beginning on the 31st day after the submission of a properly filed travel claim and ending on the date that the payment is disbursed by the Government. The only exception to the requirement for this payment is when the payment would be less than \$1.00. In addition, the employee shall be paid an amount equal to any late payment charge that the travel card contractor would have been able to charge had the employee not paid the bill.

VI. (U) LATE PAYMENT/DELINQUENT ACCOUNTS:

(U//FOUO) Payments are due in full by the due date specified on the Citibank billing statement regardless of whether or not the employee has received reimbursement.

(U/FOLO) Employees will incur a \$29.00 fee for payments returned due to insufficient funds. This return payment fee is not reimbursable.

(U//FOUO) MILITARY DELINQUENT ACCOUNTS: In accordance with the Memorandum of Agreement (MOA) between the Military Commands and the National Security Agency/Central Security Service, military accounts which are 45 days delinquent will be reported directly to their parent military command.

(U) CIVILIAN DELINQUENCY CYCLES:

(U//FOUO) 45 days Delinquency - After 45 days of delinquency, the APC will send notification to the employee and their immediate supervisor stating that unless outstanding charges are paid in full, their travel card will be

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suspended on the 61st day of delinquency. On the 61st day of delinquency, the Citibank will automatically suspend ATM and travel card privileges.

(U//FOUO) 75 days Delinquency – After 75 days of delinquency, the APC will send notification to the employee, their immediate supervisor and the organization's Chief of Staff stating that travel card privileges remain suspended and the outstanding balance must be paid in full to avoid further action. In addition, a \$29.00 late fee, which is not reimbursable, will be applied to the employee's account.

(U//FOUO) 90 days Delinquency – After 90 days of delinquency, the Individually Billed Account Manager (IBA) will notify the organization's Chief of Staff and the Employee Relations (ER) Office for appropriate disciplinary action. The

IBA will send a Due Process Letter to the employee allowing 30 days to make full payment of the outstanding balance (copies will be sent to the organization's Chief of Staff and ER).

(U//FOUO) Salary Offset – If the employee's payment is not made in full within 30 days of the date of the Due Process Letter, then the Salary Offset process will be initiated in accordance with the DoD and BOA established policy. Payments of 15% of the employee's net pay will be deducted from their bi-weekly federal salary to satisfy account balances that are not in dispute.

(U//FOUC) 120 days Delinquency - On the 120th day of delinquency, the Citibank will automatically cancel the employee's account. Once the account is cancelled, the Citibank will not reinstate the travel card for any reason.

VII. (U) MISUSE OF THE TRAVEL CARD:

(U/FOUO) Travel cards should be used only for reimbursable expenses associated with official travel which will be reimbursed on the RTA or DD1351-2.

(U//FOUO) Military Misuse: In accordance with the Memorandum of Agreement (MOA) between the Military Commands and the National Security Agency/Central Security Service, when misuse of the travel card is suspected Military accounts will be deactivated and a notice of deactivation will be sent to the respective parent command,

(U//FOUO) Civilian Misuse: If misuse of the travel card is suspected, the IBA will send an email to the employee and their immediate supervisor questioning the expenses on the traveler's account. Depending on the response provided and the seriousness of the misuse, the travel card may be deactivated to prevent further misuse. In addition, a formal case will be forwarded to Employee Relations (ER) for disciplinary action.

(U//FOUO) Supervisors shall not tolerate misuse of the travel card and cardholders who misuse their travel cards shall be subject to appropriate administrative or disciplinary action. Possible actions range from written reprimand to removal.

VIII. (U) EXCEPTIONS/EXEMPTIONS TO TRAVEL CARD USE:

(U//EOUO) Military or DoD civilian personnel whose use of the travel card, due to operational, security or other requirements of a mission, would pose a threat to national security, endanger the life or physical safety of travelers or others, or would compromise a law enforcement activity. Refer to Section 1 (PURPOSE, paragraph 2).

(U//FOUO) Military or DoD civilian personnel traveling to or in a foreign country where the political, financial, or communications infrastructure does not support the use of a travel card. Consult the Travel Office for guidance.

(U/FOUO) Military or DoD civilian personnel that are determined to be infrequent travelers. An infrequent traveler is one who travels two or less times per year. While DoD has exempted infrequent travelers from the mandate to use the official charge card, NSA offers the card to all employees and will offer no special accommodations to those infrequent travelers who elect to not apply for the card.

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(U/POUO) Individuals employed or appointed on a temporary or intermittent basis upon a determination by the individual's supervisor or other appropriate official that the duration of the employment or appointment or other circumstances pertaining to such employment or appointment does not justify issuance of a travel card to such individual.

(U//FOUO) There are two exceptions when personal charges may appear on the official travel charge card. These are:

- a. personal lodging or rental car charges incurred in conjunction with official travel charges when travelers are extending their official time at the hotel or use of a rental vehicle to include personal (leave) time
- b. when travelers are charging expenses incidental to the hotel bill (exercise room fees, movie rentals, personal phone calls or beverages)

While these personal charges are not reimbursable, travelers will not be expected to use a personal charge card since these charges are incidental to use of the hotel /rental car. If the traveler elects to change hotels or rental vehicles during the personal time, the official charge card should not be used for these expenses.

(U//FOUQ) FRIENDLY REMINDER: If an employee has any questions/concerns about their account, they should contact the APC. It is very important that the APC be notified of any address changes, name changes or to report a lost or stolen card. If an employee receives any inquiry for data, appearing to be from the Bank, either on the phone or through e-mail, the employee should not respond to it. The Citibank will not attempt to communicate via these modes. When this type of correspondence is received it should be reported to the APC.

(U//FOUO) EFFECTIVE DATE: This Corporate TravelGram is effective immediately and rescinds Corporate Travel Gram 01-2003. If you need additional information, please contact the Travel Card Program Office, 769-7100 (s) or

NOTE: (U) The contents of this Corporate Travel Gram have been coordinated with the Office of General Counsel.

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