



GSA SmartPay Conference

# Federal Regulations and How Citi Adapts

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Vice President, Citi





Success is in the Cards

11<sup>th</sup> Annual GSA SmartPay Conference

Phoenix, Arizona  
July 28<sup>th</sup> - July 30<sup>th</sup>, 2009



# Goals & Objectives

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## Enhance A/OPCs understanding of...

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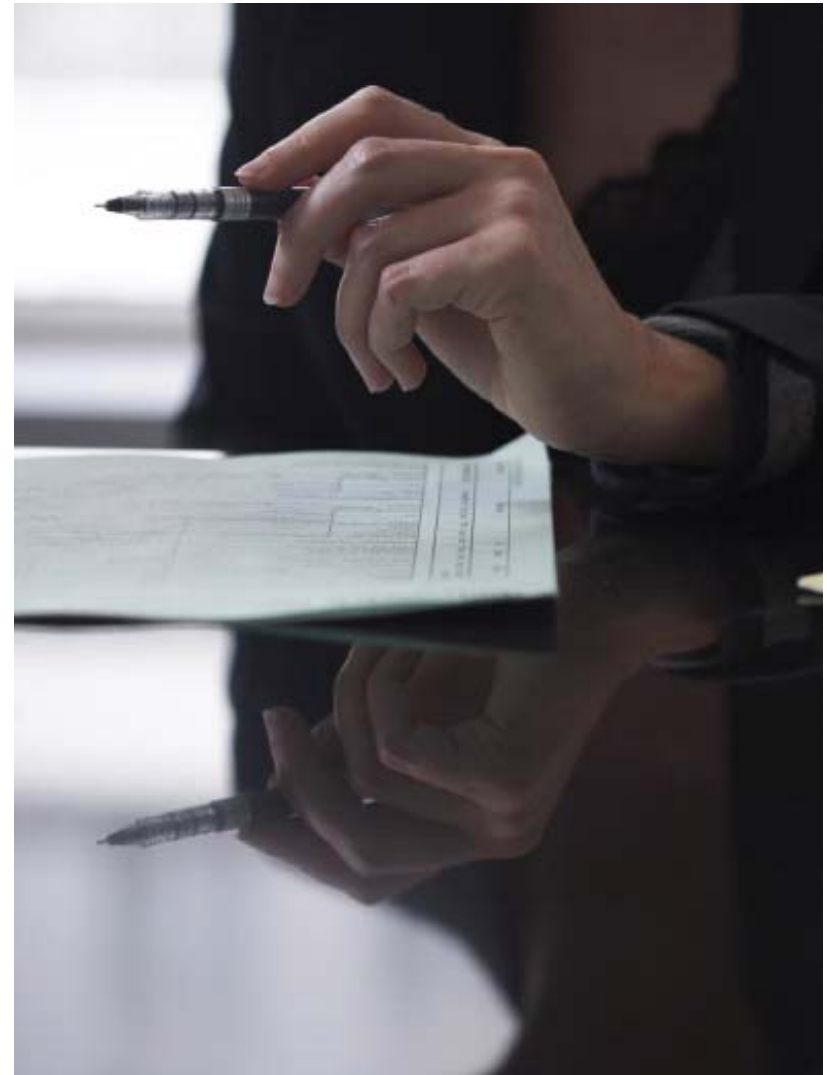
- OMB Circular Requirements
- Requirements Compliance Process
- Citibank Tools



# Agenda

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- OMB Circular A-123 Requirements
- Credit Worthiness
- OMB Reporting Elements
  - Travel card Reporting Requirements
  - P-card Reporting Requirements
- How Citibank® Can Help
- Citibank Tools and Resources



# 1. OMB Circular A-123 Requirements

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# OMB Circular A-123 Requirements

OMB Website – <http://www.whitehouse.gov/omb/>

The screenshot shows the homepage of the Office of Management and Budget (OMB) website. At the top, there is a navigation bar with the White House logo and the text "the WHITE HOUSE PRESIDENT BARACK OBAMA". Below this, there are several menu items: "the BRIEFING ROOM", "the AGENDA", "the ADMINISTRATION", "ABOUT the WHITE HOUSE", "our GOVERNMENT", and "CONTACT us". The main content area features the OMB logo and the text "OFFICE OF MANAGEMENT AND BUDGET". To the right of the logo, there are links for "President's Budget | Management | Information & Regulatory Affairs" and "Legislative Information | Agency Information | About OMB". The central focus is a large blue box with the text "A NEW ERA OF RESPONSIBILITY" and "The 2010 Budget". Below this, there is a quote from President Barack Obama: "Those of us who manage the public's dollars will be held to account—to spend wisely, reform bad habits, and do our business in the light of day—because only then can we restore the vital trust between a people and their government." The quote is attributed to "– President Barack Obama". To the right of the text, there is a photograph of President Barack Obama and a man in a suit sitting on a couch, looking at a document. A bowl of fruit is on a table in front of them.

# OMB Circular A-123 Requirements

OMB Website – <http://www.whitehouse.gov/omb/circulars>



The screenshot shows the official website of the Office of Management and Budget (OMB). At the top, there is a header for 'the WHITE HOUSE PRESIDENT BARACK OBAMA' with a search bar and a 'GET UPDATES' button. Below this is a navigation menu with links for 'the BRIEFING ROOM', 'ISSUES', 'the ADMINISTRATION', 'ABOUT the WHITE HOUSE', 'our GOVERNMENT', and 'CONTACT us'. The main content area features the OMB logo and the text 'OFFICE OF MANAGEMENT AND BUDGET'. A secondary navigation bar includes links for 'About OMB', 'President's Budget', 'Management', 'Information & Regulatory Affairs', 'Legislative Information', and 'Agency Information'. On the left side, there is a sidebar titled 'AGENCY INFORMATION' with links for 'Bulletins', 'Circulars', 'Memoranda', 'Privacy Guidance', and 'Reports'. Below the sidebar is a search bar with a magnifying glass icon and a 'SEARCH' button. The main content area is titled 'Circulars' and includes a breadcrumb trail: 'OMB HOME • AGENCY INFORMATION • CIRCULARS'. A 'Print' button is located in the top right corner of the content area. A notice states: 'Some of the documents on this page were created as PDFs. Click here for PDF assistance'. Below this, there is a paragraph of text: 'Instructions or information issued by OMB to Federal agencies. These are expected to have a continuing effect of two years or more. To obtain circulars that are not available on-line, please call the Office of Management and Budget's information line at (202) 395-3080. Choose from one of two options: Circulars arrayed by numerical sequence; or Circulars indexed by major category.' At the bottom, there is a list of categories with radio buttons: 'Budget', 'State and Local Governments', 'Educational and Non-Profit Institutions', 'Federal Procurement', 'Federal Financial Management', 'Federal Information Resources / Data Collection', and 'Other Special Purpose'.

# OMB Circular A-123 Requirements

OMB Website – <http://www.whitehouse.gov/omb/circulars>

OMB Circular A-119, Transmittal Memorandum, Federal Participation in the Development and Use of Voluntary Standards (02/10/1998)

**OMB Circular A-122**, Cost Principles for Non-Profit Organizations (05/10/2004) HTML or PDF (55 pages, 220 kb), Relocated to 2 CFR, Part 230 (17 pages, 235 kb)

- How are cognizant agencies determined for indirect costs?
- Where is the updated OMB list?

## **OMB Circular A-123,**

- Management's Responsibility for Internal Control (Effective beginning with Fiscal Year 2006) (Revised 12/21/2004) HTML or PDF (35 pages, 274 kb)
- Appendix A Implementation Plans (08/01/2005) (2 pages, 43 kb)
- Appendix A Implementation Guide (07/2005)
- Appendix A Frequently Asked Questions (04/13/2006) (14 pages, 93 kb)
- Issuance of Revised Appendix B to OMB Circular A-123 (01/15/2009) (59 pages, 418 kb)
- Management's Accountability and Control (Effective through Fiscal Year 2005) (Revised 06/21/1995)
- Appendix C, Requirements for Effective Measurement and Remediation of Improper Payments (08/10/2006) (22 pages, 236 kb)
- Conducting Acquisition Assessments under OMB Circular A-123 (May 21, 2008) (56 pages, 458 kb)

OMB Circular A-125, was rescinded and replaced by the Prompt Pay regulations at 5 CFR Part 1315

OMB Circular A-126, Improving the Management and Use of Government Aircraft (05/22/1992)

- Attachment A
- Attachment B

OMB Circular A-127, Financial Management Systems (Revised 01/09/2000)

# OMB Circular A-123

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## Management's Responsibility for Internal Control

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Effective beginning Fiscal Year 2006  
(Revised 12/21/2004)

- Appendix A Implementation Plans  
(08/01/2005)
- Appendix A Implementation Guide  
(07/2005)
- Appendix A Frequently Asked Questions  
(04/13/2006)
- Issuance of Revised Appendix B to OMB Circular A-123 (01/15/2009)
- Management's Accountability and Control (Effective through Fiscal Year 2005) (Revised 06/21/1995)
- Appendix C, Requirements for Effective Measurement and Remediation of Improper Payments (08/10/2006)



# Understanding the Circular

## Management's Responsibility for Internal Control

### Improving the Management of Government Charge Card Programs

#### Table of Contents

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• Quarterly /  
Fiscal Year  
reporting  
requirements

• Travel  
Requirements

# Chapter 6 – Credit Worthiness

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## Frequently Asked Questions

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Agencies are required to assess the credit worthiness of all **new** card applicants

May an agency contract with their respective bank card issuer to manage the credit worthiness assessments on its behalf?

Are agencies required to assess the credit worthiness of all new purchase and travel card applicants *prior* to issuing a card?

What process is required if it is not possible to obtain a credit score?

What steps are required before issuing a travel card to a 1<sup>st</sup> time applicant?

**Answers found in the  
OMB Circular**

# Credit Worthiness

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## Citi can help

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- We have a credit worthiness process – currently providing service to a number of agencies
- Request FICO score from one of three credit bureaus

**EQUIFAX**

**experian**

 **TransUnion.**

- Only the FICO score is provided to Citi – no other details
- Cardholders must contact credit bureaus directly for credit score details



# Credit Worthiness

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## FICO Score

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- FICO (Fair Isaac Corporation): Numerical score indicates credit risk level associated with credit applicant
- FICO score meanings...
  - 660 and higher: Standard card (predetermined by agency)
  - Below 660: Restricted card (also predetermined by agency)



# Credit Worthiness

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## Restricted Cards

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- Citibank will issue with stringent limitations
  - Transaction limit set to \$1
  - ATM limit set to \$0
- OMB requires the A/OPC to take one or more of the following actions:
  - Reduce overall dollar limit on card
  - Reduce the limit on individual transaction amounts
  - Limit (or further limit) the types of transactions allowed
  - Issue a pre-paid card that automatically restricts dollar amount and transaction types
  - Limit (or further limit) the dollar amount of transactions that can be applied within a particular time frame (velocity limits)
  - Limit the length of time the card is valid – i.e., only activate when the cardholder is traveling
  - Restrict (or further restrict) ATM access

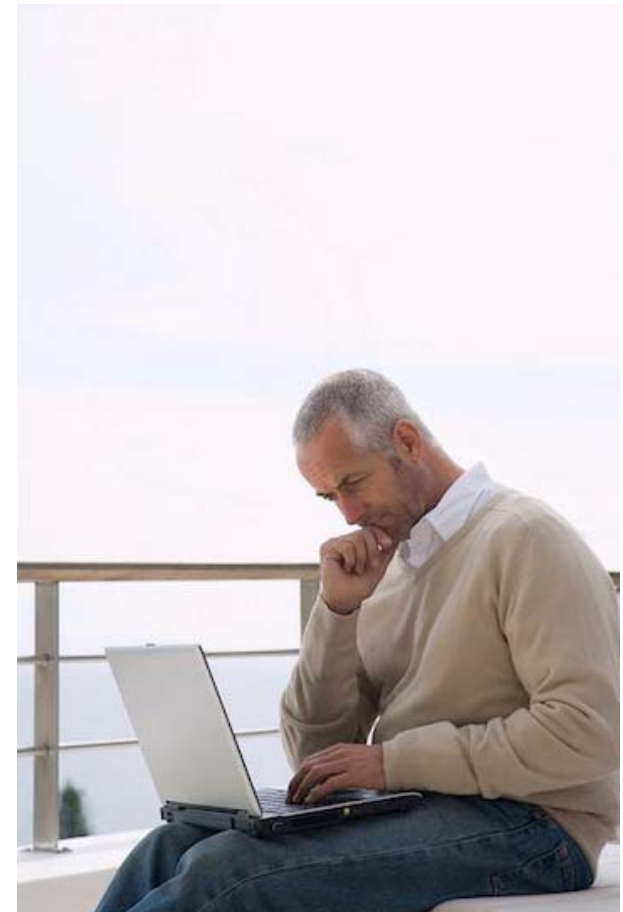
# FAR Part 8 Required Sources of Supplies

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## Federal Acquisition Regulation

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1. Agency Inventories
2. Excess from other Agencies
3. Federal Prison Industries, Inc. (UNICOR)  
Above \$2,500
4. Committee for Purchase from People who are  
Blind or Severely Disabled (NIB/NISH)
5. Wholesale Supply Sources such as Stock  
Programs of the GSA and GSA Advantage
6. Federal Supply Schedules
7. Commercial Sources

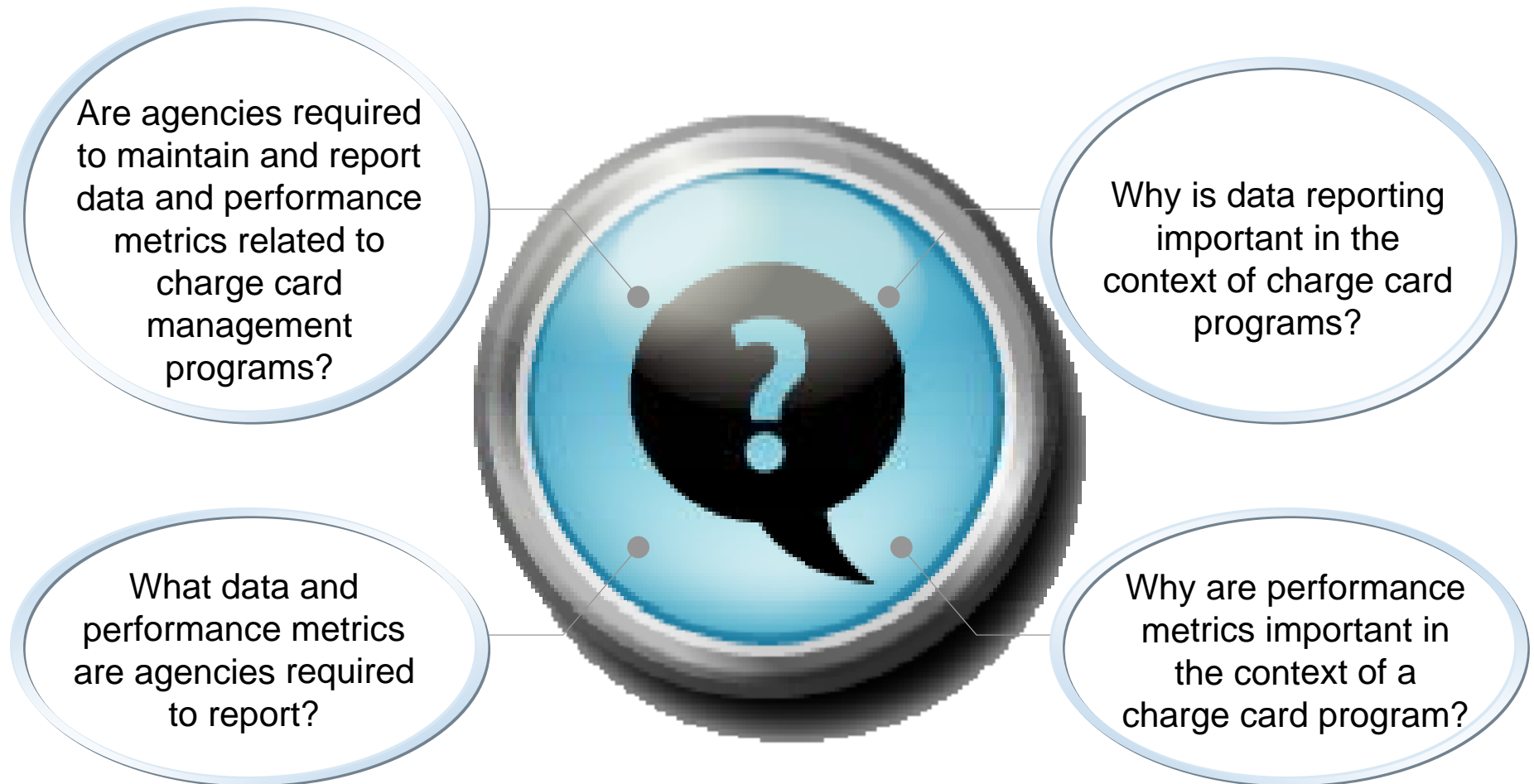


# Chapter 5 – Performance Metrics and Data Requirements

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## Frequently Asked Questions

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**Answers found in the  
OMB Circular**

# OMB Report

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## Travel & Purchase Card Standard Elements

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- Number of cards
  - Number of open accounts
  - Number of cardholders (% to employee)
  - Net number of new accounts (new less cancelled)
  - Charge card dollars spent
  - Refunds earned
- 
- Percentage of potential refunds earned
  - Number of cases reported by agency to the Office of the Inspector General
  - Number of administrative and/or disciplinary actions taken for card misuse (including delinquency)

Available from  
Citibank  
Custom  
Reporting  
System (CCRS)

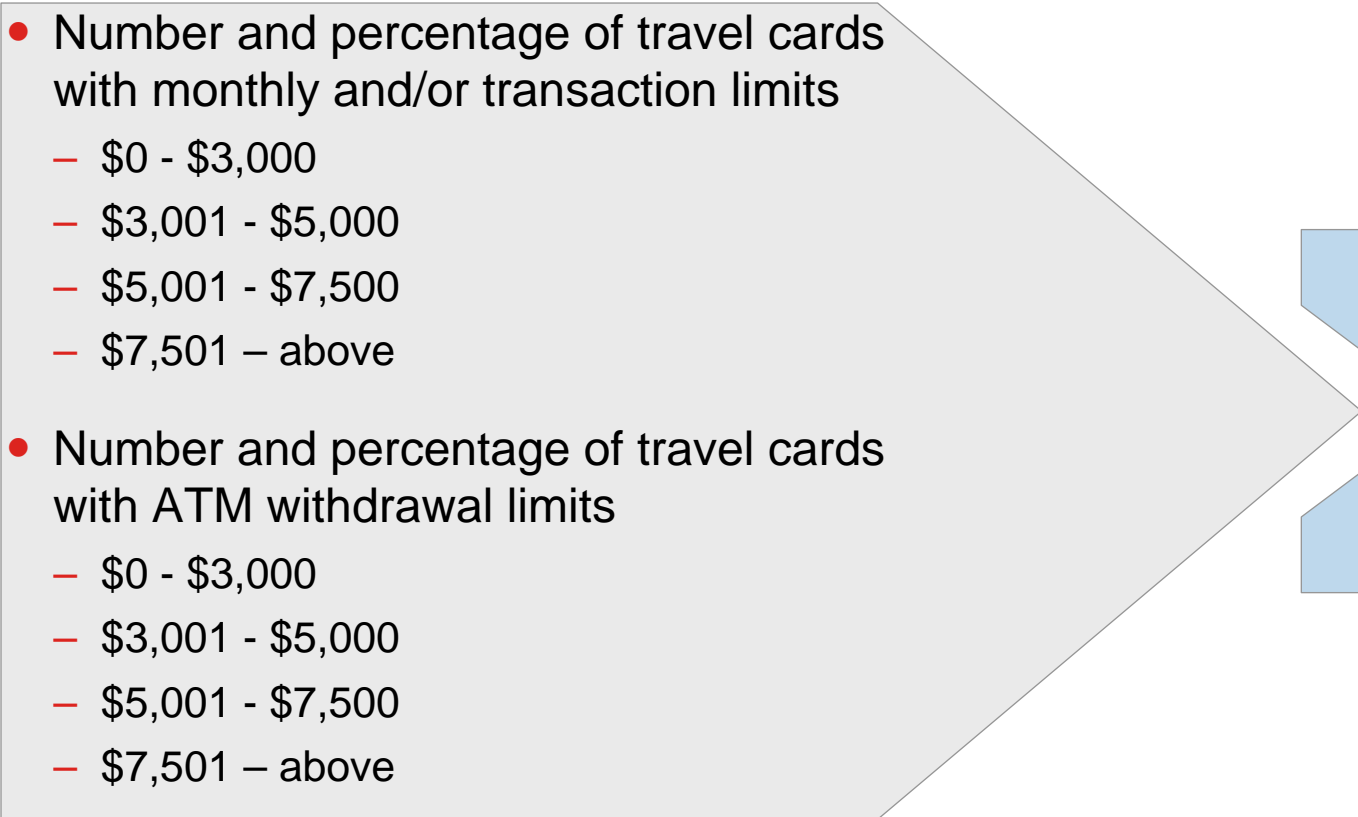
# OMB Report

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## Travel Card Requirements

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- Number and percentage of travel cards with monthly and/or transaction limits
  - \$0 - \$3,000
  - \$3,001 - \$5,000
  - \$5,001 - \$7,500
  - \$7,501 – above
- Number and percentage of travel cards with ATM withdrawal limits
  - \$0 - \$3,000
  - \$3,001 - \$5,000
  - \$5,001 - \$7,500
  - \$7,501 – above
- Percentage of travel cardholders who travel less than 5 times annually



Available from  
Citibank  
Custom  
Reporting  
System (CCRS)

# OMB Report

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## Purchase Card Requirements

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- Ratio of purchase cardholders to Approving Officials (span of control)
- Average number of monthly purchase card transactions reviewed per Approving Official
- Number of purchase cardholders with contracting warrants above \$3,000
- Number of purchase cardholders with transaction limits of \$3,000 or more that do not hold contracting warrants

CCRS Reports  
used to aid  
A/OPC in  
gathering data  
elements for  
these fields

# OMB Report

## Standard Elements

1	2	3	4	5	6	7	8	9	10
Agency	Number of Cards	Number of Active Accounts	Percentage of Employees that are Cardholders	Net Number of New Accounts (New Less Cancelled)	Dollars Spent	Refunds Earned	Percentage of Potential Refunds Earned	Number of Cases Reported by Agency to the IG	Number of Administrative and/or Disciplinary Actions Taken for Card Misuse (Including Delinquency)

1. Agency
2. Number of Cards
3. Number of Active Accounts
4. Percentage of Employees that are Cardholders
5. Net Number of New Accounts (New Less Cancelled)
6. Dollars Spent
7. Refunds Earned
8. Percentage of Potential Refunds Earned
9. Number of Cases Reported by Agency to the IG
10. Number of Administrative and/or Disciplinary Actions Taken for Card Misuse (including delinquency)

# OMB Report

## Travel Card Reporting Elements

1				2				3			
Number of Travel Cards with Monthly and/or Transaction Limits				Percentage of Travel Cards with Monthly and/or Transaction Limits				Number of Travel Cards With ATM Withdrawal Limits			
3,000	\$3,001 - \$5,000	\$5,001 - \$7,500	≥ \$7,501	≤ \$3,000	\$3,001 - \$5,000	\$5,001 - \$7,500	> \$7,501	≤ \$3,000	\$3,001 - \$5,000	\$5,001 - \$7,500	> \$7,501

1. Number of Travel Cards with Monthly and/or Transaction Limits
2. Percentage of Travel Cards with Monthly and/or Transaction Limits
3. Number of Travel Cards with ATM Withdrawal Limits

And...

# OMB Report

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## Travel Card Reporting Elements (continued)

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4				5
Percentage of Travel Cards With ATM Withdrawal Limits				Percentage of Travel Cardholders that Travel Less than 5 Times Annually
≤ \$3,000	\$3,001 - \$5,000	\$5,001 - \$7,500	≥ \$7,501	

- 4. Percentage of Travel Cards with ATM Withdrawal Limits
- 5. Percentage of Travel Cardholders that Travel Less than 5 Times Annually

# OMB Report

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## Purchase Card Reporting Elements

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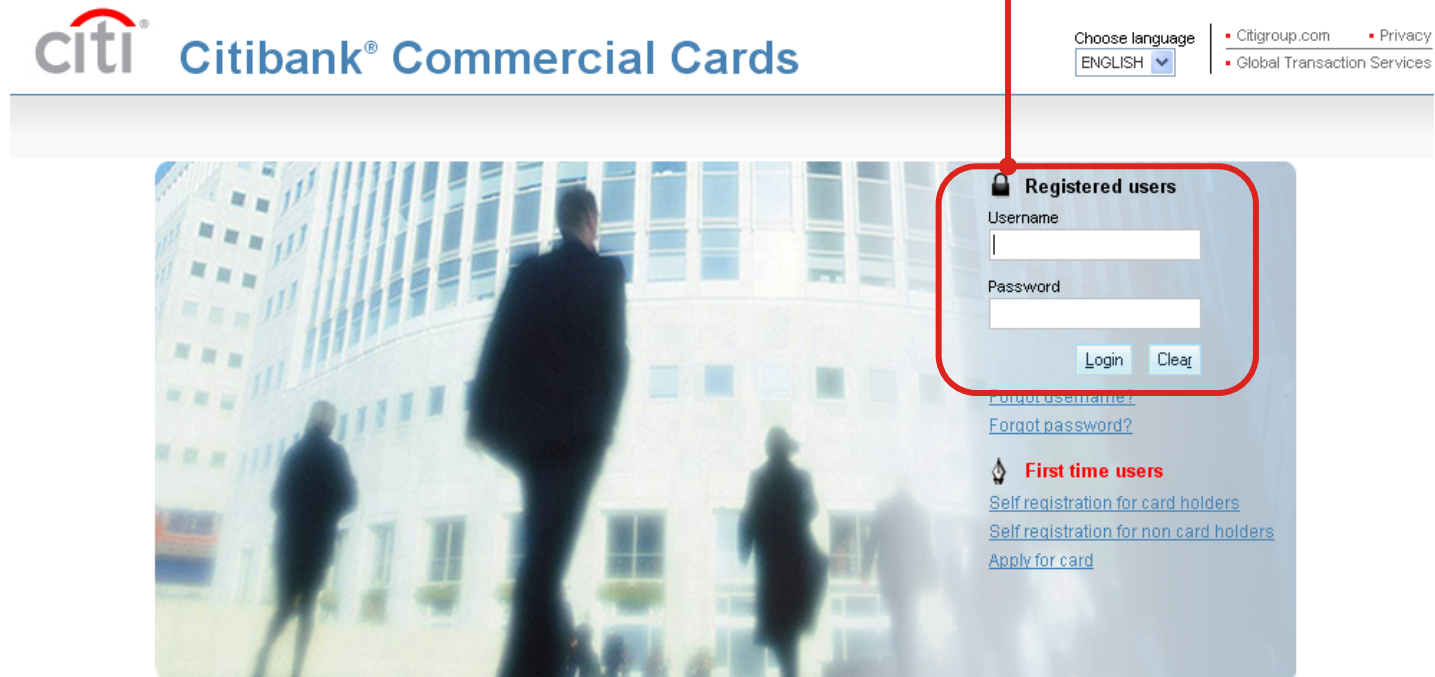
<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Ratio of Purchase Cardholders to Approving Officials (Span of Control)</b>	<b>Average Number of PurchaseCard Transactions Reviewed per Approving Official</b>	<b>Number of Purchase Cardholders with Contracting Warrants Above \$3,000</b>	<b>Number of Purchase Cardholders with Transaction Limits of \$3,000 or More that Do Not Hold Contracting Warrants</b>

1. Ratio of Purchase Cardholders to Approving Officials (Span of Control)
2. Average Number of Purchase Card Transactions Reviewed per Approving Official
3. Number of Purchase Cardholders with Contracting Warrants Above \$3,000
4. Number of Purchase Cardholders with Transaction Limits of \$3,000 or More that Do Not Hold Contracting Warrants

# Accessing the Citi Landing Page

[home.cards.citidirect.com](http://home.cards.citidirect.com)

## 1. Log in using your single sign on credentials



The screenshot displays the Citi Commercial Cards landing page. At the top left is the Citi logo and the text "Citibank® Commercial Cards". On the top right, there is a language selection dropdown set to "ENGLISH" and links for "Citigroup.com", "Privacy", and "Global Transaction Services". The main content area features a blurred background image of people in a modern office building. Overlaid on the right side of this image is a login form for "Registered users". The form includes fields for "Username" and "Password", and "Login" and "Clear" buttons. Below the form are links for "Forgot username?" and "Forgot password?". Underneath, there is a section for "First time users" with links for "Self registration for card holders", "Self registration for non card holders", and "Apply for card". A red box highlights the "Registered users" login form, and a red line connects it to the first step of the instructions.

You are authorized to use this System for approved business purposes only. Use for any other purpose is prohibited. All transactional records, reports, e-mail, software, and other data generated by or residing upon this System are the property of the company and may be used by the company for any purpose. Authorized and unauthorized activities may be monitored.

# Accessing CCRS through the Citi Landing Page

[home.cards.citidirect.com](http://home.cards.citidirect.com)

## 2. Select Applications

The screenshot displays the Citibank Commercial Cards landing page. The header includes the Citi logo and the text "Citibank® Commercial Cards". On the right side of the header, there is a "Welcome," message, a "Sign off" button, and links for "Citigroup.com", "Privacy", and "Global Transaction Services".

The main content area is divided into a left sidebar and a central grid of application tiles. The sidebar contains a "Date" field showing "03/20/2009" and a list of menu items: "Applications", "Admin functions", "Message board", "Profile", "Search", and "View links".

The central grid features a "Welcome!" message at the top, followed by an information icon and the text "View the various functionalities available to you in this application." Below this, there are six application tiles, each with an icon and a description:

- Applications**: Access the various applications allocated to you. (This tile is highlighted with a red box and a red line pointing to the "2. Select Applications" header.)
- Admin functions**: Perform administrative functions.
- Message board**: View messages.
- Profile**: View and update your profile details and preferences.
- Search**: Search users.
- View links**: View links and their mapping.

At the bottom left of the page, there are links for "Contact helpdesk" and "Home/Landing Page". At the bottom right, there are links for "Terms and Conditions" and "Copyright © 2008 Citigroup".

# Accessing CCRS through the Citi Landing Page

[home.cards.citidirect.com](http://home.cards.citidirect.com)

## 2. Select Citibank Custom Reporting System

The screenshot displays the Citibank Commercial Cards landing page. At the top left is the Citi logo and the text "Citibank® Commercial Cards". To the right, it says "Welcome," followed by a "Sign off" button and links for "Citigroup.com", "Privacy", and "Global Transaction Services".

The main content area is titled "Applications" and contains an information icon with the text "Access the various applications allocated to you." Below this is a list of applications:

- > CARD STATEMENTS AND PAYMENTS
- > **CITIBANK CUSTOM REPORTING SYSTEM**
- > CITIDIRECT CARD MANAGEMENT SYSTEM

A red arrow points from the text "2. Select Citibank Custom Reporting System" to the "CITIBANK CUSTOM REPORTING SYSTEM" link. The left sidebar contains a "Date" of "03/20/2009" and a list of navigation links: "Applications", "Admin functions", "Message board", "Profile", "Search", and "View links". At the bottom left, there are links for "Contact helpdesk" and "HomeLanding Page". The footer includes the Citi logo, "Citimanager.com", "Terms and Conditions", and "Copyright © 2008 Citigroup".

# Citibank® Custom Reporting System (CCRS)

## Page Highlights

**HOME** **SHARED REPORTS** **MY REPORTS** **CREATE REPORT** **MY SUBSCRIPTIONS** **HISTORY LIST** **PREFERENCES**

Citibank Commercial Cards Reporting System (S)

• Last Post Date: 5/9/2007 • Load Last Updated C

### Help Desk

Help Desk users can change their current security filter to assist in troubleshooting.

Current Security Filter:  (change)

### Shared Reports

- [Citi Internal Folder](#)
- [Global Shared Reports](#)
- [Organizational Shared Folders](#)
- [Citi SE Omni](#)
- [GSA SmartPay Conference Reports](#)
- [Standard Reports](#)

# Citibank® Custom Reporting System (CCRS)

## Sample: Single Transaction Limit Over \$3,000

Hierarchy Level 2	Hierarchy Level 3	Cardholder First Name	Single Transaction Limit	Card Limit
		E	25000	50000
		AN	100000	500000
		IR	25000	50000
		IA	5000	50000
12	10		100000	500000
12	10	S	25000	100000
12	10	S	25000	100000
12	10		5000	50000
12	10	N	25000	50000
			50000	100000
		RIE	25000	125000
		EL	10000	50000
		EN	100000	500000
4	10	EN	100000	500000
			100000	100000
			100000	250000
		KALD	50000	100000
4	10	N	25000	50000
		LA	5000	20000
4	10	YCA	5000	20000
14	10	Y	100000	100000
		T	100000	0
		T	100000	100000
			100000	500000

# Citibank® Custom Reporting System (CCRS)

Sample: Card Limit Over \$3,001 and \$5,000

Hierarchy Level 2	Hierarchy Level 3	Cardholder First Name	Single Transaction Limit	Card Limit
			3000	5000
			3000	5000
			3000	5000
04	00	NA	3000	5000
04	00		3000	5000
04	00		3000	5000
04	00		3000	5000
04	00	ETH	3000	5000
04	00		3000	5000
07	00		3000	5000
05	00	EN	2500	5000
			3000	5000
			3000	5000
05	00	IA	3000	5000
			3000	5000
05	00		2500	5000
05	00		2500	5000
05	00		3000	5000
05	00	TI C	3000	5000

# Citibank® Custom Reporting System (CCRS)

## Sample: AO Listing / Span of Control Report

Hierarchy Level 3	Hierarchy Level 4	Hierarchy Level 5	Hierarchy Level 6	Hierarchy Level 6 Name	AO Last Name - Level 6	Count of Card Accounts
				Group Level 6-00594		6
94	94	94	94	Group Level 6-00594	R	6
94	94	94	94	Group Level 6-00594		6
94	94	94	94	Group Level 6-00594		12
94	94	94	94	Group Level 6-00594	AD	12
94	94	94	94	Group Level 6-00594	E	6
94	94	94	94	Group Level 6-00594		6
94	94	94	94	Group Level 6-00594		6
94	94	94	94	Group Level 6-00594	E	6
94	94	94	94	Group Level 6-00594	AV	6
94	94	94	94	Group Level 6-00594		6
94	94	94	94	Group Level 6-00594		6
94	94	94	94	Group Level 6-00594	A	6
94	94	94	94	Group Level 6-00594		6
94	94	94	94	Group Level 6-00594	TT	18
94	94	94	94	Group Level 6-00594	D	6
94	94	94	94	Group Level 6-00594		6

# Citibank® Custom Reporting System (CCRS)

## Sample: New Account Listing

Hierarchy Level 1	Hierarchy Level 2	Hierarchy Level 3	Date Account Opened	Account Number (Short)	Count of Card Accounts
			5/31/2006		1
4	0	0	5/31/2006		1
94	00	00	5/31/2006	13	1
94	00	00	6/2/2006	37	1
94	00	00	6/2/2006	45	1
4	0	0	6/2/2006		1
4	0	0	6/5/2006	1	1
			6/5/2006		1
4	00	00	6/5/2006	0	1
4	0	0	6/5/2006	7	1
4	00	00	6/7/2006	3	1
			6/7/2006		1

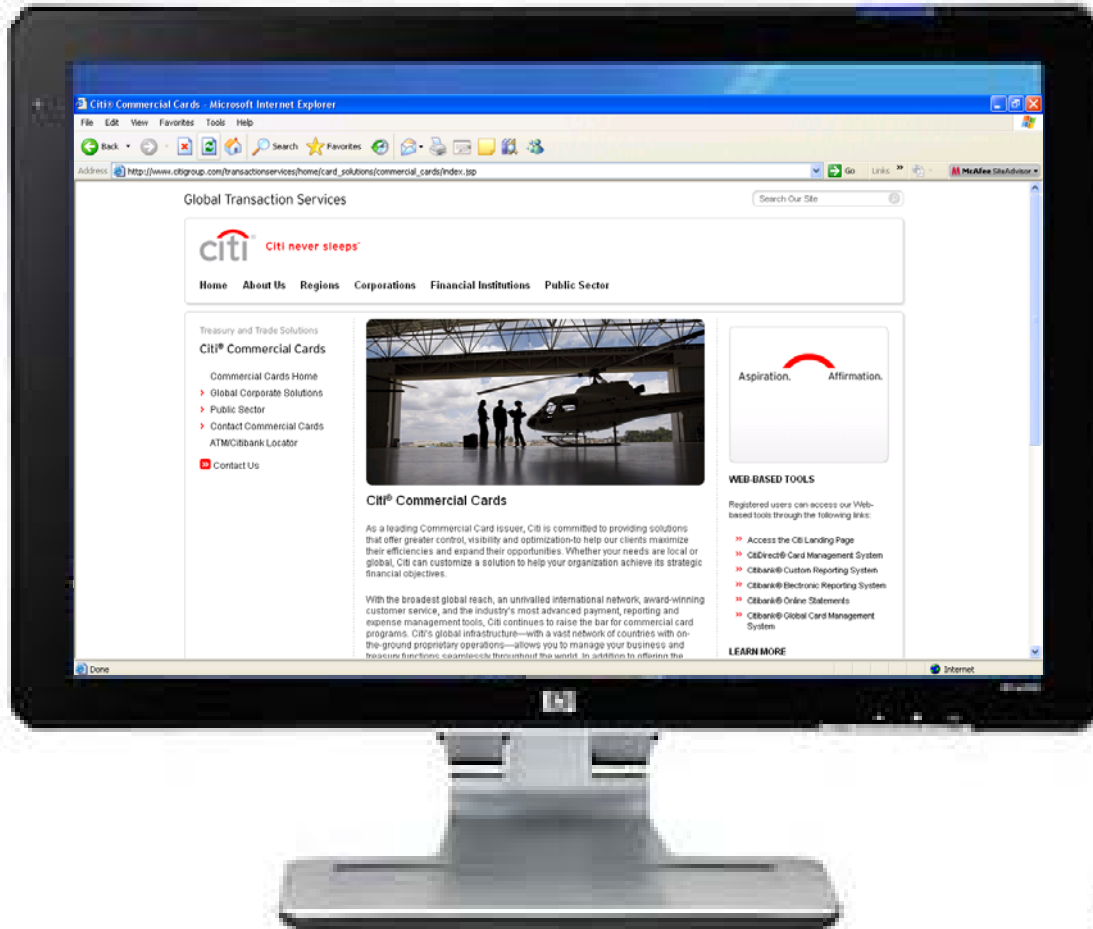
# Citibank® Custom Reporting System (CCRS)

## Sample: Single Transaction Limit Review

Hierarchy Level 1 Name	Account Number (Short)	Account Name (Short)	Card Limit	Single Transaction Limit	Total Transaction Amount
GSA Purchase Program		an	3,000,000.00	100000	1,415,106.91
GSA Purchase Program		ise	350,000.00	100000	155,082.06
GSA Purchase Program	02	airo	250,000.00	20000	204,489.37
GSA Purchase Program	59	anisha	200,000.00	20000	19,402.96
GSA Purchase Program	7	arah	150,000.00	2500	177,342.83
GSA Purchase Program	7	rick	125,000.00	10000	74,421.90
GSA Purchase Program		anela	125,000.00	25000	15,780.26
GSA Purchase Program	7	nsr	100,000.00	10000	131,573.90
GSA Purchase Program	2	an	100,000.00	20000	125,414.31

www.citimanager.com

Your Source for Additional Information



# Citibank® Electronic Reporting System (CERS)

Global Transaction Services

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Treasury and Trade Solutions  
Citi® Commercial Cards

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- > Global Corporate Solutions
- > Public Sector
- > Contact Commercial Cards
- ATM/Citibank Locator
- >> Contact Us



## Citi® Commercial Cards

As a leading Commercial Card issuer, Citi is committed to providing solutions that offer greater control, visibility and optimization-to help our clients maximize their efficiencies and expand their opportunities. Whether your needs are local or global, Citi can customize a solution to help your organization achieve its strategic financial objectives.

With the broadest global reach, an unrivalled international network, award-winning customer service, and the industry's most advanced payment, reporting and expense management tools, Citi continues to raise the bar for commercial card programs. Citi's global infrastructure—with a vast network of countries with on-the-ground proprietary operations—allows you to manage your business and treasury functions seamlessly throughout the world. In addition to offering the



### WEB-BASED TOOLS

Registered users can access our Web-based tools through the following links:

- >> Access the Citi Landing Page
- >> CitiDirect® Card Management System
- >> Citibank® Custom Reporting System
- >> Citibank® Electronic Reporting System
- >> Citibank® Online Statements
- >> Citibank® Global Card Management System

### LEARN MORE



# Summary

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**Goal: To enhance A/OPCs understanding of...**

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- OMB Circular Requirements
- Requirements Compliance Process
- Citibank Tools



# Terms & Disclosures

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**IRS Circular 230 Disclosure: Citigroup Inc. and its affiliates do not provide tax or legal advice. Any discussion of tax matters in these materials (i) is not intended or written to be used, and cannot be used or relied upon, by you for the purpose of avoiding any tax penalties and (ii) may have been written in connection with the "promotion or marketing" of any transaction contemplated hereby ("Transaction"). Accordingly, you should seek advice based on your particular circumstances from an independent tax advisor.**

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