

## **Purchase Card Frequently Asked Questions During Mandatory Telework**

This guidance is provided for Purchase Card Holders and Approving Officials to further elaborate on the guidance issued March 31, 2020 by Deputy Assistant Secretary for Administration, Wynn Coggins.

**1. Can I Use my Government purchase card while in telework status?**

Yes. Cardholders are permitted to use their purchase cards for official government purchases while in telework status. Per the Commerce Acquisition Manual 1313.301, Cardholders shall keep purchase cards and account information in a secured environment to prevent access by unauthorized personnel (i.e., locked desk drawer, or a locked safe). Cardholders shall not carry purchase cards on their person unless conducting an “over the counter” transaction.

**2. Do I still need to follow the Federal Acquisition Regulation (FAR) requirements for mandatory sources?**

Yes. Cardholders shall follow the required sources of supplies and services of FAR Part 8. FAR Part 8 sets forth statutory requirements to acquire supplies and services from priority sources when available. Other sources should be considered for use only after the priority sources have been considered. Cardholders should contact their servicing acquisition office if they need assistance in determining if their requirement can be satisfied by a required source.

Due to vendors engaging in attempted price gouging, cardholders should exercise caution when making purchases.

**3. Are there specific requirements for purchasing Information Technology Equipment?**

Yes. Cardholders should continue to use the Department’s strategic sourcing vehicles for the purchase of network equipment and PCs/laptops to ensure supply chain and supportability considerations have been addressed. Requestors must provide their cardholder with evidence of supervisory approval and approval from their bureau OCIO.

**4. Can I purchase hand sanitizer?**

The Office of the General Counsel has opined that the purchase of hand sanitizer is permissible where the purpose is to stock dispensers in common areas—e.g., entrances, lobbies, foyers, breakrooms, cafeterias, conference rooms. However, appropriated funds may not be used to purchase personal supplies, such as personal bottles of hand sanitizer for individual employees.

**5. Can I purchase personal protective items such as masks?**

Agencies are generally prohibited from purchasing personal expense items, however, such items may be acquired under limited circumstances where it can be demonstrated clearly and reasonably that the benefit to the accomplishment of the agency’s mission outweighs the personal benefit otherwise accruing to the individual. These expenses should be considered “atypical expenses” and, with approval of the requestor’s supervisor, should be referred to the cognizant Chief Financial Officer for approval in

accordance with Department's Atypical Expense Policy. Cardholders shall document their file with the required approvals.

**6. Can I purchase adaptive equipment/assistive technology and/or ergonomic equipment for employees who are teleworking?**

For information on acquiring adaptive equipment/assistive technology that is required as a reasonable accommodation for employees with disabilities, please contact your [bureau Reasonable Accommodation Coordinator \(RAC\)](#) for assistance and more information.

Requests for adaptive equipment and/or assistive technology that are not related to a reasonable accommodation request in accordance with DAO 215-10, are generally considered personal expenses and not authorized. Agencies are generally prohibited from purchasing personal expense items; however, such items may be acquired under limited circumstances where it can be demonstrated clearly and reasonably that the benefit to the accomplishment of the agency's mission outweighs the personal benefit otherwise accruing to the individual. These expenses should be considered "atypical expenses" and, with approval of the requestor's supervisor, should be referred to the cognizant Chief Financial Officer for approval in accordance with Department's Atypical Expense Policy. Cardholders shall document their file with the required approvals.

**7. Are there purchases that require safety oversight or control prior to purchase?**

Yes. Prior to purchasing any of the following items, requestor shall obtain approval from their supervisor and bureau Safety Manager:

- Flammable items
- Chemicals and especially those from the EPA's List of Lists
- Radiological materials
- Biological materials
- Class IIIb and IV and above lasers

In those instances, cardholders shall document their files with the required approvals from the requestor's supervisor and bureau Safety Manager prior to making purchases.

**8. Where should items be shipped if the Government facility is closed?**

Given the Department's mandatory telework status, there may be circumstances where purchased items need to be delivered to alternate work sites. In those instances, cardholders shall obtain necessary approvals from their approving official and clearances/approvals from appropriate stakeholders, such as property managers, prior to making purchases. Cardholders shall document transaction files with justifications, approvals, and proof of receipt and acceptance of items and coordinate deliveries with appropriate stakeholders.

Department operating units are responsible for ensuring there are adequate controls against private misuse of any supplies or equipment and that only that which is in direct support of the agency's mission is procured for use at alternate work sites.

**9. Can accountable property items be shipped to an employee's residence?**

Given the Department's mandatory telework status, there may be circumstances where purchased items need to be delivered to alternate work sites. In those instances,

cardholders shall obtain necessary approvals from the requestor's supervisor, the purchase card approving official and clearances/approvals from appropriate stakeholders, such as property managers, prior to making purchases.

To the maximum extent practicable, accountable property should continue to be shipped to a Department facility. If accountable property must be shipped to an alternate site, a written justification detailing the need of urgency must be approved by the employee's Office Director. If approved, cardholders shall work with their property officials (Bureau Property Management Officer (PMO), Property Accountability Officer (PAO), and Property Custodian (PC) and an employee's supervisor to coordinate delivery to the appropriate stakeholders and ensure that all physical attributes of accountable property are reported to the PAO/PC.

Physical attributes of an asset include:

- Barcode Number (use of system-generated barcodes is applicable, in lieu of physical barcodes)
- Manufacturer
- Make and Model
- Serial Number
- Location
- User
- Acquisition cost and supporting documentation, if applicable

To limit the risk of losing accountability, PAO/PCs shall physically barcode (or retag assets if system-generated barcodes are used) and enter all accountable property into their official property system of record at the earliest convenience and availability. It is highly encouraged that all deliveries of accountable property are documented with a signed receipt (or electronic equivalent) and forwarded to the appropriate Property Official for accountability purposes. Employees are advised to direct any property-related inquiries to their Bureau PMO for additional guidance.

**10. Will new purchase card applications be processed while the Department is in mandatory telework status?**

Yes. New cardholder applications that need to be processed during this time shall add a *shipping address* for the card to be delivered to an alternate address.

If purchase cards or convenience checks need to be reissued, the Agency Program Coordinator shall contact Citibank to provide the alternate shipping address.