



March 3, 2008

MEMORANDUM FOR HEADS OF SERVICES AND STAFF OFFICES
REGIONAL ADMINISTRATORS

FROM:

LENNARD S. LOEWENTRITT
ACTING GENERAL COUNSEL (L)

A handwritten signature in black ink that reads "Lenard S. Loewentritt".

SUBJECT:

Proper Use of Employee Business Cards

The purpose of this memorandum is to provide guidance regarding the use of employee business cards. It is permissible to use agency funds to purchase business cards for individual employees only if those employees need business cards for information and communication purposes in fulfilling GSA's mission. The following situations should be considered in determining whether it is appropriate to purchase business cards for individual employees at agency expense:

- **Public Contact.** An employee who frequently interacts with the public might require business cards whereas an employee with intermittent or sporadic contact might not warrant this agency expense.
- **Inter-agency contact.** As a provider of goods and services throughout the federal government, GSA employees work with officials from many agencies. An employee who regularly meets with customer agencies would be eligible for agency provided business cards. In addition, many GSA employees serve on inter-agency panels and groups where employee business cards are useful.
- **Contracting.** Business dealings with private contractors and suppliers can be expedited if employees are able to provide business cards at the outset. An employee who regularly engages in such business dealings is eligible for agency provided business cards.

These situations are provided as guidance to assist organizations in determining whether individual employee business cards facilitate official communications. This list is not exhaustive and there may be other circumstances in which an employee should be provided with business cards. We note that there are no grade level requirements for business cards. The determination should be made based on the requirements of the employee's position and need to communicate regularly with outside entities and individuals. Also, business cards purchased with agency funds must comply with GSA Order CSC 1808.1, "GSA Logo and Visual System," October 17, 2003, and the guidelines set forth in "GSA Building Our Brand," June 7, 2002.

Employees who are provided with business cards must also understand limitations on their use. The cards, purchased with agency funds, are government property. As such, the ethical guidelines pertaining to the use of government property also apply to business cards. Under 5 CFR 2635.704, an employee may not use such property for other than authorized purposes. The perceived personal nature of business cards, embossed with the employee's name, might prompt some employees to distribute the business cards in a purely personal context such as placing the card in a bowl at a restaurant to win a free lunch. Business cards purchased with agency funds should not be utilized in this manner. Under 5 CFR 2635.702, an employee may not use anything associated with his Government position or title for private gain. GSA employees should exercise good judgment and caution before utilizing their business cards in situations not directly related to fulfilling necessary agency communications or furthering the agency's mission.

We hope that this information is of assistance and that various concerns of managers and their employees have been addressed. If there are any questions concerning the matters addressed in this memorandum, please call Eugenia D. Ellison of my staff on 501-1460.