



General Services Administration

May 22, 2019

# **GSA SMARTPAY SMART BULLETIN**

**U.S. GENERAL SERVICES  
ADMINISTRATION FEDERAL  
ACQUISITION SERVICE  
SMART BULLETIN NO. 024**

---

## **GSA SmartPay – Rewards Program Policy and Guidance**

**EFFECTIVE DATE:** From Issuance until superseded.

**BUSINESS LINE(S) AFFECTED:**  
Purchase, Integrated (purchase) and Fleet

### **INTRODUCTION:**

Purchase account holders are frequently using sources like eBay, Amazon.com and others to meet agency requirements. Many of these on-line merchants have implemented incentive programs such as such as “rewards points/dollars” to further attract additional business. Fleet account holders are also encountering similar reward and incentives programs offered at gas stations. Questions often arise regarding the appropriateness and proper disposition of incentives received under these programs.

### **SUMMARY:**

The Center for Charge Card Management (CCCM) frequently receives inquiries from account holders regarding registration and participation in merchant incentive programs when using a purchase or fleet card. While participation in these programs is allowable if agency policy permits, it’s important to note that these rewards or incentives are property of the Federal government and may only be used for official business purposes. These rewards are not for personal use or private gain.

The Standards of Ethical Conduct for Employees of the Executive Branch (Title 5, Chapter XVI, Section 2635 of the Code of Federal Regulations) states: “an employee shall not use his public office for his own private gain.” The purchase and fleet cards are used to acquire products and services intended for the government’s use, and charges made with the card are paid for with government funds.

Government purchase and fleet account holders who register their GSA SmartPay purchase or fleet cards with these merchants must be aware that any reward points or other incentives are not for personal use. The points or incentives must be used for future government purchases or to benefit the cardholder’s agency/organization in some way. For more information on this topic, and other topics on Managing GSA SmartPay purchase or fleet cards, please use the following resources:

- [GSA SmartPay Purchase Card](#)
- [GSA SmartPay Fleet Card](#)
- [Electronic Code of Federal Regulations](#)

**ACTION:**

Purchase and fleet card A/OPCs need to ensure purchase and fleet account holders within their purview are aware that they may only participate in merchant reward/loyalty programs if agency policy permits. Account holders also need to be advised that if they register pursuant to agency policy, does enroll in a merchant reward program, a GSA SmartPay purchase or fleet card in any rewards/incentive program, these rewards are not for personal use and shall be used in a manner to benefit the government agency. The purchase cardholders should also be informed to refer to the language in CFR Title 5 – Standards of Ethical Conduct for Employees of the Executive Branch for further information. Account holders with questions about ethics rules, should be directed to contact their agency Ethics Official (usually, an attorney in the agency’s Office of General Counsel).

David J. Shea  
Director  
Center for Charge Card Management

If you have any questions or comments regarding this Smart Bulletin, please contact CCCM at 703-605-2808 or via email at: [gsa\\_smartpay@gsa.gov](mailto:gsa_smartpay@gsa.gov)