

DEPARTMENT OF HEALTH & HUMAN SERVICES

National Institutes of Health Bethesda, Maryland 20892

DATE:	December 12, 2016
TO:	NIH Executive Officers and OM Managers
FROM:	Director, Office of Acquisitions and Logistics Management, NIH Director, Office of Financial Management, NIH
SUBJECT:	Approval Level Guidance – Acquisition of Employee Business Cards

## BACKGROUND

On March 17, 1998, the Deputy Associate General Counsel (DAGC), HHS, issued a memorandum on the subject "Use of General Appropriation Funds to Purchase Business Cards for Employees". This memorandum clarifies the U.S. Department of Justice's opinion dated August 11, 1997, authorizing executive agencies, under certain circumstances, to use appropriations to purchase business cards for employees.

On April 20, 1998, the Deputy Assistant Secretary, Finance, HHS, issued a memorandum on the subject "General Counsel Opinion on Business Cards". This memorandum referenced the DAGC, HHS, March decision and advised OPDIV Chief Financial Officers to evaluate their individual circumstances in applying DAGC's guidance.

On June 10, 2004, the NIH Head of the Contracting Activity and Director, Office of Acquisition Management and Policy, and the NIH Director and Deputy Chief Financial Officer, Office of Financial Management issued a memorandum that authorized the use of appropriated funds to purchase employee business cards for NIH employees, who in the conduct of their official duties, interface significantly and continuously with people or organizations external to the NIH to further the mission of the NIH.

## POLICY

Based on the above memoranda, OGC decisions, and the need to ensure that the policy remains current with the latest technologies, mandatory sources, and needs of NIH employees, this memorandum will provide the latest policy and approval levels for the acquisition of employee business cards.

NIH continues to authorize the purchase of employee business cards for NIH employees for the performance of their official duties, and only if there is a critical need to interface with the general public on a routine and continual basis.

## Justification Required:

As such, each request for business cards must be thoroughly justified by including the following information:

- > A description of the employee's duties
- Rationale for why business cards are needed
- Level of interaction with people or organizations external to NIH, including types of interaction and frequency
- Adverse impact to the employee's communication capabilities with external parties if business cards are not authorized

### **Business Card Requirements:**

Given the importance of NIH branding and also to ensure that business cards are used for official duty only, all business cards <u>must</u> include the following information:

- > Department of Health and Human Services (spelled out) or the DHHS logo
- > National Institutes of Health (spelled out) and the NIH logo
- Employee's Name
- Employee's Official Title
- Business Address
- Business Telephone (office or mobile)
- ➢ Fax Number (if applicable)
- ➢ Email Address

Employees **may** also include other items such as official websites, twitter feeds, etc. Personal contact information should not be included on the business card. A sample business card should be provided with the justification for approval.

#### Mandatory Sources:

If using appropriated funds, business cards must be purchased in quantities of no more than 250 using one of the following two mandatory sources:

- Printing Services, Program Support Center (PSC)
- Envision Print (www.Envisionbusinesscards.com)

No other source can be authorized for the purchase of business cards unless NIH approval for an exception is obtained from OALM and incorporated in the IC's business card policy.

ICs may authorize employees to print their own business cards using business card stock and printers as long as the NIH-prescribed format is utilized **and** approval is obtained in advance using the IC's individual policy and process. This option may be attractive because it is more cost effective, and cards can be printed in limited quantities especially given the tendency for NIH employees to change positions, addresses, and Institutes/Centers.

#### Requirement for IC Policy:

In addition to the requirements that must be followed to purchase business cards, each IC must develop an individual policy that meets the requirements listed above, and includes the following additional information:

- 1. The position of the person responsible for approving business cards within the IC. To ensure broad oversight and policy compliance, the approval level must be with the Executive Officer, Deputy Executive Officer, Chief Administrative Officer(s) or Division Director(s), and may not be delegated further without approval from OALM.
- 2. The process for requesting business cards within the IC. ICs may decide to use a formal memorandum, email, a fax, or other automated system for the approval process, as long as all relevant information is provided, and the approving official's signature (electronic or wet) is included.
- 3. If desired, an IC may develop a blanket list of pre-approved key positions that will not require further approval. For example, an IC may pre-approve the IC Director, IC Executive Officer, IC Scientific Director/Division Director, or other positions that have a demonstrated need for business cards given the nature of their positions. This will eliminate the need to obtain approval prior to purchasing business cards for those pre-authorized positions.

## **LIMITATIONS**

Business cards may <u>not</u> be purchased for Federal Advisory Committee Members or Special Government Employees.

Business cards cannot be purchased for unofficial business, or if there isn't a need to interface with the public on a regular and continual basis.

### **INQUIRIES**

If you have questions regarding this memorandum, please contact the Office of Acquisition Management and Policy by telephone at (301) 496-4422 or by email, <u>OAMP@nih.gov</u>.

This memorandum supersedes all previous guidance.

Tus, For ANE J.

Diane J. Frasier Head of the Contracting Activity and Director, Office of Acquisition and Logistics Management

Glenda Conrov

Director, Office of Financial Management Deputy Chief Financial Officer

Attachment - Sample Requests for Approval Memorandum

Attachment

# **USE OF APPROPRIATIONS TO PURCHASE EMPLOYEE BUSINESS CARDS**

## SAMPLE REQUEST FOR APPROVAL MEMORANDUM

DATE:

FROM:

TO: (Insert Name) Executive Officer, (Insert IC)

SUBJECT: Request for Approval to Purchase Employee Business Cards

Attached is the Justification to purchase employee business cards for [insert name] of my staff.

The employee interacts significantly and continuously with people or organizations external to NIH. Use of the employee business cards would facilitate prompt and efficient business-related communications in the course of such interaction, which further the statutory mission of NIH. The quantity of [insert number] employee business cads requested is determined to be reasonable.

Your approval is requested.

(Signature) Immediate Supervisor's Name (typed) Immediate Supervisor's Title

\_\_\_\_\_ This request is approved

\_\_\_\_\_ This request is not approved

(Signature) Executive Officer's Name (typed)