

**COVID-19 Purchase Card Related Micro-purchase Reporting Frequently Asked  
Questions (FAQs)  
As of  
May 11, 2020**

**Q1. What is the effective date for COVID-19 (“COVID”) related micro-purchase reporting pursuant to Office of Management and Budget (OMB) memo M-20-21?**

**A1.** The effective date for reporting micro-purchases is the April 10, 2020 issuance date of OMB Memo M-20-21. This means that beginning April 10, 2020, agencies/organizations are required to add a COVID identifier to relevant transactions.

**Q2. What is the frequency of COVID-related micro-purchase reporting for all agencies in OMB Memo M-20-21?**

**A2.** In accordance with Appendix B of M-20-21, reports shall be provided on a monthly basis. GSA’s Center for Charge Card Management will do the reporting for agencies using their servicing GSA SmartPay contractor bank’s Electronic Access System (EAS) to identify COVID-related micro-purchases. CCCM will consolidate the data from both contractor banks (Citibank and US Bank) and provide a monthly micro-purchase report to the Office of Management and Budget (OMB), Office of Federal Financial Management (OFFM). The agency/organization does not need to take any action to provide these reports beyond ensuring transactions are properly coded.

Agencies that choose not to use to an EAS to identify and report COVID-related micro-purchases, in accordance with OMB memorandum M-20-21, shall apply the ‘COVID’ identifier or an agency designated identifier to appropriate transactions in the agency’s internal systems in anticipation of providing such information directly to OMB.

**Q3. Is “COVID” the only transaction identifier which can be used?**

**A3.** Although M-20-21 specifically uses the word “COVID” to identify relevant micro-purchases, OMB subsequently agreed that agencies may use other identifiers/coding schemes provided relevant transactions can be properly identified.

**Q4. Must the servicing contractor bank EAS be used to code and track/report COVID-related micro-purchases or can an agency’s internal system such as its financial system be used instead?**

**A4.** Use of the EAS is not required. Agencies/organizations have the discretion to determine which system(s) they use to track COVID-related micro-purchase spend. Agencies that do not use the bank EAS to track COVID-related spend must have another process set up for tracking purposes and must also report directly to OMB on these purchases. See the response to question Q2, above, for further information.

**Q5. For those agencies/organizations that choose to use an EAS for COVID-related micro-purchase tracking and reporting, is there training available?**

**A5.** As an EAS can be used in various ways to support COVID micro-purchase identification and reporting, the agency/organization's servicing contractor bank will coordinate with the agency/organization headquarter's Agency/Organization Program Coordinator (A/OPC) for the purchase card program on the approach to be used as well as suitable training and training materials. Agencies/organizations "tagging" onto another agency's task order should consult with the lead agency for information on the approach to be taken. For the GSA Pool task order, participating organizations should be sure to respond to the servicing bank's inquiry regarding an agency/organization's intentions regarding the use of the EAS for COVID-related micro-purchase reporting.

**Q6. Do only micro-purchases using certain appropriations/accounting lines need to be reported or is all COVID-related spending to be identified and reported?**

**A6.** Since agency/organization practice varies, cardholders should follow internal policy with regard to this matter. In general, all COVID-related spend should be identified and reported, regardless of appropriation.

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