



GSA SmartPay® Charge Card and Related Payment Services Program

Federal Government Partial Shutdown Frequently Asked Questions (FAQs)

January 24, 2019

The GSA SmartPay program includes commercial charge card accounts, such as: purchase, travel, fleet and integrated accounts, among others. **These accounts are for official government business use only at all times, regardless of agency funding status.**

Participating agencies individually manage the implementation of the GSA SmartPay program consistent with the GSA SmartPay master contracts, their task order(s) issued under those contracts, applicable law, regulation and policy. For example, agencies designate cardholders, set their spending limits and controls, perform oversight and decide which cardholders may still use their cards during a shutdown for authorized purchases, travel, and other expenses and payments.

These FAQs address inquiries the GSA Center for Charge Card Management (CCCM) typically receives during government shutdowns. These FAQs are grouped into two sections: **Cardholder FAQs** and **Agency Card Management FAQs**. Please note that these FAQs will be updated as needed.

Cardholder FAQs

C1. Can I still use my card?

It depends. **Cardholders are advised to check with their agency regarding continued use of cards due to a lapse in funding during a shutdown.** Cardholders may not be authorized to use their cards if their agency/organization determines such use does not relate to excepted or exempted activities. **Also note:** The Anti-Deficiency

Act prohibits most agencies from incurring obligations in the absence of appropriations (unless otherwise allowed by law or for emergencies involving the safety of life or limb, the protection of property, or other excepted/exempted services). Cardholders should coordinate with the appropriate officials in their agency/organization to ensure only authorized travel and purchases are made during a lapse in funding.

Absent any agency-specific action to limit card use, purchase, travel, fleet, and integrated cards will continue to function normally.

C2. Can I use my GSA SmartPay charge card for personal expenses?

No, it is never appropriate to use your GSA SmartPay charge card for expenses not related to official government business. To do so can result in your agency taking disciplinary action up to, and including, your removal from Federal service.

C3. Will the banks' 1-800 customer service call centers continue to operate?

Yes, if you need to reach your servicing contractor bank during the shutdown, please call the 1-800 number on the back of your GSA SmartPay charge card.

C4. Do I still have to pay my individually billed travel card statement if I am unable to pay due to the shutdown?

In general, the answer is “no,” provided you are affected by the shutdown and therefore unable to pay. Payment would be required once funding is restored. In the event of a shutdown, the contractor banks recognize that affected agencies/organizations and cardholders may be unable to make timely payments and accounts could therefore become past due until funding becomes available. For individually billed travel accounts in good standing as of the start of the shutdown, the contractor banks will:

- a. keep accounts open unless deactivation is requested by appropriate agency officials
- b. take appropriate action to prevent accounts from becoming delinquent, suspended or canceled
- c. ensure finance charges are not assessed
- d. waive all applicable late payment fees
- e. continue to generate account statements
- f. work with agencies to maintain risk mitigation measures

- g. coordinate with agencies and cardholders to bring accounts up to date once funding become available

Note that the banks use highly automated account management processes that during a shutdown may require manual intervention by bank staff. As a result, isolated instances of errant activities such as issuance of late payment notices on an account affected by the shutdown can occur. Should this happen, please follow your agency procedures or contact your servicing contractor bank as appropriate.

For accounts that were past due prior to the start of the shutdown, routine card management and payment rules apply.

Note that agencies/organizations may issue supplemental cardholder guidance regarding individually billed card management and payments during a shutdown, consistent with applicable GSA SmartPay contract and task order terms.

C5. If I am late paying due to the shutdown, will the delayed payment on my individually billed travel card be reported to the credit bureaus?

In general, the answer is “no.” Accounts in good standing as of the start of the shutdown will not be reported by the contractor banks to credit bureaus for late payment. Additionally, “past due” notices will not be issued and collection activities will not occur. However, statements of account will continue to be issued, and will likely show a balance due. This balance need not be paid until funding becomes available. These measures apply only to cardholders affected by the shutdown with accounts in good standing prior to the shutdown. For organizations (or components thereof) with funding, routine card management and payment rules apply. Generally, there is no need for individually billed GSA travel cardholders to contact the contractor banks in order for these shutdown measures to be implemented, but cardholders should comply with instructions issued by their agency/organization. GSA SmartPay participating agency/organization Headquarters (HQ) card managers (or other authorized HQ staff) are advised to coordinate with their servicing GSA SmartPay contractor bank(s) to ensure a clear understanding of the how individually billed travel accounts impacted by the shutdown will be handled.

C6. What if my card is already delinquent before the shutdown; will I be given more time to pay?

No. Payment is due to the contractor bank per the statement due date. If your account is delinquent prior to the shutdown, it will continue to be considered to delinquent until

full payment is made to the contractor bank. The time elapsed after payment is due does not stop accruing in the event of a government shutdown.

C7. My card is about to expire. Will I receive my new card during a shutdown?

Yes. In accordance with the terms of the GSA SmartPay master contract, if your card is due to expire during a government shut-down, your new card will still be mailed. If your agency elects to have the charge cards sent directly to you (for example, an individually billed travel card) then you will receive the card at the address on file. If your agency has elected to have the cards mailed to the government offices for dissemination by an Agency/Organization Program Coordinator or other government employee, then your card will be mailed by the bank but most likely be held by the distributing government office until the shutdown is over. If you are deemed an exempt or excepted employee, your agency/organization will most likely ensure card delivery to you, but we recommend you confirm these procedures with appropriate officials in your agency/organization.

C8. What if I am on travel during a shutdown?

Unless your agency takes action to limit or deactivate cards, your travel card will continue to work during a Government shutdown. For Government travelers on official travel recalled to return home due to shutdown, GSA SmartPay contractor banks operate under a “no-strand” policy, under which they will ensure that cards operate to support your return trip. But as policies vary, please be sure to check with your agency/organization regarding travel during a shutdown.

C9. What if I have recurring or automatic payments on my purchase card?

Please coordinate with your agency/organization finance officials and Agency/Organization Program Coordinator to ensure that these payments are properly dispositioned in the event of a shutdown. Be advised that purchase cardholders may need to contact merchants to stop any automatic payments which may be scheduled to occur during the shutdown period.

Note: The Anti-Deficiency Act prohibits most agencies from incurring obligations in the absence of appropriations (unless otherwise allowed by law or for emergencies involving the safety of life or limb, the protection of property, or other excepted/exempted activities). Cardholders should therefore coordinate with the appropriate officials in their agency to ensure only authorized travel, purchases and payments are made in the event of a shutdown, as this issue can become especially complicated given the wide variety of agency missions, funding types, etc.

Agency Card Management FAQs

ACM1: Will GSA SmartPay charge cards/accounts continue to operate normally during a shutdown to support authorized mission activities?

Yes, the program will continue to operate normally in that cards will function and GSA SmartPay contractor bank account management staff and systems, reporting, call centers, etc., will continue to operate.

ACM2: Should agencies consider deactivating/reducing the spending limits on accounts not expected to be used during the shutdown?

Agency card managers should consult with their servicing contractor bank to help ensure appropriate internal control measures are maintained during a shutdown.

ACM3. Does the Prompt Payment Act (PPA) apply to payments to the contractor banks?

The Prompt Payment Act (PPA) only applies to centrally billed accounts under the GSA SmartPay program. These account types include purchase, centrally billed travel, fleet and any centrally billed aspects of integrated accounts. PPA does not apply to individually billed accounts, as they do not constitute a Federal Government liability. GSA SmartPay cards and accounts will continue to function during a shutdown (except for those deactivated at agency/organization direction) even though agencies may be unable to timely pay proper, official contractor bank invoices (which will continue to be generated). Upon availability of funding, agencies shall reconcile and pay these invoices as promptly as possible.

ACM4. What if my agency wants to explore the temporary use of different GSA SmartPay account types during the shutdown (e.g. expanded use of centrally billed accounts)?

Agencies should first consult with GSA's Center for Charge Card Management. The Center can be reached at (703) 605-2808, or via e-mail at gsa_smartpay@gsa.gov. Changes in account types can lead to reconciliation challenges, affect dispute rights, and have other potential implications that should be fully explored and discussed prior to changes being made.

ACM5. Even though individually billed account travel cards are an individual liability, what if employees affected by a shutdown are unable to pay their card statements? Should the agency coordinate with its GSA SmartPay servicing bank regarding this matter?

Please see the response to FAQ C4, above.

ACM6. How can an agency contact the GSA Center for Charge Card Management during a shutdown?

Please contact us through our central phone line at (703) 605-2808, or via email at gsa_smartpay@gsa.gov. We remain available to assist your agency during the partial government shutdown.