USING SPOTS CARDS DURING AN EMERGENCY

Oregon Accounting Manual (OAM) Policy 55.30.00, *SPOTS Purchase Card Program*, outlines the minimum standards for processing purchase transactions using the State P-Card of Oregon Transaction System (SPOTS) card. The SPOTS card is a useful tool under normal circumstances and may be even more valuable during an emergency.

1. **Emergency SPOTS Card Options**
   a. **When**. Agencies should decide whether to issue emergency SPOTS cards in advance or wait until an emergency actually occurs. If the decision is to delay, agencies should keep in mind that communication networks could be adversely affected during an emergency, which in turn could impact the effectiveness of the expedited procedures described below.
   b. **Who**. Determine who should have emergency SPOTS cards. Should cards be issued to administrators, deputies, field supervisors and other emergency responders? Or, because of their familiarity with procurement laws, administrative rules, and statewide policies, should cards be issued to key purchasing staff only?
   c. **Credit Limits**.
      - Managing accounts are subject to a monthly credit limit. What is the available credit limit for a single billing cycle for the agency managing account?
      - SPOTS cards are subject to a monthly credit limit and an optional single transaction limit. Cards with a monthly credit limit above $50,000 require Financial Business Systems (FBS) approval as described in 2.c. below. What is the appropriate emergency spending limit for each of the potential cards? A low single transaction limit may cause a declined transaction in the event a large purchase is needed.
   d. **Managing Account Types**. Agencies have two options available for emergency SPOTS cards.
      - Use regular SPOTS cards issued under existing managing accounts. Inactive cards purge from the bank's system and may be unavailable for use when an emergency occurs. See OAM 55.30.00 paragraph 118.
      - Use Emergency Response Cards (ERC) issued under a separate managing account intended for emergency purposes. ERC accounts do not purge due to inactivity. See OAM 55.30.00 paragraph 120. ERC managing accounts must be established in advance by contacting the FBS Manager. Agencies need to allow 2-3 weeks for this process.

2. **Expedited Procedures During an Emergency**

   New Cards:
   a. Agencies issue SPOTS cards based on a SPOTS Card Application and Agreement form (OAM 75.55.02.FO). As long as the credit limit is $50,000 or less and the form has been signed by the agency's Approving Officer, the request may be processed directly by the agency's SPOTS Card Coordinator using the US Bank's (bank) Access Online system.
   b. In an emergency situation, the request for new SPOTS cards can be expedited. Cards can be issued online and made available to new users within one business day of the expedite request to the bank by the SPOTS Coordinator. Approving Officers and SPOTS Coordinators are authorized contacts with the bank and may contact their bank Account Coordinator during business hours or Customer Service, 1-800-344-5696, after hours to expedite the card request. If the request is submitted by 3pm Central Standard Time (CST), the new SPOTS card will be delivered the next business day; if the request is

submitted after 3pm CST, the card will be delivered within 2 business days. The delivery location can be pre-determined at the time of request. *(NOTE: The bank is not available to process new card requests evenings, weekends or holidays.)*

Existing Cards:
c. In an emergency, requests to increase the credit limit of an existing cardholder account can be expedited. With Approving Officers' authorization, SPOTS Coordinators can increase credit limits up to $50,000 effective immediately on Access Online. Requests to increase credit limits above $50,000 requires the approval of the FBS Manager. Agencies must submit a new form signed by the Approving Officer, along with a written explanation that:
(1) states the request to increase the spending limit is due to an emergency situation;
(2) describes the controls and safeguards in place to ensure proper receipting/tracking of emergency purchases; and
(3) discusses the controls in place to ensure the proper use and storage of the SPOTS card.

3. **SPOTS Card Training**
SPOTS card training is required before issuing emergency cards and periodically as stated in OAM 55.30.00 (paragraphs 113-115). An approved SPOTS training program is available online under the FBS SPOTS website.

4. **Emergency SPOTS Card Use**
Agencies that use the SPOTS card to pay for goods and services during an emergency must follow the Public Contracting Code. This includes ORS 279B.080, *Emergency Procurements*. Emergency SPOTS card transactions must follow the same purchasing requirements and card use policies provided in OAM 55.30.00 (paragraphs 103 and 129-136). Competitive bids and/or a purchase order may be required.

5. **Documentation Requirements**
Emergency SPOTS card transactions must comply with the same documentation requirements applicable to all purchase transactions. All expenditures require an itemized receipt. Minimum information on the receipt includes the date of the purchase, the vendor's name, item description, and the amount. Justification and documentation is required for agencies submitting claims and/or seeking reimbursement or emergency funds. Expenditure claims for FEMA projects must show purchases are reasonable and necessary, authorized within the project's scope of work, and directly benefit the project.

6. **Tracking Mechanisms**
Agencies may find it useful to develop their own internal system to track SPOTS card purchases during an emergency to monitor spending, to share data among multiple staff members, and to facilitate post-emergency audits and analysis. Access Online financial management reporting provides 24 months of transaction data and may help with organizing purchases. Special recordkeeping procedures and advance training may be needed to instruct agency personnel how to log, track and report emergency purchase information to a central authority. Financial managers should work with OEM to ensure their agency's SPOTS card reporting mechanisms generate the data required for reimbursement under federal and state disaster recovery programs.