



COMPTROLLER GENERAL OF THE UNITED STATES  
WASHINGTON D.C. 20545

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The Honorable Claiborne Pell  
Chairman, Committee on Rules  
and Administration  
United States Senate

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Dear Mr. Chairman:

Following our letter of July 8, 1980 (B-198419), you asked for further clarification of our views on business cards for Senators, and their personal and Senate Committee staffs. Specifically, you ask whether our previous decisions prohibiting the use of appropriated funds to purchase business cards in executive branch agencies apply to the Senate, and whether Senator's office expense allowances other than the 10 percent discretionary allowance may be charged with the expense of business card printing. For the reasons expressed below, we would not object to the use of the Contingent Fund of the Senate and the home state office expense allowance and stationery allowance which derive therefrom to pay for necessary business card printing.

We reach this conclusion through analysis of our earliest decisions on this question. Our original rule had both a legal and practical basis. When first presented with this question, the Comptroller of the Treasury analyzed the use of business cards and found that they served to introduce and identify a Government employee dealing with external offices in the course of performing official duties. He then held that such introductions, though customary, courteous and useful, were not necessary to the conduct of Government business, and therefore, cards could not be charged to appropriations. 10 Comp. Dec. 506 (1904). The practical reason was articulated in a later decision. Acknowledging that business cards might be necessary for some few officials to conduct Government business, the Comptroller nonetheless found it necessary to enforce the rule prohibiting business cards across the board, because it was impossible to draw a fair, enforceable line distinguishing those who were and those who were not in need of cards. 20 Comp. Dec. 248 (1913).

When the General Accounting Office was established, we adopted that rule and the underlying rationale, applying it ever since to executive branch agencies. See, e.g., 12 Comp. Gen. 565 (1933); B-131611, May 24, 1957; 42 Comp. Gen. 19 (1962); B-195036, July 11, 1979. These and our other decisions on this subject have all relied on the Joint Committee on Printing's Printing and Binding Regulations, which state at Paragraph 20 that:

"Printing or engraving of calling or greeting cards is considered to be personal rather than official and shall not be done at Government expense." (1977 ed.)

Noting that our decisions since 1921 have all been rendered to executive branch agencies, you have asked whether this rule applies to the Congress as well. In 1904, one of the very early cases denied the expense of business card printing to an employee of the Library of Congress. Scott's case, 36 MS Comp. Dec. 746 (1904). Although we in the General Accounting Office have always applied the rule to our own employees, we have not previously ruled on its applicability to the Congress.

Members of Congress, and their staffs through them, play a unique role in our Government as elected representatives of their constituents. Constituent contact, whether in person or by mail, and constituent accessibility are accepted and necessary components of congressional activity. The importance of easy constituent accessibility is reflected in congressional stationery which may contain not only the name of the Member (or of the Members on committee letterhead), but frequently the names of top Washington or home office staff. These constituent responsibilities as well as the other unique demands placed on Senators (and their staffs) are of such a nature that we would not object to a determination by individual Senators, subject to any guidelines your committee may establish, that business cards are necessary and justifiable. Assuming that determination as to necessity, we would not object to the use of the Senatorial expense allowance established by 2 U.S.C. § 58(a) (1976) to purchase those cards. The proper subaccount(s) to be charged (such as the home office allowance and the stationery allowance) in any given case would normally fall within the Senator's discretion, subject to any rules your committee may promulgate.

In this regard, unlike most Federal agencies, there would appear to be no great difficulty in determining which employees are in need of Government-supplied cards. The Senate Rules Committee can administer this matter fairly and with appropriate restraint. You and your staff are in an excellent position to determine which people and positions require business cards, and to insure that frivolous or excessive expenditures are not incurred for business card printing. We understand that the cognizant House Committee exercises this function with respect to that body.

Notwithstanding our essential agreement with your Committee's rationale for business card printing, paragraph 20 of the Printing and Binding Regulations, quoted above, categorically prohibits the printing of cards at Government expense because they are not "official". Your Committee's Chief Counsel is of the opinion that this specific regulation does not apply to the Congress. We have discussed this question with the Joint Committee informally. However,

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we have no formal ruling from the Joint Committee one way or the other. We understand that the Joint Committee is revising its regulations generally for publication next spring. This may provide an opportunity for your committee to resolve this matter.

We trust this answers your inquiry.

Sincerely yours,

Signed Elmer B. Staats

Comptroller General  
of the United States