Ethyl Alcohol

Ordering and Control

Cornell must comply with federal laws set by the U.S. Department of Treasury when purchasing Ethyl Alcohol. Special procedures are in effect to govern the ordering, use, control and reporting of tax-free alcohol required for University use.

End user/unit/SSC:
All locations where Ethyl Alcohol will be used or stored must appear on Cornell's license to buy tax-free alcohol. To have a new location added or to delete a location no longer applicable to the license, please contact Procurement Services (Procurement).

Procurement will maintain the license for ethyl alcohol, including annual renewal.

For questions about purchasing ethyl alcohol, please reach out to askEHS.

Entry Permits USDA

Cornell must comply with the federal laws that govern plant material, seeds and animals purchased from outside the limits of the United States. The requisitioning department will be responsible for obtaining the necessary U.S. Department of Agriculture Entry Permits. The Address to obtain the proper permit is:

USDA
APHIS-PPQ
Federal Building
Hyattsville, MD 20782

Materials and Equipment Requiring Radiation Safety Approval

Prior to purchase, radioactive materials, and items which either use radiation sources or produce radiation must be approved by Environment, Health and Safety (EHS). The KFS requisitions for radioactive materials are automatically routed to EHS for approval based on the UNSPSC (commodity code) classification:

- 12142200 Isotopes
- 12142203 Alpha sources
- 12142204 Beta sources
- 12142205 Cobalt sources
- 12142206 Gamma sources
- 12142207 Radioisotope sources
- 41103301 Liquid scintillation counters
- 41106006 Radio nucleotides or nucleosides

End user/unit/SSC:

1. **Radioactive Material**
    a. Radioactive Material may be purchased by purchase order through KFS or through e-SHOP. Use of a procurement card is not permitted.
    b. If e-SHOP is not used, the End User must identify the purchase as radioactive material. The requisition initiator (typically SSC) must flag the line-items as restricted to route the order to Procurement Services for EHS review.
    c. For radioactive materials, the ship-to address of the requisition must list EHS as the destination. Enter the permit holder on the attention line in the ship-to address. [All standard orders shipped to EHS should be line-item restricted.]
    d. Only authorized personnel within a unit may call Procurement Services for an emergency order number or confirming order for radioactive material.
2. **Sealed sources, Instruments containing sealed sources, and Radiation producing equipment**
    a. When the unit needs to requisition any items within these groupings, early development of specifications should be coordinated and approved through the responsible representative of EHS (Radiation Safety).
    b. Contact them at askEHS or 255-7397 or 254-8300.

Procurement Services:

1. For the following list of categories, the Procurement Agent will contact the EHS radiation specialist for approval:
   - Radioisotopes or radioactive materials
   - Nuclear Density Gauges
   - Gas Chromatographs (GC)
   - Electron Capture Detectors (ECD)
   - Liquid Scintillation Counters (LSC or LS)
   - X-Ray Producing Equipment (e.g., Generators, Diffractometers, Computed Tomography, CT)
   - Electron Microscopes (e.g., Scanning, SEM, Transmission, TEM)
   - Static Eliminators
   - Neutron Moisture Probe
   - Ion Implanter
   - Magnets
   - Radioimmunoassay (RIA)
   - Lasers

Laminar Flow and Fume Hoods

To ensure that the hood is adequately designed to handle the research for which it is being used, Environment, Health and Safety must approve all chemical fume hood, biosafety cabinets and laminar flow clean bench purchases. In addition, all vented hoods must be approved by Facilities Engineering.

End user/unit/SSC:

The requisition is processed normally. A notation that this is a laminar flow and/or fume hood is entered on the requisition. Individuals should contact EHS at askEHS for their advice before submitting the requisition or pre-approval.

Narcotics

The procurement of Narcotics requires a license with the New York State Department of Health (NYSDOH) and a registration from the Drug Enforcement Administration (DEA).

End user/unit/SSC:

It is the end user's responsibility to obtain a license and registration appropriate for the anticipated use of controlled substances. Usage of another licensee/registrant number for procurement is not allowed. Each requisition for controlled substances (Narcotics) must be accompanied by a properly prepared DEA form (dependent on the drug schedule) signed by the registration holder. If the vendor does not currently have a current copy of the registration and license, then a copy must accompany the requisition. The vendor will not ship the items without a copy of the license and registration on file. Contact Environment, Health and Safety (EHS) before purchasing to assist in procurement of Narcotics. For more information, visit www.health.ny.gov/professionals/narcotic/licensing_and_certification and www.deadiversion.usdoj.gov/drugreg/index.html.

Cornell University, EHS, and Procurement Services do not hold a university license or registration.

Orders for Lab Animals and Custom Antibodies

Use of live animals for research, teaching or demonstration at Cornell, is regulated under the Animal Welfare Act and by Public Health Service agencies such as the NIH. All animals must be received, housed and cared for in compliance with federal and state regulations as well as Association for the Assessment and Accreditation of Laboratory Animal Care International (AAALAC) guidelines. It is the responsibility of each Animal Facility Manager to adhere to these regulations. All such activities must be approved by Cornell's Institutional Animal Care and Use Committee (IACUC). Approval is indicated by an approved IACUC protocol number in Cayuse (the protocol management system). The acquisition of custom antibodies (see definition below) is considered the use of live animals, because animals are being used specifically for the purpose of a Cornell activity. Commercially available antibodies do not need IACUC approval because animals were not used specifically for the use by Cornell.

Each department/college/unit has specific individuals who purchase animals. If a department/college/unit needs to order animals, the purchaser must coordinate the order through the animal facility manager responsible for the animal facilities where the animals are to be housed. Purchase orders will be routed based on UNSPSC classification to the appropriate approving authority.

Definitions

Custom Antibodies are antibodies that are produced using antigens provided by or at the request of the investigator (i.e., not acquired off-the-shelf). The use of custom antibodies at Cornell University requires IACUC approval as outlined in IACUC Policy #360: Obtaining Custom Antibodies from Live Animals.

Commercially Available Antibodies are antibodies that have already been produced and are available from external sources.

Procedures for authorizing the purchase of custom antibodies from an external source

1. Department procurement cards (pcards) cannot be used for the purchase of custom antibodies. Commercially available antibodies may be purchased with pcards.
2. Purchase Orders (PO) should be used for the purchase of custom antibodies. The Researcher should enter commodity code 98100000, for custom antibodies, in the Requisition. For commercially available antibodies, use commodity code 98xx0000.
3. Purchases with commodity code 98100000 will route to select SSC Procure-to-Pay staff for review.
4. The Requisition should include the following information:
    a. Name and contact information for the source of antibodies
    b. Approved IACUC protocol number in the Description section. Requisitions without approved protocol numbers will not be approved until IACUC approval has been granted. SSC Procure-to-Pay staff will send a note to the researchers attempting to purchase custom antibodies without an approved IACUC protocol and will copy the IACUC staff on the correspondence.
5. SSC Procure-to-Pay staff will contact IACUC staff by email – Chris Bellezza (cab37) or Rob Felt (rjf243) for review of Requisitions.
    a. IACUC staff will review the Requisition and will check the protocol to verify that the source is listed in the IACUC protocol and that all required documentation is present.
    b. IACUC staff will respond with either verification that the purchase can proceed or with instructions to wait until IACUC approval has been granted.

c. IACUC staff will aid the Researcher in obtaining IACUC approval and appropriate documentation and will provide the approved IACUC protocol number to SSC P2P staff.
d. Once IACUC staff contact SSC P2P staff with instructions to approve the Requisition, SSC P2P staff will add the new IACUC protocol number to the Requisition (if required) and will route the Requisition to the appropriate account reviewers based on the account number provided in the Requisition.

Respiratory and Hearing Protection

Cornell's Office of Environment, Health and Safety maintains programs for respiratory and hearing protection. Before a worker may use this protective equipment, the environment they work in may need to be evaluated for particular hazards. In all cases, respiratory and other protective equipment needs to be properly selected and individually fitted for each worker. The Office of Environment, Health and Safety sells this equipment directly to University departments.

Prior to placing an order for the purchase of any respiratory or hearing protection devices, contact Environment, Health and Safety for evaluation and approval of the purchase. For further information, please contact Procurement Services (255-3804) or Environment, Health and Safety at askEHS (255-5623).

Poison Inhalation Hazards

Poison inhalation hazards are normally gases or liquids which form gases at room temperatures and have an NFPA or CERCLA rating of 3 or 4. To ensure that these gases are received, stored and used in a safe manner with the proper engineering controls and conforming to inventory reduction regulation, prior approval from Cornell's Office of Environment, Health and Safety (EHS) is recommended. For additional information please refer to the EHS web site.

End user/unit/SSC:

It is the unit's responsibility to contact EHS at askEHS prior to ordering, receiving, or storing gases. The requisition is processed normally.

Energy Procurement

Statement: Cornell University's administration is authorized to procure energy, energy related financial instruments (both physical and financial) and power purchase agreements with the intent of reducing volatility and controlling costs. This requires the procurement of certain energy hedges, some of which will extend across multiple fiscal years. The Utilities and Energy Management sections (of Facilities Services' Energy and Sustainability Department) cost of energy procurement will be applied to all central Utilities and Energy Management customers through the appropriate utility rate.

Purpose: Allow forward purchases in energy (physical or financial) and power purchase agreements to control and stabilize energy costs.

Goals of this policy include:

- Limit transaction risk and size
- Give guidance on diversification of the energy portfolio
- Define the approval processes

Entities Affected by This Policy

- All Ithaca campus units that receive energy services via Cornell Utilities and Energy Management
- Division of Financial Services
- Office of Budget and Planning
- Office of the Treasurer

Authorization: The aggregate of energy-related contracted cash flows shall not exceed $36 Million in any fiscal year. The aggregate present value of the energy portfolio shall not exceed five (5) times the projected annual value of the energy spend of approximately $180 Million.

Authorized Instruments

The following instruments are authorized and may be used independently or in combination:

1. Purchasing contracts for physical delivery or financial settlement over multiple year windows.
2. Establishing energy reserves in the Utility budget to cover variability in annual energy expense. These reserves will be funded by utility rates.
3. Purchasing of futures (either over the counter or exchange backed) from an energy broker. Such instruments may be taken to physical delivery, if necessary, with a pre-specified delivery point.
4. Purchasing derivatives (swaps, collars, and options) in the over-the-counter markets.
5. Purchasing weather derivatives, based on an over-the-counter swap contract using degree days or other weather-based statistics.
6. Entering into long term (not to exceed 50 years) power purchase agreements (or equivalent financial instruments) for energy.

Use of Consultants

When buying in the forward energy markets, an independent third-party consultant may be retained to give advice on pricing, counterparty credit, portfolio management, and to develop portfolio performance reports. A portfolio manager may be retained to establish recommendations to meet the policy guidelines, manage the layering, prepare any solicitations, and execute the rollover of the instruments.

Oversight Requests for approval shall be presented with an analysis of the following:

- An explanation of the proposed purchase
- The aggregate present value of contracted cash flows and pro forma projections
- Project risks and benefits
- Demonstrate compliance with buying manual or request for exception

Requests for approval (and exception) will be made by the Vice President of Facilities Services to the Vice President for Finance and CFO.

Advisory The Energy Risk Oversight Committee (EROC), with representatives from Utilities and Energy Management, Procurement Services, Treasury, Budget, the Investment Office and major customers. The committee chair shall be the Associate Vice President of Energy and Sustainability, or another designate from Energy and Sustainability. This committee will perform the following:

- Evaluate the performance of the energy portfolio on an annual basis and report to the CFO.
- Meet with representatives of Utilities and Energy Management to discuss strategy and manage the implementation process.
- Recommend all hedge requests and annual budgets for fuel and electric rates.

Strategy The strategy to guide the Energy Risk Oversight Committee (EROC) includes:

- Fuel instruments shall not have terms longer than 5 years.
- Renewable energy power purchase agreements shall not have terms longer than 50 years.
- Energy portfolios shall be layered over time in order to diversify the portfolio and minimize the financial impact on annual budget cycles.
- The goal of natural gas hedging is to provide relative price certainty for budget purposes.

Other rules related to Portfolio Management

- The University may hedge energy using futures purchased in its name or purchased on account by a third party.
- Instruments for physical delivery will be competitively procured when possible.
- No more than 15% of the value of any instrument shall be paid in advance of delivery or the equivalent closings.
- To the extent possible, positions shall be capable of being unwound if conditions change. This specifically allows the reselling of instruments and the resale of an energy commodity or its transportation basis on the secondary market.
- Derivative based instruments (swaps, collars, options) will be written, to the maximum extent possible, in accordance with the International Swaps and Derivatives Association's (ISDA) or the Edison Electric Institute's master documents.
- All transactions will be accounted for and audited in accordance with existing and appropriate accounting procedures.

Deviations to this policy within the limits of transaction authority may be approved by the Vice President for Finance and CFO.

Requirements for Counterparties

Counterparties for energy instruments where payment is made at or after physical delivery will have a

minimum credit rating determined by the Senior Director of Procurement Services.

For instruments where the commodity is not to be taken to physical delivery, or significant payment (>5%) is to be made prior to physical delivery, the counterparty must have a credit rating of "A3" as defined by Moody's Investor Service or "A-" as defined by Standard & Poor's. For counterparties with a split rating, each rating must be at least at the minimum of A3 or A-. Exceptions to these requirements are permitted with approval from the Vice President for Finance and CFO.

Transaction Authority

The Executive Vice President for Finance and CFO has transaction authority for the purchase of energy or energy instruments as defined in this policy.

Requisitioning of Signs

All signs located on Cornell property must be in compliance with Cornell's Sign Program policies and specifications and must conform to existing zoning and sign ordinances. Development of specifications for signage must be coordinated through the responsible representative as listed below:

Sign Type	Responsible Representative	Contact Information
Exterior Building Mounted Cast Aluminum Letters	Customer Service Humphreys Service Building	255-5322
Interior Signage and Graphics	Customer Service Humphreys Service Building	255-5322
Traffic Control Signs	Transportation & Mail Services 116 Maple Avenue	255-4600
Temporary Signs: Construction Projects	Transportation & Mail Services 116 Maple Avenue	255-4600
Temporary Signs: Special Events, Conferences, Orientations, etc.	Transportation & Mail Services 116 Maple Avenue	255-4600
All Other Exterior Signs	Transportation & Mail Services 116 Maple Avenue	255-4600

The department must contact the appropriate Sign Program representative (as listed above) to coordinate the development of the sign specifications for compliance with policy. When the specifications are finalized, the department may request that Procurement Services (Procurement) obtain pricing and delivery information. Procurement will then process the Request for Quote or the requisition.

Recycling and Disposal of Equipment

To provide for the proper methods of disposal for refuse and materials destined for waste disposal, the University has implemented a recycling program to comply with all applicable regulations.

Solid Waste Management is a program of the Grounds Department. The primary goal of the program is to provide environmentally sound solid waste disposal alternatives to the Cornell campus. The program promotes reduction and reuse of materials in addition to offering a comprehensive, convenient recycling program that even includes free removal and recycling of old computers.

For a list of equipment accepted for disposal, please consult the Grounds Department' Recycling web site at http://www.fm.cornell.edu/fm/recycle/fmn_recycle.cfm.

For more information, contact the University Solid Waste Manager at recycle@cornell.edu.

Use of Cornell Logo, Name & Insignia

The purpose of this policy is to advise schools, units and organizations of procedures for processing orders that involve the use of Cornell's name, logos, trademarks, insignia, or nicknames on items such as T-shirts, mugs, hats, memorabilia, and other clothing and products.

> "Most major colleges and universities, including Cornell, have a licensing program that regulates the use of school names, trademarks, insignias, Logos, etc. on merchandise produced for use by college and university units and student groups, or the sale on and off campus. Cornell participates in national and international licensing programs administered by Exemplar Associates. These programs prevent bootlegging, protect laborers in production of goods worldwide, and ensure that Cornell names and artwork are used consistently on only those products approved by the University."

The User/Unit/SSC is responsible for getting approval from Cornell's Office of Brand Communications, which is the responsible entity for approving and screening requests for logo approval. You may also visit the website, http://brand.cornell.edu/ for guidelines on using the Cornell logo or insignia, or to submit an approval request in the online tool.

Any club, organization, or university department that wishes to use the Cornell name or artwork on novelty items such as mugs, pens, shirts, etc. must follow the process for approval by the Campus Activities Office. The Cornell Name and Artwork website (https://scl.cornell.edu/get-involved/campus-events/merchandise-approval) which explains the procedure and directs you to submit the appropriate approval request form. Request for approval can be submitted directly at https://brand.cornell.edu/brand-forms/forms/.

A list of licensed manufacturers is available from the Campus Activities Office, 521 Willard Straight Hall, the Office of University Communications, 308 Day Hall or can also be found online at https://brand.cornell.edu/downloads/merchandising/licensed-manufacturers.pdf

- **Please attach the approval form to the I Want document or requisition.** A separate request form must be submitted for each manufacturer selected. Because our signature and artwork are required, this request must be submitted in writing.
- Once approved, a copy of the approval and artwork must be presented to the manufacturer before the items can be ordered.
- Please note that an approved design will not require subsequent review and approval provided a licensed manufacturer is used and there is no change in the design.
- Generally, approvals will not place limits on the quantity of goods to be produced.

If you have any questions or need assistance, contact:

- General logo questions: identity@cornell.edu or 607-255-1167
- Web guidelines and graphics: identity@cornell.edu or 607-255-3854
- Audio visual guidelines: tv33@cornell.edu or 607-255-7117
- Merchandise guidelines: ffp1@cornell.edu or 607-255-1573

New York State Appropriated Orders

Funds Procedures

Orders that are funded by New York State (NYS) appropriated funds must comply with both Cornell University policy and New York State policy. Please review the individual grant requirements prior to procuring goods and/or services.

New York State Contracts

The New York State Office of General Services Procurement Services Group (OGS) establishes contracts for commodities, services, and technology. These contracts are available for use by eligible entities across New York State. These contracts are established through a competitive bidding system and awarded on the basis of lowest price and/or best value to a responsive and responsible vendor. Most OGS contracts can be used to make direct purchases. All requisitions should include the OGS customer number and the NYS contract number.

New York State Preferred Sources

To advance special social and economic goals, New York State grants certain providers a “preferred source” status under the law. The purchase of commodities and/or services from Preferred Sources is exempted from statutory competitive procurement requirements. State University of New York (SUNY) defines preferred sources as the correctional industries program of the New York State Department of Corrections, approved charitable non-profit agencies for the blind, any employment program serving mentally ill persons which is operated by the New York State Office of Mental Health, any qualified charitable non-profit-making agency for severely disabled persons approved by the New York State Commissioner of Education, or veterans workshops operated by the United States Department of Veterans Affairs and approved by the New York State Commissioner of Education. Appropriate backup information designating the vendor as a preferred source must accompany the requisition.

Resources

For assistance with these orders, please contact procure.support@cornell.edu.

Orders Using Sponsored Funds

Orders that are funded by Sponsored Funds (KFS fund group CG) must comply with both Cornell University policy and the policies of the sponsor and/or the federal government.

Agency Specific Terms

There are frequently used terms and conditions associated with a particular funder (e.g., the federal government) or agency (e.g., USDA). These terms are typically contained in the sponsored agreement either explicitly or by reference. Federally funded acquisitions must also be in accordance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200). The End user and their unit must be aware of the requirements of their particular award and must notify the SSC of any special requirements that must be referenced on the purchase order.

Frequent terms seen in sponsored agreements include:

- Need for spending with groups such as MBE, WBE, etc.
- Lease-purchase analysis as part of the justification of the acquisition
- Inclusion of certain award-specific terms and conditions in the purchase document

Some purchase requisitions on sponsored funds may be pre-reviewed by Sponsored Financial Services to assist in compliance with sponsor requirements.

If you have further questions about a particular procurement or award, please contact Sponsored Financial Services or Office of Sponsored Programs.

Artwork Loans and Purchases for the Herbert F. Johnson Museum of Art

The Herbert F. Johnson Museum of Art (Museum) purchases and/or borrows works of art. Because the Museum routinely conducts such transactions, the Museum is not required to utilize a purchase order for such transactions as long as the following conditions are met.

Conditions for Purchase Order Requirement Exception

1. The Museum will determine the artwork authenticity prior to finalizing a purchase or loan agreement with a vendor.
2. The Museum will execute an Acknowledgement of Objects Received form as they take possession of artwork.
3. The Museum will place the artwork under its Museum Collection and Temporary Loans insurance policy prior to taking possession of the artwork. (Note: The Museum Collection and Temporary Loans insurance policy is maintained by the Office of Risk Management and Insurance.)
4. The Museum will add all artwork purchases to its department artwork inventory.

Editors, Indexers, and Designers for Cornell University Press

Cornell University Press will utilize a generic Independent Contractor Agreement approved by the Office of General Counsel for all editors, indexers, and designers. The agreement template will incorporate the standard terms and conditions of a purchase order, i.e., insurance and indemnification, necessary to protect the University and mitigate any possible risk.

With a contract, CU Press may pay editors, indexers, and designers, using the disbursement voucher method. Because these individual's exercise complete independence in their edits of University Press manuscripts, provide service to multiple customers and university press organizations, do not provide service on the Cornell campus, and do not receive tools or training from the University, the University Tax Office has waived the service provider questionnaire and evaluation worksheet requirements for these service providers only.

Cornell University Press may not pay anyone, who is currently a Cornell employee or who has been a Cornell employee in the past calendar year, for editing, indexing, or design services via disbursement voucher or purchase order.

The Shared Services Center and CU Press will ensure that the vendors are properly registered as disbursement voucher vendors with valid IRS Form W-9 and ACH registration.

Export Controls

Export Control Laws are a set of federal regulations that restrict the release of certain items, information and software to foreign nationals in the United States and abroad. Those regulations are the Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR), as well as regulations administered by the Office of Foreign Assets Control (OFAC).

Cornell University is fully committed to compliance with all U.S. Government export control laws and regulations.

Export Compliance is the responsibility of all Cornell University faculty and staff. All staff, faculty, and students at the University must comply with the Cornell University Export and Import Control Compliance Policy.

Penalties for non-compliance with export control laws are severe and impact both the institution and the individual involved. If an export control violation is determined by an investigating agency, an individual may be subject to civil and criminal penalties, and Cornell may be subject to, among other penalties, debarment from government contracts.

The Export Control Office, under the direction of the Vice President for Research and Innovation, assists the University community in understanding and complying with export control laws and regulations. For additional information, tools to assist in determining how the regulations apply to your activity, and contact information for assistance with export control concerns, please visit https://researchservices.cornell.edu/export-controls.

End-User Responsibilities

1. Be aware of export control compliance and that some export control terms and conditions provided by suppliers for goods or services must be negotiated or in rare cases may not be acceptable.
2. Follow any requirements determined and conveyed by Cornell's Export Control Office or conveyed by Procurement Services regarding compliance with export control related terms.
3. Do not sign any contracts, agreements, or any other documents that contain terms and conditions. Attach all such documents to your I Want Document and submit to your service center.

Service Center Responsibilities

1. Review the I Want Document attachments, e.g., quote, contract, or agreement.
2. If there are export control terms, compare the clauses to the pre-approved clauses below.
   a. If they match, proceed with the order process.
   b. If they differ, mark the line item as restricted to route the order to Procurement Services for further review.
3. Inform end-user and department administrator where there is a term that requires Cornell to notify the supplier if any items are exported or transferred beyond Cornell University, and that the department and administrator are responsible for complying with the term.

Procurement Services Responsibilities

1. Review the requisition and attachments. If a contract contains export control clauses that differ from the approved clauses below and have not been approved by the ECO, then contact the Export Controls Office (ECO). Ensure that purchase orders are not released until the ECO approves.
2. Negotiate changes or obtain additional information as directed by ECO
3. Obtain ECO final approval prior to releasing the purchase order if the export control clauses are not pre-approved.
4. Once ECO approval is received (if required per above), release the purchase order and inform the end-user and department administrator of any modifications made to the export control terms during the procurement review.

Export Control Office Responsibilities

1. The Export Control Office will review the contract for the Export Control clauses provided by the procurement agent where Cornell requires such review and will advise on any necessary changes or other information needed to proceed with the purchase.
2. Inform Procurement Services of final approval (or denial) of agreement in cases where required.
3. Provide regular updates to guidance in the buying manual.
4. Provide training to PIs, Procurement Agents, and research units as reasonably requested.
5. Assist in resolution of screens that return questionable status for new vendors.

Export Control Clauses

ECO Review Required:

These types of **clauses/situations require review by the ECO and approval** prior to releasing the purchase:

- Where there is any mention of International Traffic in Arms Regulations (ITAR)
- Where the supplier is providing export-controlled technology or software source code (rare)
- Terms that *allow* a supplier to provide technical data or information that is export controlled, whether or not the actual service/item/information is export controlled.
- If a restricted party screen returns questionable status information

ECO Pre-approved Clauses:

These clauses are acceptable and do not require ECO review and should not be sent to the ECO:

- Agreement to abide by all applicable law
- Statement that we will not use items being purchased for prohibited use
- Requirement that purchaser has an export control program in place (Cornell does have a program in place)
- Requirement that Cornell notify a supplier if the item is being transferred, shipped, exported, etc., beyond Cornell
    - The service center or Procurement Services will notify the purchaser and department supervisor or administrator of the requirement

For Help, Please Contact:

Export Control Office
T: 607-255-5284
E: exportcontrols@cornell.edu

Information Technology Governance Process

Cornell University expects all stewards and custodians of information technology (IT) systems and services to develop, manage, and use those systems and services in a manner consistent with the university's requirements for data security, data confidentiality, and business continuity. In support of this charge, Cornell has an IT Governance Framework based on formal policy and delegated responsibilities.

Before any IT applications, software, or services are purchased, the university's approval process must be followed.

Approval Process Required before Buying IT Software, Applications or Services

Work with an IT leader in your college, department, or administrative unit to submit an IT Statement of Need.

Submitting an IT Statement of Need is the first step toward purchasing IT software, applications, or services. This step helps ensure that Cornell makes sound purchasing decisions in alignment with the university's goals and remains in compliance with all applicable laws and university policies.

An IT Statement of Need is required for any IT application, software, or service that would require internal or external IT expertise or effort, or products, tools, or resources to develop, purchase, alter, upgrade, decommission, etc., an IT application or service, regardless of source of funds or availability of staff time. This includes IT applications, software, or services that are planned for use within a single department, center, college, or unit if the application requires expertise beyond that which a non-IT functional end user could provide.

> ***Exceptions:*** *A few scenarios don't require an IT Statement of Need (see this list of exceptions). Two common exceptions: If research sponsored funds are being used for the purchase, OR if the purchase is for faculty and will not be used with regulated data, an IT Statement of Need is not needed. When you submit your purchasing request to Cornell Procurement, be sure to specify the exception.*

After the IT Statement of Need is submitted, it enters a one-week collegial review period, during which university and IT leaders have an opportunity to review and comment. A CIT committee also reviews the IT Statement of Need during this period.

While the IT Statement of Need is being reviewed, you should begin working through the Checklist for Purchasing Administrative IT Software and Services, for example, requesting a Technology Risk Assessment (TRA), having a web accessibility review done, completing the Data Steward Request Form, or having a privacy review done. Alternatively, you can wait to receive the "next steps" email from the IT Project Management Office confirming what steps from the checklist must be taken before the purchase can be processed and approved by Cornell Procurement.

Contact pmo@cornell.edu with questions.

Buying IT Applications, Services, or Software After Completing the IT Statement of Need Process

When you submit your purchasing request to Cornell Procurement, attach copies of the IT Statement of Need, the "next steps" email from the IT Project Management Office confirming what steps from the Checklist for Purchasing Administrative IT Software and Services were required, and documentation showing the outcome or results of those steps.

Please note:

- Must be purchased on a purchase order when there is a contract that requires a signature, e.g., vendor contract, export control terms, vendor terms and conditions.
- Orders with incomplete information cannot be processed by the Service Center representative or procurement agent.

End User Responsibilities

1. Review the IT Governance process at https://it.cornell.edu/itgovernance.
2. Work with an IT leader in your college, department, or administrative unit to submit the IT Statement of Need and to complete the required parts of the Checklist for Purchasing Administrative IT Software and Services.
3. The "next steps" email you will receive from the IT Project Management Office will confirm which steps from the Checklist must be taken before the purchase can be processed and approved by Cornell Procurement. Once you have completed those steps, attach the following documents to the I Want Doc:

    - The “next steps” email from the IT Project Management Office.
    - All required documents identified in the “next steps” email (e.g., Technology Risk Assessment, Web Accessibility review, Data Steward Request Form, Privacy review).
    - Vendor’s quote, agreement, or contract, as appropriate.

For additional information, please contact the Project Management Office (PMO) at PMO@cornell.edu.

Service Center Roles and Responsibilities

1. PCard edoc (PCDO) processing
    a. If the IT Statement of Need process was completed, attach the “next steps” email and all required documents identified in the “next steps” email to the PCDO, then proceed with normal process
    b. If the IT Statement of Need process was not completed, then have end user complete the process and attach the documents identified in 1.a. to the PCDO

2. I Want Document processing
    a. Review the "next steps" email from the IT Project Management Office regarding the IT Statement of Need and ensure that all documentation is attached to the requisition for the required steps. (Note: Orders with incomplete or missing documentation must be returned by the procurement agent.)
    b. If a contract is attached (regardless of dollar amount), the order must be processed on a requisition and marked as line item restricted to ensure routing to Procurement.
    c. The requisition must comply with the requirements above, per the “next steps” email attached.
    d. If no contract is attached, then proceed with the standard process based on dollar amount after ensuring that the requirements per the “next steps” email have been met

Graphics Procurement

When purchasing printed material, units must adhere to Cornell's Visual Identity, Style Guidelines and Logo Approval for print and novelty/promotional items.

- Cornell Visual Identity website http://www.cornell.edu/identity/
- Cornell Logo website http://www.sao.cornell.edu/SO/logo.php

The Office of Publications and Marketing is responsible for overseeing the university's visual identity for proper use of the Cornell logo and style guidelines. Publications and Marketing is staffed with writers, editors, and graphic designers who can work with you to create print and electronic communications that reflect Cornell's strategic goals. Please contact Publications and Marketing at 255-4945 to discuss your needs.

Cornell Photography http://imagelibrary.photo.cornell.edu/ website link:
- Purchase Cornell Images

Cornell Digital Print Services http://www.cbsds.cornell.edu/ website link:
- Cost-effective, high quality copy & digital color printing

Arts and Sciences' Concert Series and Performances

Limited spend delegation

This limited spend delegation from the Senior Director of Procurement Services authorizes the representatives identified below from the Department of Music to sign contracts for concert series and performances on behalf of the University.

This delegation authorizes the Department of Performing and Media Arts to sign contracts on behalf of the University for performances at Schwartz Center.

The units will utilize the Cornell Standard Performance Agreement and process the payment via disbursement voucher. All contract modifications other than dollar value or performance date will be reviewed by the Office of General Counsel and, if appropriate, the Office of Risk Management and Insurance. Any agreements presented by a performer must be reviewed and approved by the Office of General Counsel.

Authority for the College of Arts and Sciences' concert series, performance artists, and major events up to $100,000 is granted to:

- Laurel Gilmer, Director of Events, Department of Music
- Chris Riley, Adminstrator, Department of Performing and Media Arts
- Andrew Deppen, Production Manager, Department of Performing and Media Arts

Policy Exception

The University Tax Office has consented to allow the Department of Music to engage former Cornell students or employees and disregard the service provider evaluation. This exception was approved by William D. Allen, Assistant Vice President of Tax and Financial Initiatives.

This exception to policy is granted to the Department of Music only. This exception is limited to an exemption to the service provider evaluation and requirement that the individual be paid through the University Payroll Office.

External Lease Program (formerly Section 503)

Cornell's external lease program with UniversityLease provides departments with the option to return the leased equipment at the end of the lease term or buyout for Fair Market Value or $1. This program is only available for items which cost over $100,000.

- Managed by Procurement through UniversityLease
- Operating lease with no asset transferred to Cornell University after end of lease or a $1 buyout option to own the equipment
- Pre-approved lease program with negotiated rates and terms
- Ability to work with any preferred vendor or other equipment vendor

Procedure:

- End User/Unit obtains a current, written price quote on the purchase price of the required equipment. The normal procurement process will apply in obtaining the price quote (e.g., bids, preferred supplier, single/sole source justification). End User/Unit notifies the supplier that the equipment will be leased through UniversityLease.
- End User/Unit contacts Procurement. Procurement will contact UniversityLease and provide them with a copy of the quote, the length of the lease and whether the payments will be monthly, quarterly or annually.
- UniversityLease prepares the quote for the lease and provides the original to Procurement. Procurement will send the documents to the end user for review and approval to move forward with the lease.
- End User/Unit initiates an IWNT DOC for UniversityLease covering the lease for the selected length and payment schedule.

Procurement approves the requisition and sends the purchase order and signed lease documents to UniversityLease.

Internal Borrowing Guidelines (formerly Section 504)

The University's internal borrowing guidelines are guiding principles to effectively utilize capital resources, including debt financing, in achieving the mission and goals of the University while minimizing the cost of funds. Units sponsoring a capital project that requires debt financing must ensure that the project is in compliance with the Capital Project Funding Guidelines.

Basic Guidelines

Under extenuating circumstances, certain exceptions to these guidelines can be approved by Planning and Budget and the Treasurer's office.

- For loans under $500,000, amortization period is five years or less
- For loans under $1,000,000, amortization period is 10 years or less
- Loan repayment period cannot exceed the life of the financed asset. Maximum loan period is 30 years or the term of the underlying debt instrument, whichever is shorter.
- Interest is paid during construction period; principal and interest amortization will begin within one year of project completion (e.g., certificate of occupancy)
- Compounding of interest will be available only on projects with a repayment source not available during construction (e.g., gift pledges or revenues to be generated by the completed project) greater than $5 million and pre-approved by Planning and Budget and Treasurer's Office
- All projects must have a formal funding plan and a contingency funding plan (backstop repayment source)

Internal Borrowing Guidelines may be reviewed on the University Treasurer's Web site at http://www.finance.cornell.edu/treasurer/debt/internal-debt/internal-borrowing.

Small Business Programs

Cornell University encourages small business concerns to become New York State MWBE certified and partake in opportunities to become a supplier in Cornell University's procurement of materials, supplies, and services.

Cornell University's departments and purchasing personnel should plan purchases in a manner that encourages participation by small business concerns, including economic quantities, reasonable delivery schedules and allowing enough time to these types of business enterprises to submit bids.

You may wish to review the definitions for the above categories in the Federal Acquisition Regulation (http://www.arnet.gov/far/) 19.7 or 52.219-8. If you have difficulty ascertaining your size status, please refer to the Small Business Administration's (SBA's) web site (http://www.sba.gov/contractingopportunities/officials/size/index.html), or contact your local SBA office.

Cornell Sustainable Campus

Cornell University supports research, scholarship, and the practical application of knowledge that address one of humankind's greatest challenges: achieving a sustainable world for all.

The university's specific commitment to campus sustainability was recently formalized in the new 2010-2015 Cornell University Strategic Plan. The plan calls for sustainability to be a guiding principle in all campus operations and specifically the implementation of the Climate Action Plan and Comprehensive Master Plan. For information on teaching, research, and outreach for sustainability visit the Cornell Sustainability Portal.

Progress in campus sustainability requires participation and innovation from every corner of campus. From the links below you can learn about the efforts of student organizations, staff green teams, and the Cornell Assemblies' three sustainability committees. In particular, the Presidents Sustainable Campus Committee and the Sustainability Office, along with 10 President's Sustainable Campus Committee Focus Teams, play important roles in the coordination and support of these efforts.

For more information, visit the Sustainable Campus website at http://www.sustainablecampus.cornell.edu/about/. For information on the Purchasing Team, visit http://www.sustainablecampus.cornell.edu/about/#purchasing.

Surplus Program (formerly Section 507)

The Cornell Asset Transfer System (CATS) replaces the capital asset surplus listing. CATS allows units to post excess and scrap items online and make them available to other units. Units can post and browse ads for available and wanted Cornell *capital and non-capital items only.* ***Personal items may not be posted on this system.***

All policies still apply, including those related to transferring and disposing capital assets. For information on asset policy, see University Policy 3.9, Capital Assets.

Note: Before capital asset items are posted, they will be routed automatically to Capital Assets for review.

For questions, contact the Capital Assets department via telephone at (607) 255-9872 or 255-9464 or via e-mail at Uco-capasset@Cornell.edu.

For more information on R5 Operations: Respect, Rethink, Reduce, Reuse, Recycle visit its website at http://r5.fs.cornell.edu/.

The Office of Government and Community Relations coordinates equipment requests from the off-campus community. You are required to notify and gain approval from Community Relations before a gift can be made to an individual or outside agency. You may contact them via telephone at 255-4908 or via e-mail at community_relations@cornell.edu for more information.

Charter Buses and Limousines

Environment, Health & Safety (EHS) has defined the following process to ensure that hiring transportation for groups of nine (9) or more passengers, including the driver, is both safe and efficient. To ensure that the selected vendor is in compliance with Federal Motor Carrier Safety Administration (FMCSA) standards, **all requests must be processed on a purchase order and routed to Procurement Services** by marking the requisition as line-item restricted**.** Please note that if you are working with a preferred, contract, or pricing agreement supplier for charter buses and limousines it is not necessary to route the order to Procurement Services for review as they have insurance on file and have agreed to Cornell's terms and conditions.

Vendor Selection

EHS's approval is required in addition to Procurement Services vendor approval and proof of insurance requirements. When making your travel arrangements, please allow time for the approval process.

When selecting a provider for transport of nine (9) or more passengers (not operated by Cornell drivers), refer to Environment, Health and Safety's (EHS) Passenger Transport Compliance Data Sheet. The list is limited to recently used companies reviewed for compliance by EHS. **If your selected provider is not listed on the Data Sheet or is listed in red, contact Bill Leonard (255-5616 or wl68@cornell.edu) for review before proceeding with the requested provider.**

Additionally, transportation network companies (TNCs) must identify the passenger transport company that will be operating the vehicle in their quote, proposal or contract to be considered for review.

Payment Options

Charter buses and limousines for 9 or more passengers are not eligible for procurement card or travel and meal card use – a purchase order is required.

Hiring Drivers

You may not hire individuals to drive Cornell faculty, staff, students, visitors, or groups of 7 or less. You may utilize a limousine service, Uber or Lyft business accounts, or taxi services. Contact Risk Management and Insurance for guidance.

Controlled Substances

Definition:

A controlled substance is generally a drug or chemical whose manufacture, possession, or use is regulated by federal and/or state government.

Controlled substances may be used only for duly authorized, legitimate medical or scientific research purposes, to the extent permitted by a registrant's license and registration, and in conformity with state and federal statutes and regulations.

Registration and Licensing Requirements:

The purchase of Controlled Substances requires a license with the New York State Department of Health (NYSDOH) and registration with the Drug Enforcement Administration (DEA). Contact Environment, Health and Safety (EHS) for assistance in the application process at askEHS.

Vendor Selection:

Controlled substances can only be purchased from vendors that have signed the attestation for selling controlled substances approved by Cornell University Procurement Services. These vendors include:

- Krackeler Scientific for Sigma-Aldrich products
- MWI
- Midwest Vet
- Coventrus (Schein)
- VWR

Roles and Responsibilities:

End User/Unit:

1. All principal investigators with a need to purchase, possess, and use controlled substances (Schedule I-V) for laboratory research must register, and maintain active registration, with the Federal Drug Enforcement Administration (DEA). This registration must be surrendered when the use of controlled substances in the investigator's laboratory is terminated. An investigator cannot provide controlled substances to another individual UNLESS they are collaborating on the same study and are co-listed on the same protocol that governs the work the controlled substances are used for.
2. It is also the responsibility of the end user to obtain a NYSDOH license. Usage of another license or registration number for purchases is prohibited.
3. Complete a DEA form 222 for purchases of Schedule I and II controlled substances and attach to the I Want document or purchase request submitted to the SSC.
4. Orders for controlled substances shall be limited to only those drugs specified on the principal investigator's currently active DEA registration.

SSC:

1. Each controlled substance purchase must be covered by a valid NYSDOH license, DEA registration, and purchase order for the authorized controlled substance schedule.

   a. If the approved vendor does not have a current copy of the DEA registration and NYSDOH license, then a copy must accompany the requisition, or the vendor will not process the purchase order.
2. Confirm that DEA form 222 is attached to requisitions for Schedule I and II controlled substances.
3. **Use commodity code 97000000** on the requisition for controlled substances.

❖ **Notes:**
   - The approved vendor will ship the controlled substance to the address listed on the DEA registration.
   - Notifications of controlled substances purchased will be sent to the licensee/registrant associated with the registration number used.
   - Neither Cornell University EHS nor Procurement Services hold a university license or registration for purchasing or utilizing controlled substances.

Procurement Services:

1. Review vendor selection and documentation
2. Issue the purchase order

Payment Methods

A purchase order is required for the purchase of controlled substances. Use of a procurement card, disbursement voucher, cash, check, personal payment, or money order is prohibited. Licensee/Registrant will not be able to purchase controlled substances utilizing a Purchasing Card (P-card), cash, check, or money order. Contact Procurement Services for questions about the procurement of controlled substances and EHS regarding the usage of controlled substances in research.

Resources:

For more information regarding the use or purchase of controlled substances in research, consult:

- EHS Controlled Substances website: https://sp.ehs.cornell.edu/lab-research-safety/bios/controlled-substances/Pages/default.aspx
- Regulatory Agencies:
   - NYS Department of Health (NYSDOH): www.health.ny.gov/professionals/narcotic/licensing_and_certification
   - Drug Enforcement Agency (DEA): www.deadiversion.usdoj.gov/drugreg/index.html

Needles and Syringes

Users of hypodermic syringes and needles must comply with applicable New York State Department of Health regulations, and users are responsible for appropriate certifications, procurement, storage, distribution, and appropriate disposal. New York State Department of Health requires all parties that need hypodermic needles and syringes obtain a New York State Certificate of Need.

Roles and Responsibilities

End User/Unit:

1. It is the unit's responsibility to obtain the NYS Certificate of Need for needles and syringes.
2. To apply for a certificate, complete the Certificate of Need to Possess Hypodermic Syringes and Needles form, which is on the NYS Department of Health, Bureau of Narcotic Enforcement website at www.health.ny.gov/forms/doh-2278.pdf.
3. Note the certificate number on each requisition or I Want Document.

Shared Services Center

1. Ensure the certificate number is noted on each requisition.

Procurement

1. Procurement Services does not apply for nor maintain the certificate.

Resources

For additional information, contact:

- Bureau of Narcotic Enforcement
  Riverview Center
  150 Broadway
  Albany, NY 12204
  Phone: 866-811-7957, option 3
- Cornell Environment, Health & Safety
  Website: Safe Use of Needles and Syringes
  Contact: askEHS

Regulations

- Application for Certificate of Need to Possess Needles and Syringes
- 10NYCRR Section 80.133 – Hypodermic Syringes and Needles; certificate of need
- NYS Narcotics Licensing

Human Research Participant Payments

Cornell University often conducts research projects that involve the use of individuals, i.e., human participants (also known as human subjects). Payments to human participants may be made in the form of check, petty cash, or gift cards depending on the circumstances of the study and the dollar amounts involved. The university permits payments and incentives under the following conditions:

- Payments over $100
  - Payments to human participants over $100 per occurrence **must** be paid directly to the individual via university check.
  - Gift cards, gift certificates or in-kind payments over $100 per occurrence are **not permitted** as remuneration for participation in a research study.
- Payments of $100 or less
  - Human participant payments $100 and under per occurrence may be processed via university check or other methods including petty cash, gift cards or in-kind payments.

No payment process can give confidential or personally identifiable information about the human participants to persons not entitled to receive it by an approved IRB protocol. Names, signatures, physical addresses, email addresses, and other similar information is personally identifiable information. Other information may be confidential. Any method of payments to a human participant must be described in the approved IRB protocol for the study. Any method of payment that requires personally identifiable information or other confidential information to be revealed in any way can be used only if a statement explaining the need to reveal the information is included in the Informed Consent Form for the study.

Covered Parties

This policy applies to all Principal Investigators (PI) and any other individual conducting research that involves monetary remuneration to human participants.

Tax Reporting

In order to fulfill the University's tax reporting responsibilities with the Internal Revenue Service (IRS), the University is obligated to obtain certain required information from the human participant if they will be paid $2,000 or more in a calendar year. The University is obligated to report to the IRS on Form 1099 all U.S. Citizens and Resident Aliens receiving cumulative payments greater than $2,000 annually and on Form 1042S all Nonresident Alien payments regardless of dollar value. If it is unclear if a person is a resident or nonresident alien, the required foreign national forms should be collected and sent to the Tax Office for a determination.

Please see the Summary of Payment Options and Processing Requirements for Human Research Participants table at the end of this buying manual section. The following information is currently required to be reported to the IRS for each human participant receiving remuneration of $2,000 or more in a calendar year:

- Full legal name
- Status as a U.S. citizen, permanent resident, or resident alien for U.S. tax purposes
- Social security number (SSN) or individual taxpayer identification number (ITIN)
- Permanent legal address
- Mailing address (if different)

Informed Consent Form

The informed consent form for all studies that involve remuneration of $2,000 or more, including confidential studies, shall disclose these IRS compliance requirements in a manner approved by the IRB.

If identifiable information will be sent to Cornell University departments (service center, Payment Services, etc.), this too, must be disclosed in the consent form. See the Cornell IRB informed consent templates for sample language to use.

Confidential Studies

With the understanding that all research studies involving human participants should protect the privacy and confidentiality of the participant, some studies are of a more sensitive nature and may require careful consideration of the payment method regardless of dollar amount. Consult the IRB to determine if your study is eligible for an exception on the payment method and/or documentation requirements for payments over $100. If the exception is approved, the IRB staff will provide an email to document the approved exception.

Generally, the procedures for obtaining the funds for payment are as described below in "Paying Human Participants" and payments may not be made in the total amount of $2,000 or more to any human participant in a single calendar year unless arrangements are made to obtain the required information described below.

Reimbursements

Reimbursements for actual travel expenses (e.g., parking, mileage, tolls, etc.) to human participants are not considered compensation by the University or the IRS and can be processed as non-employee reimbursement using the appropriate object code. Cornell is not required to report these reimbursements as income to the IRS; therefore, these funds are not part of the $2,000 threshold for tax reporting.

The research unit may pay on-campus Park Mobile payments for research participants with a travel and meal credit card. All travel related reimbursements must follow university policy 3.2, Travel Expenses. Typically, travel reimbursements are processed via check or petty cash.

Required Information

Regardless of the form of payment and type of study, the information listed below is required to be captured by the Principal Investigator (PI) as part of the research record supporting payment to all human participants. Payment documentation should be stored separately from research data.

- Date of study and remuneration
- Type of disbursement (e.g., check, cash, gift card)
- Amount of disbursement
- Individual disbursing payment
- Human participant's name (non-confidential studies) or identification number (confidential studies)
- IRB protocol number
- IRS Form W-9 or W-8BEN for check payments over $100

Paying Human Participants

- **Form of Payment: University Check**
  - Mechanism for Payment: I Want Document (Disbursement Voucher)
  - Preferred Method When: Payment by university check is the required method for all payments over $100 unless an exception has been granted for highly confidential studies.
  - Process Requirements:

        - Complete an I Want document. Include the payee's name, address, and email address and payment amount. (Note: Informed Consent Disclosure must state that this information will be revealed.)
        - The PI has the discretion to collect either the W-9/W-8BEN form or an email address. The service center can use the email address to send an electronic registration invitation to the human participant.
        - Reference the IRB number in the business purpose. Business purpose should state: "Confidential study [date]; IRB Number ###; the PI securely maintains study data."
- **Form of Payment: Gift Cards**
    - Mechanism for Payment:
        - **Blackhawk Networks** in e-SHOP for plastic and electronic gift cards. Contact procure-support@cornell.edu to request access to the supplier catalog.
        - Tango Cards for electronic gift cards with account creation and prepayment required.
        - PCard with memorandum of understanding. Contact shared-services-center@cornell.edu to request MOU.
    - Preferred Method When: Gift cards may be appropriate for smaller scale studies when the confidentiality of participants must be maintained, and the per visit payment to the participant is $100 or less.
    - General: Payments to each human participant by gift card must be individually accounted for and reconciled monthly.
    - Documentation in PI's Study File:
        - Documentation showing receipt of payment
            - The documentation can be a single receipt per recipient or a listing with each participant's identification number and signature.
            - If recipients are offsite and cards are mailed or emailed, documentation needs to include reconciliation of cards purchased, distributed, and remaining and a certification that all cards charged to the sponsored agreement were distributed to participants or refunded thereto.
    - Process Requirements:
        - The preferred method for purchasing gift cards and eGift cards is Blackhawk Networks in e-SHOP.
        - Reconciliations are required. This convenient method makes it easier to purchase cards as needed.
        - If you choose to use Tango Cards, do not pre-fund your Tango Card account with the full budget for participant payments. Your Tango Card account should only be pre-funded with payments anticipated for issuance within the next 30 days.
        - Follow the Tango Card instructions to submit an IWNT document for funding of your Tango Card platform. Payment via procurement card is not allowed for Tango Cards.
- **Form of Payment: Cash**
    - Mechanism for Payment: Petty Cash
    - Preferred Method When: For studies involving one-time cash payments to participants of $20 or less.
    - General: Studies in which the recipient is paid in cash must be done through the establishment of a petty cash fund used exclusively for the purpose of paying human participants for a particular research study. For audit purposes, when using petty cash as a disbursement mechanism, a log must be tracked and signed by the PI or the PI's designee, but not the person who distributed the funds. Payments to each human participant must be individually accounted for and reconciled monthly.
    - Documentation in Study File:
        - Documentation showing receipt of payment with participant's signature and date.

        - The documentation can be a single receipt per recipient or a listing with each participant's identification number and signature.
        - For Confidential Studies, participant signatures should **not** be shared with the service center, as they are considered personally identifying information. In these cases, the PI must retain the documentation described above in their files.
    - Process Requirements:
        - To request a petty cash fund, complete the Establish a New Petty Cash Fund form for a review by Accounting.
        - Once approved, contact your service center for assistance with requesting a new petty cash account.
        - Responsibilities of the Petty Cash custodian include safeguarding the funds, maintaining receipts or records to support transactions, and completing a monthly reconciliation. A reconciliation template may be found at https://www.finance.cornell.edu/sites/default/files/petty-cash-reconciliation.xlsx. Note that the Study File includes documentation for payment to X number of participants paid a total of $$$ from date to date for IRB #.
        - To replenish the fund or close it out after the research is completed, contact your service center.
- **Form of Payment: Drawing or In-kind gift for tangible personal property**
    - Mechanism for Payment: Determined by the nature of the prize, most likely e-SHOP or procurement card.
    - Preferred Method When: Eligibility for a prize may be appropriate when the nature of the study requires limited incentive, such as one-time participation in an online survey.
        - The consent form and recruitment materials (if applicable) must be in accordance with IRB guidelines.
    - Documentation in Study File:
        - Prize winner legal name, address, and social security number (if cumulative payments/prizes during the calendar year could reach $2,000 or more).
        - Documentation showing receipt of prize or gift with participant's signature.
        - The documentation can be a single receipt per recipient or a listing with each participant's identification number and signature.
    - Process Requirements:
        - Prizes should be purchased in e-SHOP or with a procurement card, not personal funds.
        - Prizes with a value of $2,000 or greater must be reported to the IRS. If value is greater than $2,000, collect an IRS form W-9 or W-8BEN from the recipient. Report on the Cornell Tax Office's Gift Card/Certificate Reporting form and submit it to the Tax Office with the IRS form.
        - Receipts are required for all procurement card transactions charged (or transferred) to sponsored awards and federal appropriations accounts.
- **Unauthorized Forms of Payment: Personal Funds, Venmo, PayPal, Cash Applications**
    - Under no circumstances should investigators' personal funds, Venmo, PayPal, or other cash applications be used to pay human research participants.
    - University funds (received via petty cash or advance) should not be transmitted via Venmo or PayPal or other cash applications to human research participants.

Online Survey Tools

Online survey tools, such as, Mechanical Turk, Prolific, Cloud Research, are considered a professional service. These providers utilize a unique identifier (or worker ID) rather than a participant's name. A report showing the unique identifier, date of payment, and payment amount may act as a receipt showing

participation in the study and should be maintained by the principal investigator. The university provides access to the Qualtrics survey tool at no cost to faculty, staff, and students. See https://it.cornell.edu/qualtrics for further information.

Many of these survey tools require advance payments. Payments may be issued via procurement card or purchase order. It is the responsibility of the PI/researcher and their support team to ensure the funds are reconciled and unused funds are refunded appropriately. Please note that Mechanical Turk will invoice for payment rather than requiring advance payment.

IT-related purchases for faculty do not require an IT Statement of Need unless regulated data will be stored. Generally, IT applications, software, or services being purchased with sponsored funds don't require an IT SoN. For more information on the IT Statement of Need (SoN) process, please visit the IT@Cornell website.

Object Code Use

When processing human participant payments, use the correct general ledger object codes:

- Cash, Check, or Gift payments: Use object code 6200, Fees-human participants with Payment Reason code U-Insurance/Licenses/Taxes/Debt
- Gift cards through Tango
    - To fund Tango before participation, use object code 1420, Accounts Receivable – Participant Advance with Payment Reason code Y-Study/Participant/Research Project Advance
        - After cards are distributed, a Distribution of Income (DI) e-doc should be used to move funds to object code 6200, Fees-human participants
    - To fund Tango after participation, use object code 6200, Fees-human participants with Payment Reason code U-Insurance/Licenses/Taxes/Debt
- Travel reimbursement
    - Use object code 6751, Travel-domestic, non-employee
    - Use object code 6750, Travel-domestic, employee
- Research services, survey software, online survey tools or data collection
    - Use object code 6610, Services-Corporations, or other appropriate service object code with Payment Reason code E-Compensation for Services
- Participant advance – may be used for low dollar remuneration to study participants. Advances should not be issued more than 30 days before the date you reasonably expect to incur the associated expense for Cornell University, must be substantiated within a reasonable timeframe, and the unsubstantiated advance must be returned within 120 days of receipt. See the Tax Office guidelines at https://finance.cornell.edu/tax/fordepartments/expensetaxability.
    - Use object code 1420, Accounts Receivable – Participant Advance with Payment Reason code Y-Study/Participant/Research Project Advance
    - For information on advances, visit Accounting's website at https://finance.cornell.edu/accounting/topics/traveladvances#participant

Record Retention

In the event of a university, IRS, or sponsor audit, it will be the joint responsibility of the PI/researcher and the related service center, working with Payment Services, to supply the Audit Liaison with all required supporting documentation for human participant payments made from the PI/researcher's accounts. PI/researchers must ensure all high-risk confidential information, including data relating to confidential studies, is maintained securely and in compliance with Policy 4.21 Research Data Retention. The Division of Financial Services retains supporting documentation for any checks issued to an individual in accordance with Policy 4.7 Retention of University Records. Sponsored agreement terms may dictate a longer retention period.

Roles and Responsibilities

The Principal Investigator, in conjunction with their support team, is ultimately responsible to assure proper accounting of payments made to human participants for fiscal accountability and federal tax purposes and to maintain privacy of the human participant. Other responsibilities include:

- Ensure that all human participants are informed during the consent process (verbal or written) of Cornell's responsibility for reporting human participant remuneration to the IRS for aggregate payments of $2,000 or more.
- Document the participants' names or identification numbers and payments to those human participants in a log for studies where remuneration or incentive payments are used as enticement for participation. Tango Cards has standard reporting that provides this information for your records.
- Omit confidential information from check requests (I Want documents). The request should not link the participant to the research study by title nor should it ever include medical information, diagnostic information, personal information, or other legally protected health information.
- Ensure that potentially sensitive data is protected.
- All collected IRS forms should be sent to the Service Center via Cornell Secure File transfer and should not be retained locally.
- Participants' social security number should not be kept on a local desktop, laptop, or other computing device. The regulated data chart allows storage on Managed Servers only.

The table below is a summary of the requirements and processing instructions and is intended for reference.

Summary of Payment Options and Processing Requirements for Human Research Participants

U.S. Based Study	
Value $100 or less	
Payment Type	**Requirements and Processing**
Gift Card Cash Drawing or In-Kind Gifts	• Required: Signed receipt or acknowledgement of payment. Keep on file with PI/Office. • Best Practice: Collect full legal name and keep on file with PI/Office.
Check	• I Want Document submitted to service center with IRB number • U.S. Citizen or resident alien: IRS Form W-9 • Foreign National: IRS Form W-8BEN
Value over $100	
Check	• I Want Document submitted to service center with IRB number • U.S. Citizen or resident alien: IRS Form W-9 • Foreign National: IRS Form W-8BEN
Foreign-Based Study – U.S. Tax Resident	
Value $100 or less	
Payment Type	**Requirements and Processing**
Gift Card Cash Drawing or In-Kind Gifts	• Required: Signed receipt or acknowledgement of payment. Keep on file with PI/Office. • Best Practice: Collect full legal name and keep on file with PI/Office.
Check	• I Want Document submitted to service center with IRB number • U.S. Citizen or resident alien: IRS Form W-9

Value over $100	
Check	• I Want Document submitted to service center with IRB number • U.S. Citizen or resident alien: IRS Form W-9
Foreign-Based Study – Foreign National	
Value $100 or less	
Payment Type	**Requirements and Processing**
Gift Card Cash Drawing or In-Kind Gifts	• Required: Signed receipt or acknowledgement of payment. Keep on file with PI/Office. • Best Practice: Collect full legal name and keep on file with PI/Office.
Check	• I Want Document submitted to service center with IRB number • IRS Form W-8BEN
Value over $100	
Gift Card Cash Drawing or In-Kind Gifts	• Required: Signed receipt or acknowledgement of payment. Keep on file with PI/Office. • Best Practice: Collect full legal name and keep on file with PI/Office.
Check	• I Want Document submitted to service center with IRB number • IRS Form W-8BEN

Definitions:

Gift card, gift certificate: A gift card is a prepaid debit card that may be used to pay for purchases. The card may be for a specific retailer, or it may be issued by a Visa, MasterCard or American Express. Gift cards can be a physical card or an electronic card. A gift certificate is a voucher that is exchangeable for a specified cash value of goods or services for a particular place of business.

Informed Consent Form: Informed consent is the process of telling potential research participants about the key elements of a research study and what their participation will entail and obtaining participants' agreement to take part in the research. The informed consent process typically includes a written document—the informed consent form.

In-kind payments: Goods or services provided for payment instead of cash or cash equivalent.

IRB Protocol: The IRB protocol is the official record of the human participant research study as reviewed and approved by the IRB. It defines study objectives, research population, planned procedures, data management, and other administrative aspects of the study.

Foreign National: A foreign national is an individual who is a citizen of any country other than the United States. These individuals are treated differently for tax purposes than U.S. tax residents.

Study file: Documentation of the study retained by the PI, including but not limited to research data. Confidential or personally identifiable information included in the study file can only be revealed in conformance to Cornell Policy, approved IRB protocols, relevant informed consent documentation, and applicable law and regulation.

U.S. Tax Resident: a person who is subject to U.S. tax reporting rules. U.S. tax residents include:

- U.S. citizens
- Permanent residents: persons who are allowed to reside indefinitely within a country of which they are not citizens. For tax purposes, permanent residents are subjected to the same rules that apply to U.S. citizens and are taxed on their worldwide income.

- Resident aliens for U.S tax purposes: Defined by the IRS as foreign nationals who satisfy the substantial presence test. These individuals are taxed under the same rules that apply to U.S. citizens and are taxed on their worldwide income.

Visa: An official government document that gives someone permission and establishes conditions to travel into a specific country and stay there for a set period.