

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/BSC:

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 To have a new location added or to delete a location no longer applicable to the license, please contact Procurement and Payment Services (Procurement).

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

Buying Manual

Subject: Purchases with Special Procedures

Title: Entry Permits USDA

Number: 602

Issued: February 9, 2009

Revised: March 1, 2012

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

Isotopes and Radioactive Materials and Items Requiring Radiation Safety Approval

Prior to purchase, radioactive materials and items which either use radiation sources or produce radiation must be approved by the Office of Environmental Health and Safety (EH&S), Radiation Safety. The KFS requisitions for radioactive materials are automatically routed to EH&S for approval based on the UNSPSC classification.

End User/Unit/BSC:

1. **Radioactive Material**
 - a. Radioactive Material may be purchased with a purchase order through KFS or through e-SHOP. Use of a procurement card is not permitted.
 - b. The ship-to address of the requisition must list EH&S as the destination. Enter the permit holder on the attention line in the ship-to address.
 - c. Only authorized personnel within a unit may call Procurement and Payment 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 EH&S (Radiation Safety).
 - b. Contact them at 255-7397 or 254-8300.

Procurement and Payment Services:

1. The Procurement Agent will ad hoc route the requisition to the EH&S radiation specialist for approval.

Category List

- Nuclear Density Gauges
- Gas Chromatographs (GC)
- Electron Capture Detectors (ECD)
- Liquid Scintillation Counters (LSC or LS)
- X-Ray Equipment
- Electron Microscopes
- X-Ray Diffractors
- X-Ray Accelerators
- TEM'S
- SEM'S
- Static Eliminators
- Neutron Moisture Probe
- Defibrillators
- Implanter
- XPS-X-Ray Photo Spectrometry
- SIMS-Secondary Ion Mass Spectrometry

Buying Manual

Subject: Purchases with Special Procedures

Title: Isotopes and Radioactive Materials

Number: 603

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2. The following radioactive commodity codes will route to Environmental Health & Safety for review:

- 12142200 Isotopes
- 12142202 Heavy water
- 12142203 Alpha sources
- 12142204 Beta sources
- 12142205 Cobalt sources
- 12142206 Gamma sources
- 12142207 Radioisotope sources
- 12142208 Calibration sources
- 41103301 Liquid scintillation counters
- 41106006 Radio nucleotides or nucleosides

Buying Manual

Subject: Purchases with Special Procedures

Title: Laminar Flow and Fume Hoods

Number: 604

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Laminar Flow and Fume Hoods

To ensure that the hood is adequately designed to handle the research for which it is being used, Environmental 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/BSC:

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 EH&S 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/BSC:

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 Environmental 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 and Payment 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 eSirius (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 Research BSC staff for review: Charyl Barnes (cd88).
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. Research BSC 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. Research BSC 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.

Buying Manual

Subject: Purchases with Special Procedures

Title: Orders for Lab Animals and Custom Antibodies

Number: 606

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- c. IACUC staff will aid the Researcher in obtaining IACUC approval and appropriate documentation and will provide the approved IACUC protocol number to BSC staff.
- d. Once IACUC staff contact BSC staff with instructions to approve the Requisition, BSC 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.

Buying Manual

Subject: Purchases with Special Procedures

Title: Respiratory and Hearing Protection

Number: 607

Issued: February 9, 2009

Revised: March 1, 2012

Respiratory and Hearing Protection

Cornell's Office of Environmental 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 Environmental 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 Environmental Health and Safety for evaluation and approval of the purchase. For further information, please contact Procurement and Payment Services (255-3804) or Environmental Health and Safety (255-5623).

Buying Manual

Subject: Purchases with Special Procedures

Title: Poison Inhalation Hazards

Number: 608

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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 Environmental Health and Safety (EH&S) is recommended. For additional information please refer to the [EH&S web site](#).

End User/Unit/BSC:

It is the unit's responsibility to contact EH&S 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 Affairs
- 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.

Buying Manual

Subject: Purchases with Special Procedures

Title: Energy Procurement

Number: 609

Issued: February 9, 2009

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

- A. An explanation of the proposed purchase
- B. The aggregate present value of contracted cash flows and pro forma projections
- C. Project risks and benefits
- D. 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

Buying Manual

Subject: Purchases with Special Procedures

Title: Energy Procurement

Number: 609

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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 and Payment Services (Procurement) obtain pricing and delivery information. Procurement will then process the Request for Quote or the requisition.

Buying Manual

Subject: Purchases with Special Procedures

Title: Recycling and Disposal of Equipment

Number: 611

Issued: February 9, 2009

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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.

Buying Manual

Subject: Purchases with Special Procedures

Title: Use of Cornell Name, Logo & Insignia

Number: 612

Issued: February 9, 2009

Revised: March 1, 2012

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 students groups, or the sale on and off campus. Cornell participates in national and international licensing programs administered by the Collegiate Licensing Company (CLC). These programs prevent bootlegging and ensure that Cornell names and artwork are used on only those products approved by the University.”

The User/Unit/BSC is responsible for getting approval from Cornell's Office of Communications, which is the responsible entity for approving and screening requests for logo approval. You may also visit the website, <http://cornelllogo.cornell.edu/> for guidelines on using the Cornell logo or insignia, or to acquire a copy of the approval form.

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 obtain written approval from the Student Activities Office. The Cornell Name and Artwork website (<http://dos.cornell.edu/sleca/event-planning/use-of-cornell-name-logo-artwork>) which explains the procedure and allows you to download the appropriate form. This form is available electronically at <http://dos.cornell.edu/sites/dos.cornell.edu/files/sleca/documents/Use-Cornell-Logo.pdf>.

For your request to be approved, you must select a manufacturer that is licensed by Cornell University or the Collegiate Licensing Company. A list of licensed manufacturers is available from the Student Activities Office, 521 Willard Straight Hall, the Office of University Communications, 308 Day Hall or can also be found online at http://cornelllogo.cornell.edu/downloads/Licensed_Companies.pdf or <http://cornelllogo.cornell.edu/list.cfm>.

Please do not attach the approval form to the requisition. You may mention that you have approval from the Office of Communications in the “Department Notes” section of the 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 this form 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 607-254-3369
- Merchandise guidelines: ffp1@cornell.edu or 607-255-1573

Buying Manual

Subject: Purchases with Special Procedures

Title: New York State Appropriated Orders

Number: 613

Issued: February 9, 2009

Revised: March 1, 2012

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 procurement@cornell.edu or the Procurement Services Help line at 254-5300.

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 BSC of any special requirements that must be referenced on the purchase order.

Frequent terms seen in sponsored agreements include:

- Need for diverse spending to 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.

Buying Manual

Subject: Purchases with Special Procedures
Title: Artwork Loans and Purchases for the Herbert F.
Johnson Museum of Art

Number: 615
Issued: January 15, 2015
Revised:

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.

Buying Manual

Subject: Purchases with Special Procedures

Title: Editors, Indexers, and Designers for CU Press

Number: 616

Issued: June 30, 2015

Revised:

Editors, Indexers, and Designers for Cornell University Press

Cornell University Press will utilize a generic Independent Contractor Agreement 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 individuals 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 University Business Service 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 personnel retained by or working at, consulting to, or volunteering for the University must comply with the Cornell University Export Compliance and Management Plan while teaching, conducting research or providing service activities at or on behalf of the University.

Penalties for non-compliance with export control laws are severe and impact both the institution and the researcher. 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 Officer in the Office of Sponsored Programs, under the direction of the Office of the Vice Provost for Research, 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 www.osp.cornell.edu/export/ or email exportcontrols@cornell.edu.

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.

Business 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. If the export control terms, require representation or warranties that Cornell and relevant Cornell personnel are not listed on a United States list (e.g., specially designated nationals, specially designated terrorists, foreign sanctions evaders list, nonproliferation list, etc.) or that "Items will not be provided to any individual on the U.S. denied party list," then mark the line item as

restricted to route the order to Procurement Services for Visual Compliance screening. Please provide the name and NetID of the principle investigator, instructor, supervisor, etc. and the individual who is ordering the item/service.

4. 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 and Payment 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 Officer (ECO). Ensure that purchase orders are not released until the ECO approves.
2. Negotiate changes or obtain additional information as directed by ECO
3. If the contract contains a clause requiring Visual Compliance restricted party screening, run the screening on the individual responsible for the activity (principle investigator, instructor, supervisor, etc.) and the individual who is ordering the item/service. Example of a screening requirement: "Items will not be provided to any individual on the U.S. denied party list."
 - a. If the restricted party screening is clear, document the disposition on the Purchase Order Notes tab.
 - b. If the screening result is questionable, contact the ECO to resolve.
4. Obtain ECO final approval prior to releasing the purchase order if the export control clauses are not pre-approved.
5. 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 Officer Responsibilities

1. The Export Control Officer 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 in order 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.

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

Buying Manual

Subject: Purchases with Special Procedures

Title: Export Controls

Number: 617

Issued: February 1, 2016

Revised: May 14, 2021

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 business service center or Procurement Services will notify the purchaser and department supervisor or administrator of the requirement
- Where restricted party screening is required, the order should be marked as line-item restricted and routed to Procurement Services for Visual Compliance restricted party screening. The procurement agent will notify the ECO of questionable results.

For Help, Please Contact:

Office of Sponsored Programs

T: 607-255-5337

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.

Buying Manual

Subject: Purchases with Special Procedures
Title: Information Technology Governance Process

Number: 618
Issued: December 8, 2017
Revised: September 14, 2020

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 Business 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.

BSC 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

Buying Manual

Subject: Purchases with Special Procedures

Title: Graphics Procurement

Number: 619

Issued: February 9, 2009

Revised: May 10, 2016

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://imagedlibrary.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

Buying Manual

Subject: Purchases with Special Procedures

Title: Arts and Sciences' Concert Series and Performances

Number: 620

Issued: May 1, 2017

Revised: January 31, 2020

Arts and Sciences' Concert Series and Performances

Delegation of Signature Authority

This delegation of signature authority from the Senior Director of Procurement and Payment Services authorizes the Department of Music to sign contracts for a concert series on behalf of the University only if the contract has been reviewed by the Office of University Counsel.

This delegation of signature authority from the Senior Director of Procurement and Payment Services authorizes the Department of Performing and Media Arts to sign contracts on behalf of the University for performances at the Schwartz Center only if the contract has been reviewed by the Office of University Counsel.

All modifications other than dollar value or performance date will be reviewed by the Office of University Counsel and the Office of Risk Management and Insurance.

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

- Deborah Justice, Concert Series Manager, in the Department of Music
- Chris Riley, Administrator, in the 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, utilize the Performer without Equipment contract, disregard the service provider attestation, and process the payment via disbursement voucher. 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 attestation and requirement that the individual be paid through the University Payroll Office.

Student and Campus Life's Entertainment Contracts

Delegation of Signature Authority

This delegation of signature authority from the Senior Director of Procurement and Payment Services authorizes the Assistant Dean of Students and the Student and Academic Services Business Service Center Director to sign contracts for major events for students on behalf of the University only if the contract has been reviewed by the Office of University Counsel.

These contracts for major events require specific contractual language and review by the Office of University Counsel. These two departments host these events and work with both University Counsel and the Office of Risk Management and Insurance.

All modifications other than dollar value or performance date will be reviewed by the Office of University Counsel and the Office of Risk Management and Insurance.

Signature authority for the Office of Student and Academic Services and the Office of the Dean of Students for performance artists and major events up to \$100,000 is granted to:

- Shura Gat, Campus and Community Engagement Program Coordinator
- Sharon Baum, Director, Student & Academic Services (alternate)

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.dfa.cornell.edu/treasurer/debt/internal-debt/internal-borrowing>.

Small and Diverse Business Programs (formerly Section 505)

Cornell University endeavors to promote the development of mutually beneficial business partnerships so that Small, Small Disadvantaged, Woman-Owned, Veteran-Owned, Service-Disabled Veteran-Owned, and HUB Zone business concerns (hereafter collectively referred to as “small/small disadvantaged business concerns”) have competitive access to participate under Cornell University’s procurement of materials, supplies, and services consistent with effective and economic purchasing practices.

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. When mutually beneficial, Cornell University will provide assistance to small/small disadvantaged business concerns.

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 (formerly Section 506)

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 diverse 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 DFA 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

Environmental Health & Safety 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 and Payment Services.

Vendor Selection

EH&S's approval is required in addition to Procurement and Payment Services vendor approval and proof of insurance requirements. When making your travel arrangements, please allow time for the approval process, especially International travel that requires coordination with Global Operations (Navigate).

When selecting a provider for transport of nine (9) or more passengers (not operated by Cornell drivers), refer to Environmental Health and Safety's (EH&S) [Passenger Transport Compliance Data Sheet](#). The list is limited to recently used companies reviewed for compliance by EH&S. **If your selected provider is not listed on the Data Sheet or is listed in red, contact Bill Leonard (255-5616 or w168@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 Environmental Health and Safety (EHS) for assistance in the application process at askEHS@cornell.edu.

Vendor Selection:

Controlled substances can only be purchased from vendors that have signed the attestation for selling controlled substances approved by Cornell University Procurement and Payment 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 BSC.
4. Orders for controlled substances shall be limited to only those drugs specified on the principal investigator's currently active DEA registration.

BSC:

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

Buying Manual

Subject: Purchases with Special Procedures

Title: Controlled Substances

Number: 628

Issued: November 20, 2019

Revised:

- 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 EH&S nor Procurement and Payment Services hold a university license or registration for purchasing or utilizing controlled substances.

Procurement and Payment 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 to first obtain a license.

Roles and Responsibilities

End User/Unit:

1. It is the unit's responsibility to obtain a license for needles and syringes.
2. To apply for a license, 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 license number on each requisition or I Want Document.

Business Service Center

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

Procurement

1. Procurement and Payment Services does not apply for nor maintain the license.

Resources

For additional information, contact:

- Bureau of Narcotic Enforcement
Riverview Center
150 Broadway
Albany, NY 12204
Phone: 866-811-7957, option 3
- Cornell Environmental Health & Safety
Website: [Safe Use of Needles and Syringes](#)
Contact: Biosafety Specialist, sem336@cornell.edu
Contact: Biosafety Officer, josturse@cornell.edu

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](#)