**Buying Manual** 

Subject: PCard

Title: Prohibited Transactions

Number: 302

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## **Prohibited Transactions**

Certain transactions are prohibited on procurement cards because the good or service requires additional review for reasons of tax, insurance, a contract or other regulatory issues. Prohibited transactions may result in suspension or revocation of the procurement card, or other disciplinary action.

◆ **Note**: If paying for services, consult the <u>Purchases with Special Procedures</u>: <u>Paying for Services</u> section of this manual.

Type of Purchase	Description
Animals and Custom Antibodies	Live vertebrates and custom antibodies require pre-transaction review per University Policy 1.4, Care and Use of Animals in Teaching and Research. Only individuals employed in a BSC, who record these transactions in the Cayuse Animal system, may utilize pcard for the payment of animals.
Architectural and Engineering Services	In accordance with Cornell policy, authority for these transactions requires the additional review of the University Architect. Only those individuals employed in Contracts and Capital Projects, or their BSC, may execute these transactions via pcard.
Audit Services	In accordance with Cornell policy, authority for this transaction requires the additional review of the University Auditor. Only those individuals employed in the University Audit Office, or their BSC, may execute these transactions via pcard.
Capital Assets	The purchase of capital assets require recording in the capital assets system per <u>University Policy 3.9</u> , <u>Capital Assets</u> .
Cash Advances	Cash advances of university funds require pre-transaction review per University Policy 3.2, University Travel and, therefore, are not allowed on pcard. Cash cannot be obtained through an ATM, nor will cash transfers through a third-party, such as, Wester Union, Venmo, CashApp, or Xoom, be allowed.
Catering	Catering occurs when a vendor prepares, sets up, serves or cleans up food on Cornell controlled property, including both facilities owned by Cornell and facilities that may be rented or leased and only under Cornell's control for the period of the event, i.e., rented banquet facility. Catering should not be confused with simple food delivery where no service is provided on site, i.e., pizza delivery.
Conflict of Interest, Vendor	Purchases from vendors where a potential conflict of interest exists require pre-transaction review, per <u>University Policy 4.14, Conflicts of Interest and Commitment</u> .
Controlled Substances	A controlled substance is generally a drug or chemical whose manufacture, possession, or use is regulated by federal and/or state government. A purchase order and appropriate license and registration are required. See section 628, Controlled Substances.

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Cornell Unallowable Goods/Services	Purchases identified as Cornell unallowable in <u>University Policy 3.14</u> , <u>Business Expenses</u> , are not allowed, regardless of the source of funds or mode of payment.
Deposits/Partial Payments/Multiple Payments	Do not make partial payments where the total value of the purchase exceeds your procurement card transaction limit. Do not circumvent your per transaction limit by making multiple payments on your pcard against a single invoice. Each payment on a pcard must be supported by an individual invoice/receipt.
Donations	Any voluntary contribution of cash or property to any organization outside of the university, regardless of source of funds. All donations over \$500 require pre-approval by University Relations. Donations may not be paid via pcard; see your Business Service Center for payment options.
Employees	Per IRS tax guidelines, you may not pay: 1. A current employee via pcard 2. An individual who has been employed by Cornell at any time in the current calendar year via pcard
Equipment Rental	The issuance of a purchase order is required for the rental of any type of equipment that is powered by gas or other fuel, electricity, or battery, for example, lift, bulldozer, backhoe.
Event Space Rental	Payment for event space rental is not allowed on pcard as a contract is required, which must be reviewed and approved by Procurement Services. Complete an IWNT doc for payments of this nature as soon as a vendor is identified.  Exception: The rental of a pavilion in a City of Ithaca, Tompkins County or New York State park is allowed on individual pcard as your online reservation requires a credit card to complete.
e-SHOP Vendors	Do not use your pcard to purchase from a vendor that is available in e-SHOP.  Exception: If the supplier's site within e-SHOP does not offer the needed item or a needed function (e.g., expedited shipping, bundling, or configurable products), you may use your pcard to purchase directly from the e-SHOP supplier as long as the intended purchase is otherwise allowed on pcard. Include the reason for purchasing outside of e-SHOP in your documentation.
Gasoline for personal or rental vehicles	Gasoline for vehicles used during university travel may not be paid via pcard; this includes gasoline for a personal vehicle or a unit-owned or leased vehicle. Note: When a personal vehicle is utilized for business travel, the university reimburses the traveler based on mileage. When renting a vehicle for university travel, a Travel and Meal card may be used for gasoline and other travel-related expenses; see University Policy 3.2, Travel Expenses.

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	When a unit owns or has a long-term lease for a vehicle that is driven only locally (i.e. driver incurs no other travel-related expenses such as meals or lodging), or requires gasoline for other equipment, that gasoline may be paid via pcard.
Gifts Cards/Certificates	Gifts cards and /or certificates are generally classified as taxable income by the IRS and may not be purchased with a procurement card. Contact your BSC for guidance.
Insurance	You may not pay for insurance premiums, co-payments, deductibles, or services with your procurement card. For information on purchasing insurance, please contact Risk Management and Insurance. Only those individuals employed in Risk Management and Insurance, or their BSC, may execute these transactions via pcard.
Investment Services	In accordance with Cornell policy, authority for these transactions requires the additional review of the university's Investment Office. Only those individuals employed in the University Investments Office, or their BSC, may execute these transactions via pcard.
Lasers	The purchase of any type of laser requires reporting and potentially training by Environment, Health and Safety, and therefore, lasers may not be purchased via pcard. Lasers may be purchased through e-SHOP or on a purchase order. Use a commodity code of 41115307 on the requisition.
Late Fees/Fines/ Collection Agencies	Late fees, fines and payments to collect agencies are generally considered Cornell unallowable based on University Policy 3.14, Business Expenses and, therefore, will not be paid by any method, including pcard. Direct questions to shared-servicescenter@cornell.edu.
Legal Services	In accordance with Cornell policy, authority for these transactions requires the additional review of the Office of General Counsel. Only those individuals employed in the Office of General Counsel, their Service Center, or the Law School clinics, may execute these transactions via pcard.
Medical Services	Due to tax reporting requirements, medical services (i.e., physician, surgeon, ophthalmologist, etc.) may not be paid via pcard.
Non-Preferred Suppliers	Do not use the pcard to purchase goods and services from a non- Preferred Supplier, where the good or service is available from a Preferred Supplier.

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Parking Fees, Permits, Road Tolls	The pcard may not be used to pay for parking for individual faculty, staff or students.
	Parking fees, permits, and road tolls incurred at an individual's normal business location are considered a personal expense and will not be paid via pcard or any other form of university payment, per University Policy 3.14, Business Expenses. In addition, parking fees, permits, and tolls for faculty, staff, or students will not be paid via pcard while in travel status.
	Parking fee exceptions: Parking for incoming visitors at campus locations may be paid via pcard. In addition, when business needs require a faculty, staff or student to be at a local office that is different from their primary workspace, and they are not in travel status, those parking fees may be paid via pcard. For example, a staff member's primary work location is Caldwell Hall, but they are required to attend a meeting at Seneca Place; or the English department is hosting an event at Treman Park.
Personal Expenses	Do not purchase any good or service that is primarily for personal use. Use of this card for personal expenses is governed by <a href="University Policy3.6">University Policy3.6</a> , <a href="Financial Irregularities">Financial Irregularities</a> . Using the card in this manner with the intention of reimbursing Cornell is NOT an acceptable practice.  Caution: Many items lend themselves to personal use, such as magazines and newspaper subscriptions. It is the cardholder's responsibility to provide documentation to support that the purchase of an item that lends itself to personal use is essential to fulfilling his or her job responsibilities.
Pest Control	These services must be coordinated with the customer service center in the Department of Facilities Management, due to the potential use of pesticides. Contact your local building coordinator. Only those individuals employed in the Department of Facilities Management, or their BSC, may execute these transactions via pcard.
Radioactive Materials	Environment, Health & Safety must approve all requests for radioactive materials prior to an order being placed with a vendor. See the "Radiation Safety Manual" for further information on purchasing radioactive material.
Real Estate Services, Purchase, Rental, etc.	In accordance with Cornell policy, authority for these transactions requires the additional review of the university's Real Estate Office. Only those individuals employed in the Real Estate Department, or their BSC, may execute these transactions via pcard.
Refund or Reimbursement	The pcard is intended for the payment of good and services only and is not to be used to send funds to an individual for a refund or reimbursement. For more details on the appropriate method for initiating a refund or reimbursement, see section 203.
Security Systems, Building	Building security systems must be coordinated through the Cornell Police, and must not be purchased with a procurement card.

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Services Performed on University Property	Nearly all services, regardless of where they are performed, require both a contract and verification that the vendor meets the university's insurance requirements. Therefore, pcard holders may not pay for services being performed on university owned or controlled property, except those services that are being performed by a vendor who has signed a university contract and whose services are not already specifically prohibited.
	Contracted vendors performing the services listed above may be found on Procurement Services' web site at <a href="http://www.finance.cornell.edu/procurement/supplierlistview">http://www.finance.cornell.edu/procurement/supplierlistview</a> .
	Contact your Service Center to discuss the appropriate payment for any other service PRIOR to engaging the service provider.
Services Requiring a Contract	Any service requiring a contract will not be paid via pcard; contracts must be reviewed and approved by Procurement Services. Complete an IWNT doc for payments of this nature as soon as a vendor has been identified.
Software, Software Licenses, Software as a Service, Cloud Services	Before any IT applications, software, or services are purchased, the university's IT Governance process must be followed regardless of dollar amount. Follow the steps outlined below to determine if your purchase is eligible for payment by pcard.
	Step 1. Determine if the university already holds licenses for your desired product/service by visiting <a href="https://it.cornell.edu/software-licensing">https://it.cornell.edu/software-licensing</a> . If not available from the university, proceed to step 2.
	Step 2. Determine if an IT Statement of Need (SoN) is required by reviewing: <a href="https://it.cornell.edu/itgovernance/scenarios-when-it-">https://it.cornell.edu/itgovernance/scenarios-when-it-</a>
	statement-need-or-isnt-required. Software purchases with click-through agreements require completion of the SoN process and approval from the IT Project Management Office.
	<ul> <li>a) When the SoN is <u>not</u> required:</li> <li>1) Any purchase that requires a signed contract must be processed via purchase order.</li> </ul>
	<ol> <li>If no contract is needed, you may pay via pcard.</li> <li>When documenting the pcard transaction, include the reason the SoN was not required.</li> </ol>
	b) For purchases that <u>require</u> a SoN, proceed to Step 3.
	Step 3: Submit an IT Statement of Need (SoN) found at <a href="https://it.cornell.edu/itgovernance-project-management/2-submit-it-statement-need">https://it.cornell.edu/itgovernance-project-management/2-submit-it-statement-need</a> . After receipt of the SoN, the IT Project Management Office will email you a Checklist for Purchasing Administrative IT
	Software and Services outlining required next steps.  a) If your checklist indicates that the order must be sent to Procurement, and/or if the supplier's contract requires a signature then a Purchase Order is required. Complete an
	IWNT doc and attach supplier's license agreement and all CIT required documents.

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	<ul> <li>b) If your checklist does <u>not</u> indicate that the order must be sent to procurement, follow all other instructions and payment may be made via pcard. When documenting the pcard transaction, include the "next steps" email and documentation showing the outcome or results of those steps.</li> <li>For addition information refer to:         <ul> <li>Buying Manual section 618, IT Governance Process</li> <li>Software Acquisition and License Management at <a href="https://it.cornell.edu/software-licensing">https://it.cornell.edu/software-licensing</a></li> </ul> </li> </ul>
Travel-Related Expenses	Any travel-related purchase or rental is prohibited (e.g., hotel, motel, airline, train, bus, taxi, limousine, or cruise fare; rental of vehicle or any type of watercraft; fuel for vehicles not owned by the university; road tolls of any kind; travel agency purchase; parking lot fees). Certain travel-related merchants have been blocked from accepting procurement cards.
	Note:  1. Conference registration fees may be charged to your procurement card if the fee does not exceed your transaction limit.  2. For university owned vehicles and equipment in or near Ithaca, fuel can also be obtained at the university's Fuel Station at 209 Solidago Road. For information on setting up an account, contact fleet@cornell.edu.  3. Special exceptions have been granted to BSCs. If you are planning a group or visitor travel, contact your BSC.
Travel Meals	You may not charge meals to your procurement card while you are traveling for the university if that travel includes an overnight stay.
Vehicle Rental	The rental of any type of car, truck (including moving truck), van, bus, or limousine is prohibited on pcard. This includes both rentals while in travel status and locally.  Note:
	<ol> <li>Towing services may be paid via pcard for any university owned, rented, or leased vehicle.</li> <li>For rental vehicles, always contact the rental company first to determine their preferred process for arranging towing services. The Travel and Meal Card is also an option for the payment of towing services for a rental vehicle.</li> </ol>
Watercraft Rental, Cruise or Boat Fair	Payment for the rental or lease of any type of watercraft is prohibited on pcard. In addition, fees for passage on any type of watercraft will not be paid via pcard. These high-risk activities require the issuance of a purchase order in advance.