SALES & SERVICE POLICIES

2001 SALES AND SERVICE ACTIVITIES

Effective: December 1986
Revised: January 2017
Last Reviewed: April 2018
Responsible Office: Office of Research Services
Approval: Associate VP for Research Services

PURPOSE

The University engages in sales and service activities in support of its mission of instruction, research and public service.

POLICY

1. Sales and service activities are generally limited to those activities that are substantially related to the University's exempt purposes of instruction, research and public service. Even though the University primarily engages in sales & services related to its mission, there can be other sales or services activity that are not mission related.

   These non-mission related activities can be classified in two general categories; sale of" tangible personal property" and "Fee for Services" activities.

   Tangible Personal Property- is property that can be seen, weighed, measured, felt and touched. Examples of sold tangible property would be the sale of computers, software, equipment, supplies, books, etc.

   Fee for Service - Activities that include both Facilities or Equipment Use Arrangements, and Services Arrangements. Requests by a third person to rent or otherwise use University equipment or research facilities, on a limited basis, for a purpose unrelated to research being conducted at the University, and without any assistance or intellectual input from University personnel, are proposed Facilities or Equipment Use Arrangements. Requests by a third person to have a University faculty member, staff member or student perform non-research-related and technical services, using University facilities or equipment, on a limited basis, for the sole or principal benefit of the third person, are one type of proposed Services Arrangements.

   Fee for service arrangements may exist for scientific, or research-oriented, activities, or for professional consulting in the fields of business, education and community service. Scientific/research-oriented agreements will typically be considered fee-for-service when the following conditions exists:

   a. *The facilities or equipment, or the services to be performed, is not commonly available to the public, or readily available from a private entity provider. The facilities or equipment*

must be provided at a predetermined, fixed price (e.g., hourly or daily rate to use the facility or equipment, or to perform the specialized services.)

b. *The service does not involve any intellectual contribution from University faculty, staff or students. (e.g., no design advice, no analysis of data or results,.) The proposed payor designs and defines the project without contribution from University faculty, staff or students.*

c. *No intellectual property or new knowledge is anticipated to result from the activity or service. The project does not involve the exploration or testing of a hypothesis with an outcome that is unknown at the beginning of the project.*

d. *No publications are anticipated and there is no intent to publish.*

e. *It is not anticipated that the University will subcontract any portion of the services to an outside party.*

A project that requires the academic expertise or unique, specialized skills of University faculty, staff or students, that is not professional consulting in the fields of business, education, or community service is a sponsored program, and not a sales or service activity, and is subject to all of the sponsored program policies.

2. All proposed new sales and service activities must be reviewed by the Office of the Comptroller for possible unrelated business taxable income (UBTI) considerations and, for Facilities or Equipment Use arrangements, possible sales and use tax.

3. Accounting for sales and service activity will be in accordance with the AICPA Audit Guide for Colleges and Universities.

4. Sale and service activity that is transacted on credit cards is subject policy 2006 – Credit Card Sales PCI Compliance.

5. All Fee for Service activity should be documented with a contract or other documentation acceptable to the Office of Research Services or and Office of the General Counsel

2002 COLLECTION, REPORTING, AND PAYMENT OF PENNSYLVANIA SALES AND USE TAX

Effective: December 1986
Revised: June 2006
Last Reviewed: May 2018
Responsible Office: Comptroller
Approval: VP-Finance and Treasurer

PURPOSE:

The purpose of this policy is to ensure proper collection, reporting and payment of Pennsylvania State and Local Sales Tax.

General

Sales of Goods and Services

Sales of goods and services, unless specifically exempted (e.g. tuition and fees, professional services including legal and accounting) are generally subject to sales tax collection at a rate of 6% for Pennsylvania, 2% for Philadelphia sales, 1% for Philadelphia hotel occupancy and 1% for Allegheny County.

If sales tax is not collected, the selling organization must have available for review by the Department of Revenue one of the following:

1. Evidence that the sale did not involve tangible personal property or taxable services;
2. Documentary evidence that the sale was to the federal or state government;
3. Documentary evidence that it was required to and did deliver the property to an out-of-state destination; or
4. A properly executed exemption certificate..

The sales tax applies to delivery or shipping charges made in conjunction with a taxable transaction. Delivery or shipping charges made in conjunction with nontaxable transactions are not subject to tax.

Purchases made for a special function at the University are exempt from the sales tax provided that it is a University function and it is charged to a University account number supported by a budget for such purpose.

If sales tax is included in the sales price written notification to the purchaser is required. An invoice must be provided to the customer that clearly lists the sales price and associated sales tax.

POLICY AND PROCEDURES:

Centers must report their monthly sales activity to the Tax Office using the worksheets provided in Appendix 1 to 4 briefly described below:

a) Gross sales and taxable sales must be summarized on a weekly basis, and entered in the "Monthly Sales Tax Calculations Worksheet" (Appendix 1) Non- taxable sales and tax collected are calculated automatically.

b) Sales and tax collections reported in Appendix 1 must be reconciled to the general ledger using the "Monthly Sales – Reconciliation to Ledger Worksheet" (Appendix 2)

   i. It is important that centers ensure that object codes are properly utilized to capture all reportable sales and tax collections.

   ii. Tax collected will be calculated automatically once gross sales and taxable sales are entered. ***It is important to ensure that the calculated sales tax is reconciled to the tax reported in the object code- 2111, Sales Tax Collected, for the month reported.*** Any differences must be fully investigated to ensure that all taxes due are paid even if inadvertently not collected from purchasers. Any necessary adjustments must be recorded in object code 2111 and Appendix 2 as noted below:

      (a) Adjustments for prior month refunds or returns

      (b) Any reclasses for improperly booked sales tax

      (c) Accrual of sales tax not collected from customer

c) The "Monthly Sales Tax Remittance Worksheet" (Appendix 3) is automatically completed based on the data provided from Appendix 1 and 2 and is the underlying support for filed tax returns.

d) Centers must collaborate with the Tax Office regarding the taxability of any additional products or services as soon as possible but no later than two weeks before the sales of the new item. The new activity must be documented using the "New Product/Service Notification Worksheet" (Appendix 4)., and must contain the following information:

   i. A description of the product or service

   ii. The date the product or service was introduced

   iii. Expected purchasers of the product, and

   iv. The 26-digit account number for reporting the new revenue stream

The sales tax liability accrual for a month must be posted to the general ledger by the end of that month. For example, April's liability must be posted by April 30th. The Worksheets provided in Appendix 1 to 3

must be forwarded to the Tax Office on or before the 5th day of each month for the prior months reporting. For example, April's monthly sales and corresponding sales tax collected must be reported to the Tax Office by May 5th.

Centers selling to exempt organizations must secure and file the purchasing organization's Sales Tax Exemption Certificate. All exemptions from Pennsylvania Sales Tax must conform to the Commonwealth of Pennsylvania's laws and regulations.

TAXABILITY DETERMINATION MATRIX

A taxability determination matrix is provided on the Comptroller's website; Corporate Tax, Documents/ Forms, PA matrices: http://www.finance.upenn.edu/comptroller/tax/

All Centers must use this matrix to evaluate whether sales tax collection is required for any tangible personal property or goods sold by that Center.

RESPONSIBILITY

Each Center engaged in sales and service activities has the primary responsibility for collecting state and local sales tax on all applicable sales at the prevailing rate and accurately reporting this information to the Tax Office and in the general ledger on a monthly basis as outlined in the procedures above.

The Tax Office is responsible for filing the respective tax returns on behalf of the respective Centers and collaborating with Center personnel to ensure that the centers are complying with state and local laws and regulations regarding the collection, reporting and payment of sales tax.

Upon audit, each center will be responsible for providing the auditor with supporting documentation such as invoices. Each center will be responsible for audit deficiencies assessed.

2003 FINANCIAL RESPONSIBILITIES FOR SALES AND SERVICE ACTIVITIES

Effective: December 1986
Revised:
Last Reviewed: April 2018
Responsible Office: Comptroller
Approval: Comptroller

PURPOSE

Effective financial management of sales and service activities requires adherence to all University Financial Policies. These include but are not limited to Inventories, Extension of Credit to Outside Third Parties for Sales and Services, Collection, Reporting and Payment for Pennsylvania Sales and Use Tax, Sales and Service Activities, and Internal Control Policies.

POLICY

1. Proper financial management of sales and service activities is the responsibility of the school/department's dean or director.

2. The responsible dean or director must ensure that the approved purpose for which the sales or service activity was organized is maintained. Any significant deviation from the original purpose must be approved by the Senior Planning Group.

3. Separate accounting records must be maintained for each unique sales and service activity.

4. Deans and directors of responsibility centers are required to report annually to the Office of the Comptroller the nature of any sales and service activity so that a proper determination of UBTI exposure can be performed.

2004 UNRELATED BUSINESS TAXABLE INCOME (UBTI)

Effective: December 1986
Revised: November 2005
Last Reviewed: May 2018
Responsible Office: Associate Comptroller
Approval: Comptroller

PURPOSE

To ensure proper reporting of Unrelated Business Taxable Income (UBTI).

This policy must be followed in conjunction with Policy #3003 External Activities Business Plan Review.

DEFINITION

All tax exempt organizations and nonexempt charitable trusts, including independent colleges, universities and hospitals exempt under section 501(c)(3) of the Internal Revenue Code (IRC) are required to file IRS Form 990-T, "Exempt Organizations Business Income Tax Return" if they have gross income from an unrelated trade or business of $1,000 or more. If an activity generates UBTI, federal income tax must be paid on the amount generated by such activity.

POLICY

1) In order to determine whether a particular activity that the University engages in will generate UBTI, the following three elements must be present:
    a) Trade or Business
    b) Regularly Carried On
    c) Substantially Unrelated to the Exempt Purpose of the University
2) UBTI means the gross income derived from any unrelated trade or business regularly carried on by Penn, less the deductions "directly connected" with carrying on the trade or business (subject to certain modifications).
3) To be directly connected with the conduct of an unrelated business, deductions must have a proximate and primary relationship to carrying on that business.
4) For purposes of computing UBTI, expenses attributable solely to the operation of an unrelated business may be deducted in full.
5) Expenses incurred in connection with both an exempt purpose and the conduct of an unrelated trade or business (e.g., facilities or personnel) must be allocated between the two purposes using a reasonable basis of allocation.

6) If a particular cost has been allocated, the department, school or center must specify the basis of allocation.

7) Federal income tax must be paid on the amount of UBTI generated by an activity.

8) Those schools/departments whose activities generate UBTI will be charged their proportionate share of the tax expense which will be allocated at the time of the IRS payment and reporting.

EXAMPLES OF UBTI

1) Sale of advertising space in bi-monthly alumni magazine to local and national companies interested in contacting the market demographics represented by Penn Alumni.

2) Retail sales of computer hardware, software, peripherals and accessories to the University community (students, alumni, local customers) for personal use.

3) Daily parking fees collected in specific Penn parking lots from visitors, guests, patients, vendors, contractors, general public, and special events (i.e. theatre, sports, hotels and retail stores).

4) Routine laboratory, radiology or diagnostic testing services to non-hospital patients.

5) The portion of revenue generated from athletic facilities, such as the Levy Tennis Pavilion, for use to the general public.

RESPONSIBILITY

1) The Corporate Tax Office, in consultation with the Office of General Counsel, is responsible for ensuring that the schools and centers comply with federal tax law and regulations regarding the reporting and taxation of UBTI. This includes the timely preparation and submission of the Exempt Organization Business Income Tax Return (IRS Form 990-T).

2) Each school or center has the primary responsibility for monitoring and reporting any external revenue generating activity to ensure that such activity is properly reported for possible inclusion on IRS form 990-T. This includes, but is not limited to, implementation of monitoring procedures, on a quarterly basis, in the school/center which
   a) Ensure timely notification and consultation with the Corporate Tax Office prior to the commencement of such activity for guidance and potential mitigation of tax exposure.
   b) Ensure such activity is consistent with policy #3003; External Activities Business Plan Review
   c) Ensure allocation methods associated with the costs of each activity are reasonable and consistent.

3) Annually each department, school or center is required to complete an Unrelated Business Income questionnaire for **each** activity generating UBTI.
   a) The questionnaire includes a worksheet to be used for reporting of the revenue and expenses associated with the Unrelated Business Income.

b) The questionnaire along with the worksheet must be submitted by the end of each November for activity related to the prior fiscal year. (i.e. November 30, 2005 for fiscal year June 30, 2005 activity)
c) Part One of the questionnaire must be completed for all activities with a potential for generating unrelated business income.
d) Part Two must also be completed by any hospital or healthcare related entity.
e) The completed questionnaire will be used to determine if the activity should be included in Penn's Exempt Organization Business Income Tax Return (Form 990-T) submitted to the IRS.

4) Annually each Senior Business Administrator will be requested to certify to the accuracy of the activity being reported to the Corporate Tax Office from their respective departments and that it encompasses all business activities that must be reported as UBTI.

2005 PATENTS AND ROYALTIES

Effective: December 1986
Revised: April 2017
Last Reviewed: April 2018
Responsible Office: Comptroller
Approval: Comptroller

PURPOSE

The filing and prosecution of patent applications as well as maintaining issued patents are necessary for the University to protect the ownership of inventions and discoveries.

POLICY

1. The Trustees have delegated the authority and responsibility for patents and royalties to the Vice Provost for Research.

2. Any invention or discovery which results from work carried out, including but not limited to the following is University Property:
- On University time;
- At University expense;
- On University property, whether owned, controlled, rented or leased by the University;
- By special grant;
- Supported by research funding at the University, regardless of the source; or
- Otherwise.

All inventions or discoveries falling under these guidelines must be disclosed to The Penn Center for Innovation at the University and accordingly must be assigned to the University. The "Patent and Tangible Research Policies and Procedures of the University of Pennsylvania" governs the intellectual property created by faculty, employees, students and guest scholars of the University.

The highlighted section was added in April, 2017.

2006 SALES AND SERVICES – CREDIT CARD SALES PCI COMPLIANCE

Effective: June 2016
Revised: June 2016
Last Reviewed: April 2018
Resp. Office: The Office of the Treasurer

I. AUTHORITY AND RESPONSIBILITY

The Treasurer's office is responsible for issuing credit card merchant accounts and for overseeing policies and procedures regarding payment processing and adherence to information security policies, guidelines and standards. Information Systems and Computing (ISC) is responsible for the operation of Penn's data networks (PennNet). The Treasurer's Office has the responsibility and authority to ensure that all merchant accounts and any related third-party payment processors adhere to the Payment Card Industry (PCI) requirements to protect cardholder data throughout the University.

The Senior Business Leader(s) in conjunction with the merchant account owners in each School/Center will be responsible for ensuring that their merchant account(s) are PCI Compliant on a daily basis.

The Treasurer's office is responsible for submitting the annual Attestation of Compliance (AOC) to our acquiring bank.

II. EXECUTIVE SUMMARY

The Payment Card Industry (including VISA, Master Card, AMEX, Discover and other major card issuers) has established important and stringent security requirements to protect credit card data. These are called the PCI Data Security Standards or "PCI-DSS." These standards define the way in which credit card merchant accounts must protect cardholder data and achieve PCI compliance based on the method by which credit cards are processed. This policy is intended to be used in conjunction with the complete PCI-DSS standards as established and revised by the PCI Security Standards Council at: https://www.pcisecuritystandards.org/.

III. PURPOSE

This policy defines the responsibilities that merchant account owners and Senior Business Leaders have in assessing and validating compliance with PCI-DSS standards. It also establishes responsibility and accountability in the processing of credit card data, conducting the ongoing self-assessment of the merchant account and undertaking any remediation of processes associated with the transmission, storage or processing of credit card data.

Upon review of the PCI self-assessments and any necessary remediation efforts by merchant account owners, the Treasurer's Office will then complete and submit the annual AOC to the University's acquiring bank that includes all University merchant accounts.

IV. RISK OF NON-COMPLIANCE

Without adherence to the PCI-DSS standards and this policy, the University would be in a position of unnecessary reputational risk and financial liability.

Departments who fail to comply are subject to:

a) Any fines imposed by the payment card industry
b) Any additional monetary costs associated with remediation, assessment, forensic analysis, fraudulent card activity or legal fees
c) Suspension of the merchant account.

V. DEFINITIONS

Merchant Account

A relationship set up by the Treasurer's office between the University and a bank in order to accept credit card transactions. The merchant account is tied to a general ledger account to distribute funds appropriately to the School/Center (owner) for which the account was set up.

For purposes of the PCI DSS, a merchant is defined as any School/Center that accepts payment cards bearing the logos of any of the five members of the PCI Security Standards Council (American Express, Discover, JCB, MasterCard or Visa) as payment for goods and/or services. Note that a merchant that accepts payments cards as payment for goods and/or services can also be a service provider, if the services sold result in storing, processing or transmitting cardholder data on behalf of other merchants or service providers.

Merchant Account Owner

As defined by Penn: point of contact for the School/Center's merchant account. This person is responsible for the completion of the Self-Assessment Questionnaire in Coalfire One in conjunction with the Senior Business Leader. This should be a full time, exempt Penn employee approved by the Senior Business Leader.

Cardholder Data

At a minimum, cardholder data consists of the full Primary Account Number (PAN). Cardholder data may also appear in the form of the full PAN plus any of the following: cardholder name, expiration date and/or service code.

PAN

Primary Account Number is the payment card number (credit or debit) that identifies the issuer and the particular cardholder account. It is also called Account Number.

Payment Card Industry Data Security Standard (PCI-DSS)

The PCI-DSS is a set of comprehensive requirements for enhancing payment account data security. It was developed by the founding payment brands of the PCI Security Standards Council (PCI-SSC), including American Express, Discover Financial Services, JCB, MasterCard Worldwide and Visa International, to help facilitate the broad adoption of consistent data security measures on a global basis.

The PCI-DSS is a multifaceted security standard that includes requirements for security management, policies, procedures, network architecture, software design and other critical protective measures. This comprehensive standard is intended to help organizations proactively protect customer account data.

PCI Security Standards Council (PCI-SSC)

The security standards council defines credentials and qualifications for assessors and vendors as well as maintaining the PCI-DSS.

Approved Scanning Vendor (ASV)

A Company approved by the PCI-SSC to conduct external vulnerability scanning services.

Penetration Test

Penetration tests attempt to identify ways to exploit vulnerabilities to circumvent or defeat the security features of system components. Penetration testing includes network and application testing as well as controls and processes around the networks and applications, and occurs from both outside the environment (external testing) and from inside the environment.

PCI Self-Assessment Questionnaire (SAQ)

The PCI Self-Assessment Questionnaire (SAQ) is a validation tool that is primarily used by merchants to demonstrate ongoing compliance to the PCI-DSS. The University currently uses Coalfire One, a third-party tool created by Coalfire, to automate the Self-Assessment Questionnaire (SAQ) process.

For information see:

http://www.coalfire.com/Documents/DataSheets/DS_SAQ_CoalfireOne.jpg

Authorized users who have already set up their merchant accounts through the Treasurer's Office can access the system at: https://idp.coalfire.com/account/signin

VI. SCOPE

This policy applies to all persons who come in contact with credit card data. It applies to any computing devices owned or leased by the University of Pennsylvania that store, transmit, or process credit card data over the Penn network (PennNet). It also applies to all third parties who process credit card data on behalf of a University-issued merchant account. The use of a PennCard as a debit card (PennCash) is not within the scope of this policy.

VII. STATEMENT OF POLICY

A. Penn requires that Schools/Centers using credit cards to process payments on behalf of the University to comply with the requirements and obligations set forth in Sections B and C below. If you are establishing a merchant account for the University of Pennsylvania Health System (UPHS), you must refer to the UPHS PCI policy [hyperlink].

B. Requirements.

i. General Requirements. Schools/Centers using credit cards to process payments must ensure that:

a) Their credit card merchant accounts are approved by the Senior Business Leader for the School/Center and by the Treasurer's Office. A new credit card merchant account should not be requested without a full understanding of the responsibilities and alternatives of accepting funds on behalf of the University. Approval will generally be given only to those who have an anticipated annual credit card sales volume of approximately $100,000 unless otherwise documented and approved by the Treasurer's Office.

b) Management and employees who process or have access to credit card data are familiar with and are adhering to the applicable PCI-DSS requirements of the PCI Security Standards Council and have taken the annual University PCI course located in Knowledge Link.
c) Senior Business Leaders in conjunction with the merchant account owners conduct an ongoing self-assessment against the PCI-DSS standards in Coalfire One.
d) All employees involved in processing credit card payments shall acknowledge electronically a statement that they have read, understood, and agree to adhere to Computer Security Policy, Incident Response Policy (see section D. – References) and this policy.
e) Any proposal for a new process (electronic or paper) related to the storage, transmission or processing of credit card data must be brought to the attention of and be approved by the Treasurer's Office. This includes both internal processes and those of approved third party vendors (See Appendix A) whose applications or software store or process credit card data on the University's behalf.

ii. The Treasurer's Office requires any third parties processing credit card payments on behalf of the University must be approved by the Treasurer's Office in accordance to Appendix A.

iii. Approved SAQ validation Types. Only the following SAQ validation types highlighted in Table 1 below are allowed:

a) SAQ A
b) SAQ B

Use of any alternative SAQ Validation types must be approved, on a case-by-case exception basis, by the Treasurer's Office.

Table 1

SAQ Validation Type	Description	# of Questions v3.1	ASV Scan Required v3.1	Penetration Test Required v3.1
*A	Card not present merchants: All payment processing functions fully outsourced, no electronic cardholder data storage.	14	NO	NO
B	Merchants with only imprint machines or only standalone dial-out payment terminals: No e-commerce or electronic cardholder data storage.	41	NO	NO
A-EP	E-Commerce merchants redirecting to a third party website for payment processing, no electronic cardholder data storage.	139	YES	YES
B-IP	Merchants with standalone, IP-connected payment terminals: No e-commerce or electronic cardholder data storage.	83	YES	NO
C	Merchants with payment application systems connected to the internet: No e-commerce or electronic cardholder data storage.	139	YES	YES

C-VT	Merchants with web-based virtual payment terminals: No e-commerce or electronic cardholder data storage.	73	NO	NO
P2PE	Merchants only using hardware payment terminals in a PCI SSC listed P2PE Solution: No e-commerce or electronic cardholder data storage.	35	NO	NO
D-MER	All other SAQ-eligible merchants.	326	YES	YES

***SAQ A as specified in the above table shall mean using a PCI-compliant service provider approved by the Treasurer's Office (see Appendix A) such that the credit card number is NOT entered into a web page of a server hosted on the Penn network.**

C. Compliance

I. **Training**: All merchant account users, individuals involved in any way with the processing of credit/debit card transactions to accept/refund money for products or services on behalf of the University are responsible for taking annually the University Payment Card Industry - Data Security Standards Workforce Education course located in Knowledge Link.

II. **Notification:** The Treasurer's Office will notify departments of any upcoming trainings, changes to Coalfire One and other PCI-DSS related updates.

III. **Self-Assessment:** The PCI-DSS Self-Assessment Questionnaire (SAQ) must be maintained by the merchant account owner and updated anytime a credit card related system or process changes/added.

IV. **Remediation**: Any systems or processes that do not meet the current version of the PCI-DSS requirements must be remediated to meet PCI-DSS standards. Merchant account owners are responsible for remediation and the Treasurer's Office is responsible for the final approval of the SAQ in Coalfire One.

V. **Attestation of Compliance**: Upon completion of remediation efforts across the University's Schools and Centers, the Treasurer's office will submit the annual AOC to our acquiring bank.

VI. **Financial Implications**: The department shall bear the costs associated with ensuring compliance with this policy and the PCI-DSS standards as well as any fines imposed by the payment card industry for non-compliance and any additional monetary costs associated with remediation, assessment, forensic analysis, fraudulent card activity or legal fees.

VII. **Review**: ISC Information Security is responsible for reviewing the Computer Security Policy and Information Security Incident Response Policy (listed in reference D) annually. The Treasurer's Office is responsible for reviewing the Credit Card Sales PCI Compliance policy annually and for conducting an appropriate awareness and training program.

VIII. **Responsibility**: Responsibility for compliance with this policy lies with the merchant account owner and the School/Center's Senior Business Leader.

IX. **Enforcement**: Compliance with this policy will be enforced by the Treasurer's Office. The Treasurer's Office will be monitoring compliance of participating Schools/Centers by reviewing self-assessments in Coalfire One.

D. References

- PCI Data Security Standards: (https://www.pcisecuritystandards.org)
- Computer Security Policy: http://www.upenn.edu/computing/group/npc/approved/20100308-computersecurity.html

- Information Security Incident Response Policy: http://www.net.isc.upenn.edu/policy/approved/20070103-secincidentresp.pdf)

APPENDIX A - APPROVED VENDOR LIST

The intent of the Treasurer's Office is to standardize the vendor relationships that handle credit card data on behalf of the University. The below vendors and their associated processing formats have been approved for use by merchant account owners across the University and have included PCI compliant language in their contracts or in an amendment of their contracts. Any additional vendor relationships must be requested by the Senior Business Leader and must be approved by the Treasurer's Office before any negotiations are started. Third Party relationships will only be considered for accounts with signification transaction volume.

Acquiring Bank
Bank of America

Point-of-Sale (POS) Hardware Devices (Treasurer's Office will handle the ordering of any devices)
Bank of America devices
- FD130
- FD410

E-Commerce Payment Processors
CyberSource