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University Policy & Procedures

Operational University policies and procedures span a number of topics. They, along with other University resources, are designed to enable Yale’s mission, simplify and standardize financial and operational services in order to make life easier where everyone has a role in building a strong culture of integrity, insight, and stewardship of Yale resources.

About the Key Financial Policy Highlights

This guide highlights the most essential policies and procedures. It is:
- purposeful and representative, but it is not comprehensive.
- the result of solicited feedback from a cross-section of Yale community members who identified these topics as the most important to know.

For a full inventory of the most current policy and procedure information, please refer to the University Policy Library.

Questions

When in doubt, rely upon the experts. Consult with your business office personnel, who can confer with central process owners and subject matter experts as appropriate.
Travel, Meals & Entertainment
Applies to faculty, staff, visiting scholars, students, and non-University personnel traveling or using funds administered by Yale.

Provides guidance for those traveling on University business to ensure:

- the best use of University resources; and
- compliance with other obligations (e.g., sponsored award requirements).

**Air Travel**

- Discussed at length in Procedure 3301 PR.03 Air Travel on University Business
- Travelers are expected to use economy/coach class.
- Business class is permitted if the relevant business office confirms before purchase that the appropriate funds are available and if any of the following conditions are met*:
  - Any single flight segment has a scheduled in-air flying time in excess of five (5) hours;
  - The total scheduled in-air flight time, including connecting legs, is in excess of eight (8) hours; or
  - A medical justification exists, documented in writing by a primary care provider.

*See Procedure 3301 PR.03 for information about other restrictions.

First class is not permitted under any circumstances.

**Air Travel on Federally Sponsored Awards**

- Air travel on federally sponsored awards carries additional requirements. Examples include:
  - Pricing comparisons to demonstrate selected flight does not exceed the basic least expensive unrestricted accommodations class – Use of World Travel is strongly recommended as it performs this function automatically.
  - Compliance with the Fly America Act (FAA) – Use of World Travel is strongly recommended to simplify and streamline many of the FAA requirements.

**Ground Transportation**

- Travelers are expected to select ground transportation that is reasonably priced, consistent with business requirements.
- Rental cars & insurance:
  - Employees are covered under Yale’s insurance for most domestic rentals;
  - For international and some domestic rentals, outside insurance coverage may be required; please refer to the policy for detailed information;
  - Students may be covered, but they must first complete Yale’s Driver Safety Awareness Training;
  - Consultants and others non-Yale individuals are not covered; and
  - Rentals of 12- and 15-passenger vans are not permitted.

**Mileage Reimbursement**: business mileage does not include the normal commute to and from work. In general, this also applies to travel between multiple work locations. For detailed scenarios regarding mileage reimbursement, see the Mileage Reimbursement Matrix.

References:

- Policy 3301 Travel on University Business
- Procedure 3301 PR.03 Air Travel on University Business
- Mileage Reimbursement Matrix

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Meals & Entertainment

- Travelers will be reimbursed for reasonable, actual meal expenses, or may opt for the Meals and Incidental Expense (M&IE) per diem allowance.
- Travel greater than 30 days:
  - Expected that travelers will be able to secure less expensive meal options (e.g., groceries);
  - Rule is that reimbursement is permitted for actual meal expenses only up to 50% of the published federal per diem rate for the location;
  - Applies to entire trip, not just the period greater than 30 days.

Payments to Non-U.S. Individuals

- U.S. Immigration regulations restrict the types of payments that can be made to these individuals.
- See Policy 3415 Payments to Individuals Who Are Neither Citizens nor Permanent Residents of the United States for details.
- Direct payments (i.e., through Yale mechanisms) are the preferred method and employees should avoid out-of-pocket payments to these individuals.
- For payments to non-U.S. individuals engaged temporarily outside the U.S., use IRS Form W-8BEN.
- In the alternative, may also use Form 3415 FR.04 Statement of Foreign Source Payments.
- The Payment Planning Tool provides a convenient snapshot of requirements based on visa status, location of activity, and payment type.

Payments/Reimbursements

- Yale PCard – preferred method for paying travel expenses.
- Employees are expected to prepare and submit expense reports, with supporting documentation, within thirty (30) days from the date the expense is incurred.
- Non-Employee reimbursement requests are to be submitted and paid after the completion of a trip.
- $75 rule – receipts are required documentation for all travel expenses ≥ $75 (note, however, that receipts are required for all lodging expenses).
- 120-day rule:
  - Out-of-pocket expenses submitted and approved for reimbursement 120 days through 366 days from the date incurred will be reimbursed and reported as taxable income to the employee.
  - Expenses submitted or approved for reimbursement later than 366 days from the date incurred will not be reimbursed.
- Expenses must only be claimed/reimbursed once (e.g., travel expenses paid for by an institution hosting a Yale employee as a visitor may not also be reimbursed through Yale).

References:

- Policy 3301 Travel on University Business
- Procedure 3301 PR.03 Air Travel on University Business
- Mileage Reimbursement Matrix
- Policy 3415 Payments to Individuals Who Are Neither Citizens nor Permanent Residents of the United States
Policy 3302 Business Meals, Entertainment, and Other Social Events

- Provides that expenditures for a reasonable number of business meals and entertainment events are the necessary result of the normal business operations of the University.
- In each case, the business meal or event must be appropriate to the situation and the nature of the business conducted by schools and departments.
- Prudent business judgment and moderation, coupled with disciplined budgetary control, dictate whom these functions serve, the frequency of events, and the reasonableness of related costs.

**Expenses**

- Business Meals are limited to up to $125.00/person, including tax, tip & alcohol.
- Detailed receipts are the preferred type of receipt.
- Not necessarily related to business travel but may be.

**Alcohol**

- Not required to break out alcohol on business meals when submitting expense report.
- Reasonableness – proportion of alcohol vs. food expenses.
- Alcohol expenses are unallowable on federally sponsored awards.

**University Personnel**

The University allows payment for reasonable and necessary business meal expenses for meetings involving only University personnel under certain circumstances.

**External Parties**

The University allows payment for reasonable and necessary meal expenses incurred during a business meeting involving external parties if the purpose of the meeting is to discuss University business, and it is necessary or beneficial to the University to provide a meal while the meeting is being held.

**Entertainment & Social Events**

- The event must be approved by the department head or a designee if the event costs $10,000 or more;
- Alumni and fund-raising events must be approved by the dean or an officer of the Corporation;
- If the event involves external parties, the person(s) entertained must have an actual or potential business relationship with the University; and
- The event will provide a benefit to the University.

Reference:

- Policy 3302 Business Meals, Entertainment, and Other Social Events
Addresses the ethical practices and procurement requirements associated with purchasing methods, supplier selection, comparative pricing, approval of purchasing transactions, signing authority, receipt of goods and services acknowledgment, and sales tax issues.

**Purchasing Methods**

- **Purchase requisitions**: required for procuring most common goods and services. Should be the default method as the University’s preferred purchasing mechanism.
- **PCard purchases**: primarily for travel and entertainment expenses. Also authorized for miscellaneous, small dollar business-related goods and services (<$2,000).
- **Out-of-pocket purchases**: in very limited circumstances, business-related small dollar purchases may be made using personal funds. Reimbursement for purchases of this type should be done via Yale’s expense management system.
- Employees should not pay out of pocket for third party (e.g., grad students, postdocs, etc.) expenses.
- Use the preferred purchasing method in the [University Buying Guide](#).

**Comparative Pricing**

- No comparison required under $10,000
- Multiple quotes required over $10,000
- Competitive bidding required over $150,000

**Sole Source**

- Contracts entered into without a competitive process.
- Only one known source exists or only one supplier can fulfill the specific requirements.
- Must be [justified](#), with documented reasoning.

**Prohibition on Transaction Splitting**

It is prohibited to “split” a transaction into multiple transactions to purposely evade any requirement of this or any other University policy. For example, if a purchase of goods and/or services from a Supplier is anticipated to equal or exceed $10,000, it is not permitted to split the goods and/or services purchase into multiple separate transactions of less than $10,000 in order to purposely evade approval thresholds or the requirements associated with the Small Purchase Threshold.

**References:**

- [Policy 3201 General Purchasing](#)
- [Procedure 3201 PR.01 Purchase Requisition Process](#)
- [Policy 3210 Purchase Contracts](#)
Policy 3215 Yale Purchasing Card

- Promotes discretion in spending and establishes the rules and guidelines for appropriate use of the Yale Purchasing Card (PCard).
- Informs the Yale community of the University’s expectations regarding the use of the Yale Purchasing Card.
- Emphasizes proper stewardship and judgment when utilizing Yale’s financial resources.

**Department vs. Individual PCards Agreement**
- All cardholders must sign and agree to the cardholder agreement.

**Appropriate Uses**
- Employees are expected to use the preferred purchasing method in the University Buying Guide whenever possible.
- University travel and entertainment expenses.
- Small dollar (<$2,000) business-related goods and services.
- Publishing fees.

**Important Notes**

**Do not:**
- Use PCards for personal purchases (except for incidental business travel expenses);
- Use PCards to pay for goods or services more appropriately paid for via requisitions/invoices (University contracted goods and services);
  - For additional information refer to the Prohibited Commodities section of Procedure 3215 PR.01 Yale Purchasing Card Procedure.
- Share Pcards;
- Split transactions to circumvent limits.

**Do:**
- Use Pcards only for purchase permitted commodities, as listed in Procedure 3215 PR.01 Yale Purchasing Card Procedure.
- Prepare expense reports within 30 days
  - Timely submission of out-of-pocket reimbursements is essential:
    - Expense reimbursements are taxable unless submitted and fully approved within 120 days from the date incurred; and
    - Expense reimbursements are not reimbursed at all unless submitted and fully approved within 366 days from the date incurred.
- Stay within dollar and transaction limits
  - For temporary limit exceptions, use Form 3215 FR.10 Individual and Department PCard Exceptions

eBay purchases need prior approval from the Controller’s Office. These requests are approved in very limited circumstances (e.g., documented unavailability from standard suppliers).

**References:**
- Policy 3215 Yale Purchasing Card
- Permitted Commodities and Prohibited Commodities
Other Key Financial Policies
Discusses the limitations placed on gifts that may be made from University funds, including gifts collected at the University for the benefit of third parties, expressions of sympathy or employee recognition, development gifts, gifts to public officials, and limits on charging instructions.

**Third Parties**
- Employees, schools, departments, and offices of the University are prohibited from collecting contributions either to or on behalf of the University for the benefit of other organizations or private individuals, including University employees.

**Sympathy, Employee Recognition, Milestones**
- Only allowable to University employees, students or postdocs.
- No cash gifts (including gift certificates) to employees.
- Under ~ $100 for expressions of sympathy.
- Non-cash gifts of $100 or greater, and all gift certificates, must be reported for tax purposes (Payroll or A/P).
- Certain recognitions allowable for milestones/departures/retirements.
- Under $400 for retirement of employee with 10+ years.

**Development Gifts**
- Gifts to donors or other individuals serving development interests, or for alumni relations purposes using university funds or property cannot exceed $100 in value.

**Institutional Gifts**
- When University officials are visiting abroad or are hosting visitors from other institutions, University funds may be used to give such visitors a gift (i.e. value of $100 or less) as a sign of appreciation or gratitude.

**Public Officials**
- In general, University policy prohibits all gifts to public officials, except for token gifts valued at less.

**References:**
- Policy 3303 Gifts from University Funds
There are a number of considerations related to financial administration of sponsored projects. While business office staff will provide guidance on and carry out many of the financial tasks, the Principal Investigator ("PI") ultimately has the responsibility to assure that project funds are expended according to University and sponsor requirements.

Examples of these considerations are:

**Policy 1316 Effort Commitment: Managing Effort Associated with Sponsored Projects**
- Most faculty generally have responsibilities for teaching, administration, or patient care that would preclude them from devoting 100% of their time to sponsored activities.
- PIs and key personnel are expected to propose some level of sponsor supported activity or the minimum required by the program on proposals on which they are listed as PI or key personnel unless specifically exempted by the sponsor.
- On-going extra compensation impacts to Institutional Base Salary and Effort Reporting to Sponsors.

**Policy 1307 Subrecipient Establishing, Managing and Monitoring**
- Subrecipient invoices issued under a federal prime award must be paid within 30 days of receipt.
- Subrecipient Invoices must be signed by PI or equivalent email approval.

**Allocation Principles and Methodologies**
- Costs must be allowable, reasonable and allocable.
- Basis for allocation methodologies must be documented PRIOR to a purchase or at the time of ordering good/services in order to avoid cost transfers.
- Purchases at the end of an award are considered by auditors to be at high risk for disallowance.
- Additional Information:
  - Allocation Principles and Methodologies
  - Allocability of Costs
  - Unallowable Costs

**References:**
- Policy 1316 Effort Commitment: Managing Effort Associated with Sponsored Projects
- Procedure 1305 PR.04 Unallowable Costs
- Policy 1307 Subrecipient – Establishing, Managing, and Monitoring
Policy 1305 Cost Transfers Involving Sponsored Projects

- Cost Transfers to any sponsored project are allowable only where there is a direct benefit to the sponsored project being charged.
- Overdrafts or any direct cost item incurred during the conduct of one sponsored project may not be transferred to another sponsored project merely for the sake of resolving a surplus/deficit or an allowability issue.
- Cost Transfers should not be used as a means of managing awards.
- Faculty and their business offices are expected to review monthly Account Holder reports promptly to ensure proper award management and to comply with the cost transfer policy. This regular review will help identify issues timely. Specific review elements and effective practices for managing sponsored projects are outlined in the Sponsored Projects Administration for Faculty module.

References:
- Policy 1305 Cost Transfers Involving Sponsored Projects
- Sponsored Projects Administration for Faculty Training
The University must properly classify, safeguard, and depreciate its equipment, and must abide by federal guidelines and the terms of sponsored awards with respect to the purchase, use, and disposition of equipment.

- Equipment with a value ≥ $5,000 is capitalized and becomes part of the University’s moveable equipment inventory (“MEI”).
- Be sure the proper MEI spend category is selected at the time of purchase.
- Relocating equipment, particularly to off-campus locations, is subject to advance approvals and record-keeping. Consult with your business office before arranging to move, transfer, sell or discard any equipment.
- Proper approvals are required prior to any equipment leaving the University, including PI Released equipment.
- Departments must obtain advance approval and the appropriate clearance(s) from the Office of Environmental Health & Safety for safety critical equipment.
- MEI is subject to a biennial physical inventory in which departments are responsible for participating.

References:
- Policy 4209 Moveable Equipment
- Procedure 4209 PR.01 Acquisition and Maintenance of Moveable Equipment
- Procedure 4209 PR.02 Capitalization of Moveable Equipment Accessories and Composite Assets
- Procedure 4209 PR.03 Transfer, Sale, Disposal, or Release of Moveable Equipment
Policy 1104 University Signature Authority

- Outlines who among the University’s officers and employees have been granted Signature Authority.

- Signature Authority:
  - Is formally assigned and pertains to only a limited and prescribed group of individuals at the University.
  - Allows certain individuals to sign agreements, contracts, and other legally binding documents on behalf of Yale.

Only individuals with delegation letters from the Corporation and/or an Officer may sign Yale agreements.

Signatures Authority v. Approval Authority

**Signature authority**
- Permission granted or delegated to sign agreements, contracts, and other legally binding documents on behalf of Yale.

**Approval authority**
- Permission granted or delegated to approve (but not sign and/or execute) University operational transactions.
- An approval attests to the appropriateness of the transaction within the University’s mission objectives.

**Example:** Procuring professional services requiring a signed contract. An individual with approval authority may review and approve the requisition in Workday, but only an individual with signature authority may sign the contract.

References:
- Policy 1104 University Signature Authority
- Signature Authority Tool
There are many considerations when hiring employees, contractors and other visitors at Yale. Hiring managers are encouraged to engage their business office early in the process.

- All individuals must be classified as either a University employee or as an independent contractor prior to providing services to the University, regardless of the amount of compensation to be paid.
- Determinations as to whether an individual is an independent contractor vs. employee must be made in accordance with the Employee vs. Independent Contractor Test as outlined in Procedure 3210 PR.02 Employee vs. Independent Contractor.

Procedure 3210 PR.01 Services Contracts Process
- If it is determined that the individual is an independent contractor, this process describes the required steps to be taken before the work commences.
- This procedure supports Policy 3210 Purchase Contracts.
- Purchases must comply with ethical practices, supplier selection and pricing justification requirements.

Procedure 3503 PR.01 Hiring New Staff Employees
- Describes the process used for hiring all types of regular staff (non-academic) employees. It outlines key steps and requirements for the hiring process.
- Hiring managers should work with their business office and Human Resources Generalist to begin the hiring process.

References:
- Procedure 3210 PR.01 Services Contracts Process
- Procedure 3210 PR.02 Employee vs. Independent Contractor
- Procedure 3503 PR.01 Hiring New Staff Employees
- Hiring Guide

Hiring Academic Appointees - Postdocs, Postgrads, Laboratory Associates and Visiting Fellows
- The Office for Postdoctoral Affairs oversees the above-mentioned appointment types. Faculty should notify the administrative staff in their department as soon as a prospective candidate is identified.
- Guidance for these types of appointments can be found at: Hiring a Postdoc Titles & Eligibility

Hiring Faculty
Faculty search and other requirements vary based on faculty category (e.g., ladder, research, teaching) and track (e.g., tenure track, clinical track, etc.) and if the appointment is in the Faculty of Arts and Sciences (“FAS”) or a professional school.
- The sites below provide guidance for all schools at Yale with the exceptions of the Schools of Medicine and Public Health:
  - Hiring and Appointing New Faculty
  - Faculty Search Procedures
- Guidance for the Schools of Medicine and Public Health can be found at: Office of Academic & Professional Development (“OAPD”)
Internships

- An internship is a learning experience for a young adult, typically a college student, looking to work in a professional area to reflect their studies.
- The hiring process is initiated by filling out the request form and requisition.
- Each department is responsible for the funding of their intern.
- Occasionally unpaid internships are available but academic credit or stated learning goals must be stated and met.

Internship Resources for Managers

Minors and Visiting Undergraduates Participating in Research or Clinical Activities

- The sponsoring faculty member must submit an application and all required information to Yale Environmental Health & Safety.
- All approvals need to be place, safety and compliance requirements met and there needs to be appropriate supervision at all times before the individual is allowed to enter the work area.

Minors and Visiting Undergrads

Policy 5001 Hybrid Work Policy and Policy 5002 Remote Work Policy

This set of policies and procedures formally documents University decisions regarding hybrid and remote work and to establish the rules, standards, and expectations for the community.

Policy 3505 Out-of-State Work Locations

Provides the basis for permitting staff employees to work at a location outside Connecticut and the specific approvals required in advance of establishing a work location outside Connecticut.

Policy 3510 Faculty & Staff Relocation Expenses

Establishes the rules and processes governing relocation expenses for faculty and staff. It applies to all faculty and staff for whom the University agrees to pay relocation expenses.

- All relocation expenses are taxable income to the employee.
- Yale Relocation & Logistics Management assists with relocation logistics and can often access reduced rates with approved shipping and moving companies.

References:

- Internship Resources for Managers
- Minors and Visiting Undergrads
- Policy 5001 Hybrid Work Policy and Policy 5002 Remote Work Policy
- Policy 3505 Out-of-State Work Locations
- Policy 3510 Faculty & Staff Relocation Expenses

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**Policy 1601 Information Access and Security**

- Establishes requirements for staff, faculty, and students regarding access to University information as well as the responsibilities for stewardship of University information.
- Each member of the Yale community is assigned a unique network identification (“NetID”) (Procedure 1601 PR.02).
- Individuals must not share their NetIDs and passwords with others.

**Policy 1607 Information Technology Appropriate Use**

- IT Systems may be used only for their authorized purposes – that is, to support the research, education, clinical, administrative, and other functions of Yale University.
- Use of IT Systems, even when carried out on a privately owned computer or other device that is not owned, managed, or maintained by Yale University, is governed by this Policy.

**Policy 1604 Data Classification/Data Security**

- Establishes a system for classifying data according to their sensitivity and their importance to the functioning of the University.
- Members of the Yale community entrusted with Yale data must understand and apply the Minimum Security Standards (“MSS”) and be alert to circumstances in which additional security measures might be warranted.

**Policy 1605 Web Accessibility**

- Establishes requirements for staff, faculty, and students to procure, develop and modify University Websites so that they are accessible to people with disabilities.
- It is the policy of the University that all content provided through University Websites be accessible.

**Procurement of Computers**

- Computers are a University-contracted commodity and should be procured through preferred suppliers.
- Regardless of purchase method, individuals should work through their department Desktop Service Provider (“DSP”) to ensure computers are appropriately set up and secured.

**References:**
- Policy 1601 Information Access and Security
- Policy 1607 Information Technology Appropriate Use
- Policy 1604 Data Classification Policy
- Policy 1605 Web Accessibility Policy
When in doubt, rely upon the experts. Consult with your business office personnel, who can confer with central process owners and subject matter experts as appropriate.
Appendices
Applicability
The Institutional Standards of Conduct (formerly the Standards of Business Conduct) apply to all Yale faculty and staff in a manner consistent with the Faculty Handbook and other University policies. For example, these Institutional Standards are consistent with and complement the Faculty Standards of Conduct, and both sets of standards are included in the Faculty Handbook.

1. Integrity, Honesty, and Ethical Conduct
2. Individual Responsibility and Accountability
3. Freedom of Expression
4. Respect for Others
5. Compliance with Laws, Regulations, Policies, and Procedures
6. Compliance with Contractual, Grant, and Other Obligations
7. Internal Controls
8. Health and Safety
9. Appropriate Use of University Resources
10. Conflicts of Interest and Conflicts of Commitment
11. Privacy and Confidentiality
12. Information Security
13. Reporting Violations and Non-Retaliation

References:
• Yale University Institutional Standards of Conduct
Establishes the fundamental principles for University Operations at Yale, creating the framework for a sound and ethical business and Internal Control environment.

Discusses overarching and pervasive principles like:
- Internal controls
- Budget development and oversight
- Financial management
- Requestors and preparers
- Approval authority
- Segregation of duties
- Accountability

Yale Community Members participating in University Operations are expected to conduct their activities with integrity, in accordance with the University’s sound and ethical business and Internal Control environment.

Every Yale Community Member is responsible for adhering to stated University policy, as well as the Yale University Institutional Standards of Conduct.

Requestor: A Yale individual who identifies a need for the initiation of an operational transaction and requests such initiation. Requestors are also known as Initiators. A Requestor may either be the same individual as the Preparer or direct another individual to act as the Preparer.

Preparer: A Yale individual who creates an operational transaction. A Preparer may either be the same individual as the Requestor or act at the direction of the Requestor.

Approver: A Yale individual granted or delegated Approval Authority. An Approver’s responsibilities are specific to the transaction type being approved.

References:
- Policy 1101 Guiding Principles for University Operations
- Procedure 1101 PR.06 Approval Authority
- Yale University Institutional Standards of Conduct
Approver’s responsibilities/attestations:

- The Approver has the appropriate level of Approval Authority to approve the transaction;
- The Approver is not the transaction’s Requestor (except for transactions in which self-approval limits apply);
- The Approver has sufficient knowledge to recognize and challenge any irregularities in the transaction;
- The transaction does not personally involve the Approver;
- The transaction, upon review, complies with University policies and procedures, as well as any applicable laws, regulations, sponsor requirements, donor specifications, and other applicable documentation; and
- The transaction, upon review, is appropriate, reasonable, accurate, and complete with all applicable supporting documentation.

In addition, for financial transactions:

- Funds supporting the transaction are available in an approved budget;
- The transaction’s costs are allowable and allocable for the applicable source(s) of funding (e.g., gift indenture, terms and conditions of a sponsored award);
- The accounting information and source of funds supporting the transaction are appropriate; and
- If the transaction involves goods and/or services, the Approver has verified, through inquiry or with personal knowledge, that the goods were received and/or the services were performed, in accordance with Policy 3201 General Purchasing.

References:
- Policy 1101 Guiding Principles for University Operations
- Procedure 1101 PR.06 Approval Authority