

HARVARD

UNIVERSITY POLICY



University-Issued Card Policy

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Responsible Office: Travel, Reimbursements, and Card Services

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Policy Statement

[Harvard-issued credit cards](#) may be used by authorized individuals to make certain types of payments while performing University business. **Only eligible direct University business expenses may be charged to University-issued cards; personal purchases are strictly prohibited.** All transactions must be supported by a detailed business purpose, proof of purchase documentation, and submitted in a timely manner. Improper use of a University-issued card, including late payments or use personal purchases, may result in disciplinary action including revocation, employment termination, expulsion from school (for students), and criminal charges.

Reason for Policy

A University-issued card can reduce administrative burdens on the University but can also expose the University to risk. Potential risks include inappropriate card use, fraud, inappropriate general-ledger-coding allocation, non-compliance with IRS rules, and reputational damage to the University. This policy and related procedures establish controls to mitigate risks and comply with state and federal regulations.

Who Must Comply

Anyone who holds a University-issued credit card, administers a card, or processes or approves transactions for a University-issued card must follow this policy.

If this or any other applicable University policy conflicts with another University policy or term, or applicable regulation or law, the more restrictive provision will apply.

Harvard University schools, departments, and units may implement additional local policies provided such policies are consistent with, and meet the minimum standards set by, this Policy.

Roles, Responsibilities, and Processes

Everyone who spends Harvard funds has an obligation to spend those funds with sound business judgement and good stewardship. Those making purchases on behalf of Harvard have a fiduciary responsibility to use Harvard's resources prudently, in accordance with [sponsored guidelines](#), donor expectations and within the requirements of the regulatory environment in which we operate.

Failure to use the credit card in compliance with University policy can result in revocation and possible disciplinary action, including employment termination, expulsion from school (for students), and criminal charges.

I. Card Types and Who May Qualify for a Card

Harvard offers multiple card types based on the needs of the Tub/unit. See the [credit card matrix](#) for a current list of University cards. Cards may be restricted based on [card type](#), an [individual's role](#), appointment length, and local school policies and procedures.

Tub/units make the ultimate decision as to whether it is appropriate to issue a University card and, if so, what type.

Use of a University-issued card for all appropriate Harvard expenses is the recommended practice due to greater transaction visibility as well as allowing the payment to be processed prior to travel being completed. Individuals using personal funds or personal credit cards will not be reimbursed until after the trip has been completed.

II. Responsibilities of the Cardholder/Department Card/Centrally Billed Administrator

Cardholders, Department Card Administrators, and Administrators of Centrally Billed programs, such as the Declining Balance Card, are responsible for:

- Following [card-specific processes](#), [ROPPA Policy](#) and any additional University policies.
- The security of the card(s)
- Knowing any card/program limits and restrictions
- Ensuring Harvard's tax-exempt status is used when making purchases on behalf of Harvard.

Anyone requesting a University-issued card must sign an application affirming that they have reviewed the cardholder agreement. In addition, cardholders and Program Administrators must comply with the following:

A. Timely Card Payment and Reconciliation

- Cardholders and Program Administrators are responsible for all transactions charged to their Harvard-issued card/programs and must validate the reasonableness of the charges.
- Cardholders and Program Administrators have a responsibility for submitting reports/statements in a timely manner including the follow details:
 - detailed business purpose,
 - required receipts,
 - proper account coding.

Schools and units have the discretion to terminate cards for those who do not comply with submission deadlines and requirements. Refer to the [card at a glance materials](#) for card-specific deadlines.

B. Adhere to University Policy and Card Restrictions

Harvard must follow IRS rules when paying for or reimbursing expenses. **Harvard business-related expenses** are those that are ordinary and necessary in the direct conduct of Harvard's activities. Purchasers should be familiar with Harvard [financial policies](#) including the [Travel Expense Policy](#) and [Business Expense Reimbursements Policy](#).

Cards may have additional restrictions, see [Appendix A: Allowable, Restricted, and Prohibited Purchases](#) and [specific card processes and guidance](#) for details.

Schools and units may have their own restrictions. Please contact your finance office for additional guidance.

C. Personal Charges

University cards **cannot be used for personal use**. Per the Citibank Cardholder Application and Agreement, **only Harvard business-related expenses** that comply with University policy are permitted. Inadvertent personal use of a Harvard-issued credit card should be rare and should result in prompt identification and payment of the respective charges by the cardholder. See detailed instructions for each card on the [Card Services website](#).

Those holding individual or centrally billed cards should regularly log in to Citibank to review their statement to confirm it has been paid in full and there are no outstanding balances. An outstanding balance is likely to be caused by charges marked personal in Concur and not paid to Citibank.

- Charges marked as personal in Concur must be paid directly to Citibank in a timely manner to make sure there are no outstanding balances that can incur late fees. See [Corporate Card FAQ](#).
- Any credits applied to a card must be resolved in a timely manner and cannot be used for personal purchases. See [Expense and PCard FAQs](#) on how to process a credit.
- Harvard will not reimburse for credit card late payment fees. Exceptions to this require financial dean/designee approval and may be considered taxable to the cardholder.

D. Reimbursements by Outside Organizations

University-issued cards should not be used for expenses that will be reimbursed from another source. For travel and other expenses that will ultimately be paid by a third party, cardholders should use a personal form of payment and seek reimbursement from the third party directly.

Under extenuating circumstances, such as uncertainty regarding the third party's willingness to pay, or a multi-leg trip with expenses split between Harvard and the third party, use of a University-issued card may be appropriate. Delay in the third party's payment does not constitute an extenuating circumstance. If Harvard funds pay for business expenses that are later reimbursed by a third party, the individual cardholder must repay Harvard in full for any duplicate reimbursements. Under no circumstances will Harvard provide up-front payment for expenses that are not related to University business, and may not be charged to a University-issued card, even if the recipient intends to later reimburse Harvard.

E. Making Payments Using PayPal, Venmo or other Cash Apps

Regardless of card type used, payment to third-party payment services such as PayPal, Venmo, or other cash apps is **limited to the purchase of goods only** due to tax withholding and reporting requirements.

Buy-to-Pay is preferred for payments made directly to suppliers¹.

- Purchases of goods using PayPal, Venmo or other Cash Applications
 - Best practice is to use a preferred supplier, if possible, through B2P.
 - PayPal, Venmo, or other cash applications can be used for the purchase of goods. If using a third-party payment service for the purchase of goods, the business purpose must include the ultimate vendor's name.
 - Schools and units must comply with any restrictions or requirements, including any reporting requirements, around funding source (e.g., sponsored) and foreign transactions (e.g., export controls, VAT, economic and trade sanctions, etc.). See [Export Controls](#) and [Global Support Services](#).
 - Charges to Lyft, Uber, Air BnB and VRBO are allowed on University-issued cards but are at the discretion of the local school or unit and may be incurred only if funding allows. Individuals cannot be compelled to use these services.

If taxable charges have been made on a University-issued card, contact your School or unit's finance office for guidance.

F. Purchases of Services or Royalty/Copyright Payments

The following **cannot** be made using a University-issued card, personal credit card, out-of-pocket or making payments through PayPal, Venmo, or other cash applications:

¹ B2P suppliers go through a review by Visual Compliance (a third-party compliance screener) and allows Harvard University to be compliant around tax withholding and reporting requirements. This is especially important when making service payments due to additional restrictions regarding IC classification regulations, performer tax withholding, immigration documentation requirements, export controls and economic and trade sanctions.

- Payments for services to individuals / independent contractors (U.S. or foreign nationals) who are single-employee companies (sole proprietor, unincorporated, incorporated, or an LLC)².
- Payments for service to foreign entities.
- Payments for royalties (copyright, patent, film/photos, etc.) to individuals or foreign entities.

G. Payments That May Have Taxable Implications to Payee / Reimbursee

Payments that may have tax or reporting implications for individuals **should not** be charged to a University-issued cards (e.g. health insurance, housing, or living allowances, child care, prizes or awards, fellowships, **gift certificates to employees, gifts over a certain dollar threshold (>\$100)**, moving or commuting expenses, certain visa expenses, etc.

In the event a taxable charge is made to a University-issued card, and if approved by the Financial Dean/Designee, additional steps are required to have the payment reflected on an individual's tax form. See [Processing Additional Pays in Concur Expense FAQ](#) on how to process taxable payments.

H. Tax Exempt Status and Export Controls

The University, as a nonprofit educational institution, is exempt from Massachusetts sales and use tax (meals) and from sales and use tax in many other states. Sales and Meals Taxes **cannot** be charged to federal or cost-share funds if Harvard is exempt from the specific taxes. See [Procurement Tax Forms and Tax Exemption Guidance](#) for complete details.

Follow Harvard's [Export Control Policies and Procedures](#) for any items being sent or transported from the United States to a foreign destination.

I. Safeguard the Card and Report Fraud, Misuse, or Disputes

Cardholders must protect a card from loss and theft and report any fraudulent charges or disputes on cards to the credit card company within 60 days. Individuals preparing card transactions should also communicate concerns around fraudulent activity to their supervisor, local Tub finance office, local or central human resources, or the [Anonymous Reporting Hotline](#). See [Fraud Awareness and Reporting](#).

J. Lost or Stolen Cards

If a card is lost or stolen, the cardholder or Card Administrator must immediately notify:

- Citibank customer service at 1-800-248-4553, also refer to [Card Services FAQ's](#)
- [Local school or unit Card Program Administrator](#)
- Harvard Police if due to an on-campus theft

See [Card Services](#) for additional information.

² Per the [Independent Contractor Policy](#), payment by B2P is the only acceptable method of payment for individuals or foreign entities performing services for Harvard due to tax withholding and reporting requirements.

K. Disputing Charges and Reporting Fraudulent Charges

The cardholder must dispute an erroneous or fraudulent charge with Citibank customer service no later than 60 days after the transactions. Cardholders will be directed by Citibank customer service on necessary steps for resolution.

The cardholder or Program Administrator should also inform the local Tub/Unit Card Program Administrator of any outstanding card issues. See [Card Services FAQ](#) for additional information.

L. Card Transfer, Cancellation or Suspension

Cardholders leaving Harvard or no longer having a use for a University-issued card must cancel and return their card to their Tub/Unit Card Program Administrator or local finance office immediately. Cardholders out of the office for a significant amount of time (e.g., parental or other leave) should consider suspending their card while on leave. See also card at a glance materials.

- Corporate Cardholders transferring to a different Tub or Org must contact their [Tub/Unit Card Administrator](#) who will work with Travel, Reimbursements and Card Services to move the card to the appropriate Hierarchy in Citi.
- PCard holders transferring to another Tub must cancel their PCard and reapply for a new PCard.
- Outstanding Expense/PCard Statement reports should be resolved prior to leaving Harvard or transferring to a different Tub/Org.
- Standing orders/recurring transactions should be transferred to a new University card.

III. Responsibilities of the Preparer Delegates and Requestors

Preparer Delegates and Requestors, are responsible for ensuring that transactions contain information that is fully descriptive of the underlying expense (who, what, where, when, why). Individuals who prepare credit card transactions on behalf of a cardholder or Program Administrator are required to follow any [card-specific processes](#), the [ROPPA Policy](#), as well as other University policies. Preparing reports/statements includes:

- defining a complete business purpose,
- ensuring all transactions have proper account coding,
- attaching required receipt,
- submitting the report for review by the cardholder in a timely manner.

IV. Responsibilities of the Approver/Approver Delegate

An Approver or Approver Delegate, is an individual who approves credit card transactions in the Harvard financial system(s) and is required to follow any [card-specific processes](#), the [ROPPA Policy](#) as well as other University policies.

Approvers are responsible for the review of reports/transactions submitted to them in a timely manner. This includes:

- making informed judgments about the reasonableness of those transactions,
- reviewing reports for correct account coding, proper business purpose, receipts, and additional supporting documentation,

- confirming that the University card and ROPPA policies as well as other local, University or external requirements/regulations (e.g. federal sponsored award requirements) have been followed,
- approving or returning to Preparer Delegate, Cardholder, or Card Administrator for further follow-up or review in a timely manner.

V. Responsibilities of the Tub/Unit Card Program Administrator

The Tub/Unit Card Program Administrator is responsible for ensuring that this policy is communicated to all individuals who purchase, prepare, or approve transactions.

Individuals who hold the role of Tub/Unit Card Program Administrator are required to follow [card-specific processes](#) and are responsible for the following:

- acting as the primary point of contact for cardholders,
- for new cardholder applicants:
 - confirming eligibility and supervisor approvals,
 - determining credit limits ,
 - confirming [required training](#) has been completed prior to submitting the application,
- facilitating the card transfers, cancellation and replacement of lost, damaged, or stolen cards with Card Services,
- reviewing and canceling underutilized cards as appropriate,
- refer repeat or significant violations of the card policy to the School or unit's financial dean or designee for review and consideration of next steps which can include card revocation,
- promptly requesting that Card Services or Tub Program Administrator cancel cards of terminated employees; cards are not automatically shut off upon an employee's termination,
- ensuring outstanding transactions/statements have been processed and cards are destroyed when a Cardholder terminates or when a card is canceled. This may require working with the cardholder's local department,
- monitoring credit limits and ensuring changes to spending limit levels or MCC codes are approved by the Cardholder's department administrator or supervisor before requesting changes from Card Services,
- coordinate with School or unit's Concur Financial Authorized Requestor to request appropriate roles and financial systems access,
- reviewing and acting on reports sent by Card Services (e.g., quarterly cardholder listing report) as well as proactively running reports for general program maintenance,
- reviewing and acting on any materials that may be part of an annual security review.

VI. Responsibilities of the Tub Finance Offices Financial Dean or Designee

The Tub Finance Offices are responsible for:

- ensuring that local units comply with this policy and accompanying procedures for any University-issued card,
- appointing Tub/Unit Card Program Administrators,
- monitoring reports, and
- establishing local procedures supporting this policy including a School or unit escalation process for repeat or significant violations of the card policy.
- At their own discretion, Tubs may impose greater but not less control than required by this policy

VII. Responsibilities of Travel, Reimbursements and Card Services (Strategic Procurement)

- Responsible for maintaining the University's card policy.
- Developing any required trainings and additional supplemental job aids.
- Monitoring card program compliance with University policies and IRS regulations.
- Providing support for cardholders, approvers and Tub/Units Card Program Administrators.

VIII. Responsibilities of Risk Management and Audit Services, RMAS (Financial Administration)

RMAS is responsible for performing departmental audits, which include reviews of credit card transaction data and documentation.

IX. Card Monitoring

In addition to responsibilities listed under each specific role, cardholders, Concur preparers, approvers, Tub/unit card administrators, and finance offices may have additional reviews and audit requirements. Below are additional areas that should be considered.

- A. Follow any review and reporting requirements of [Harvard's Internal Controls](#) or quarterly review and annual close processes.
- B. Regularly Review Reports or Communications
 - Cardholders should review and respond, as required, to any communications generated by the Card company or Harvard.
 - Cardholders should regularly log-in to Citimanager to confirm card balances are paid in full.
 - Tub/units should review card transactions using HART reports that have specific criteria. This may include a review of specific object codes such as:
 - a. the use of object codes in the 8400 series that might be used for gifts, late fees, alcohol,
 - b. the use of purchases of equipment >\$5,000 that must be capitalized,
 - c. review the Travel and Expense Detail report to review personal charges, first class plane tickets, use of alcohol, etc.
 - d. run keyword searches for gift certificates, human subject payments, taxable, fellowship, prize, donation, etc.

X. Required Training

Required training may vary by card. Detailed requirements and processes are listed on the [card application page](#). Cardholders or program administrators are required to take training prior to applying for a card. Tubs/units may have their own additional training requirements. Contact your finance office for guidance.

Definitions

Approver or Approver Delegate: Individual who is authorized to certify that a transaction (or a particular element of a transaction) is correct and appropriate; these certifications may happen online in Harvard's Concur or B2P system or on paper.

Card Program Administrator: The person responsible for managing a card or program not in an individual's name (e.g., department card, meeting card, or declining balance card program).

Cardholder: Individual with a University-issued card in their name.

Centrally Billed Card: A card that is billed to a centrally billed account which must be reconciled by the Card Program Administrator and paid through Buy-2-Pay (e.g., meeting or declining balance card program).

Corporate Card or Department Card: A card that is issued to an individual in the individual's name or a card overseen by a Card Program Administrator (Department Card) issued in a department's name.

Preparer Delegate or Requestor: An individual who assembles the information (who, what, where, when, why) and backup needed for a transaction, keys it into the system for review and electronic approval.

Tub/Unit Card Program Administrator: Individual(s) with the authority to act as a liaison between their Tub/Unit and University Card Services and oversee cardholder applications and card administration for their Tub/Unit.

University Issued Card: Any card issued by Harvard. This may be a corporate card or centrally billed card such as a PCard or Declining Balance Card.

Contact/Responsible Office

[Anonymous Reporting Hotline](#): 877-694-2275

[Financial Authorized Requestor](#)

[Travel, Reimbursement and Card Services](#)

[Tub/Unit Card Program Administrator](#)

Revision History

10/06/2023: Replaces the PCard Policy and formalizes and combines previously existing policies, processes, and practices into one policy. Published on 10/06/23 with an effective date of 01/01/2024.

Related Resources/Appendices

[Appendix A –Allowable, Restricted, and Prohibited Purchases by Card](#)

[Business Expense Reimbursements Policy](#)

[Cardholder Agreement](#)

[Corporate Card At a Glance](#)

[Corporate Card Roles and Responsibilities](#)

[Department Card At a Glance](#)

[Department Card Roles and Responsibilities](#)

[Environmental Health and Safety – Controlled Substances](#)

[Export Controls Policies and Procedures](#)

[Financial Systems Access](#)

[Fraud Awareness and Reporting](#)

[PCard At a Glance](#)

[PCard Roles and Responsibilities](#)

[Responsibilities of Purchasers, Preparers and Approvers \(ROPPA\) Policy](#)

[Travel Policy](#)

[University Issued Corporate Card At a Glance](#)


[Whistleblowing Policy](#)

Appendix A

Allowable, Restricted and Prohibited Purchases by Card

Schools and units have the ultimate decision to determine when and what type of University-issued card is appropriate and may have more restrictive policies. Contact your finance office for guidance.

See the credit [Card Services](#) for types of cards which are available as well as additional reference materials.

 University Corporate Card (Travel and Entertainment Card) Allowable, Restricted, and Prohibited Purchases Schools and units may have more restrictive policies. Contact your finance office for guidance.	
Allowable Expenses	<ul style="list-style-type: none"> • Lodging (includes Air BnB or VBRO based on the Travel Policy and local school or unit policies) • Ground transportation • Reimbursable meals • Airfare • Conference fees • Other appropriate and allowable business expenses or goods
Allowable With Restrictions	<ul style="list-style-type: none"> • Equipment related to Work in Progress (WIP) Projects ≥ \$5,000. • Purchases of goods made with PayPal or other third-party systems- must include name of ultimate seller/vendor in the business purpose. Purchases of services to are not allowed using PayPal, Venmo or other Cash Applications. • For special purchases such as alcohol and tobacco, animals, biological materials, chemicals, controlled substances, radioactive materials, and hazardous materials, additional regulatory and licensing requirements may apply. Contact your local procurement office see Procurement Policy or contact your environmental and health & safety school contact or Environmental Health & Safety and Controlled Substances. • Gift certificates for nonemployees ≤\$100
Prohibited Purchases	<ul style="list-style-type: none"> • Personal purchases of any kind • Purchases of capitalized equipment, furnishings, software or vehicles ≥ \$5,000 that are not Works In Progress (WIP). See Financial Management of Property, Plant & Equipment & Software Accounting Policy. • Payments for services to individuals / independent contractors (U.S. or foreign nationals) who are single-employee companies (sole proprietor, unincorporated, incorporated, or an LLC). • Payments for service to foreign entities. • Royalty or copyright payments to individuals or foreign entities. • Gift certificates for employees (considered taxable) • Gift certificates >\$100 for nonemployees • Late Fees



[Department Card](#)

Allowable, Restricted, and Prohibited Purchases

Schools and units may have more restrictive policies. Contact your finance office for guidance.

<p>Allowable Expenses</p>	<ul style="list-style-type: none"> • Lodging (includes Air BnB or VBRO based on the Travel Policy and local school or unit policies) • Ground transportation (cab, Uber, excludes rental cars) • Reimbursable meals • Airfare • Conference fees • Meeting deposits & charges • Other appropriate and allowable business expenses or goods
<p>Allowable With Restrictions</p>	<ul style="list-style-type: none"> • One-Time gift certificates for human subjects or nonemployees ≤\$100. • Purchases of goods made with PayPal or other third-party systems- must include name of ultimate seller/vendor in the business purpose. Purchases of services to are not allowed using PayPal, Venmo or other Cash Applications. • Equipment that is related to Work in Progress ≥ \$5,000 • For special purchases such as alcohol and tobacco, animals, biological materials, chemicals, controlled substances, radioactive materials, and hazardous materials, additional regulatory and licensing requirements may apply. Contact your local procurement office see Procurement Policy or contact your environmental and health & safety school contact or Environmental Health & Safety and Controlled Substances. • Late fees require a letter of exception signed by Financial Dean or designee and cannot be charged to sponsored funds.
<p>Prohibited Purchases</p>	<ul style="list-style-type: none"> • Personal purchases of any kind • Purchases of capitalized equipment, furnishings, software or vehicles ≥ \$5,000 that are not Works In Progress (WIP). See Financial Management of Property, Plant & Equipment & Software Accounting Policy. • Payments for services to individuals / independent contractors who are single-employee companies (sole proprietor, unincorporated, incorporated, or an LLC) or foreign entities. Royalty or copyright payments to individuals or foreign entities. • Rental cars (includes Zip Car) – Contact Card Services for specifics. • Gift certificates for employees (considered taxable) • Gift certificates >\$100 for nonemployees



[Purchasing Card \(PCard\)](#)

Allowable, Restricted, and Prohibited Purchases

Schools and units may have more restrictive policies. Contact your Finance Office for guidance.

<p>Allowable Expenses</p>	<ul style="list-style-type: none"> • Low-dollar, high-volume, non-travel business expenses that can't be purchased via Buy to Pay. • Harvard business-related retail point-of sale purchases at campus restaurants where payment by 33-digit code is unavailable.
<p>Allowable With Restrictions</p>	<ul style="list-style-type: none"> • Gasoline for Harvard-owned vehicles only • Equipment that is related to Work in Progress (WIP) ≥ \$5,000 • Purchases of goods made with PayPal or other third-party systems- must include name of ultimate seller/vendor in the business purpose. Purchases of services are not allowed using PayPal, Venmo or other cash applications. • The travel and entertainment expenses below are allowable (within the guidelines of the Travel Policy) however the preferred method of payment is the corporate or department card: <ul style="list-style-type: none"> ○ Conference Fees ○ Local taxis or sedan services (including UBER, UBER Black, or Lyft) ○ Business meals and allowable entertainment in the Boston/Cambridge area
<p>Prohibited Purchases</p>	<ul style="list-style-type: none"> • Personal purchases of any kind • Purchases of capitalized equipment, furnishings, software or vehicles ≥ \$5,000 that are not Works In Progress (WIP) . See Financial Management of Property, Plant & Equipment & Software Accounting Policy. • Split transactions to circumvent the single transaction limit. • Gift cards/gift certificates of any amount • Gifts for employees or students equal to or greater than \$100 • Payments for services to individuals / independent contractors who are single-employee companies (sole proprietor, unincorporated, incorporated, or an LLC) or foreign entities. • Royalty or copyright payments to individuals or foreign entities. • Travel and Entertainment: <ul style="list-style-type: none"> ○ Airline, bus, cruise ship, railroad tickets ○ Travel agency charges ○ Lodging ○ Gasoline for vehicles not owned by Harvard ○ Theater tickets for entertainment purposes (tickets for academic/teaching purposes are allowed on the PCard) ○ Airline club fees or airline memberships ○ Rental cars, including Zip Car • Cash advances or travelers checks • Purchases to Outings and Innings (See Department Orders on how to charge directly to a Harvard account) • Special purchases such as alcohol and tobacco for resale, animals, biological materials, chemicals, controlled substances, radioactive materials, and hazardous materials.