



Payment Acceptance

Policy#: FI006

Responsible Administrator: Vice President for Finance and Administration

Responsible Office: Office of the Controller

Issue Date: September 2025

Policy Statement

The Fashion Institute of Technology (“FIT” or “the college”) established this policy to ensure the proper management of financial assets. The policy aims to prevent errors, losses, misuse of funds, and fraudulent activities. All college employees must adhere to these guidelines when they handle any kind of funds (i.e., cash, checks, money orders, credit/debit cards, or any other electronic transactions).

Reason for the Policy

FIT is responsible for safeguarding and managing its assets and reducing misuse of funds. Cash handling and payment collection are vulnerable to errors, losses, abuse, and fraud. A best practice to prevent these problems and lower risk is to establish, enforce, and monitor compliance with clear and precise policies and procedures. This policy sets minimum control standards for payment acceptance in accordance with general accounting and cash management principles set forth by federal and state entities.

Who is Responsible for this Policy

- Office of the Controller
- Designated Departments, as defined in this policy

Who is Affected by this Policy

- Faculty, staff, student employees, students, and third-party service providers of the college with responsibility, authority, or stewardship over financial assets, including Cash and Card Payments.

Definitions

- **Cash:** For the purposes this policy, “Cash” can include (but is not limited to) the following:
 - Currency and coins
 - Checks (including, but not limited to, personal checks, business checks, traveler’s checks, and cashier’s checks)
 - Money orders
- **Cardholder Data:** As defined by the Payment Card Industry Security Standards Council (PCI SSC), a 15- or 16-digit credit card or debit card number (i.e., a primary account number, or PAN).

Cardholder Data may consist of various other elements when used in combination with a PAN, such as cardholder name, service code, and expiration date. A Personal Identification Number (PIN) is not considered Cardholder Data because it is used for user authentication, rather than being linked to a card's account information.

- **Card Payment:** Any payment method that utilizes physical cards (e.g., credit, debit) or virtual cards (e.g., Apple Pay, Google Pay).
- **Designated Department:** A college department authorized by the Controller's Office to operate in specified financial capacities. *Currently, only the Controller's Office, the Bursar's Office and the FIT Foundation are Designated Departments.*
- **Non-Designated Department:** Refers to any department other than the Controller's Office, the Bursar's Office, or the FIT Foundation.
- **Payment Card Industry Data Security Standard (PCI DSS):** A set of security standards, administered by the PCI SSC, that protects Cardholder Data.
- **Segregation of Duties:** The process of safeguarding assets by assigning the authorizing, executing, recording, and reconciling of transactions to different individuals.
- **Stewardship:** Careful and responsible management of college assets under one's duties or jurisdiction at FIT.

Principles

Only authorized personnel are permitted to engage with financial institutions and/or facilitate payment acceptance, including, but not limited to, accepting or managing Cash, Card Payments, or affiliated student/employee data, and managing bank accounts on behalf of the college. The Controller's Office holds the authority to grant the eligibility to act in this capacity to Designated Departments. Designated Departments must accept Cash and Card Payments subject to the principles of this policy.

Non-Designated Departments must follow proper procedures and exercise internal controls when handling the collection and deposit of Cash and Card Payments. FIT has implemented a system of internal controls designed to detect and correct errors during the collection, receipt, and remittance of financial assets. If there is a reasonable basis to believe there is a control deficiency or to suspect unusual activity, the Controller's Office must be notified immediately.

To enhance security and reduce risk, FIT prioritizes electronic payment methods and seeks to limit the acceptance, storage, and handling of physical Cash whenever feasible. Periodic reviews of the payment acceptance procedures will be conducted by the Office of Internal Controls and Management Analysis to ensure compliance and to aid in improving procedures where necessary. Audits may also be conducted by external agencies, such as the Office of the NYS Comptroller.

Cash Handling Controls

- **Segregation of Duties:**

Duties relating to Cash, such as Cash collection, preparing receipts, and account reconciliation, are performed by different individuals (i.e., one individual is not responsible for two or more of these activities) to the extent permitted by staffing resources.

- **Cash Handling and Access:**

- Cash handling and access is generally restricted to select, authorized FIT personnel in the Office of the Bursar and the FIT Foundation.
- In certain instances, a Non-Designated Entity may collect Cash to support a departmental function or event (for example, a fundraiser or student event).
 - A Non-Designated Department must steward Cash in accordance with this policy, and may not hold or use it for purposes other than its intended use. All Cash must be delivered promptly and intact to the Bursar's Office within two (2) business days of collection.

- **Cash Collection and Stewardship:**

- Cash collection for authorized departmental deposits is managed by the Bursar's Office, while the FIT Foundation oversees FIT Foundation funds.
 - The Bursar's Office and the FIT Foundation provide the Controller's Office with records of each authorized deposit.
 - The Controller's Office maintains these records, ensuring they are complete and accurate upon receiving all necessary supporting documentation from the Bursar's Office.
- Cash collection associated with student accounts is recorded in the student's account in FIT's Student Information System and is reconciled to their account by Accounts Receivable.
- Cash payments collected on behalf of FIT must always be secured in a locked safe or cash drawer, out of public view, and available at any time for inspection by an authorized representative of the Treasurer and Vice President for Finance and Administration.
- In certain instances, a Non-Designated Department may collect Cash to support a departmental function or event (for example, a fundraiser or student event).
 - A Non-Designated Department must steward Cash in accordance with this policy, and may not hold or use it for purposes other than its intended use. All Cash must be delivered promptly and intact to the Bursar's Office within two business days of collection.

- **Cash Deposits:**

- All departments must deposit their Cash collections in full to either the Bursar's Office (for college) or FIT Foundation (for Foundation) depending on the source of funds (see Procedures).
 - Cash deposits for college funds are prepared for the bank on a weekly basis by the Bursar's Office and are retrieved by armored truck.
 - Cash deposits for FIT Foundation funds are prepared at least weekly by the FIT Foundation and deposited in person, with the potential for increased frequency during high-volume periods.

- Cash received by the college that exceeds \$10,000 (in a single transaction, or multiple transactions, over a 12-month period) must be reported to the IRS (see related documents.)
- All Cash receipts are subject to verification of the depository bank.
- **Checks**
 - All checks must be made payable to either the Fashion Institute of Technology or the Fashion Institute of Technology Foundation, as applicable, and must be payable through a U.S. bank in U.S. dollars.
 - All checks will be accepted only in the amount of the transaction; checks may not be cashed, deposited, or written for more than the required or applicable amount.
 - FIT and the FIT Foundation will not accept post-dated checks.
 - Responsible parties must ensure funds are available to cover check payments. If a deposited check is returned due to insufficient funds, fees may apply for the unpaid check.
- **International Transactions**
 - **Students:** FIT generally does not accept foreign currencies or checks directly. Wire transfers are accepted via a third-party vendor that manages international wire transfers.
 - FIT's account number and routing number are generally not provided to students; the Office of the Bursar may make exceptions in rare instances.
 - **Vendors:** Payments made by international vendors must be wired to FIT's designated bank accounts as overseen by the Controller's Office.
- **Card Payments**
 - Faculty, staff, student employees, and students of the college who accept Card Payments for transactions must follow the PCI DSS and complete annual PCI DSS training.
 - Non-Designated Departments **may not** collect Card Payments on behalf of the college or from FIT students without *prior approval* from the Controller's Office.
 - The Controller's Office has a process in place to assist with the collection of Card Payments when it has been deemed necessary to facilitate certain college business. This permission is not granted regularly and must be formally vetted and approved by the Controller's Office. If approved, the Office will assist with facilitating this action in a manner that does not expose Cardholder Data and ensures compliance with PCI DSS (See Procedures).
 - All contracted vendors providing Card Payment Services for FIT must comply with PCI DSS standards. The FIT department that initiated and manages the vendor relationship must collect an annual Attestation of Compliance to verify adherence. Failure to maintain PCI DSS compliance may result in suspension or termination of services for both the FIT department and the vendor.
- **Record-Keeping**
 - Departments must retain all records in accordance with FIT's Record Retention and Disposition policy, including appropriate supporting documentation for Cash receipts, irrespective of the manner of deposit.

- The Office of Policy and Compliance has established records management standard operating procedures for all departments based on adherence to the New York State Archives LGS-1 records retention schedule. These may be accessed internally by logging into MyFIT, or by contacting the Records Management Officer.
- Records must be available for audit and/or review at the request of the Controller's Office.

Responsibilities

- **Office of the Controller:**
 - Allocates the duties associated with the secure handling of payments to the appropriate personnel and designates individuals or departments who may interact with financial institutions, open and manage accounts on behalf of the college, and accept/remit payments.
 - Reviews supporting documentation for transactions to ensure compliance.
- **Designated Departments:**
 - Process payments and deposits for the college, including providing supporting documentation to the Controller's Office;
 - Maintain control over Cash from students and college departments;
 - Assist in matters concerning Cash activities, which may include, but are not limited to, collections of Cash from various campus locations; and
 - Prepare deposits for courier services.

Procedures

- **Cash Collection by Non-Designated Departments:**
 - Cash collections must be brought to the appropriate Designated Department in a sealed envelope within two (2) business days of collection, and must include a deposit slip and documentation to support the transaction.
 - Deposit slips are obtained from the Cashiering Office.
 - Non-Designated Departments should maintain copies of all transactions, including the deposit slip, before they submit the Cash to the appropriate Designated Department.
 - The appropriate Designated Office will verify the documentation before forwarding to the Controller's Office.
 - The Controller's Office will conduct a secondary review of the transaction and supporting documentation.
- **Check Deposits:**
 - **Bursar's Office**
 - Checks received by mail or in person are deposited daily by remote deposit to FIT's bank.
 - Deposited checks are maintained in a safe and are shredded after ten (10) business days.
 - **FIT Foundation:**
 - Checks are deposited at minimum on a weekly basis.

- Most checks are deposited remotely, however, in-person deposits may occur in situations where Cash is received.
 - All checks submitted must include backup documentation and a general ledger code (obtained from FIT's Finance Management System).
 - Backup documentation, shared with the Controller, is retained electronically in a secure, shared drive and for six (6) years in a locked drawer.
- **Collection of Card Payments by Non-Designated Departments:**
 - If a Non-Designated Department identifies a potential need to collect Card Payments independently (for example, a fundraiser), they *must* obtain advanced approval from the Controller's Office. Failure to do so is considered a violation of this policy.
 - The Controller's Office should be contacted in writing with reasonable advance notice of the event.
 - The request should include as many details about the event as possible.
 - The Controller's Office will review the request in consultation with other offices, as needed.
 - The Office of the Controller will approve or deny the request in writing.
 - If approved, the Controller's Office will provide the Non-Designated Department with a secure mechanism to facilitate Card Payment collection and support proper Stewardship of the Card Payment, and Cardholder Data.

Violations

Violations of this policy may put confidential information and FIT assets at risk and compromise the integrity and reputation of the college. In the event of a violation, the Office of the Controller will take immediate steps to protect FIT's interests. The Office of the Controller will report violations of this policy to the Office of Human Resource Management and Labor Relations for investigation, and may temporarily or permanently suspend or restrict access to payment acceptance mechanisms depending on the severity of the violation.

A violation of this policy may subject employees and students to disciplinary action, as warranted, and in accordance with applicable policies and/or the FIT/UCE collective bargaining agreement.

Related Policies

- [Code of Student Conduct](#)
- [Employee Code of Ethical Conduct](#)
- [Information Security](#)
- [Purchasing](#)
- [Records Retention and Disposition](#)

Related Documents

- [PCI Data Security Standards Overview](#)
- [IRS Form 8300](#)

Contacts

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