



## **DOCUMENT INTERNAL REVIEW AND SIGNATURE AUTHORITY FOR EXTERNALLY SPONSORED PROJECTS**

Responsible Offices: Office of Sponsored Projects (OSP), Colleges (or Departments or Centers)  
Controller's Office, Office of Provost.  
Effective Date: July 1, 2011; updated FY18  
Updates: Included information about online/electronic submissions  
Uniform Guidance: OMB Uniform Guidance, #200.61, #200.62, #200.327-328, #200.303

### **PURPOSE**

This document sets forth the guidelines for document internal review and signature authority for externally sponsored projects. Externally sponsored projects include submission of proposals, acceptance of award agreements (or amendments), and submission of reports when an institutional signature is required. The document addresses both hard copies as well as electronic formats for submitting proposals, executing agreements, and accepting awards on behalf of the university.

### **POLICY STATEMENT**

Document internal review and signatories is a part of internal controls procedures. Signature authority for sponsored projects at Seattle University rests primarily with the Provost, who is the Authorized Organizational Representative (AOR) for the institution. Only the AOR or designee has the authority to consent to the submission of a proposal, execution of a sponsored project agreement (or amendment), sub-award, subcontract/consultant agreement and submission of report(s).

Seattle University has limited signatory authority for documents regarding externally sponsored projects for the following individuals (or their designees): the President, the Provost, Associate Provosts, Executive Vice President, Vice President of Finance, Associate Vice President of Finance, and/or the Controller.

The positions listed above may delegate their signatory authority to another position (e.g. SROs) but this decision must be put in writing signed by the delegator.

The following documents must be reviewed by the Office of Sponsored Projects (OSP) and approved by the AOR or designee prior to submission and/or execution:

- All proposal submissions to external sponsors, including letters of intent and pre-proposals.
- All sponsored agreements, including sub-awards (or subcontracts), independent contractor agreements, contracts for services, data sharing agreements, memorandums of understanding and contract amendments between Seattle University and any third party regarding or funded by externally sponsored projects. OSP will confer with University Counsel regarding the terms and conditions of the agreement (or amendment) prior to forwarding to the AOR for review and approval.
- Any grant reports such as financial, technical or other reports that require the AOR's certification or signature according to the sponsor's guidelines.



Please be advised that any document regarding an externally funded sponsored project that is not reviewed or executed by the OSP and not certificated by the AOR is unauthorized and unacceptable.

## **Procedures**

### **1. Authorized Signature Process**

Proposal Submissions: For purposes of grant proposal submissions, the AOR authority lies with the Sponsored Research Officers (SRO). The SRO is granted AOR authority upon approval of the proposal via the "Proposal Transmittal Form" (PTF) by the Office of the Provost.

Online/electronic Approval and/or Certifications: Federal agencies typically have a process in place that allows the AOR to approve acceptance by delegating that authority to the Sponsored Research Officers (SRO). When sponsors require acceptance of an agreement, amendment, or report via an online portal that does not formally allow the AOR to designate their authority to an SRO, the "Request for Online Approval and/or Certification Form" will be used. The Request for Online Approval applies to all sponsored project agreements, amendments, or reports that legally bind Seattle University to an external entity for the duration of the sponsored project.

1. The assigned SRO must be given access to the online sponsor portal that requires online approval and/or certification.
  - a. If the SRO does not currently have access to the online portal, the Request for Online Approval and/or Certification Form should be completed and attach a hard copy of the online/electronic documents. Please contact the OSP to grant SRO portal access.
  - b. If the SRO already has online document access, the SRO will still download a copy and complete the Request for Online Approval and/or Certification Form.
2. The SRO at OSP will review the document(s) and if needed, forward to SU Legal Counsel for further review and negotiations.
3. Once the agreement has been deemed acceptable by SU legal standards, OSP will sign off and route the request form and the documents(s) to the AOR for review and approval.
4. The SRO will sign or submit the online document(s) on behalf of the AOR only after it has been internally approved via the "Request for Online Approval and/or Certification Form." The OSP will keep the signed form on file.

## **Related Forms**

Proposal Transmittal Form (PTF)

Request for Online Approval and/or Certification Form