Policy 2.21
Authority, University Funds and Federal Procurement Requirements

This policy version was not current at the time of printing. Please see http://policies.emory.edu/2.21 for the current version.

Responsible Official: Vice President for Finance/Chief Finance Officer
Administering Division/Department: Procurement Services
Effective Date: March 21, 2007
Last Revision: March 27, 2007

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Overview

General policies regarding the authority to expend university funds.

Policy Details

2.21.1 Authority and Responsibility

The Board of Trustees and the President of Emory University, through the Office of the Executive Vice President for Finance and Administration, has delegated the responsibility for expending University funds to the Office of Procurement Services. Procurement Services partners with all University departments and programs to select vendors, negotiate prices, and assure the quality and timely delivery of goods purchased for Emory University.

Procurement Services has delegated to the following University entities the authority to expend University funds to purchase certain goods and services directly from vendors, in accordance with the policies of Procurement Services.

- Emory Hospital - items required by hospital operations
- Facilities Management - construction, renovation contracts, and building maintenance service agreements
- Food Services - perishable and non-perishable foods
- University Libraries - books and periodicals

2.21.2 Signature Authority

Procurement Services has the sole authority to enter into a purchase agreement or obligate the University, unless the Trustees specifically authorize an individual. A properly executed Purchase Order constitutes a binding contract between the University and a vendor. All documents without an authorized signature will be considered invalid and non-binding to the University.

Please see the Emory University Signature Authority policy for complete details on signature authority.

2.21.3 University Funds

All funds deposited with the University, regardless of source, are University funds and must be handled in accordance with University and Procurement Services policy. Although departments are allocated funds in their budgets for a given period, this allocation is only an authority to requisition, not to purchase.
2.21.3.1 Sponsored Projects

In general, items should only be purchased under sponsored agreements when the item is necessary for completion of the goals of the project and will specifically benefit and be used for the sponsored agreement. Items should not be ordered late in a project period, unless the items will actually be received and used by the project prior to the end date. All sponsored projects (grants and contracts) related purchases should be submitted to and fully approved by the department hierarchy and the Office of Grants and Contracts Accounting (OGCA) and received in Procurement Services at least ten working days before the expiration of the grant or contract.

Purchases using grants and contract funds require a three-step process:

When a departmental requisition is entered, the expenditure must go through the approval hierarchy set up by the requisitioning department,
Be approved by the OGCA office (when applicable), and
Allow Procurement Services time to meet its policy and procedure requirements before the Purchase Order can be issued.

Please note: For most awards, it would be inappropriate to order equipment or other major purchases in the last 30 days of the award because benefit and use cannot be documented to an auditor. The OGCA may not approve requisitions submitted in the last 30 days of an award, based solely on timing and anticipated receipt of the goods. The OGCA will have to consider approximate receipt date and benefit to the project before an approval can be processed. As part of that process, the department will need to provide a specific justification for the late purchase (i.e., within 30 days of project end period). The justification must include an explanation of how the item is necessary for the scientific/technical needs of the project and how it will be used in order to be of specific benefit to the project prior to the award end date.

Additional Resources:

Click here for the OGCA Policies and Procedures.
Click here for the OGCA contact information.
Click here for Procurement Services contact information.

2.21.4 Federal Procurement Requirements

Emory University, in compliance with federal regulations, must maintain a formal procurement system for all purchases made with federal funds; specifically the requirements of the Office of Management and Budget Circular A-110, Attachment O.

Related Links

- Current Version of This Policy: http://policies.emory.edu/2.21

Contact Information

<table>
<thead>
<tr>
<th>Subject</th>
<th>Contact</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Procurement Services</td>
<td></td>
<td>404-727-5400</td>
<td><a href="mailto:e-market@emory.edu">e-market@emory.edu</a></td>
</tr>
</tbody>
</table>

Revision History

*Emory University policies are subject to change at any time. If you are reading this policy in paper or PDF format, you are strongly encouraged to visit policies.emory.edu to ensure that you are relying on the current version.*