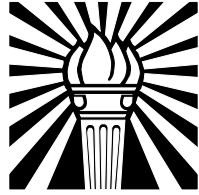


NU



RESEARCH NOTICE

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SIGNATURES ON RESEARCH DOCUMENTS

What do they represent? Why are they required?

DSPA Requires 5 Days for Reviewing and Processing Proposals

NECESSARY SIGNATURES

The bureaucracy and red tape that surrounds getting and managing grants and contracts, everyone agrees, can sometimes get excessive. At NU those who administer the paperwork are always looking for ways to help faculty researchers and to minimize the pain.

We realize that obtaining the signatures of a number of individuals on a variety of different types of documents can be a time-consuming and annoying distraction. If we could eliminate them, we would. But at this time we cannot. Signatures are required by governmental and legal regulations.

Although you—the faculty member, the principal investigator—write the proposals, and conduct the research, the fact is that, legally, a proposal and the conduct of the research are institutional. This means that, legally, a proposal is submitted by Northeastern University, and an award or contract, if and when made, is issued to the University, not to the individual researcher. At the same time, however, both the PI and NU share fiduciary responsibility for the project.

This basic principle is reflected in the different signatures required on the various documents; signatures, therefore are important.

Signatures on the Proposal Processing Form (PPF)

Agencies and sponsors will only consider a proposal officially approved by the submitting institution (NU). For this purpose, NU's Board of Trustees have del-

egated signatory authority, in most instances, to the **Directors of DSPA and Technology Transfer**.

However, the directors of DSPA and DTT cannot sign the PPF unless they are fully assured:

- (a) that the proposals are actually being submitted by all the **PIs** listed in the project;
- (b) that the **PIs' department chair(s)** approve of the use of department personnel and facilities for the performance of the proposed project;
- (c) that the **PIs' dean(s)** approve of the use of department personnel and facilities for the performance of the proposed project;
- (d) that the **PIs** are familiar with, and promise to comply, with certain requirements (*e.g.* conflict of interest, drug-free workplace, lobbying prohibitions, misconduct in science, policies relating to human & animal subjects and certain hazards, etc.);
- (e) that any cost sharing commitments are properly made and identified; and
- (f) that budgetary and other provisions included in the proposals fully meet legal, sponsor and NU regulations.

Signatures testify to the fact that those involved will live up to these assurances, pledges, promises and commitments, and/or have given their approvals.

Signatures on Agency/Sponsor Award Documents

While there some agencies/sponsors which don't require signatures on their award documents, other agencies/sponsors **do** require that **authorized NU officials** sign the award instruments. These signatures

testify that in the administration of the project, NU and its personnel will fully comply with the terms and conditions of the award.

The important words are “*authorized NU officials*;” these are named individuals who have been designated by the NU Board of Trustees as having legal authority to sign certain types of documents, the terms of which become binding on the University. In most cases certain persons in NU’s Legal Counsel Office have been granted the signatory authority on behalf of the Trustees.

This means that NU faculty and principal investigators are not permitted to sign these documents, and they have no authority to bind the University.

Signatures on Contracts and Subcontracts

Some *proposals*, specially those submitted to private companies, may include or take the form of contracts, and some *awards* made by federal or local agencies, or by private companies may also include or take form of contracts. These documents are to be signed by the *authorized NU officials*; and **NOT** by staff, faculty or principal investigators. The same regulation applies with respect to **subcontracts** issued by NU to another

institution under the terms of an award or contract received by NU; only authorized NU officials are empowered to sign these.

Exceptions

Some documents may require the PI’s signature as an addition to the official NU signatures. Invention disclosures, and invention assignments, for example must be signed by the PI. When in doubt, call DSPA (ext. 5600), DTT (ext.8810) or DRD (ext. 8770).

Finally

This Notice probably has more information than you wanted to know. Nevertheless, signatures are important, and can have serious legal and financial consequences if not done in accordance with the rules. A PI, improperly signing one of these documents without authority, could potentially become *personally* liable in the event that the terms of an award or contract are not met.

At this time we are hoping to find ways to make the signature-acquisition process a bit easier. The electronic submission of forms, with electronic signatures is being explored. We will keep you informed.

DSPA Requires 5 Days Prior to the Agency’s Deadline for Reviewing and Processing Proposals

The staff of DSPA must have at least five days to review and process your proposals, to ensure that all parts of your proposal meet sponsor expectations and conditions, and that all required signatures have been secured. As a reminder, the text below, from the *Proposal Processing Form*, spells out what’s required.

A. PI’s are strongly encouraged to submit proposal materials & draft budgets to DSPA, or to the Division of Technology Transfer, or to the Division of Research Development for early review. This will facilitate final review and approval.

B. There is a **5-business-day minimum required for review and processing proposals by the Division of Sponsored Project Administration (DSPA) and by the Division of Technology Transfer (DTT). Dean’s**

office approval is required PRIOR to DSPA’s and DTT’s review, final sign off, and submittal to the sponsoring agency. PI/PD’s must also observe any additional time requirements that may be imposed by the Department, School or College. This deadline refers to all proposal, both electronic and paper submissions.

C. When DSPA accepts your proposal, it must be complete with narrative, budget, appendices, etc., with all signatures as required on the Proposal Processing Form (PPF). A PPF lacking the required signatures will not be accepted, and will be returned to the Principal Investigator.

D. The Director of DSPA may not accept late proposals (received with less than 5-business days

before the submittal date) for signature or processing except for emergency processing.

E. Emergency processing of a proposal will not be undertaken except **unless it is accompanied by an e-mail from the Dean of the Principal Investigator's college to the DSPA Director and the Vice Provost for Research requesting emergency processing and providing a rationale for failure to meet the 5-day deadline.** Please recognize that, while every attempt will be made to accommodate such requests, we cannot guarantee that proposals that are submitted in an emergency manner will be reviewed in time to meet the funding agency's deadline.

Edited: 9/22/08