

Clemson University Research Policies Manual

Office of Sponsored Programs

Policy for Violation of Official Signature Authority by Principal Investigator

Approved: April 20, 2004

Effective: July 1, 2004

Section: Clemson University Signature Authority and Name of Legal Applicant for Sponsored Program Funding

Statement

The Board of Trustees has delegated to the Vice President for Research the signature authority necessary for effective policy administration and compliance oversight associated with grant and contract managements. Therefore, failure to obtain the official signature will be considered a Violation of the Official Signature Authority Policy.

Purpose

The purpose of this policy is to establish a mechanism to handle situations where there is a violation of the Official Signature Authority Policy (someone other than the Vice President for Research or his designee signs any legal documents, including proposals, associated with Sponsored Program Activities).

Discussion

The Vice President for Research's signature certifies that: Project proposals for external funding meet the University's mission(s) objectives and stated sponsor's solicitation requirements; Grant or Contract awards will be performed within the constraints of the grant or contract terms and conditions; and The University will maintain, or implement if necessary, operational policies and procedural standards that comply with appropriate federal policies or regulations. Compliance with federal policies or regulations is essential to the University's ability to continue to conduct or grow research.

This policy applies to all legally binding documents involving sponsored program activity where funding is provided by an outside agency and an "authorized official" signature is required. Examples: Memorandum of Agreement, Standard Research Agreement, Letter of Agreement, Compliance Certifications, proposal submission, contracts, etc.

Policy

The Office of the Vice President for Research will monitor project proposals for external funding to determine the appropriateness of the authorizing signature and maintain a file on each Principal Investigator in violation of the Official Signature Authority Policy. Failure to obtain the appropriate signature may void a contract and/or will create unnecessary delay for correction and approval of a proposal or award and will result in the following progressive disciplinary actions:

- **First Violation:** The principal investigator, his/her immediate supervisor where appropriate and his/her department chair will meet with the Vice President for Research resulting in a Memorandum of Record detailing the offense with a copy of the signature

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policy attached. A file for the Principal Investigator with a copy of the Memorandum of Record will be established in the Office of the Vice President for Research. In any case where the principal investigator is either the department chair or the dean, the principal investigator and his/her immediate supervisor would meet with the Vice President for Research.

- **Second Violation:** The principal investigator, his/her immediate supervisor where appropriate, his/her department chair and his/her dean will meet with the Vice President for Research resulting in a formal letter of reprimand to be placed in the PI's official personnel file. A copy of the letter will be placed in his/her departmental file, his/her college/division file, and in his/her file in the Office of the Vice President for Research. In any case where the principal investigator is the department chair or the dean, the principal investigator, his/her immediate supervisor, and his/her vice president would meet with the Vice President for Research.
- **Third Violation:** A memorandum to PI and his/her immediate supervisor where appropriate and department chair detailing new offense, previous official action, and notification regarding the forfeiture of all associated incentive return funds. A formal letter of reprimand will be placed in the PI's official personnel file in the Office of Human Resources. A copy of the letter will be placed in his/her departmental file, his/her college/division file, and in his/her file in the Office of the Vice President for Research. Any person found to have violated this policy on three or more occasions may also be subject to further appropriate disciplinary action, including but not limited to, reassignment, demotion, suspension, or termination of employment.