



## Policy 2.121

# Strategic Procurement Policy

The following policies have been consolidated into Policy 2.121:

- 2.109 Business Purpose Requirements For Use of University Funds
- 2.114 Fiscal Transactional Roles and Responsibilities
- 2.118 Conflict Materials Policy
- 2.121 General Purchasing Policy
- 2.21 Authority and Responsibility for Acquiring Goods and Services
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- 2.25 Ethical Guidelines
- 2.88 Compliance with Procurement Policies

**Responsible Official:** Vice President for Finance/Chief Finance Officer

**Administering Division/Department:** Procurement Services

**Effective Date:** January 01, 2014

**Last Revision Date:** October 09, 2018

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### Overview

This policy assigns authority and responsibility for the purchase of and payment for products and services.

This policy outlines the procurement methods for purchasing all goods and services at Emory University. The policy addresses competitive bidding and supplier selection, contracting authority, issuance of purchasing transactions, purchasing methods, authorizations, receipt of goods and services, required documentation, and ethical practices.

Purchases for University business must be made through standard methods, as outlined in the Purchasing Methods section below. The university's competitive bidding threshold is \$5,000, at which competition via bids and quotes from multiple suppliers is required before purchase of a good or service is completed. The Procurement Office may waive the bid requirement if there is an established preferred supplier contract in place.



For purchases below the University's competitive bidding threshold, Strategic Procurement should be used as the primary resource for guidance as needed. Faculty and staff members are not authorized to establish direct relationships with suppliers which will result in a fiscal demand upon the University.

Strategic Procurement has the authority to determine the supplier source that will be utilized to procure goods and services. Strategic Procurement has the sole authority to issue Purchase Orders on behalf of the University.

This policy as set forth is in accordance with University Bylaws as well as the University Contract Approval and Signature Authority Policy.

All funds deposited with the University, regardless of source, are University funds and must be handled in accordance with University policies and procedures. Although departments are allocated funds in their budgets for a given period, this allocation carries the authority to submit a request (requisition) to purchase goods/service, not the authority to purchase.

Purchases not covered by this policy include investment management services, insurance, employee travel and entertainment costs, legal services, employee benefit programs, construction contracts, and real estate.

### **Applicability**

All Emory University employees.

### **Policy Details**

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## Authority and Responsibility for Acquiring Goods and Services

### Overview

The Associate Vice President, Strategic Procurement will establish and maintain policies and procedures to provide for the efficient and responsible conduct of all procurement and disbursement activities.

[Strategic Procurement](#), in conjunction with the Associate Vice President, Strategic Procurement, is responsible for enforcing University procurement and disbursement policy.

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

The Associate Vice President, Strategic Procurement has the authority and responsibility to:

- Negotiate all procurement terms and execute all purchases of goods and services unless otherwise prohibited by University statutes or policy or Trustee action; and
- In conjunction with the Vice President for Finance, determine and recommend, when appropriate, the potential benefits offered by a lease as compared to the purchase of equipment.

No employee of the University, except as authorized by the Trustees of Emory University, the statutes of the University or President's letter of delegation, is empowered to incur any obligation or make any commitment on behalf of the University for the procurement of products, services, or equipment unless specifically delegated in writing by the Associate Vice President, Strategic Procurement.

### Contract Signing Authority

Please refer to the official university policy located at <http://policies.emory.edu/1.2>.

As taken from the aforementioned policy: Individuals do not have the authority to enter into negotiations or approve or sign contracts with external entities on behalf of Emory unless there is: (1) authority as set forth in the Bylaws of the University or one of its corporate legal entities; (2) a resolution of the Board(s) of Trustees; (3) a valid delegation of



authority from the President or other Emory official listed herein; or (4) a purchase made in accordance with Emory's Procurement Department Policies and Procedures.

Those with authority to authorize contracts should engage the services of the Procurement and Contract Administration department to ensure contract language and terms are not in opposition to standards and best practices set forth by Emory. Care must also be taken to ensure the selection of suppliers is done in a manner consistent with other awards.

Officers or departments other than Strategic Procurement that have been delegated the responsibility for procurement of certain goods and services must procure those goods and services in accordance with University procurement policy. Procedures governing procurement in these areas are subject to prior review and approval by the Associate Vice President, Strategic Procurement.

All purchases must be made for the purpose of University-related activities. Purchasing any goods or services for personal use is prohibited.

Procurement and Payment Services is responsible for maintaining records of all procurement and disbursement transactions. University faculty and staff who have been authorized to use a Purchasing Card are responsible for maintaining records of all procurement credit card transactions.

1. Procurement and Payment Services is responsible for responding to all external audit findings or agency inquiries concerning procurement and disbursement issues.
2. 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.

Issuance and Authorization of Purchasing Transactions

Strategic Procurement oversees the University's purchasing process, including efforts to secure the best price and quality for the required goods and services and ensure compliance with University policies and Federal and state laws and regulations.

The departments listed in the table below are authorized to create departmental orders for the specific goods and services delegated to them as follows:

Purchasing Authority Delegations

Delegated Purchaser	Allowable Goods and Services
University Museums	Books and other items for University collections
Campus Services Capital Construction Non-Capital Renovations/Alterations	Contracts for architectural, engineering, construction, and related consulting services, as well as for capital and specific non-capital construction projects, renovations and alterations

Secondary Authorizations

*Purchase Requisitions*

Purchase Requisitions with an aggregate value equal to or greater than \$10,000 must be approved by the appropriate Senior Business Officer or Chief Business Officer assigned to the department or school.

Purchase Requisitions with an aggregate value equal to or greater than \$250,000 must be approved by the appropriate Executive Vice President (or their designee).



### Segregation of Duties

Departments must separate the duties of requesting procurement of goods and services from the approval of such requests. If staff limitations require one person to be responsible for these functions, a supervisor must accept responsibility for monitoring and verifying the transactions.

**Note – the Emory Express system is configured so that a person cannot create and approve the same requisition.**

### Business Purpose Requirements for Use of University Funds

When using Emory University funds, documentation of a clear business purpose is required so an approver, reviewer and /or auditor will reasonably conclude and agree that the expenditure is an appropriate business expense.

An explanation of business purpose must be documented and should contain sufficient information so the approver, reviewer and/or auditor will clearly understand how the expense benefits Emory.

The documentation of business purpose required for the following process or system is listed below.

- Purchase requisitions originating in Emory Express with the University's contracted vendors generally require minimal documentation regarding business purpose if business use of the goods and services are apparent and multiple approvals have been obtained prior to purchase.
- Invoices processed through the Emory Express "Invoice attached" process require business purpose documentation when the business purpose is not readily evident.
- Purchases and expenditures made with personal funds or Emory's Corporate Card (thus seeking reimbursement) or with an Emory Purchasing Card generally need significant business purpose documentation.

Expenditures that by nature may be construed to have or may have some personal use or personal benefit will require a much higher level of substantiation of the business purpose. Certain expenditures may have both personal and business use; however, it should be clear by the explanation of the purpose of the expenditure that the preponderance of the use is for business purposes, even if some personal use remains. If in reviewing the expenditure the preponderance of use is determined to be personal, no reimbursement or payment should be made with University Funds.

Below is a non-exhaustive list of expenditures that require a much higher level of substantiation of business purpose:

- Subscriptions for general interest newspapers, magazines, or on-line services.
- Books that, by their title, would not seem to apply to the discipline or academic field of study or area of responsibility.
- Any expenditure for an entertainment item or activity, particularly if an Emory employee is not present during the entertainment or activity.
- Goods or services that are commonly used personally.

Explanations such as "research", "business meeting" or "lunch meeting" are NOT sufficient explanations of business purposes.

### Final Authority Regarding the Adequacy of Business Purpose

Final determination of the adequacy of the business purpose explanation and whether it sufficiently justifies the expenditure of University funds resides with the Vice President for Finance and is administered by the Associate Vice President, Strategic Procurement.

The Office of Financial Operations will enlist, as appropriate, those subject-matter experts (e.g., General Counsel, Internal Audit, etc.) needed to ensure that all uses of University funds are consistent with the mission, and in the best interest, of Emory University.

### **General Procurement**



## Overview

Emory University personnel shall purchase goods and services using practices that are compliant with Federal and state laws and aligned with Emory's best business practices. Furthermore, goods and services purchased with sponsored funds must comply with sponsor terms and conditions. Finally, Emory University personnel must purchase goods and services using practices that leverage University-wide contracts, thereby maximizing the University's buying position and minimizing overall cost.

## Purchasing Methods

The University has defined standard purchasing methods for procuring goods and services for the University business purposes (listed below in order of preference). Refer to the University Buying in the Marketplace website for guidance on selecting preferred suppliers and the appropriate purchasing method: either preparing a purchase requisition or using a P-Card. Unless notified otherwise, individuals must adhere to the purchasing method(s) identified for each Commodity. Regardless of the method used, documentation, authorization, compliance with policies and procedures, and individual accounting integrity is the responsibility of the initiating department.

The Emory Express Purchasing System and the Visa Purchasing Card are the University approved buying tools for purchases from external suppliers. Use of the appropriate buying tool must be in compliance with guidelines listed on the Buying in the Marketplace website.

### *Purchase Requisitions*

Emory's Procurement System (Emory Express) is the University's best practice approach and is required to purchase goods and services. Please note – a purchase requisition can and should be placed for all goods and services required at the University. Faculty and staff should not directly instruct suppliers to ship items. Purchase requisitions are initiated and must be approved by a duly authorized departmental approver.

### *Emory Purchasing Card*

Emory University provides two methods for obtaining goods and services:

The primary method is through the use of the enterprise Procurement System, Emory Express and is the most cost effective way to obtain most goods and services. The cardholder should first review the [Emory Commodity Matrix](#) list of items obtainable through Emory Express.

The secondary method is the Emory JP Morgan Chase Visa Purchasing Card (P-Card). The P-Card is for use by faculty and staff for low dollar purchases (\$1,499 and less) otherwise not available through Emory's contract suppliers. The card should also be utilized for recurring small dollar departmental charges. Refer to the [Emory Commodity Matrix](#).

All P-Card transactions must be reviewed and approved in a timely manner using the JP Morgan Chase PaymentNet online P-Card transaction tool. The P-Card policy may be reviewed [here](#).

The appropriate Chief Business Officer must approve all requests to obtain a new [Purchasing Card](#).

The Cardholder must successfully complete required training, and, upon completion of training, sign and accept the terms and conditions of the Purchasing Card Cardholder Agreement prior to receiving his/her Purchasing Card. Cardholders must also complete a bi-annual refresher training course in order to retain use of their Purchasing Cards.

All Purchasing Card transactions must be processed in accordance with University Procurement and Payment [finance policies](#) and the authorized buying method instructions listed in the [Emory Marketplace](#).

The standard Purchasing Card monthly spend limit is \$5,000.00. The standard single transaction limit is \$1,499.00. Requests to increase the standard spend or transaction limit must include an explanation of the business purpose for the request and must be approved by the appropriate Senior Business Officer. The request must then be forwarded to the Financial Operations' designee for final review and approval.

The Purchasing Card cannot be used for purchases of [restricted commodities and/or purchases from restricted suppliers](#).

All Purchasing Card transactions must be made by the individual to whom the Purchasing Card is issued.



All Purchasing Card transactions must be made for the sole use and benefit of the Emory University. Personal purchases are not permitted under any circumstances as per the terms and conditions of the Cardholder Agreement.

As an authorized agent of the University, it is the cardholder's responsibility to ensure proper use of the University's sales tax exemption number.

It is the cardholder's responsibility to ensure appropriate supporting documentation for each Purchasing Card transaction is uploaded into the PaymentNet system.

It is the Authorized Approver's responsibility to review and approve each transaction in the PaymentNet system.

Strategic Procurement is authorized to review Purchasing Card purchasing activity to ensure compliance with this policy. Strategic Procurement is authorized to suspend the Purchasing Card privileges of any Cardholder who is deemed to be in violation of this policy.

Violation of this policy and/or the duties and responsibilities listed in the Purchasing Card Training program will result in further action by the Dean, Director, or appropriate Chief Business Officer in accordance with the Emory University Human Resources policies.

Fraudulent use of the Purchasing Card will result in actions being taken in accordance with the procedures established in the Cardholder Agreement form

### Source Selection

#### *Competition and Supplier Selection*

The University requires and encourages competition among suppliers in providing goods and services to the University. Competition ensures quality, service and price that matches the stated needs of the University. Accordingly, those involved in supplier selection have the responsibility to search broadly and completely for viable suppliers. Strategic Procurement should be contacted to assist with identifying suppliers to meet your needs.

#### *Competitive Bidding Requirements*

Competitive bids are required when purchasing goods or services more than the University's competitive bid threshold of \$5,000. Requisitions submitted to Strategic Procurement requesting the issuance of Purchase Order for any item or service more than the bid threshold must be supported by evidence that competitive bids were obtained or submitted with a sole source justification. If a requisition for material or services is received without evidence of such competition Strategic Procurement will attempt to obtain the required quotes or secure the required justification prior to issuance of a Purchase Order. Exceptions: Purchases of material or services from a supplier in possession of a University approved contract, no competitive bids or sole source justification is required.

Strategic Procurement

#### *Preferred Suppliers*

In order to streamline the supplier selection process, the University has established contracts with preferred suppliers for the most commonly purchased goods and services. Preferred suppliers are listed on the Buying in the Marketplace website and must be used whenever possible. Suppliers without University contracts should only be considered if preferred suppliers do not provide the good or service, or if the pricing is not competitive.

#### *Diverse Suppliers*

Every effort has been made to provide a selection of diverse suppliers which are able to meet the requirements of the University. These are suppliers who are able to certify they meet the standards for small, disadvantaged, minority, and/or women-owned suppliers set by the Federal Small Business Administration.

#### *Sustainable Procurement*

Emory's sustainable procurement practices are designed to support the University's efforts to monitor and reduce its environmental impact. Emory encourages the effort to procure goods and services with these standards in mind.

#### *Emory's Internal Service Providers*

Emory's internal service providers furnish a considerable amount of goods and services to the University. Every effort should be made to utilize Emory's Internal Service Providers.



### *Conflict Materials*

The Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), which focuses on reforming U.S. financial regulation, was signed into law on July 21, 2010. Section 1502 of this “Act” imposes reporting requirements on U.S. companies regarding their use of certain “conflict minerals.” This section of the “Act” was intended to address Congressional concerns related to the exploitation resulting from the purchase of certain minerals originating in the Democratic Republic of the Congo and adjoining countries. Such purchases, by US companies, would help finance the conflict, characterized by extreme levels of violence, in the eastern Democratic Republic of the Congo and a continuing humanitarian crisis.

Emory University recognizes the humanitarian crisis in the Eastern Democratic Republic of the Congo by supporting the intent of the legislation through the purchase of conflict-free electronic products from contracted electronic suppliers in compliance with the reporting requirements of Section 1502. In the future Emory University may offer preference to those suppliers who have made a commitment to conflict-free supply chains when quality and cost performance are equal or superior.

### *Radioactive Materials*

Approval to acquire radioactive materials must be received from the University's [Environmental Health & Safety Office](#) prior to the creation of a purchase order.

The University Purchasing System must be used for the purchase of all radioactive materials. Purchase orders that take advantage of the [Emory Marketplace](#) for ordering radioactive materials will be required to reference the Environmental Health & Radiation Safety Office approval number while they are completing the requisition. Free form orders must include the Environmental Health & Radiation Safety Office approval number in the description field of the order.

### *Restricted Suppliers*

Federal guidelines (FAR 9.405-2 and FAR 52.209-6) prohibit subcontracting of Federal funds in excess of \$30,000 to an organization or individual who is debarred, suspended, or proposed for debarment unless there is a compelling reason to do so.

### *Deposits and Prepayments*

It is uncommon that suppliers request prepayment or down payments from Emory. Any request to do so should generate cause for concern. Any request from suppliers for deposits, down payments or prepayments in the amount of \$100,000 or greater must be pre-approved by the Associate Vice President for Strategic Procurement.

### *Receipt of Goods Acknowledgment*

Departments are responsible for verifying the actual receipt of goods and services. Receipt of goods acknowledgement confirms that purchased goods and services have been received in the manner and quantity ordered. Electronic receipt acknowledgement is required for orders in the amount of \$5,000 or greater. The receipt acknowledgement for these orders must be completed in Emory Express prior to any payments being released to the supplier.

The receiving process is to be completed in a timely manner (within 10 business days of receipt of goods).

### Ethical Practices and Guidelines

Strategic Procurement adheres to the highest ethical principles of the University and fosters and promotes fair, ethical, and legal trade practices.

University personnel involved in the purchasing process must also follow the requirements set forth in the University's Standard of Business Conduct and Purchasing Code of Ethics. Any situation that compromises, or appears to compromise, any personnel involved in the procurement process must be reported immediately to the Assistant Vice President for Strategic Procurement. Violation of the requirements noted above will lead to disciplinary action, up to and including termination of employment. In general, ethical practices include, but are not limited to, observing the guidelines in this section.

### *Confidentiality*

When discussions arise between suppliers and University departments, University personnel involved in the procurement process may only discuss the specifics of applicable policies and standard procedures as they impact specific orders.





To protect a supplier’s right to confidentiality and the University’s interest, competing suppliers must not be told the prices, terms, or conditions quoted by other suppliers. All university personnel must respect the confidentiality in all procurement activities.

*Gifts, Gratuities and Business Meals*

Employees are prohibited from accepting gratuities or special favors from any vendor, potential vendor or contractor seeking to do business with Emory. This does not include the acceptance of items of nominal or minor value (\$40.00 or less) that are clearly tokens of respect or friendship and are not related to any particular transaction or activity of the University, nor does it include business-related social events where the employee is representing the University’s interest.

Emory University employees shall not solicit a gift or accept a significant gift from any supplier or prospective supplier. A ‘significant gift’ is defined as any item, service, favor, monies, credits, or discounts not available to others which could influence purchasing decisions. University personnel are permitted to accept trivial items as a matter of courtesy, but may not solicit them. Acceptance of social invitations to occasional business meals, entertainment, and hospitality will be subject to prudent judgment as to whether the invitation places or appears to place the recipient under any obligation, the appropriateness of the occasion, frequency, and choice of facilities. Questions about the value of a gift or the appropriateness of an invitation should be referred to your supervisor to ensure compliance with the University’s conflict of interest policy.

*Purchases for Employees*

It is the policy of the Strategic Procurement not to permit the expenditure of University resources to acquire goods and services for the personal use of University employees.

*Conflict of Interest*

Employees of Emory University who act on its behalf are required to avoid all business and financial relationships, transactions or activities that may constitute, or appear to constitute, a conflict of interest. Employees must not use their University position to influence outside organizations or individuals for the personal, financial or professional benefit of themselves, their family members, or others with whom they have a personal relationship.

All personnel involved in the procurement process must abide by Emory Policy 4.87 Conflict of Interest Policy and, if applicable, Emory Policy 4.112 Conflict of Interest – Trustees, Principal Officers, and Key Employees. In addition, personnel who request that orders be directed to suppliers that employ members of their families, or when they or members of their families have a financial or other interest, must report this information, along with documentation that the proposed transaction has been approved by the employee’s dean, director or vice president in accordance with Policy 4.87 – Conflict of Interest or by the relevant Conflict of Interest Committee in accordance with Policy 4.112 – Conflict of Interest – Trustees, Principal Officers and Key Employees, to the Assistant Vice President for Strategic Procurement prior to creating the requisition. This information will be formally documented in the purchasing transaction record.

*Fiscal Transactional Roles and Responsibilities*

All fiscal transactions involve the fiscal roles defined below. An individual's responsibility for a specific fiscal role is assigned by her/his job description or through specific written authorized delegation. Please note that in these fiscal transactions, fiscal responsibility is held by the fiscal manager of the funds used for these transactions.

In a fiscal transaction, each individual takes on a specific role and provides a certification as described below. All fiscal transaction roles are required to establish the appropriateness of the fiscal transaction. Employees should be familiar with and consult all applicable policies related to their expenditure prior to expense submission for approval. Sample diagrams of the processes for Travel & Expense, Emory Express, and Purchasing Card (P-Card) transactions are illustrated below:

Travel & Expense:

Submitter (cardholder) ⇒ Processor (proxy, as applicable) ⇒ Approver(s)

Emory Express:

Requestor ⇒ Approver(s)

Purchasing Card:

Cardholder ⇒ Approver(s)



Role	What is the Role?	When does it occur?	How is it documented?
Requestor (Submitter)  (Cardholder)	<p>The individual initiating the request to engage in a fiscal transaction or requesting reimbursement for University business.</p> <p>If the Requestor does not have the authority to commit the University to the fiscal transaction, the Requestor needs to obtain departmental approval before initiating and/or completing the fiscal transaction.</p>	At the beginning of a fiscal transaction.	<p>Documentation can be in memo form, email, hand-written note, on-line request, etc.</p> <p>The Requestor is expected to provide documentation supporting purchases, as required by University policies.</p>
Processor (or Proxy)	<p>The individual responsible for completing the administrative steps for inputting or guiding a fiscal transaction through the appropriate business process to successful completion.</p> <p>Process or cannot approve a transaction. This is an administrative or clerical function.</p> <p>Note that payment processing does not occur in Emory Express transactions.</p>	<p>Upon appropriate request of the Requestor.</p> <p>The Processor should notify the Approver if they have concerns with the requested transaction. These concerns could include, but are not limited to, understanding the business process of a transaction, not believing the transaction is in compliance with University policy, and so forth.</p>	Various means of documentation depending on the fiscal transaction, but it must be in physical form (either in electronic or paper files).
Approver(s)	<p>The individual accountable for the fiscal transaction. Approvers are expected to consider a transaction's impact on the University, challenging any transaction that does not appear to be in compliance with University policy. Approving a payment is not the same as processing a payment.</p> <p>The Approver must ensure that the transaction:</p> <ul style="list-style-type: none"> <li>is in accordance with regulations, laws, University policies, as well as contracts or donor restrictions,</li> <li>has appropriate documentation,</li> <li>has sufficient funds, and</li> </ul>	<p>Depends on the transaction type.</p> <p>For Purchase Card (P-Card) and Travel Card transactions, approval occurs after the fiscal transaction. For P-Card transactions, payment is made to the P-Card vendor at the time of the transaction and prior to approval.</p> <p>For Travel Card transactions, payment is made to the card vendor only after all required approvals.</p> <p>For Emory Express transactions, approval</p>	<p>Documentation depends on the type of transaction.</p> <p>Documentation must be written (physical - either in electronic or paper files) and not verbal. Receipts and documentation should be compliance with University policies.</p> <p>If the Approver does not have the ability to make all required certification statements, then the signer must have documentation from the other responsible</p>



Role	What is the Role?	When does it occur?	How is it documented?
	<ul style="list-style-type: none"> <li>has appropriate prerequisite approvals, as applicable.</li> </ul> <p>Approval may be the responsibility of multiple individuals with different roles, as designated by a higher-level approver than the requestor. It is required by the person with primary budget oversight responsibility for the source of funds.</p> <p>The individual approving the transaction (evidenced by either written or electronic signature) must be in a position of fiduciary authority to the Requestor and must be in a position to deny the request. All approvals must occur from an appropriate individual with higher-level fiscal role (or designated as such).</p> <p>It is NOT appropriate for a subordinate or peer, in fact or circumstances, to approve any transaction for anyone deemed at a higher level of authority without additional document review by a person of higher authority than the Requestor (or as previously designated by a person of higher authority).</p>	<p>must occur prior to the fiscal transaction; payment is made after the transaction is complete.</p> <p>All transactions should occur within an employee's delegated authority.</p> <p>If approvals are designated, the person of higher authority must review on a periodic and regular basis, such as monthly.</p> <p>Approvers are expected to challenge any transaction that does not appear to be in compliance with University policy.</p>	<p>individual attesting to approval.</p>
<p>Additional University Approvers</p>	<p>Secondary approval is sometimes required per University policy. This is typical of transactions in excess of certain dollar thresholds.</p> <p>Additional levels of approval may be added within units at the discretion of unit leadership and within reasonable operational norms.</p> <p>As needed, Compliance approvals may be required on certain fiscal transactions in order to ensure compliance with certain policies, laws, regulations, rules, or restrictions.</p>	<p>Once certain thresholds are met as defined in University policies.</p> <p>All transactions should occur only if within an employee's delegated authority.</p>	<p>Documentation depends on the type of transaction.</p> <p>Documentation must be written (physical - either in electronic or paper files) and not verbal.</p> <p>Documentation must be in compliance with University policies.</p>



Role	What is the Role?	When does it occur?	How is it documented?
	These additional approvals do not relieve the initial Approver of his or her responsibilities.		

Signatures:

For every fiscal transaction involving a charge card or Emory Express, signatures and documentation must support the involvement of at least two distinct University employees (i.e., no one person can requisition and approve or process and approve). When an employee signs (written or electronic) her/his name on a document, he/she is saying that certain criteria have been met, the action can proceed (or is ratified if after the fact), the person signing has the authority to sign, and the person will be held personally accountable for their work-related actions. These assertions must be in compliance with each employee’s official signature authority as defined by Contract Approval and Signature Authority Policy. Electronic signatures can include an online submission or approval of a transaction or a sender’s email address in an authorizing email.

- Manual signatures must be the actual signature of the person signing the document.
- Rubber stamp signatures, other facsimile signatures, or signatures for another person (e.g., signed John Doe by Jane Smith) are not acceptable unless the signature authority has been officially delegated in advance of the transaction.

If it is not possible or practical to obtain the signature of the Requestor, an exception to this policy may be granted in writing by the appropriate unit Chief Business Officer or the Office of the Vice President for Finance.

Fiscal Misconduct:

All fiscal transaction related university policies, procedures, enforcements, and disciplinary procedures should be considered prior to signing or approving any document or fiscal transaction.

**Compliance with Procurement Policy**

Strategic Procurement, in conjunction with the Office of the Associate Vice President, Strategic Procurement is responsible for ensuring compliance with University procurement policy.

Authorization to suppliers for the purchase of products and services must be made through an approved University purchase order or a Purchasing Card.

Certain purchases may be made through means other than a University purchase order or a Purchasing Card. See [Emory Marketplace](#) for guidelines on the type of transactions that may be processed without using a University purchase order or a Purchasing Card.

Strategic Procurement, in conjunction with Payment Services, has been delegated responsibility for managing the University supplier database.

Strategic Procurement has the authority to determine the source that will be utilized to procure goods and services. Ordering departments have the authority to requisition for goods and services, however Strategic Procurement has the sole authority to issue Purchase Orders on behalf of the university.

Any supplier contract or agreement requiring signature authorization must be reviewed by the Contract Administration Office and/or the Office of the General Counsel prior to execution.

Competitive bids may be required for all purchases in any amount at the discretion of Strategic Procurement. Competitive bids are not required when purchasing products or services from a University Contract Supplier.

Violation of Policy

This University Policy is intended to maximize the University’s buying power, streamline business practices and reduce potential institutional risks associated with contracting and other procurement related activities. Violation of University policies may carry disciplinary consequences, up to and including dismissal.



**Definitions**

*Procurement:* The process, from initial concept and planning through to contract completion and post-contract analysis, of purchasing of goods or services from external sources for the University.

**Related Links**

- Current Version of This Policy: <http://policies.emory.edu/2.121>
- Emory Commodity Matrix (<https://www.finance.emory.edu/home/Procure%20and%20Pay/purchasingmethodswlinks.8.16.13.pdf>)
- Purchasing Card Policy (<http://policies.emory.edu/2.23>)
- University ByLaws (<http://www.emory.edu/secretary/governance/bylaws.html>)
- Contract Approval and Signature Authority (<http://policies.emory.edu/1.2>)

**Contact Information**

Subject	Contact	Phone	Email

**Revision History**

- Version Published on: **Oct 09, 2018** (quick revisions)
- Version Published on: **Aug 25, 2016** (*Please refer to the preapproval email submitted by Loette (8/17/2016)*)
- Version Published on: **Aug 20, 2014** (*Change made to position title.*)
- Version Published on: **May 08, 2014**
- Version Published on: **Dec 10, 2013** (*Original Publication*)