



SOCIETY OF  
RESEARCH  
ADMINISTRATORS  
INTERNATIONAL

# Power of the Pen: Should I sign this?

Kathy Kreidler, MBA

Associate Vice President, Sponsored Projects Administration

Caroline Dietz, PhD, CRA

Assistant Director, Grants and Award Management

UTHealth Houston

# Authorized Organizational Representative

# Authorized Organizational Representative (AOR)



## NIH GRANTS POLICY STATEMENT

### 2.1.2 Recipient Staff

Overall responsibility for successfully implementing an NIH grant is a shared responsibility of the PD/PI(s), the AOR, and the Research Administrator. As key members of the grant team, they respectively lead the scientific and administrative aspects of the grant. While communications can be conducted with Research Administrators and other institutional staff, NIH staff members conduct official business only with the designated PD/PI(s) and AORs. The roles and responsibilities of recipient participants are as follows:

- **Authorized Organization Representative.** The AOR is the designated representative of the recipient organization in matters related to the award and administration of its NIH grants, including those that require NIH approval. The AOR should ascertain and assure that the materials the applicant organization are submitting on behalf of the PD/PI are the original work of the PD/PI and have not been used by other individuals in the preparation and submission of a similar grant application. In signing a grant application, this individual certifies that the applicant organization will comply with all applicable assurances and certifications referenced in the application. This individual's signature on the grant application further certifies that the applicant organization will be accountable both for the appropriate use of funds awarded and for the performance of the grant-supported project or activities resulting from the application. (Also see [Legal Implications of Applications](#).) This individual also is responsible to NIH for ensuring that the organization complies with applicable Federal laws and regulations, including required certifications and assurances, its application, and the terms and conditions of individual awards. For applications submitted electronically through Grants.gov, the signature of the AOR is documented as part of the electronic submission process and is authenticated through the Grants.gov registration process. In the eRA Commons, this individual holds the Signing Official role. Although NIH requires that the recipient organization designate such an official, NIH does not specify the organizational location or full set of responsibilities for this official.

# Authorized Organizational Representative (AOR)

The person(s) designated to:

- Submit applications on behalf of the university/organization
- Provide certifications and assurances
- Sign grant agreements and contracts on behalf of the university/organization
- Complies with applicable laws and regulations and terms and conditions of an award

Fun Fact: In general, awards are made to institutions, not individuals, and require AOR certification and signatures to be accepted.

# Paths to becoming an AOR



# How do universities or organizations designate AORs?

Universities designate Signature Authority to employees who they determine to be well-versed in the policies and procedures of the institution that they represent, the sponsor regulations and policies and in the federal, state and local laws that their institution resides.

- Position-dependent
- Content-specific
- Limitations on signature authority

The way that your university is organized influences who is designated as AOR

- Centralized organizations may have fewer AORs
- Decentralized organizations that allow schools/designated units AOR authority may have several AORs

How does your institution delegate signature authority?

# What do AORs do all day? A Day in the Life of an AOR

Log In 5 AM  
Check your email  
Sign LOI  
Meeting with Professor X about contract  
Submit Grant  
Discuss difficult life situation with employee  
Sign Contract  
Phone call with department admin about grant review  
Reply to sponsor  
Eat lunch  
Try (and fail) to access sponsor portal to submit report  
Review contract, send back for missing item  
Submit Grant  
Sign Letter  
Create PO  
Approve Job Description  
Approve timesheets  
Submit another grant  
Sign contract  
Sign LOI  
Sign subrecipient commitment form  
Dinner?  
Read about another Federal change  
Sleep



# Prioritization and Multi-Tasking

There are many items that an AOR must complete daily

Everyone wants AOR sign off but not everything passes muster

AORs protect the interests of the institution above all else

Time sensitive deadlines (like proposals) take precedence, but it is essential to understand what you are signing

Just because someone sent a document to you does not mean it can be signed!



[This Photo](#) by Unknown Author is licensed under [CC BY](#)



# I can sign this, but should I?

## EXTERNAL MAIL

Good afternoon Dr. [REDACTED],

I'm reaching out on behalf of Dr. [REDACTED] at UTHealth Houston. Attached are the subcontract documents for the R01 [REDACTED] proposal. Dr. [REDACTED] will send you her bio-sketch separately.

Attached is the:

- Signed LOI
- SOW

**Subject:** Re: [REDACTED] E due date for subcontract materials  
**Importance:** High

Hello [REDACTED]

Thank you for these! May we also request the following documents be completed and forwarded to us:

Subrecipient Profile Questionnaire (pre-filled and attached)

# I can sign this, but should I?

"Good morning xxxx,

These forms should not be necessary. [The University of Texas Health Science Center at Houston](#) and xxxxxx are both participants in the Expanded Clearinghouse, a Federal Demonstration Partnership (FDP) initiative that reduces the administrative burden associated with the exchange of subrecipient monitoring forms. As a condition of our participation, we agreed to utilize the Expanded Clearinghouse to obtain publicly available information rather than exchange forms....."

"Hello UTHealth,

I completely understand.....

However, the subrecipient profile questionnaire is required for our internal purposes that we must include prior to submission in our Grants system (see screenshot below), or our Sponsored Programs Admin (SPA) will not allow me to submit the award unfortunately. "

# AOR Line in the Sand: Time of Proposal

Direct Competitors  
Violation of State law  
Duplicative paperwork  
Unclear of the scope of participation/Scope  
of Work  
Costs are not clearly outlined

Options:  
Complete denial  
Request revised proposal  
Require more information at time of award



[This Photo](#) by Unknown Author is licensed under  
[CC BY-NC-ND](#)

# I can sign this, but should I?

Collaboration agreement  
comes to you for signature.

Scope of Work: We provide  
patient data to test their  
suicidal ideation app

This was negotiated by  
Legal, it must be ok, right?



## I can sign this, but should I?

*"We received all the necessary [budget] approvals two days ago...now it is ready to move forward with contract editing....We have already provided the contract draft. I also need to update the company on our progress...if you could provide a rough estimate of when we can expect the first draft, that would be really helpful. This way, I can communicate a timeline to them accordingly."*

*Thanks,*

*PI*

### **PI pushing**

**Foreign industry contract with cost share (\$22K with equip loan)**

**Cost share is under university threshold for additional budget approval**

**Oh, and the contract....What's really going on?**

# AOR Line in the Sand: Award Acceptance

Contract for work that is not adequately compensated  
Intellectual Property issues  
PI agreed to terms and conditions that University could not agree to  
Scope of Work is unclear  
Unacceptable terms and conditions

**\*\*Warning\*\*** Some sponsors consider drawing down funds or cashing checks to be acceptance of terms and conditions

Options:

Do not sign

Revise Budget/Scope of work

Renegotiate

Waivers



[This Photo](#) by Unknown Author is licensed under [CC BY](#)

# I Can sign this, but should I?

Captain from US Army calls  
at 4:30 PM

He's got a contract that is  
due at 5 PM for \$4 million

What would you do?



# AOR Line in the Sand: Post Award Issues

Prior Approval Requests with false statements

Scope Creep

Fund deobligations (money is already spent!)

Deliverables not being met

Options:

Revised request/scope

Ask for more funds

No Cost Extension with progress requirements





# What have your lines in the sand been?

How do you prepare rising Research Administrators in your institution to become AORs?



[This Photo](#) by Unknown Author is licensed under [CC BY](#)