



Transaction Authority and Payment Approval

POLICY STATEMENT

Cornell's Board of Trustees, "the Board," formally delegates authority to designated individuals to enter into agreements with external parties that obligate the university. This is referred to as "transaction authority." An individual must not assume transaction authority unless that authority is extended through this policy.

The Board also grants to heads of units the authority to delegate "payment approval" to individuals with related functional responsibilities. This is not the same as transaction authority. Instead, payment approval is the authority to approve payments charged to university accounts.

REASON FOR POLICY

To protect the interests and manage the risks of the university, the Board delegates authority to specific individuals to undertake transactions with external parties. In addition, the Board provides for the appropriate review of all transactions by establishing payment approval.

ENTITIES AFFECTED BY THIS POLICY

All units of the university

WHO MUST READ THIS POLICY

- Anyone who conducts business on behalf of the university

WEB ADDRESS FOR THIS POLICY

- This policy: www.dfa.cornell.edu/policy/policies/transaction-authority-and-payment-approval
- University Policy Office: www.policy.cornell.edu

POLICY 4.2

Transaction Authority and Payment Approval

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RELATED RESOURCES

University Policies and Documents

[University Policy 1.5, Inventions and Related Property Rights](#)

[University Policy 3.1, University Fundraising](#)

[University Policy 3.14, Business Expenses](#)

[University Policy 3.15, Unrelated Business Income Taxes \(UBIT\)](#)

[University Policy 3.16, External Organization Accounts](#)

[University Policy 3.25, Procurement of Goods and Services](#)

[University Policy 4.3, Sales Activities on Campus](#)

[University Policy 4.6, Standards of Ethical Conduct](#)

[University Policy 4.9, Legal Defense and Indemnification](#)

[University Policy 4.10, Use of Cornell's Name, Logos, Trademarks, and Insignias](#)

[University Policy 4.11, Forming a University-Related Subsidiary or Affiliate or Acquiring a Controlling Interest in a Separate Entity](#)

[University Policy 4.14, Conflicts of Interest and Commitment \(Excluding Financial Conflict of Interest Related to Research\)](#)

[University Policy 4.15, Copyright](#)

[University Policy 4.22, Export and Import Control Compliance](#)

[Cornell University Hazardous Waste Manual](#)

[Cornell University Real Estate Administrative Plan](#)

[Faculty Handbook](#)

[Guide to Proposal Preparation for Sponsored Projects](#)

[Procurement and Payment Services Buying Manual](#)

[University Bylaws](#)

[Reporting Foreign Gifts and Contracts at Cornell University](#)

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CONTACTS, ITHACA CAMPUS UNITS

Direct general questions about this policy to your unit's administrative office. If you have questions about specific issues, please contact the following offices:

Subject	Contact	Telephone	Email/Web Address
Policy Clarification and Interpretation	Executive Vice President and Chief Financial Officer	(607) 255-4242	executivevp@cornell.edu
Audit	University Audit	(607) 255-9300	audit@cornell.edu audit.cornell.edu/
Banking	Office of the Treasurer, Cash Management	(607) 254-1590	cashmanagement@cornell.edu http://www.finance.cornell.edu/treasurer/cash-management
Benefits	Division of Human Resources, Benefit Services	(607) 255-3936	benefits@cornell.edu hr.cornell.edu/benefits-pay
Contract Provisions	Office of General Counsel	(607) 255-5124	counsel-web@cornell.edu counsel.cornell.edu
Export Control	Export Control Office	(607) 255-5284	https://researchservices.cornell.edu/export-controls exportcontrol@cornell.edu
Financial Matters	Division of Financial Services	(607) 255-6240	finance@cornell.edu www.finance.cornell.edu
Gift Processing	Alumni Affairs and Development, Advancement Services	(607) 254-7121	info-services@cornell.edu
Indemnification	Office of General Counsel	(607) 255-5124	counsel-web@cornell.edu counsel.cornell.edu
Payment Approval	Division of Financial Services	(607) 255-6240	finance@cornell.edu
Purchasing	Procurement Services	(607) 255-3804	procurement@cornell.edu www.finance.cornell.edu/procurement/
Reporting Foreign Gifts and Contracts	Sponsored Financial Services	(607) 255-2016	hea117reporting@cornell.edu https://finance.cornell.edu/our-policies/reporting-foreign-gifts
Sponsored Programs	Office of Sponsored Programs	(607) 255-5014	osp-help@cornell.edu https://researchservices.cornell.edu/offices/osp
Transactions with International Entities	Division of Financial Services	(607) 255-2016	https://finance.cornell.edu/our-policies/reporting-foreign-gifts

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CONTACTS, WEILL CORNELL CAMPUS UNITS

Direct general questions about this policy to your unit's administrative office. If you have questions about specific issues, please contact the following offices:

Subject	Contact	Telephone	Email/Web Address
Policy Clarification and Interpretation	Executive Vice President and Chief Financial Officer	(607) 255-4242	executivevp@cornell.edu
Audit	University Audit	(607) 255-9300	audit@cornell.edu audit.cornell.edu/
Banking	Finance Office	(646) 962-3648	cash@med.cornell.edu
Benefits	Human Resources Office	(646) 962-9247	https://hr.weill.cornell.edu/benefits mab4012@med.cornell.edu
Contract Provisions	Office of General Counsel	(212) 746-0463	deh4003@med.cornell.edu
Export Control	Export Control Office	(607) 255-5284	https://researchservices.cornell.edu/export-controls exportcontrol@cornell.edu
Financial Matters	Finance Office	(646) 962-3648	cas2045@med.cornell.edu
Gift Processing	Office of External Affairs	(646) 962-9476	development@med.cornell.edu
Indemnification	Office of General Counsel	(212) 746-0463	deh4003@med.cornell.edu
Purchasing	Procurement Office	(646) 962-3648	cas2045@med.cornell.edu
Payment Approval	Finance Office	(646) 962-3648	cas2045@med.cornell.edu
Reporting Foreign Gifts and Contracts	Sponsored Financial Services	(607) 255-2016	hea117reporting@cornell.edu https://finance.cornell.edu/our-policies/reporting-foreign-gifts
Sponsored Programs	Research and Sponsored Programs Office	(646) 962-8290	grantsandcontracts@med.cornell.edu
Transactions with International Entities	Finance Office; Senior Associate Dean for International Affairs and Affiliations		https://finance.cornell.edu/our-policies/reporting-foreign-gifts

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DEFINITIONS

These definitions apply to these terms as used in this policy.

Agreements	A set of agreed-upon terms and conditions defining the rights, obligations, and liabilities that govern a Transaction. For purposes of this policy, the terms “agreement” and “contract” are interchangeable.
Capital Project	A project to construct new facilities or to significantly renovate or repair existing facilities. See Appendices D and E.
Delegation Plan	A document prepared by individuals with transaction authority (“responsible individuals”) that further delegates this authority. For a list of individuals with transaction authority, see appendices A through E.
Institutional Review	An examination of a proposed transaction by the appropriate responsible individual to evaluate institutional risk and compliance with university policy.
International Entity	Any legal entity created under the laws of a foreign government and any legal entity created under U.S. or state law if the majority of its stock is directly or indirectly owned legally or beneficially by one or more foreign governments, foreign persons, or foreign legal entities, or if a majority of the entity’s membership is composed of foreign persons or foreign legal entities, including agents of foreign legal entities.
Ithaca Campus	For purposes of this policy, all Ithaca-reporting units, including Cornell Tech and Cornell Agritech.
Level I, II, III, IV, and V Review	Dollar threshold levels established for payment approval. For details, see Appendix F.
Operating Unit	An organizational unit designated by the president or the provosts. For a list, see Appendix G.
Payment	A transfer of value, generally in cash, check, or by electronic transaction.
Payment Approval	The authority to process a payment from a university account and to certify that appropriate funds are available and that goods or services have been received. ♦ Note: Payment approval does not constitute transaction authority.
Resource	Something of value, whether in the form of money, property, right to use, etc.
Responsible Individual	A person with transaction authority, that is, with responsibility for contracting with external parties on behalf of the university.
Transaction	An agreement that creates rights or obligations between the university and another party, typically involving exchanges of services, supplies, assets, or other resources between the university and another party. See appendices B through E for specific examples. The terms and conditions governing a transaction should be memorialized in an agreement executed by a responsible individual.
Transaction Authority	Authorization to administer, approve, and execute transactions.

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RESPONSIBILITIES

Division of Financial Services (DFS), Ithaca Campus Units	Maintain copies of approved delegation plans prepared by responsible individuals.
Finance Office, Weill Cornell Campus Units	<p>Receive payment approval information from unit heads.</p> <p>Maintain inventory of delegates with payment approval.</p> <p>Initiate periodic review by unit heads of payment approval inventories and delegation plans.</p>
Individual with Payment Approval	<ul style="list-style-type: none"> • Approve payments as appropriate, ensuring the appropriate reviews and approvals have taken place as required and that the transaction conforms with relevant university policies, terms and conditions of contracts, and sponsor, donor, or other restrictions. • Ensure that: <ul style="list-style-type: none"> ○ The payment has not been made previously or is not being held intentionally. ○ The initiator of the transaction has the required authority. ○ Goods or services have been received. ○ Appropriate resources are available to make the payment. ○ The type of payment is appropriate for the source of funds being used.
Individual with Transaction Authority (Responsible Individual)	<p>Understand and administer all aspects of this policy in relation to transactions under their jurisdiction.</p> <p>If appropriate, further delegate transaction authority and submit a written delegation plan for approval and recordkeeping, as required by this policy.</p> <p>Before executing agreements, transactions, or contracts, determine whether:</p> <ul style="list-style-type: none"> • They have the authority to enter into a transaction on behalf of Cornell. • The transaction complies with all applicable laws, university policies, and sponsor, donor, or other restrictions. • An assessment has been made of the likely impact of the transaction on other elements of the university and the broader community and consults when appropriate. • Any real or apparent conflict of interest exists on the part of the individual or organization involved in a transaction, as provided for by University Policy 4.14, Conflicts of Interest and Commitment. Where such a conflict exists, the individual must resolve the issue before entering into the transaction or agreement. • It is a foreign gift or agreement with a foreign source and, thus, requires reporting according to Section 117 of the Higher Education Act of 1965 and Section 207-a of the New York State Education Law.

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RESPONSIBILITIES

Operating Unit Head	<p>Delegate payment approval authority to individuals in the operating unit.</p> <p>Update the list of individuals with payment approval authority and notify the Division of Financial Services (Ithaca campus) or Finance Office (WCM campus) of any changes on a timely basis.</p> <p>Establish internal controls and procedures for reviews so that only individuals with authority can approve payments.</p>
President and Provosts	<p>Designate, within the respective academic and administrative purviews, those units to be considered operating units with authority and responsibility to establish an approval structure to review all transactions. For a list of operating units, see Appendix G.</p> <p>For the Ithaca campus, the president or provost must review the submitted transaction authority delegation plans and approve them, if appropriate.</p> <p>For the Weill Cornell campus, the provost for medical affairs must review transaction authority delegation plans submitted and approve, if appropriate.</p>
Office of General Counsel	<p>Render legal advice and service to all duly authorized university representatives and be available to advise on the legal aspects of any contract transaction or particular provision.</p> <p>On behalf of Cornell University, execute indemnification of faculty and staff against legal claims based on acts, omissions, or transactions that arise within the scope of university employment and in the performance of authorized duties. Protection does not extend to personal, unofficial, or unauthorized acts, omissions, and transactions.</p>

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PRINCIPLES

Overview

To protect the interests of the university and manage risk, Cornell's Board of Trustees ("the Board") has established a formal transaction authority policy that identifies types of transactions and the related levels of authority, responsibility, and accountability of those entering into these transactions on behalf of the university. The Board has delegated the authority to approve any transaction not specifically requiring Board action to the president as chief executive and educational officer of the university. In the president's absence, the provost exercises the powers and duties of the president.

In addition to the president, certain individuals have been delegated authority for particular transactions in line with their functional responsibilities. Individuals who hold transaction authority are referred to as "responsible individuals."

For the list of responsible individuals according to financial levels and areas of responsibility, see appendices A through E.

◆ Notes:

- In the contract colleges, transactions may also require approval from one or more state agencies, the provost, or the vice provost for land grant affairs.
- Subsidiaries of Cornell and other separate, legal, affiliated organizations are not subject to this university policy but must develop their own policy.
- This policy does not cover compensation or hiring of individuals through payroll.

The Board also requires that the president and the provosts designate those units within their respective academic and administrative purviews to be considered "operating units," with the authority and responsibility to establish an approval structure that will achieve appropriate review of all transactions. For a list of operating units, see Appendix G.

Heads of operating units must establish this approval structure within their units by delegating authority to appropriate individuals to approve payments. Individuals with payment approval authority may only approve payments and must not enter into agreements that commit the university. For the different levels of payment approval, see Appendix F.

◆ **Note:** Some payments, such as refunds, do not require prior approval by someone with transaction authority.

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PRINCIPLES, CONTINUED

International Entities

Compliance with U.S. Export Control Regulations (the Export Administration Regulations (EAR), International Traffic in Arms Regulations (ITAR), and Office of Foreign Asset Control (OFAC) regulations) is under the purview of the Export Control Office and subject to University Policy 4.22, Export and Import Control Compliance. Foreign gifts or contracts must be reported as defined in DFS policy [Reporting of Foreign Gifts and Contracts at Cornell University](#).

Indemnification

Subject to the terms and conditions in University Policy 4.9, Legal Defense and Indemnification, adopted by the Board, the university will protect faculty and staff against legal claims based upon an act, omission, or transaction that arises within the scope of university employment and in the performance of authorized duties, except those attributable to intentional wrongdoing, gross negligence, or recklessness.

Because the protection does not extend to personal, unofficial, or unauthorized acts, omissions, and transactions, University Policy 4.9 must be carefully consulted in relation to University Policy 4.2, Transaction Authority and Payment Approval.

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PROCEDURES

Transaction Authority vs. Payment Approval

The Board has delegated authority to certain individuals to enter into agreements with external parties that obligate the university, referred to as “transaction authority.” Individuals with this authority are referred to as “responsible individuals.” Further, the Board requires heads of operating units to delegate to certain individuals within their units the authority to approve payments, referred to as “payment approval.” Individuals with “payment approval authority” must not enter into agreements with external parties, as that is transaction authority. Transaction authority is directly granted to only a few individuals at the university. Therefore, administrators will refer more often to procedures relating to payment approval, which most directly affect operations at the unit level.

Delegating Transaction Authority

The Board has delegated transaction authority to the president as chief executive and educational officer of the university to approve any transaction with external parties that does not specifically require Board action. In the president's absence, the provost exercises the powers and duties of the president. In addition to the president, responsible individuals have authority over particular transactions related to their functional responsibilities. See appendices A through E for lists of responsible individuals according to financial value and transaction type.

Responsible individuals must develop, implement, and maintain policies and procedures to (1) ensure adequate review of all transactions within their purview prior to execution, and (2) secure the university's financial, legal, contractual, and other interests in relation to those transactions.

Responsible individuals must also determine that the transaction meets the following requirements:

- The transaction complies with all applicable laws and university policies, as well as sponsor, donor, or any other restrictions.
- An assessment has been made of the likely impact of the transaction on other elements of the university and the broader community, and appropriate consultation has taken place with constituencies the transaction or agreement might impact.
- Any real or apparent conflict of interest on the part of the individual or organization involved in a transaction, as provided for by University Policy 4.14, Conflicts of Interest and Commitment, has been resolved before entering into the transaction or agreement.

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PROCEDURES

Transaction Authority Delegation Plans

Responsible individuals must provide biennially, or when organizational changes necessitate, a written delegation plan identifying other responsible individuals with related duties to whom they have delegated transaction authority.

At the Ithaca campus, transaction authority delegation plans must be presented to and approved by the president or provost, and a copy of the approved plan must be sent to the university controller.

At the Weill Cornell campus, transaction authority delegation plans must be presented to and approved by the provost for medical affairs, and a copy of the approved plan must be sent to the WCM Finance Office.

Delegation of transaction authority for university-wide transactions (covering all campuses) must be presented to and approved by the president, with a copy of the approved plan sent to the university controller and WCM Finance Office.

For the list of responsible individuals according to levels and types of transactions, see appendices A through E.

Delegating Payment Approval Authority

Payment authority is not the same as transaction authority. The head of each operating unit established by the president and the provost must formalize and delegate payment approval authority to appropriate staff within the unit. When changes occur, the operating unit must update payment approval authorities on a timely basis and notify the Division of Financial Services (Ithaca campus) or Finance Office (WCM campus). For levels of payment approval, see Appendix F.

Individuals Who Approve Payments

The individual who holds payment approval authority authorizes a payment from a university account. This individual is responsible and accountable for the following:

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PROCEDURES

- Determining whether they have the authority to approve the dollar value of the payment.
- Where required, ensuring institutional review and approval has been obtained before a commitment, agreement, or contract is signed between the unit and a vendor.
- Confirming the transaction complies with all applicable laws and university policies, as well as sponsor, donor, or any other restrictions.
- Assigning resources or ensuring they are otherwise available within regularly approved budgets, special appropriations, or restricted or delegated accounts.
- Verifying the type of payment is appropriate for the source of funds.
- Verifying the payment has not previously been made and is not being held intentionally.
- Ensuring that goods or services have been received.

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APPENDIX A: FINANCIAL LEVELS OF TRANSACTION AUTHORITY

Spending Threshold (subject to notes below)	Transaction Authority, Ithaca Campus Units and University-Wide Transactions	Transaction Authority, Weill Cornell Campus Units
Transactions up to \$1,000,000	Executive Vice President and CFO or as stated in the Delegation Plan. For responsible individuals, see appendices A through E.	Executive Vice Provost and Chief Operating Officer, WCM, or as stated in the Delegation Plan. For responsible individuals, see appendices A through E.
Transactions between and including \$1,000,000 and \$4,999,999	The Provost or Executive Vice President and Chief Financial Officer or President	The President; or The Provost for Medical Affairs or the Executive Vice Provost and Chief Operating Officer, and the Executive Vice President and CFO
Transactions of \$5,000,000 or greater	The President and Board of Trustees	The President, the Board of Fellows, and Board of Trustees
Sponsored project transactions up to \$10,000,000 per year in expected expenditure	Vice President for Research and Innovation	Executive Vice Provost and Chief Operating Officer
Sponsored project transactions exceeding \$10,000,000 per year in expected expenditure	The President and Board of Trustees	The President, the Board of Fellows, and Board of Trustees

◆ **Note:** The “threshold” above is defined as the aggregate expected expenditure or university liability through the entire agreement period.

◆ **Note:** The Board has authorized the executive vice president and CFO to make energy purchases at the Ithaca campus for up to \$36 million per year, with a total cost not to exceed \$180 million on a rolling five-year term.

◆ **Caution:** Transactions related to investments fall under the authority of the chief investment officer, within guidelines established by the Investment Committee, and are not subject to Appendix A limitations or approvals.

◆ **Caution:** Transactions related to real estate and capital projects are subject to separate spending thresholds and approvals; please refer to Appendices C and D.

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APPENDIX B: TYPES OF TRANSACTION AUTHORITY

◆ **Note:** Responsible individuals have the authority to further delegate transaction authority, as enumerated in their delegation plans.

Types of Transactions	Transaction Definition	Responsible Individual, Ithaca Campus Units and University-Wide Transactions	Responsible Individual, Weill Cornell Campus Units
Affiliation Agreements	Formal, non-sponsored program agreements with other institutions (excluding International Agreements, addressed below)	Provost	Provost for Medical Affairs
Benefit-Related Matters	Employee benefits	Vice President and Chief Human Resources Officer	Executive Vice Provost and Chief Operating Officer, WCM
Energy Purchasing	Electricity, natural gas, and oil	Executive Vice President and Chief Financial Officer See Note to Appendix A	Executive Vice Provost and Chief Operating Officer, WCM
Establishing Bank Accounts	Payroll; general, investment-related, securities custody; and all other bank accounts and their signatories	Executive Vice President and Chief Financial Officer	Executive Vice President and Chief Financial Officer
Facilities Contracts	Feasibility studies; architectural/engineering design services; facilities-related consulting services; commissioning; testing services; renovations; construction services for both capital and non-capital projects	Executive Vice President and Chief Financial Officer See Appendix D for capital projects	Executive Vice Provost and Chief Operating Officer, WCM See Appendix E for capital projects
Financial Matters	Agreements with State of New York, including all financial, budgeting, and contractual matters other than sponsored programs	Provost	Provost for Medical Affairs
	Audit and other related services	The Audit Committee of the Board of Trustees and the University Auditor	The Audit Committee of the Board of Trustees and the University Auditor
	Borrowings and advances, internal and external	Executive Vice President and Chief Financial Officer	Executive Vice President and Chief Financial Officer
	Insurance: Liability (including medical liability), property, and all other types of insurance, except for benefit-related	Executive Vice President and Chief Financial Officer	Executive Vice President and Chief Financial Officer

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Financial Matters, con't.	Investments: Internally and externally managed, including the purchase and sale of marketable securities and real estate held in the long-term pool	Chief Investment Officer	Chief Investment Officer
	Write-offs of student accounts and other accounts receivable	Executive Vice President and Chief Financial Officer	Executive Vice President and Chief Financial Officer
Gifts	Proposals, acceptances, and acknowledgments	<p>Vice President for Alumni Affairs and Development subject to certain approval requirements in Policy 3.1, University Fundraising.</p> <p>For gifts of real property: the Vice President for Alumni Affairs and Development and the Executive Vice President and Chief Financial Officer</p> <p>For gifts of in-kind property: Vice President for Alumni Affairs and Development and the Operating Unit head (or delegate)</p>	<p>Assistant Vice Provost, Development, subject to certain approval requirements in Policy 3.1, University Fundraising.</p> <p>For gifts of real property: the Assistant Vice Provost, Development and the Executive Vice President and Chief Financial Officer</p> <p>For gifts of in-kind property: the Assistant Vice Provost, Development and the Operating Unit head (or delegate)</p>
Human Resources	Policies and compensation programs, including collective bargaining negotiations and agreements	Vice President and Chief Human Resources Officer	Executive Vice Provost and Chief Operating Officer, WCM
Intellectual Property	Policies, patents, licenses, and related transactions	Vice President for Research and Innovation	Vice President for Research and Innovation
International	<p>An agreement with a foreign source that includes any endowment, gift, grant, contract, award, service, or property of any kind, as well as agreements with foreign institutions involving exchanges of students, collaborative research, and other academic pursuits</p> <p>A foreign source includes any of the following:</p> <ul style="list-style-type: none"> • A foreign government, including an agency of a foreign government • A legal entity, governmental or otherwise, created solely under the laws of a foreign state or states • An individual who is not a citizen or a national of the United States or a trust territory or protectorate thereof 	<p>Varies based on the type of agreement. See Reporting Foreign Gifts and Contracts at Cornell University for a detailed classification matrix and designated responsible offices.</p> <p>For agreements not addressed by the classification matrix: Vice Provost for International Affairs</p>	<p>Varies based on the type of agreement. See Reporting Foreign Gifts and Contracts at Cornell University for a detailed classification matrix and designated responsible offices.</p> <p>For agreements not addressed by the classification matrix: Senior Associate Dean for International Affairs and Affiliations, in consultation with the Vice Provost for International Affairs</p>

Cornell Policy Library
Volume: 4, Governance
Responsible Executives:
President/Provosts
Responsible Office: Executive
Vice President and Chief
Financial Officer
Originally Issued: December
1989
Last Updated: July 2, 2024
Board of Trustees Approval:
May 24, 2024

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	<ul style="list-style-type: none"> An agent, including a subsidiary or affiliate of a foreign legal entity, acting on behalf of a foreign source 		
Legal Services	Outside legal services	Office of General Counsel	Office of General Counsel
Other	Transactions not otherwise identified in this policy	Confer with the Office of General Counsel for guidance regarding the most appropriate Responsible Individual.	Confer with the Office of General Counsel for guidance regarding the most appropriate responsible individual
Purchasing	Policies, purchase orders, agreements, equipment leases, software contracts, and all other contracts related to the procurement of goods and services, except as otherwise indicated in this policy	Executive Vice President and Chief Financial Officer	Executive Vice President and Chief Financial Officer
Sponsored Awards	Proposals, grants, sub-awards, contracts and subcontracts, cooperative agreements, testing and technical services agreements, renewals, and associated non-financial agreements, including nondisclosure agreements, data use agreements, and material transfer agreements	Vice President for Research and Innovation	Executive Vice Provost and Chief Operating Officer, WCM
Vehicle-related	Purchases and sales (including execution of title)	Executive Vice President and Chief Financial Officer	Executive Vice Provost and Chief Operating Officer, WCM

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APPENDIX C: FINANCIAL LEVELS OF TRANSACTION AUTHORITY FOR REAL ESTATE MATTERS

Transaction Definition	Responsible Individuals, Ithaca Campus Units	Responsible Individuals, Weill Cornell Campus Units
Purchase and sales contracts, deeds, mortgages, leases, easements, and other instruments relating to the acquisition or conveyance of an interest in real property, excluding (1) investment real estate; (2) disposition of Category A real estate where the university cannot exercise repurchase rights within seven years notice; and (3) real property gifts	<p>For transactions up to \$2,000,000: Executive Vice President and Chief Financial Officer</p> <p>For transactions between \$2,000,000 and \$10,000,000: Executive Vice President and Chief Financial Officer and Capital Funding and Priorities Committee</p> <p>For transactions exceeding \$10,000,000: Executive Vice President and Chief Financial Officer, Capital Funding and Priorities Committee, and Building and Properties Committee</p>	<p>For transactions up to \$2,000,000: Executive Vice President and Chief Financial Officer</p> <p>For transactions between \$2,000,000 and \$10,000,000: Executive Vice President and Chief Financial Officer and Capital Funding and Priorities Committee</p> <p>For transactions exceeding \$10,000,000: Executive Vice President and Chief Financial Officer, Board of Fellows Real Estate, Renovation and Facilities Planning Committee, Capital Funding and Priorities Committee, and Building and Properties Committee</p>
Purchase and sales contracts, deeds, mortgages, leases, easements, and other instruments relating to the acquisition or conveyance of an interest in investment real estate	For transactions of all values: Executive Vice President and CFO and Investment Committee	For transactions of all values: Executive Vice President and CFO and Investment Committee
Disposition of Category A real estate where the university cannot exercise repurchase rights within seven years' notice	For transactions of all values: Executive Vice President and Chief Financial Officer and Buildings and Properties Committee	N/A
Acquisitions and dispositions of real property gifts	For transactions of all values: Executive Vice President and Chief Financial Officer and Vice President for Alumni Affairs and Development	For transactions of all values: Executive Vice President and Chief Financial Officer and the Assistant Vice Provost for Development, WCM.

◆ **Notes:**

- Responsible individuals are authorized to further delegate transaction authority as enumerated in their delegation plan.
- Appendix C spending thresholds supersede any conflicting limits in the Real Estate Administrative Plan approved by the Executive Committee and the Buildings and Properties Committee on January 20, 2011.
- Real estate leases treated as capital leases for accounting purposes are subject to this Appendix C.
- "Category A real estate" includes real estate interests located on or adjacent to the Ithaca campus that

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APPENDIX C: FINANCIAL LEVELS OF TRANSACTION AUTHORITY FOR REAL ESTATE MATTERS, CONTINUED

are or may be needed by the university to accomplish its educational mission, including those properties immediately contiguous to university operations that serve to enhance and protect university holdings. Category A real estate is defined by the Buildings and Properties Committee. For further information, contact the Real Estate office.

- "Investment real estate" is all real estate acquired or held primarily for investment purposes under the oversight of the Investment Committee.

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APPENDIX D: FACILITIES-RELATED CAPITAL PROJECT APPROVAL AUTHORITIES, ITHACA CAMPUS UNITS

◆ **Note:** Responsible individuals have the authority to further delegate transaction authority as enumerated in their delegation plans.

Project	Responsible Individuals, Ithaca campus units
I. \$100,000 to \$250,000	Associate Vice President for Engineering and Project Administration, Director of Capital and Space Planning
<p>If a project is not in the approved Capital Budget, it must first be approved and added to the annual Capital Budget, with variance approval as described in II.</p> <p>If the project is already included in the approved annual Capital Budget, proceed to III.</p>	
II. a. For projects up to \$2 Million	Authorization to design, construct, or other major implementation phase
1. \$250,000 to \$500,000†	Vice President for Facilities and Campus Services
2. \$500,000 to \$2 Million†	Vice President for Budget and Planning
II. b. For projects greater than \$2 Million†	
1. Authorization to conduct feasibility; other pre-design; pre-implementation or institutional planning study for projects anticipated to cost \$2 Million or more or which have a broad campus impact	Vice President for Facilities and Campus Services and Vice President for Budget and Planning as delegated by the Provost
2. Authorization to design, construct, or other major implementation phase	Capital Funding and Priorities Committee
<p>Once the project is in the approved annual Capital budget (by either annual board or variance approval):</p>	
III. Authorization to conduct feasibility; other pre-design; pre-implementation or institutional planning study for projects anticipated to cost \$2 Million or more or which have a broad campus impact	Vice President for Facilities and Campus Services and Vice President for Budget and Planning as delegated by the Provost
IV. Authorization to design, construct, or other major implementation phase	
a. \$250,000 to \$500,000†	Associate Vice President of Engineering and Project Administration, Director of Capital and Space Planning
b. \$500,000 to \$2 Million†	Vice President for Facilities and Campus Services and Vice President for Budget and Planning
c. \$2 Million to \$10 Million†	Capital Funding and Priorities Committee

POLICY 4.2

Transaction Authority and Payment Approval

APPENDIX D: FACILITIES-RELATED CAPITAL PROJECT APPROVAL AUTHORITIES, ITHACA CAMPUS UNITS, CONTINUED

Project	Responsible Individuals, Ithaca Campus Units
V. Project Budget Variances (positive or negative)	
All projects with revised project cost identifiers up to \$2 Million	Vice President for Facilities and Campus Services and Vice President for Budget and Planning
For projects with revised project cost identifiers greater than \$2 Million but less than \$10 Million	Capital Funding and Priorities Committee
For Projects \$10 Million or More:	
VI. a. Architect Selection	a. Capital Funding and Priorities Committee
b. Site Selection and Guidelines	b. Capital Funding and Priorities Committee and Buildings and Properties Committee
c. Project Concept*	c. Capital Funding and Priorities Committee and Buildings and Properties Committee
d. Project Design**	d. Capital Funding and Priorities Committee and Buildings and Properties Committee
e. Project Construction***	e. Capital Funding and Priorities Committee and Buildings and Properties Committee
f. Funding Plan	f. Finance Committee (if project not included in approved annual capital plan)
VII. Annual and Five-Year Capital Plan	Buildings and Properties Committee, Finance Committee, Executive Committee, and full Board of Trustees

† Any project that falls within this level of cost, lies within the “core campus areas” at Ithaca, Agritech, and Cornell Tech, and, in the opinion of the Vice President for Facilities and Campus Services, will significantly change the outward appearance of a building or an area will come to the Buildings and Properties Committee for approval of the design.

* Includes a description of the functional program to be satisfied, a general description of the scope of construction, a citation of the key project schedule milestones, and the major components of a preliminary budget. For new structures, concept approval might also include a review of criteria for the placement of the structure upon a site.

** Design approval includes a review of the schematic or design development documents that illustrate the layout, massing, and exterior appearance of the facility within the context of its site. Also included is an updated planning budget based upon a refined definition of the project scope and delivery schedule.

*** Construction approval authorizes construction of the final project scope defined by the construction documents and specifications.

POLICY 4.2

Transaction Authority and Payment Approval

APPENDIX E: CAPITAL PROJECT APPROVAL AUTHORITIES, WEILL CORNELL CAMPUS UNITS

Project	Approval Authority
I. ≤\$50,000	Senior Director of Facilities Management
II. >\$50,000 to ≤\$1,000,000	Executive Vice Provost and Chief Operating Officer
III. >\$1,000,000 - ≤\$2,000,000	Executive Vice President and Chief Financial Officer
IV. >\$2,000,000 - \$10,000,000	Capital Funding and Priorities Committee
V. >\$10,000,000	
A. Project Development: Including Consultant Selection and Initial Feasibility	Capital Funding & Priorities Committee
B. Project Plan: Including Project Scope, Budget, and Schedule	Capital Funding & Priorities Committee, Board of Fellows Real Estate, Renovation and Facilities Planning Committee, and Building and Properties Committee
C. Design (Exterior Construction)	Capital Funding & Priorities Committee, Board of Fellows Real Estate, Renovation and Facilities Planning Committee, and Building and Properties Committee
D. Final Construction Plan and Budget	Capital Funding & Priorities Committee, Board of Fellows Real Estate, Renovation and Facilities Planning Committee, and Building and Properties Committee
E. Financing Plan	Business and Finance Committee of the Board of Fellows and the Finance Committee of the Board of Trustees (if project not included in approved annual capital plan)
F. Construction Contracts	Executive Committee of the Board of Fellows and Buildings and Properties Committee
VI. Five-Year Capital Plan	Business and Finance Committee, and Executive Committee of the Board of Fellows, Board of Fellows, Buildings and Properties Committee, Finance Committee, Executive Committee of the Board of Trustees, and the full Board of Trustees

POLICY 4.2

Transaction Authority and Payment Approval

APPENDIX F: LEVELS OF PAYMENT APPROVAL

Level I Review	Payments up to \$25,000, to be processed by an authorized service center representative (for Weill Cornell campus units, an authorized department staff member).
Level II Review	Payments of \$25,000, up to and including \$200,000
Level III Review	Payments of \$200,001, up to and including \$1,000,000
Level IV Review	Payments over \$1,000,000 require approval by the Executive Vice President and Chief Financial Officer, the Provost, or the President
Level V Review	Payments of \$5,000,000 require approval by the President and the Board of Trustees

POLICY 4.2

Transaction Authority and Payment Approval

APPENDIX G: OPERATING UNITS

Operating units at the Ithaca campus:

- Admissions and Financial Aid – Graduate Admissions
- Admissions and Financial Aid – Undergraduate Admissions
- Agriculture and Life Sciences
- Alumni Affairs and Development
- Architecture, Art, and Planning
- Arts and Sciences
- Audit and Compliance
- Computer and Information Sciences
- Continuing Education and Summer Sessions
- Cornell Tech
- Engineering
- Facilities
- Financial Services
- Graduate School
- Hotel Administration
- Human Ecology
- Human Resources
- Industrial and Labor Relations
- Information Technologies
- Investment Office
- Jeb E. Brooks School of Public Policy
- Johnson Graduate School of Management
- Johnson Museum of Art
- Law School
- Libraries

POLICY 4.2

Transaction Authority and Payment Approval

APPENDIX G: OPERATING UNITS, CONTINUED

- Office of the Chief Risk Officer
 - Office of General Counsel
 - Planning and Budget
 - President
 - Provost
 - Public Safety
 - Research
 - Student and Campus Life
 - University Relations
 - Veterinary Medicine
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POLICY 4.2

Transaction Authority and Payment Approval

APPENDIX G: OPERATING UNITS, CONTINUED

Operating units at the Weill Cornell campus:

- Academic Affairs
- Alumni Affairs and Development
- Anesthesiology
- Biochemistry
- Budget
- Capital Planning
- Cardiothoracic Surgery
- Cell and Developmental Biology
- Center for Complementary and Integrative Medicine
- Center for Reproductive Medicine
- Dermatology
- Executive Vice Provost
- Facilities
- Finance
- Genetic Medicine
- Graduate School of Medical Sciences
- Human Resources
- Information Technologies and Services Department
- Institute for Computational Biomedicine
- Medicine
- Microbiology and Immunology
- Neurology
- Neurosurgery
- Ob/Gyn
- Ophthalmology
- Otorhinolaryngology

POLICY 4.2

Transaction Authority and Payment Approval

APPENDIX G: OPERATING UNITS, CONTINUED

- Pathology and Laboratory Medicine
- Pediatrics
- Physician Organization Administration
- Physiology and Biophysics
- Primary Care
- Provost
- Psychiatry
- Public Affairs
- Radiology Oncology
- Research
- Risk Management
- Student Affairs
- Surgery
- Tri-Institutional Medical Scientist Training Program
- Urology