

Officer Accountability Policy

Effective Date:	July 8, 2024
Supersedes:	Officer Accountability Policy, effective September 1, 2016
Policy Review Date:	To be reviewed every 3 years from effective date
Issuing Authority:	Research Foundation President
Policy Owner:	Chief Financial Officer
Contact Information:	518-434-7050 rffinance@rfsuny.org

Reason for Policy

The Officers of The Research Foundation for The State University of New York ("Research Foundation" or "RF") are in positions of authority. They are accountable for expenditure of certain RF funds and management of RF activities to accomplish their assigned responsibilities. This policy establishes the requirements for independent review and approval of transactions that have a professional or personal impact on these Officers to assure compliance with established RF policies and procedures.

Statement of Policy

Officers must obtain the appropriate level of review and approval for all Officer Transactions. The required reviews and/or approvals are set out in the table in the "Responsibilities" section of this document.

Officer Transactions must not be approved by the impacted Officer, nor a person who reports to or is a subordinate of that Officer except as identified in the Responsibilities section. The person authorized to review or approve Officer Transactions must be an individual with sufficient knowledge to evaluate the appropriateness of the Officer Transaction.

Each operating location must maintain records that document Officer Transactions. While the procedures and specific content and structure of the file(s) may vary at individual operating locations, all Officer Transactions must be documented to show the date and type of Officer Transaction and the review and approval of the Officer Transaction by the Authorized Signer(s).

The Campus President is the Authorized Signer for all Officer Transactions that pertain to the RF Operations Manager at each SUNY campus and has the authority to choose a designee. If a Campus President chooses a designee, the Campus President must notify in writing the RF Office of Compliance Services.

If an Officer also serves as a Principal Investigator (PI) on a sponsored award or serves as an officer or director of an Affiliated Entity, transactions executed when acting in those roles are not Officer Transactions.

and may be processed consistent with the normally applicable policies and procedures utilized for sponsored programs administration or technology transfer. However, mechanisms must be in place to ensure compliance with the RF's Conflict of Interest and Fraud and Whistleblower Policies.

Responsibilities

The following table outlines the responsibilities for compliance with this policy:

Responsible Party	Responsibility
RF Board of Directors	Make Compensation determinations for the RF president. Supervise the RF President.
RF President	Establish and approve all Compensation for other Elected Officers consistent with RF policy and practices. Note: These determinations must be reviewed by the Board of Directors for reasonableness. Review and approve Officer Transactions for (or on behalf of) other Elected Officers. The RF President may delegate this responsibility to another Elected Officer who is not benefited by the Officer Transaction subject to review. As the Chief Executive Officer, the RF President is the highest-ranking RF employee and must comply with all RF policies and procedures, including maintaining documentation of Time and Attendance, Travel and OTPS Expenditures.
Chief Operating Officer	Review and approve Officer Transactions of Elected Officers, except the RF President, as applicable or as delegated by the RF President.
RF Chief Financial Officer	Review and approve Travel and OTPS Expenditures of the RF President and Officer Transactions of other Elected Officers, as applicable or as delegated by the RF President.
RF Officers	Obtain appropriate review and/or approval by an Authorized Signer for all of their Officer Transactions. As delegated by the RF President, review and approve Officer Transactions of other Elected Officers other than the RF President.
Campus Presidents	Review and approve, or delegate to an appropriate Authorized Signer the responsibility to review and approve, Office Transactions for or on behalf of Appointed Officers (i.e. Operations Managers at his/her campus).
Authorized Signer	Review and approve Officer Transactions for (or on behalf of) Officers.
Internal Audit Services	Periodically review and audit compliance with this policy. Specifically, a sample of Officer Transactions for all Elected Officers and a sample of Appointed Officers will be reviewed annually.

Responsible Party	Responsibility
RF Compliance Office	Office of record to maintain signatory delegation documentation.

Definitions

Affiliated Entity - an organization that the RF serves as a corporate partner or corporate member.

Appointed Officer - an individual appointed by the RF Board of Directors or RF President as an officer who is given the signature authority and administrative authority to perform executive duties. For the purposes of this policy an appointed Officer includes Operations Managers at the operating locations of the RF and Vice Presidents with delegated authority at the RF central office pursuant to Article IV Section 13 of the RF bylaws.

Compensation - includes but is not limited to the following: salary and wages; benefits; bonuses; and extra service payments an Officer receives for performing the designated role.

Elected Officer - an officer elected under the RF's bylaws, including the RF President, Chief Operating Officer, General Counsel, Secretary, and Chief Financial Officer.

Officer - any Elected or Appointed Officer.

OTPS (Other Than Personnel Services) Expenditures - Expenses or reimbursements other than salaries and fringe benefits, such as but not limited to supplies, equipment, meals, and contractual services that do not have a reasonable business purpose, or are not commensurate with the business purpose and are in direct benefit or use solely by an Officer.

Travel – expenses or reimbursements (i.e. travel vouchers, credit card transactions) for travel and travel related transactions that do not have a reasonable business purpose or are not commensurate with the business purpose and are for (or on behalf of) an Officer.

Time and Attendance - exception reports or time sheets, in any form, indicating time worked, or leave taken (i.e., annual, sick, holiday), filed by an Officer.

Officer Transactions - Time and Attendance, Travel, OTPS Expenditures, and Compensation.

Related Information

[Travel Handbook](#)

[Unrestricted Fund Expense Policy](#)

[Conflict of Interest Policy](#)

[Code of Conduct](#)

[Records Management Policy](#)

[Time Reporting Policy](#)

Forms

None

Change History

Date	Summary of Change
July 8, 2024	Policy reviewed. Made edits to Definitions section; added reference to Fraud and Whistleblower Policy.
January 28, 2021	Corrected spelling of "Officer" in Responsibility table, incorrectly spelled "Efficer". Removed redundant word "bylaws" in the definition of "Elected Officer".
September 1, 2016	Removed senior executives from the policy. Some language was moved from the definitions section to the statement of policy. Language regarding exceptions to the policy was eliminated.
March 15, 2013	Include Compliance Office as office of record, responsibilities clarified, added sentence related to management plan for Pls and when serving on affiliated entities, added definition of Affiliated Entity, updated name to reflect senior executives and included them in the policy. Effective 3/15/2013
February 13, 2012	Officer Accountability Policy created.

Feedback

Was this document clear and easy to follow? Please send your feedback to webfeedback@rfsuny.org.