



United States  
Department  
of Agriculture

Research,  
Education, and  
Economics

National Institute  
of Food and  
Agriculture

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Washington, DC 20250

July 27, 2016

**To: 1890 Land-grant University Presidents, Provosts, 1890 Extension Administrators, and 1890 Agricultural Research Directors**

**From: Sonny Ramaswamy, Director**

**Subject: 1890 Land-Grant University Research and Extension Award Authorized Representative/Authorized Organizational Representative Clarification**

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This memorandum is intended to provide clarity regarding the roles and functions associated with Authorized Representative (AR), 1890 Extension Administrator, 1890 Agricultural Research Director, and custodian of funds relative to 1890 capacity (Research and Extension) awards. The definitions in this memorandum apply only to capacity awards to 1890 institutions, not other capacity award recipients (e.g., 1862s) or competitively awarded grants to 1890 institutions. Further, this memorandum applies (but is not limited ) to all capacity grant programs at 1890 Institutions, including but not limited to: Evans-Allen Research (Section 1445 of National Agricultural Research, Extension, and Teaching Policy Act (NARETPA), 1890 Agricultural Extension Program (Section 1444 of NARETPA), McIntire-Stennis Cooperative Forestry Act, Expanded Food and Nutrition Education Program (EFNEP), and Renewable Resources Extension Act (RREA).

The National Institute of Food and Agriculture (NIFA) is sending this clarification to all 1890 Land-grant universities and requesting your assistance in appropriate use of the terms, roles, and responsibilities as described below, and in disseminating this information within the 1890 Land-grant community. In Fiscal Year (FY) 2017, NIFA will include the terms 1890 Extension Administrator, 1890 Agricultural Research Director, and custodian of funds in the Capacity Research and Extension Grant terms and conditions and in the update to the NIFA Policy Guide.

Within 1890 capacity awards for research and extension activities, four roles highlighted herein are: Authorized Representative (AR); 1890 Extension Administrator (Extension Administrator); 1890 Agricultural Research Director (Research Director); and Custodian of Funds. An AR is designated by an institution for each grant. This is a government-wide term that is used to identify the individual(s) who, on behalf of the institution, have the authority to sign the SF-424 and submit proposals; submit post-award actions, and receive and accept awards. AR's have overall responsibility for ensuring grant funds are expended for allowable purposes in accordance with federal authorizing statutes, program regulations, government-wide laws and regulations, and the approved plan of work. A single individual may have this authority or multiple individuals may share some or all of this authority. The AR is a role of authority, it is not a specific position. For instance, an Extension Administrator may also act as the AR because he/she has the authority to submit proposals and receive an award on behalf of the institution. Authorized Organization Representative (AOR) is the previous iteration of the AR and for NIFA purposes, the terms are interchangeable. The term AR was included in the NIFA Policy Guide because of its use on the SF-424 and the Notice of Award and was not intended to create a new position or role at 1890 Institutions.

The roles and responsibilities of the Extension Administrator, Research Director, and custodian of funds/legal custodian relative to 1890 capacity (Research and Extension) awards were articulated in the former Cooperative State Research, Education and Extension Service (CSREES) administrative manuals.

The use of the term AR, and the role of the AR, does not change the roles and responsibilities of the Extension Administrator, Research Director or the custodian of 1890 capacity funds. 1890 capacity (Research and Extension) award funds may be disbursed only as authorized by either the Extension Administrator or Research Director, or their designees, as appropriate, in accordance with 2 CFR 200 (the Uniform Guidance), federal authorizing statutes, program and other applicable regulations, and the approved plan of work. The Extension Administrator or Research Director, or their designee, must approve all expenditures of funds made available for research and extension programs to ensure funds are expended for purposes specified in the authorizing statute. The roles and responsibilities of the Extension Administrator, Research Director, and custodian of funds are defined below.

We hope this clarification is useful in determining appropriate personnel to serve in these roles. **By September 30, 2016**, we ask that you let your **NIFA Administrative contact** know the individual or individuals who will be performing the roles discussed in this memo: 1890 Extension Administrator (Extension Administrator); 1890 Agricultural Research Director (Research Director); and Custodian of Funds. If this individual has changed, please let the NIFA Administrative contact know as soon as possible.

Again, we ask your support in complying with these roles and functions and in disseminating information throughout the Land-Grant University system. If you have any questions, please do not hesitate to contact Cynthia Montgomery, Deputy Director, Office of Grants and Financial Management at 202-401-6021 or [cmontgomery@nifa.usda.gov](mailto:cmontgomery@nifa.usda.gov).

### **1890 Extension Administrator/ 1890 Agricultural Research Director**

- Responsible for:
  - extension or research activities
  - funds at the 1890 land-grant college or university; and
  - compliance with the applicable rules and regulation.
- Assumes obligations imposed by NIFA capacity award.
- Should be a direct report to the University governing board (President, Provost, etc.).
- Authorizes distribution and expenditure of award funds.
- Ensures expenditures are consistent with the approved plan of work.
- May be designated by the governing body of the institution to serve as the AR.
- NIFA **strongly encourages** 1890 Institutions to designate the 1890 Extension Administrator and 1890 Agricultural Research Director as the AR for the applicable 1890 NIFA capacity awards.

### **Custodians of Funds (Legal Custodian)**

- Appointed by the governing body of the Institution to receive and account for all Section 1444 (Extension) and/or 1445 (Research) funds allocated to the Institution.
- Certifies and submits the annual SF-425 financial report. NIFA **strongly encourages** the Comptroller of the University to certify SF425.
- Under 2 CFR 200.303, **internal controls** and **separation of duties** are required elements in administration of grant awards. The custodian of funds must be a different individual than the person who authorizes and/or approves expenditures.

### **Relevant NIFA 1890 Programs:**

- Evans-Allen Research Program (Section 1445 of NARETPA)
- 1890 Agricultural Extension programs (Section 1444 of NAREPTA)
- McIntire-Stennis
- RREA
- EFNEP