

**NOVA SOUTHEASTERN UNIVERSITY
OFFICE OF SPONSORED PROGRAMS
POLICIES AND PROCEDURES**

AWARD MAINTENANCE

PRIOR APPROVAL REQUIREMENTS

EFFECTIVE 12-01-08, REVISED 12-26-2014

POLICY #39

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PURPOSE:

To establish the policy and procedure for effectively managing and documenting post-award changes and other award actions (i.e., pre-award costs, significant rebudgeting, changes in scope, no-cost extensions, etc.) requiring sponsor prior approval.

DEFINITIONS:

Carryover: Unobligated funds remaining at the end of any budget period that, with the approval of the sponsor or under an automatic authority specified in the award terms and conditions, may be carried forward to another budget period to cover allowable costs of that budget period (whether as an offset or as additional authorization). Obligated, but unliquidated, funds are not considered carryover. The award conditions and sponsor policies will dictate the requirements of carryover of funds.

Change in Scope: When the scope or the objective of the project or program changes from what was approved in the funded proposal, even if there is no change in the budget.

Expanded Authorities: Operating authorities provided in federal administrative regulations to grantees that waive requirements for prior approval for specified actions under federal awards, as defined by the federal awarding agency.

No-Cost Extension: An extension of time to a period of performance and/or budget period to complete the work of the sponsored program, without additional funds or competition.

Pre-award Costs: Any cost incurred prior to the beginning date of the period of performance or the initial budget period of a competitive segment (under a multi-year award), in anticipation of the award and at the applicant's own risk, for otherwise allowable costs (refer to OSP Policy No. 27 – *Pre Award Costs*).

Prior Approval: Written approval from the designated administrative official at the sponsoring agency to make specified post-award changes in the approved project or budget. The need for prior approval is based on the policies of the sponsoring agency and/or terms and conditions of the award.

Rebudgeting: To transfer original authorized budgeted line items from one cost category (e.g., supplies) to another (e.g., travel) to enable the PI/PD to complete the scope of the award.

POLICY:

It is the policy of the university that sponsored projects are managed in accordance with sponsor terms and conditions, and that post-award changes and other award actions adhere to prior approval requirements of the sponsoring agency.

Principal Investigators/Project Directors (PIs/PDs) are responsible for knowing and adhering to sponsor requirements and for appropriately submitting requests for changes and other award actions to the Office of Sponsored Programs (OSP) for review and appropriate approvals. Where sponsor prior approval is

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required under the terms and conditions of the award, the OSP will seek and obtain such approval as requested by the PI/PD.

Post-award changes and other award actions for which sponsor prior approval are generally required, subject to award terms and conditions, include but are not limited to:

- Change in scope
- Change in PI/PD or key personnel specified in the award or the PI/PD's disengagement/absence from, or greater than 25% reduction in time devoted to, the project
- Certain rebudgeting actions (i.e., significant rebudgeting across categories, transfer in or out of participant costs)
- Certain items of cost, in accordance with applicable cost principles (i.e., extra service pay, entertainment costs necessary for the conduct of the program, cost increases due to fluctuations in exchange rates, equipment, dues and memberships, alteration and rearrangement of facilities, etc.)
- Transfer of substantive programmatic work to a third party, or issuance of fixed amount subawards, not previously authorized in the proposal
- Inclusion of certain items of costs not approved in the proposal budget (i.e., capital equipment, overload compensation, alterations and renovations)
- Changes in amount of approved cost-sharing or matching, or use of unrecovered indirect costs or program income to meet cost sharing requirements
- Direct charging of administrative and clerical salaries, if not specifically authorized in the budget
- Carryover of unobligated balances, if not authorized under expanded authorities
- No-cost extensions, if not authorized under expanded authorities
- Pre-award costs, if not authorized under expanded authorities (refer to OSP Policy No. 27 – *Pre-Award Costs*)

Approval for changes must be received prior to implementation.

REFERENCES:

- OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200, <https://federalregister.gov/a/2013-30465>
- OMB Federal Awarding Agency Regulatory Implementation of Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, <https://www.federalregister.gov/articles/2014/12/19/2014-28697/federal-awarding-agency-regulatory-implementation-of-office-of-management-and-budgets-uniform>
- NIH Grants Policy Statement, <http://grants.nih.gov/grants/policy/policy.htm#gps>
- NSF Proposal and Award Policies and Procedures Guide, <http://www.nsf.gov/bfa/dias/policy/>
- HHS Grants Policy Statement, <http://www.hhs.gov/grants/grants/policies-regulations/index.html>

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PROCEDURES:

1. The PI/PD will submit a request with justification to the OSP for a post-award change or other award action requiring prior approval, as soon as the need for the action is realized but before implementation.
2. The OSP will review the request for appropriateness and compliance with university policies and sponsor terms and conditions to determine whether the action is permissible under expanded authorities or whether sponsor prior approval is required.
3. For changes not requiring sponsor prior approval, such as minor rebudgeting (refer to OSP Policy No. 25 – *Recording of Budgets and Encumbrances*), the OSP can process the request with internal approval of the Director of OSP and Dean, as applicable.
4. For post-award changes requiring prior sponsor approval, the PI/PD will prepare a written request and justification for the change in the format specified by the sponsor, with support from the OSP.
5. When such request requires signature, the request will be signed by the Director of the OSP, and co-signed by the PI/PD.
6. The request will be submitted by the Director of OSP (or designee) on behalf of the PI/PD to the appropriate authorizing official of the sponsor (refer also to OSP Policy No. 8 – *Sponsor Contact*) in the method specified by the sponsor, with a copy to the PI/PD.
7. Upon disposition of the request by the sponsor, the OSP will inform the PI/PD and take appropriate actions for processing the request.
8. Documentation of sponsor prior approval will be communicated to all appropriate parties (PI/PD, Departmental Contact, Contracts and Grants Accounting Department, etc.) and maintained in the official award file housed in the OSP.