1. **Purpose**

Prior approvals are necessary because of the extensive financial or programmatic impact on the sponsored program if the recipient were allowed to undertake such changes in the budgets or scope of work without authorization from the sponsoring agency. Furthermore, the sponsoring agency cannot exercise its financial and programmatic stewardship responsibilities without having prior approval requirements in place. These regulations are established in adherence to the University’s compliance obligations as a recipient of sponsoring agency funding.

2. **Scope**

All University personnel with grant management responsibilities.

3. **Definitions**

3.1 **Carryover of Unobligated Balances** – The carryover of funds unspent as of the expiration of the sponsored program award that is carried over into the next budget year.

3.2 **Change in Scope** – Change in the methodology, approach, stated objective, or other aspects of the sponsored program.

3.3 **Change in Key Personnel** – The withdrawal from a sponsored program entirely or an absence in excess of 25% or more from the budgeted level of effort in an sponsored program award of an approved, assigned principal investigator or project director or other key personnel.

3.4 **Expanded Authorities** – Regulatory waivers of the requirement for sponsoring agency prior approval of specific actions prior to them being undertaken not otherwise specified in the Notice of
3.5 No-Cost Extension – A sponsoring agency-authorized extension of a sponsored program award period based on a need to continue award activities.

3.6 Prior Approval – A sponsoring agency’s requirement for principal investigators or project directors to seek approval for specific post-award changes in the approved project or budgets. Prior approval requirements are found in applicable Uniform Guidance (2 CFR 200) guidelines, cost principles and sponsoring agency administrative regulations and guidelines. Some actions require sponsoring agency prior approval. Some sponsoring agencies have delegated authority to recipients to approve certain other actions.

4. Procedures

4.1 Requesting Prior Approval Federal agencies may waive any prior approval requirements. It is important to review the terms and conditions of each sponsored program award for waivers, authorizations required for pre-award spending or transfer of funds.

4.2 Any procedures deemed necessary by the University will be based on the sponsoring agency’s particular requirement in conjunction with other necessary guidelines.

4.3 All post-award administrative actions requiring prior approval based on University or sponsoring agency regulations must be forwarded to the Office of Sponsored Programs and Research using the “Prior Approval Request Form.” The Form should include the PI’s name and PI’s telephone number; any applicable subcontractors or consultants’ names, applicable fund numbers, contacts names and phone numbers; the sponsoring agency; the Banner fund number; and the action(s) requiring prior approval. The Form must include an explanation, including the project specific rationale for the requested action, the impact of the requested action(s) on the project and budget should also be discussed. Any relevant information, which is useful to the evaluation of the request, should be included.

4.4 If the request involves changes in key personnel, provide the relevant CV as a separate attachment.

4.5 For action requests that seek a change in objectives, please submit the applicable sponsoring agency’s change in objectives form, if one exists.

4.6 For action requests that require re-budgeting (budget transfers), changes to the applicable budget categories, Banner account codes, and dollar amounts should be indicated. Do not forget to calculate the effect on F & A cost if funds are being moved from/to direct salaries and fringes. Requests to transfer funds from personnel account codes will be carefully reviewed and granted in exceptional circumstances. Requests to transfer funds to equipment account codes will also be granted in exceptional circumstances because of their negative impact on F & A cost recovery.

4.7 Particular attention should be paid to University turnaround times for processing transactions, sponsored agency prior approval requirements and deadlines (i.e., foreign travel, no-cost extension requests.) The Form must be signed by the PI and the Dean or administrative department director, as appropriate.

5. Approval Process

5.1 The PI must submit the Form to OSRP for review. If contract modification is necessary, the Dean of Research and Sponsored Research will be included in the approval/denial process. PI’s should not contact the sponsoring agency directly.

5.2 After review by OSRP, if the request can be approved internally, it will be endorsed by the
OSRP Director for approval.

5.3 Institutional Prior Approval- memberships, subscriptions and dues Requests are submitted to OSRP and if deemed approvable following review are authorized by the dean of Research and Sponsored Research or the designee.

5.6 After review by OSRP, if the request requires the approval of the sponsoring agency, OSRP shall send a written request to the sponsoring agency for decision. OSRP will communicate the sponsoring agency’s decision by endorsing the Prior Approval Request Form and sending a copy of the endorsed form the PI. The PI should attach the approved form to the online requisition.