

Prior Approval on Sponsored Awards

Policy Owner: Office of the Vice Provost for Research
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Policy Contact: Associate Vice Provost for Research Administration & Development

REASON FOR POLICY

All activity proposed or incurred on a sponsored project must comply with the award terms and conditions and University policies and procedures. The purpose of this policy is to assist Principal Investigators (PIs) and administrators in effectively managing sponsored awards by providing guidelines for obtaining prior approval, when applicable. Prior approval is the written permission by an authorized official in advance of an administrative action that would result in a change in budget and/or program plans on a sponsored award.

The OMB Uniform Guidance, 2 CFR Part 200— Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards [section 200.308](#) specifies prior approval requirements for budget revisions and changes to program plans for Federal awards. Non-Federal sponsors may have similar, additional, or less restrictive requirements for prior approval. For prior approval requirements specific to each sponsored award, reference sponsor agency terms and conditions and award documentation. Pre- and Post-Award Research Administration at the Office of the Vice Provost for Research (OVPR) will provide guidance and advice regarding prior approval requirements for individual awards.

POLICY PRINCIPLES

After a sponsored award is made, changes resulting from circumstances not anticipated in the planning stages of the project are sometimes necessary. Some changes require the sponsor's prior written approval; other changes may be processed internally by the University on behalf of the sponsor.

For Federal awards, prior written agency approval is required for the following changes:

- Change in the objectives or scope of the project (even if there is no associated budget revision)
- Change in the key person(s) specified in the notice of award
- Need to charge salaries of administrative and clerical staff as direct costs (unless included in the approved proposal)
 - See [Research Terms and Conditions](#) for the list of agencies that waived this prior approval
- Disengagement from the project for more than three months by the approved project director or Principal Investigator (PI)
 - Physical absence from the University campus is not automatically considered disengagement as long as the PI is able to carry out their responsibilities from a remote location
- Reduction in time devoted to the project by the PI or key person(s) specified in the award notice by 25% or more

- For NSF projects, prior approval is not needed for effort reduction of key personnel and is only needed if the reduction of effort of the PI of 25% or more may result in impairment of the successful execution of the project. If this is the case, a modification to the project or a replacement PI is needed
- Transfer of Participant Support/trainee costs to another budget category
- Addition of a foreign component
- Transfer of a significant part of the programmatic effort to a third party via a subcontract not included in the approved proposal. This does not include acquisition of services.
 - NIH has waived prior approval unless the transfer is to a foreign component or will result in a change in scope
- Need to issue a fixed price subaward
 - NIH has waived prior approval unless the amount of a fixed price subaward exceeds the simplified acquisition threshold of \$150,000, provided the subaward meets the requirements for fixed amount awards in 45 CFR 75.201(b)
- Change in the approved cost sharing
- Change in the approved use of animals or human subjects
- Change of grantee institution
- Need for pre-award spending more than 90 days prior to the award start date
- No-cost extensions
 - First no-cost extension of up to 12 months can be approved by the University (written notification of the Federal agency at least 10 calendar days before the end of the period of performance is required. NSF and NIH notifications are performed by the OVPR Pre-Award Signing Official in Fastlane and ERA Commons, respectively)
- Carry-forward of funds of the current year budget (including prior year carry-forward funds) into the next budget period within a project period, unless the agency waived this prior approval (see [Research Terms and Conditions](#)) or an award has carry-forward authority.

Additional changes may require prior sponsor approval per specific agency or award terms and conditions. In such instances, OVPR Pre-Award office makes a determination of whether or not prior sponsor approval is required and interacts with the sponsor on behalf of the PI and the University to seek approval.

For non-Federal awards, prior sponsor approval is required depending on the specific agency and award.

To determine whether prior sponsor approval is required, the PI and the Local Research Administrator (LRA) should seek guidance from the OVPR Pre-Award office. Pre-Award will either approve the change on behalf of the sponsor or interact with the sponsor on behalf of the PI and the University to seek such approval.

DEFINITIONS

Carry-forward: availability of unspent funds from previous budget period(s) into the next within a project period.

No-cost extension: an extension of the period of performance without additional funds.

Participant Support costs: those costs paid to (or on behalf of) participants or trainees (not employees) for participation in meetings, conferences, symposia, and workshops or other training activities, when there is a category for participant support costs in the award.

Pre-award spending: expenditures incurred on the approved project prior to the award start date.

Prior Approval: the written permission by an authorized official in advance of an administrative action that would result in a change in budget and/or program plans on a sponsored award.

Rebudget: revision of the project budget between the budget categories within the overall budget total.

RELATED LINKS AND INFORMATION

[Tufts No-Cost Extension Approval Form](#)

[Tufts Budget Revision Form](#)

[Allocating Expenses to Sponsored Awards](#)

[2 CFR Part 200.308 —UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS – Revision of Budget and Program Plans](#)

[2 CFR Part 200.407 —UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS – Prior written approval](#)

[Research Terms and Conditions](#) overlay to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), 2 CRF 200