



Post Award Changes to Sponsored Programs – Rebudgeting, Prior Approvals and University Expanded Authority Approval

Policy Type: Administrative

Responsible Office: Office of Sponsored Programs, Office of the Vice President for Research and Innovation

Initial Policy Approved: 01/07/2013

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Policy Statement and Purpose

This policy addresses budgetary and other post award changes to sponsored programs. Applicable university and sponsor guidelines, policies, procedures, and regulations govern the course of action required to effect post award changes.

Sponsor rebudgeting and prior approvals policies vary, and it is the principal investigator's (PI) responsibility to review and take appropriate actions to comply with the terms and conditions of their sponsored award.

Post Award Changes Requiring Both University and Sponsor Prior Approval:

Most sponsors require sponsor written approval prior to certain post award changes. In these cases, the university requires approval from the Office of Sponsored Programs prior to submission of the request to the sponsor. Post award changes that often require sponsor prior approval include, but are not limited to, the following:

- Change in the objectives or scope of the project
- Change in key personnel
- Significant re-budgeting
- Disengagement of PI for more than 90 consecutive days
- A 25 percent or greater reduction of effort for key personnel from current approved committed effort
- Change of grantee institution
- Need for additional funding
- Transfer of a "significant part" of the programmatic effort to a third party
- Transfer of participant support costs to another budget category

- Change in the approved use of animals or human subjects
- Pre-award spending more than 90 days prior to the award start date
- No-cost time extension (see below for clarifying details)

Post Award Changes Requiring Only Internal University Approval:

In addition to the changes listed above, the university requires internal approval from the Office of Sponsored Programs on all other changes, including those listed below:

- Change of effort for key personnel and faculty on sponsored awards (less than 25 percent of approved committed effort)
- One-time 12-month no-cost time extension per competitive segment (federal awards only when delegated to VCU)

The above constitutes general rules. The Research Terms and Conditions, Appendix A (Prior Approval Matrix) <https://www.nsf.gov/bfa/dias/policy/fedrtc/appendix_a.pdf> also provides direction regarding prior approval and rebudgeting conditions. PIs are ultimately responsible for being familiar with, and adhering to, the sponsor’s requirements of the award.

Noncompliance with this policy may result in disciplinary action up to and including termination. VCU supports an environment free from retaliation. Retaliation against any employee who brings forth a good faith concern, asks a clarifying question, or participates in an investigation is prohibited.

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Who Should Know This Policy

All individuals involved in sponsored programs are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

Definitions

Authorized Official

The individual(s) formally authorized to bind the institution to grants, contracts and other agreements; the official "signer" for the institution.

Award

Funds that have been obligated by a funding agency for a particular project, or the document memorializing this transaction.

Faculty

Individuals performing teaching, research, and service duties in support of the university's mission. These faculty members may hold tenure, serve in tenure-track positions that are eligible to receive tenure or occupy collateral positions that are not tenure-eligible. These positions include academic titles such as professor, associate professor, assistant professor, instructor or lecturer.

Key Personnel

Individuals who provide critical leadership positions within the proposal (and consequently their intellectual guidance) or because of the uniqueness of the expertise they are contributing relative to the proposed scope of activity. Key Personnel typically include principal investigators, research scientists, principal scientists and senior scientists, depending on their intellectual contribution to the proposed scope of activity. Typically, replacement of any of these individuals requires approval from the sponsor. Importantly, the status of key personnel does not necessarily imply salary support from the sponsor.

Prior Approval

Written documentation from the sponsor memorializing permission for VCU to use project funds for purposes not in the approved budget or to change aspects of the program from those originally planned and approved.

University Approval

Many federal agencies have delegated to the institution the authority to exercise certain prior approvals required for federal research grants through the expanded authorities designation. These include, but are not limited to, carryover of unobligated balances and up-to-12-month no-cost extension to the final budget period.

Contacts

The Office of Sponsored Programs officially interprets this policy. This office is responsible for obtaining approval for any revisions as required by the policy *Creating and Maintaining Policies and Procedures* through the appropriate governance structures. Please direct policy questions to the associate vice president for sponsored programs.

Policy Specifics and Procedures

Procedure for Post Award Changes Requiring Both University and Sponsor Prior Approval

PIs are responsible for initiating prior approval requests and receiving sponsor approval prior to implementing any change(s) in the project. The PI must prepare a request to the sponsor in the format required by the sponsor requesting the prior approval. Some sponsors require these requests to be submitted via their electronic systems. Requests must specifically identify the sponsor's award number and title. Complete justification of the request (including a revised budget, if applicable) must be included. Requests must be submitted to Office of Sponsored Programs (OSP) (prior to submission to the sponsor) as an Administrative Action through the Research Administration Management System – Sponsored Programs Online Tracking system (RAMS SPOT) for review, countersignature by VCU's Authorized Official, and submission to the sponsor for consideration. These requests must be submitted in accordance with the RAMS SPOT Get Started Guide for Administrative Actions. Sponsor approval must be obtained in accordance with the award terms and conditions and oftentimes will be in the form of an amendment or modification to the award. Responses received from the sponsor by the department or PI must be forwarded to OSP for processing. When approved, OSP will process the change in RAMS-SPOT and notify the Grants & Contracts Accounting Office of such changes.

Special Instructions and Notes for No-Cost Extensions: Extensions may be requested for programmatic reasons only as long as funds remain. Some sponsors may request information about the amount of funds remaining in the account and others may request a budget indicating how funds remaining at the end of the original project period will be spent during the extension. When in doubt, consult the original award and/or the OSP.

Timing: To accommodate time limits for sponsors, requests for extensions must be submitted to OSP at least four weeks before the grant period ends. Please refer to the sponsor agreement or guidelines if there are any questions regarding timing.

Procedure for Post Award Changes Requiring Only University Approval

Change of Effort on Sponsored Award – Requests must be submitted to OSP as an Administrative Action through RAMS SPOT for review and approval. OSP maintains “committed effort” records for all key personnel. These data are used by the eCRT program for effort certification

One-time 12-month no-cost time extension:

Federal Awards – Many (but not all) federal agencies have delegated the responsibility for approving initial 12-month no-cost extensions to the university's Authorized Official for grants to the institution. This delegation allows OSP to internally approve a one-time request to extend the end date of the project period up to an additional 12 months. Please review the Research Terms and Conditions, Appendix A (Prior Approval Matrix) for information regarding which federal agencies have delegated this responsibility.

Procedure for Internal Approval: Requests must be submitted to OSP as an Administrative Action through RAMS SPOT for review and approval. OSP will then electronically submit the notification to the sponsor.

Upon approval, OSP will process the change in RAMS-SPOT and notify the Grants & Contracts Accounting Office of such changes.

Exception for NSF awards: NSF requires that notification of extensions be submitted through FastLane. The PI or research administrator must initiate the notification procedure through FastLane and also complete and submit an Administrative Action through RAMS-SPOT. OSP will forward the notification to NSF via FastLane.

Timing: The sponsor must be informed about the extension well before the original expiration date. Therefore, requests for extensions must be processed at least four weeks before the grant period ends.

Non-Federal Awards and Federal Awards that have not delegated to University - When it is necessary to request a no-cost extension from a non-federal sponsor or from a federal agency that requires agency approval for extensions, the PI must write a letter to the appropriate official as identified in the award document (usually Program Officer or Grants Management Officer) or complete the appropriate form in the sponsor's electronic system. The letter must include: 1) justification for the no-cost extension; 2) the sponsor's award number; 3) the new requested expiration date; 4) PI signature; and 5) OSP countersignature. Submit the request to OSP (prior to submission to the sponsor) as an Administrative Action through RAMS-SPOT for review, countersignature by VCU's Authorized Official, and submission to the sponsor for consideration.

When approved, OSP will process the change in RAMS-SPOT and notify the Grants & Contracts Accounting Office of such changes.

Non-federal contracts such as pharmaceutical company clinical trials often do not specify an end date in the contract but the university requires an end date be associated with the account. Requests must be submitted by the PI or department to OSP as an Administrative Action through RAMS SPOT for review and approval.

**** Reminder: All terms and conditions of the award remain in effect during the period of a no-cost extension, including effort commitment of the key personnel named in the notice of award.****

Forms

There are no forms associated with this policy and procedures.

Related Documents

1. Research Terms and Conditions, Appendix A (Prior Approval Matrix)
https://www.nsf.gov/bfa/dias/policy/fedrtc/appendix_a.pdf
2. [RAMS SPOT](#)
3. [RAMS SPOT Get Started Guide - Administrative Actions](#)
4. VCU Policy: [Office of Sponsored Programs Responsibilities](#)

5. 2 CFR 200, UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

Revision History

This policy supersedes the following archived policies:

01/07/2013

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FAQ

- 1. My Program Officer approved a major change to my project over the phone and followed up via e-mail. Why is my fiscal administrator and OSP requiring that I request the change in writing?**

2 CFR 200.308 requires that certain changes to awards be approved in writing by the sponsor. If your change meets the requirements for prior approval, the request must be made in writing through the OSP and approved by the sponsor before implementation. Further, while the Program Officer may approve a change to the project, typically only the sponsor's Grant or Contract Officer can officially approve the request.

- 2. I just realized my NIH grant expired two days ago but I need a no-cost time extension. Can the university still approve the extension even though it's past the end date?**

Unfortunately, no. The authority given the university to approve a no-cost extension requires that the approval be processed, and the sponsor notified, prior to the existing end date. The PI will need to follow the requirements for sponsor prior approval to request the extension. It is important to note that the sponsor is not obligated to approve the extension.