The University of Vermont

Sponsored Project Administration

Procedure:	**Prior Approvals**
Owner:	**Sponsored Project Administration**
Effective date:	**03/01/2018**
Last Updated:	**11/06/2023**

Background

During the life of a sponsored project, adjustments that have significant implications, for example, a change the original project objective, change of PI, or changes that have significant budget implications may require prior written approval before the change can be implemented.

Depending on award terms and conditions, some changes require sponsor prior written approval; others may be approved internally by Sponsored Project Administration (SPA). It is important to coordinate with SPA and review the award terms and conditions for prior approval requirements.

All prior approval requests must be submitted to SPA for authorized official signature and approval.

Purpose

The goal of this document is to outline the process for prior approval requests.

Roles and Responsibilities

Principal Investigator and Unit Administrator

- Contact SPA for prior approval questions.
- Initiate and coordinate prior approval requests with SPA.
- Provide all necessary information, documentation, and justifications.
- Initiate requests in a sponsor electronic system, where applicable.
- Obtain department and college approval, where required.

SPA Research Administrator

- Provides Authorized UVM Signature on all prior approvals.
- Primary liaison between UVM and Sponsor Grant Office.
- Informs PI and Unit Administrator of sponsor requirements.
- Reviews request for completeness and compliance with sponsor guidelines.

SPA Financial Analyst

- Confirms all dollar amounts included in any request.
- Coordinate, review, and submit prior approval requests of primarily budgetary nature.

The University of Vermont

Prior Approval Request: The formal request made by the University of Vermont to a sponsor to allow a change to the project or project budget that would otherwise violate the terms and conditions of the sponsored agreement.

SPA: Sponsored Project Administration

FA: Financial Analyst

RA: Research Administrator

PI: Principal Investigator

UA: Unit Administrator (For the purpose of all procedures, Business Unit Administrator, Business Manager, Grant Administrator and Department Administrator are all used interchangeably and refer to the person assisting the PI in the Department.)

Procedures

Contact SPA with Questions

- PIs and Business Unit administrators should consult with SPA for prior approval requirements that apply to specific awards.

SPA Approves

- All prior approval requests must be submitted to SPA for authorized official signature and approval.

Typical Process

Task 1: Receive Prior Approval Request

Prior approval requests normally originate from the PI in coordination with the Unit Administrator or through analysis by SPA staff. SPA will review the request to determine what change to the project or project budget is needed and how that change can be best accomplished.

Task 2: Review Award Document and Determine Instrument

SPA staff reviews the award document keeping in mind how to affect the requested project change. This includes reviewing whether prior approval is required to affect the change, what format or system is used to make the request, who the request should be addressed to, and what constitutes approval by the sponsor.

SPA will review what information is needed as a part of the prior approval request. For example, a narrative justification and effective date for the request is often required but depending on the sponsor and the kind of prior approval being requested, we made need to provide budgets and budget justifications, CVs, or bio sketches.

Task 3: Compose Request

SPA staff will work with the department to collect the required information and compose the request in the appropriate format. If a letter is required, it should be written on SPA letterhead and addressed to the appropriate business contact identified in the award document.

PI in coordination with the Unit Administrator are responsible for providing necessary programmatic or budgetary justifications and budgets in the forms required by the sponsor.

Remaining balances should be checked by SPA Financial Analyst.

The University of Vermont

If the sponsor uses an electronic research administration system to receive prior approval requests, the PI in coordination with the Unit Administrator should initiate the request, upload the required information, and electronically "route" to the responsible SPA staff member to review.

Task 4: Review and Submit

Requests submitted by departments using electronic systems are reviewed by responsible SPA staff for completeness and accuracy.

Language included in requests should be reviewed by SPA team leads if necessary to ensure the request will be sufficient to accomplish the requested action.

If the prior approval requires submission of a signed letter, the PI, and responsible SPA staff should both sign and the letter should be sent by SPA to the required individual at the sponsoring agency.

Task 5: Approval Received

Responsible SPA staff will ensure that approval received from the sponsor is sufficient to make the requested changes per the terms and conditions of the award document. The responsible SPA staff will then forward the approval to set-up and the financial team to include in the financial records as needed.

Common Prior Approval Requests for Federal Grants

Many prior approval requests are initiated and managed using a sponsor's eRA systems, such as; NSF FASTLANE, NSF thru Research.gov or for NIH eRA Commons. However, a very common communication tool used is email with attachments.

> **Commented [AC1]:** I don't think fastlane is a thing anymore so we should remove this

Federal grants from NSF, NIH, NIFA, Energy, NASA, and Commerce are awarded under the Federal Wide Research Terms and Conditions.

For this cohort of sponsors, a handy Prior Approval Matrix is maintained that clearly identifies prior approvals that require sponsor approval or have been waived, allowing SPA to make the determination.

Below is a matrix of common federal prior approvals requirements and what action may need to be taken prior to implementing the change. Please note that the actual information required to submit a request may be different.

Changes in Objectives, Scope, or Methodology	Data/Information	Coordinating SPA Personnel
Change in Scope/Significant changes/delays or events of unusual interest/ Significant changes in methods/procedures includes a change in animal model	PI should consult with the Program Officer for an initial determination. If a change of scope is confirmed, the PI should present a detailed justification explaining the reason for a deviation from the original scope of work and present the change of scope, work plan, or aim. This may or may not require a revised budget be submitted. The justification should be addressed to the sponsor's Grant Officer or initiated eRA system.	Research Administrator
Changes in PI, Reduction in Effort Devoted to the Project	**Data/Information**	**Coordinating SPA Personnel**

The University of Vermont

Change of PI	In the event UVM elects to continue the project with a new PI, a request presenting the new PI, qualifications, effort devoted to the project, and current and pending support (if required), shall be provided to SPA from the dept. The justification should be addressed to the sponsor's Grant Officer or initiated eRA system.	Research Administrator
Change or withdrawal of Senior/Key Personnel specifically named in the NoA.	The PI should present a detailed justification explaining the change or withdrawal of Senior/Key Personnel, present replacements; include qualifications, the effort devoted to the project, and current and pending support (if required). If withdrawal, present the impact statement. A revised budget may be required. The justification should be addressed to the sponsor's Grant Officer or initiated eRA system.	Research Administrator
Long-term disengagement of PI or other Senior/Key Personnel specifically named in the NOA. Long-term means absent from the project for any continuous period greater than 3 months.	In the event the PI will be away and not engaged in the project for a consecutive period of greater than 3-months (e.g., sabbatical leave) but intends to return, the PI shall present in writing the arrangements for oversight of the project during the long-term absence and/or provide an impact statement. This information must be provided at least 30 days before departure or as soon as practicable after the absence is known. The justification should be addressed to the sponsor's Grant Officer or initiated eRA system.	Research Administrator
PI or other Senior/Key Personnel specifically named in the NOA reduce time devoted to the project by 25 percent or more from the level that was committed at the time of initial competing year award (definition of senior/key personnel may vary by sponsor)	The PI should present a detailed justification explaining the change in level of effort and provide an impact statement. This may or may not require a revised budget be submitted. The justification should be addressed to the sponsor's Grants Officer or initiated eRA system.	Research Administrator
Change from multiple PI models to a single PI model. Change from a single PI model to a multiple PI model. Change in the number or makeup of the PIs on multiple PI awards.	The contact PI should present a detailed justification explaining the change in in the multi-PI project and impact statement. This may or may not require a revised budget be submitted. The justification should be addressed to the sponsor's Grant Officer or initiated eRA system.	Research Administrator
Adding Subawards	**Data/Information**	**Coordinating SPA Personnel**
Adding a domestic or foreign Subaward not originally budgeted for.	PI shall provide a subrecipient proposal SPA subrecipient commitment form signed by the subrecipient's authorized official and include at a minimum the following:	Research Administrator

The University of Vermont

Issuing a fixed price subaward.	• a clear description of the work to be performed. • the basis for selection of the subrecipient; and • a separate budget for each subaward. The justification including a revised UVM budget should be addressed to the sponsor's Grant Officer or initiated eRA system.	
Pre-Award Costs	**Data/Information**	**Coordinating SPA Personnel**
Pre-Award Costs on grants greater than 90-days prior to the start date new or competing continuation award or up to 90 days if all pre-award spending is restricted	PI should present a detailed justification explaining the reason why the project needs to start greater than 90-days prior to the award's start date. Include proposed pre-award start date, pre-award budget and specific costs to be covered. The justification should be addressed to the sponsor's Grant Officer or initiated eRA system.	Research administrator if request is made prior to advance account or award set-up or Financial Analyst if request is made after set up
Pre-Contract Costs	PI should present a detailed justification explaining the reason why specific pre-contract costs need to be incurred. Include a budget for the pre-contract costs and justification of each item requested. The justification should be addressed to the sponsor's Grant Officer.	Research administrator if request is made prior to advance account or award set-up or Financial Analyst if request is made after set up
No Cost Extensions	**Data/Information**	**Coordinating SPA Personnel**
UVM authorized No Cost Extension of the final budget period	[Follow No Cost Extension Procedures](#)	Research Administrator
Sponsor approved no-cost extension, extension greater than 12 months, or late notification of initial no-cost extension	[Follow No Cost Extension Procedures](#)	Research Administrator
Carry Forward Unobligated Balances	**Data/Information**	**Coordinating SPA Personnel**
Carryforward of restricted unobligated balance	[Follow Carryforward of Unobligated Balance](#)	Financial Analyst
Re-budgeting/Cost Sharing	**Data/Information**	**Coordinating SPA Personnel**
Unless waived, re-budgeting of funds between direct cost categories in which the cumulative amount of such transfers exceed or is expected	PI must provide a detailed justification that provides a scientific justification for the re-budgeting action and explain why the funds are available in the category that will be re-budgeted to another category.	Financial Analyst

The University of Vermont

to exceed 10 percent of the total budget as last approved by the Federal awarding agency.		
Re-budgeting of funds awarded for a specific purpose to use for other purposes (i.e.: Participant Support Costs, Diversity supplements, Trainee Costs, Patient Care, equipment supplements)	PI must provide a detailed justification that provides a scientific justification for the re-budgeting action that would move funds awarded for a specific purpose to another purpose and explain why the funds are available. A budget may be required.	Financial Analyst
Change in Cost Sharing	PI must provide a justification that explains the circumstances and presents the request to change the mandatory cost sharing amount in an award.	Research Administrator or Financial Analyst
Equipment/Capital Expenditures	**Data/Information**	**Coordinating SPA Personnel**
Purchase of a unit of equipment exceeding $25,000 not originally budgeted and awarded	PI must provide a detailed justification that provides a scientific justification for the purchase.	Financial Analyst
Capital Expenditures or Alteration and Renovation of Facilities under non-construction awards	PI must provide a detailed justification that provides a scientific justification for the transaction prior to submission to the sponsor.	Financial Analyst
Transfers out	**Data/Information**	**Coordinating SPA Personnel**
Transfer of grant out of UVM	See Award Relinquishment and Equipment Transfers to a New Institution	Research Administrator

FAQs

N/A

Helpful Links

SPA No-Cost Extensions

Federal Sponsors:

NIH Prior Approval Policy Document

NSF Prior Approval Document

The University of Vermont

Date	Version	Author	Change Details
03/01/2018	1	SPA	Initial release
05/16/2019	1.2	Nicole	Updated Links
11/06/2023	1.3	Austin	Remove systems no longer in use