



Institutional Prior Approval System (PAS) for Management of Federal Grants

Many Federal agencies have transferred the authority to approve a variety of post-award changes, most of which involve rebudgeting of grant funds, to awardee institutions. A recent revision of Office of Management and Budget Circular A-110, which provides government-wide administrative regulations for Federal grants, standardizes post-award approvals and provides more flexibility to institutions in the administration of grants. This revision has required the University to re-evaluate its existing prior approval system (PAS). The following guidelines have been developed to assist Principal Investigators in preparing requests for changes in Federally-funded projects.

All requests for prior approval must be in writing, well-justified, and accompanied by supporting documentation where necessary to ensure revisions are reasonable and appropriate.

Items Requiring Institutional Prior Approval

- purchase of capital equipment to be used principally or solely for research if not identified in the original agency-approved budget;
- requests for travel exceeding approved budget by \$1,000 or 25%, whichever is greater;
- incurring of pre-award costs, for essential expenditures to be incurred within 90 days prior to the effective date of a new or competing renewal award, at the school's risk;
- requests for a one-time no-cost extension of up to 12 months, provided the reason for such an extension is not simply to expend unliquidated grant balances.

Items Requiring Agency Prior Approval

- change in the scope or objective of project;
- change of Principal Investigator and/or key personnel (note that definition of key personnel may vary by agency);
- the absence for more than three months, or a 25% or more reduction in time devoted to the project, by the Principal Investigator;
- need for additional Federal funding;
- transfer of funds allotted for training allowances into other categories;
- subaward or transfer of any significant portion of work, unless approved in original award;
- budgeting of pre-award costs to be incurred more than 90 days prior to award;
- rebudgeting among direct cost categories for awards in which the Federal share of the project exceeds \$100,000 and the cumulative amount of such transfers exceeds or is expected to exceed 10% of the total budget as last approved by the awarding agency. For PHS, approval is required for cumulative expenditures of 25%, or \$250,000, whichever is less.

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Instructions

Making a Request under the Prior Approval System (PAS)

NOTE: Approval for any changes outlined on the previous page must be obtained **prior to** implementing those changes. Requests for approval of changes that have already occurred will not be reviewed and cannot be approved by the University. Please consult an Office of Sponsored Programs Projects Officer before submitting the PAS.

Principal Investigators should complete and sign the attached forms before securing the signatures of the department chair and Dean or Dean's designee. The request is then submitted to the Director of Office of Sponsored Programs for final approval. For the Courant Institute, the Director's Office will act for the Office of Sponsored Programs.

Each request must include a well-detailed justification explaining the reason for a deviation from the original, approved budget and/or work plan.

Each request will be reviewed for propriety in relation to the objectives of the project and for compliance with the regulations, policies, and procedures of both the University and the awarding agency.

Once a PAS request has been approved, the Sponsored Research Accounting Department will be notified, and the appropriate changes will be reflected in the Expenditure Control Report (ECR), which is distributed to Principal Investigators monthly.

Principal Investigators should refer to specific grant conditions from the awarding agency that may be attached to the initial award letter or award notice for further details on budget restrictions and/or post-award changes.

Making a Request to the Awarding Agency

Those changes requiring approval from the awarding agency should be described in a letter from the Principal Investigator to the appropriate agency official. The letter must be countersigned by the Director of Sponsored Programs, Richard Louth, who will review each request. Once the letter has been approved, the Office of Sponsored Programs will then forward the request to the agency.

Request for Prior Approval of Changes in Federal Grants

	Budget Period
Principal Investigator(s)	NYU Account Number
Agency	Grant Number
Project Title	

Check the type of change requested below:

- Capital equipment to be used principally or solely for research if not identified in the original agency-approved budget.
- Travel exceeding approved budget by \$1,000 or 25%, whichever is greater.
- Pre-award costs for essential expenditures to be incurred within 90 days prior to the effective date of the grant, at the school's risk.
- One-time no-cost extension of up to 12 months. Federal guidelines do not permit extensions simply to expend unliquidated grant balances. Explain need for additional time, and provide a new termination date.

A detailed justification is required for any change requested (see following page).

Consult the listing of [expense subcodes](#) on the back of this form to complete this section:

Transfer	from	Category/Code	to	Category/Code
\$ _____		_____		_____
\$ _____		_____		_____
\$ _____		_____		_____
\$ _____		_____		_____

Certification of Principal Investigator: This request is proper in relation to and consistent with the approved project objective. Re-budgeting will not hinder completion of the approved project, nor increase the total amount to be expended.

Signature of Principal Investigator	Date
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Please sign and print names below:

Department Chair	Date
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Dean or Dean's Designee	Date
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Director, Office of Sponsored Programs	Date
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Distribution: PI; Sponsored Research Accounting; Chair; Dean's office; OSP; PAS file

Request for Prior Approval of Changes in Federal Grants

Principal Investigator(s): _____

Justification

[Empty box for justification text]

Expense Subcodes for Sponsored Research Accounts

For a complete list, please visit:

<http://www.nyu.edu/financial.services/cdv/pdf/accounts.pdf>

For further information, contact Research Restricted Accounting Services (RRAS) Department at 998-2888.

Revised A-110 and Institutional Requirements: Agency Specifications

	DHHS [^]	DOD [#]	DOE	DOI	DOJ	DOL	ED [*]	EPA	HUD	NEH	NHPRC	NSF	USDA	USIA
AGENCY PRIOR APPROVAL REQUIRED FOR:														
• change in the scope or objective of project	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• change in key personnel	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• absence for more than 3 months, or 25% or more reduction in time devoted to project, by PI	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• need for additional Federal funding	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• transfer of funds allotted for training allowances into other categories	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• the subaward, transfer, or contracting out of any significant portion of work, unless approved in original award	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• pre-award costs for more than 90 days prior to award	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• rebudgeting among direct cost categories for awards in which the Federal share of the project exceeds \$100,000 (for PHS, \$250,000), and the cumulative amount of such transfers exceeds or is expected to exceed 10% (for PHS, 25%) of the total budget as last approved by the Federal awarding agency	X		X	X	X	X	X	X	X		X		X	X
INSTITUTIONAL PRIOR APPROVAL REQUIRED TO:														
• purchase capital equipment to be used principally or solely for research if not identified in the original agency-approved budget	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• budget for travel exceeding approved budget by \$1,000 or 25%, whichever is greater	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• incur pre-award costs 90 days or less prior to award	X	X	X	X	X	X	X	X	X	X	X	X	X	X
• initiate a one-time no-cost extension of up to 12 months (but not for the purpose of expending unliquidated grant balances)	X		X	X	X	X	X	X	X	X	X	X	X	X

[^] Includes PHS/NIH, HRSA, CDC.

[#] Includes AFOSR, ARO, ONR. No-Cost Extensions will ordinarily require agency approval.

^{*} No-Cost Extensions are not permitted for National Institute on Disability & Rehabilitation Research Programs.

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