

New York University

UNIVERSITY POLICIES

Title:	Prior Approvals Policy for Sponsored Programs
Effective Date:	December 1, 2017
Supersedes:	September 1, 2013
Issuing Authority:	Sponsored Programs Administration
Responsible Officer:	Assistant Vice President for Post-Award Administration

Policy

It is the policy of New York University (NYU, “the University”) that all costs proposed or incurred on a sponsored project comply with all terms and conditions and University policies and procedures, including those associated with obtaining prior approval for changes in a sponsored project, and the exercise of authority over such changes when necessary.

Purpose of this Policy

The purpose of this policy is to assist Principal Investigators (PIs), schools, departments, units and personnel of the University to effectively manage the finances of sponsored program awards by providing guidelines and procedures for attaining prior approvals when applicable.

Scope of this Policy

This policy is applicable to all schools, departments, units, and personnel of the University involved in administering sponsored awards.

Procedures for Implementation

a. University Internal Prior Approval and Expanded Authorities for the Management of Federal Grants

A PI may report deviations from budget and program plans and request prior approvals from the Office of Sponsored Programs (OSP) for the following:

- **Pre-Award Costs**

To create a sponsored project for the purpose of incurring pre-award costs up to a maximum of 90 calendar days prior to award start date. However, expenditures prior to the award start date are solely at the financial risk of the department.

- **No-Cost Extension**

To initiate a one-time extension of the award expiration date of up to 12 months. The funding sponsor must be notified of the extension at least ten days prior to the original termination date. This extension may not be exercised solely for the purpose of using any unobligated balance.

- **Adding Scientific or Special Purpose Equipment**

To re-budget funds for the purchase of scientific or special-purpose equipment not identified in the original sponsor approved budget, general-purpose equipment is not allowable unless used solely or primarily for the objectives of the sponsored project and if the cost supports the activity that is directly related to the special purpose or circumstance of the sponsored agreement.

Approval Required from the Sponsoring Agency

The PI of a Federally-sponsored project is required to report major deviations as outlined below from budget and program plans. The PI should work with the OSP, following PAS procedures, to request prior approvals directly from Federal awarding agencies for any of the following program or budget-related reasons:

- Change in the scope or the objectives of the project or program.
- Change in the PI and/or key personnel (the definition of key personnel may vary by sponsoring agency) or in project effort (disengagement for more than three months or a 25% reduction in time devoted to the project).
- Transfer of funds allotted for trainee expenses (direct payment to trainees: stipend, tuition, fees) to other categories of expense.
- Subawards, transfers or subcontracting a substantive portion of work, unless described in the application and funded in the approved award.
- Budgeting of pre-award costs to be incurred more than 90 days prior to award.
- Other expenses, if not waived by a particular agency in the notice of award (i.e., foreign travel, carryforward of funds from one budget period to the next, re-budgeting of trainee allowances or participant costs, alterations and renovations in excess of \$25,000, adjustment of cost sharing commitment).
- Please refer to the OSP Prior Approval Matrix for a complete listing of possible post award actions that may require sponsor approval.

b. Requesting Prior Approval

Prior approval for post award changes on sponsored projects must be requested by the PI (or his or her designee) to the Office of Sponsored Programs. NYU has implemented a Prior Approval Matrix that will document whether prior approval is required from the sponsoring agency or whether NYU has approval authority for post award changes or actions. The Prior Approval Matrix contains all the information necessary to make this determination. The Prior Approval Matrix can be found on the OSP website at:

<https://wikis.nyu.edu/pages/viewpage.action?spaceKey=RES&title=Research+Terms+and+Conditions+Prior+Approval+Matrix>.

- The Prior Approval Matrix should be used for all federally funded awards
 - The Prior Approval Matrix identifies a wide range of possible actions, including no-cost extensions
 - For non-federally funded awards, OSP will follow the sponsor's specific requirements regarding actions requiring prior approval
- All requests for post award changes must be made in a timely manner
- All requests must provide sufficient justification and supporting documentation
- All requests must reference the CAYUSE award number to which the post award action applies
- When completed, the request should be emailed to osp.agency@nyu.edu
 - The request should cc the PI, Department Chairperson, Department Administrator and the Dean or his/her designee
- The OSP Project Officer assigned to the award's unit will review the request and determine if any further information is needed. Upon completion, the Project Officer will submit the request to the sponsoring agency if necessary. If internal approval is appropriate, OSP will notify the sponsoring agency of the approved action.
- Those changes requiring approval from the awarding sponsor should be described in a letter from the Principal Investigator to the appropriate sponsor official. The Director of Sponsored Programs in OSP will review each request. The letter must be approved/signed by both the PI and the OSP Director. Once the letter has been approved, OSP will forward the request to the sponsor. In lieu of a signed letter, many agencies will now accept an email from OSP.
- The OSP Project Officer assigned to your unit will provide assistance and answer any questions regarding this procedure

Policy Definitions

N/A

Related Policies

- Charging Administrative Expenses to Federal Awards Policy
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/charging-administrative-expenses-to-federal-awards-policy.html>
- Costing Policy
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/costing-policy.html>
- Cost Sharing Policy
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/cost-sharing-policy.html>
- Effort Reporting Policy for Sponsored Programs
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/effort-reporting-policy-for-sponsored-programs.html>

Federal Regulations

- OMB Uniform Guidance
http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl