

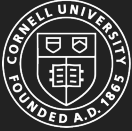
A photograph of a woman with red hair, wearing sunglasses and a dark shirt, walking through a field of pink cherry blossoms. In the background, a tall brick clock tower with a pointed roof is visible. The scene is set outdoors on a grassy area. The right side of the image is overlaid with a dark grey semi-circle containing white text.

Post-Award Prior Approval Requests

James Brooks

Grant and Contract Officer

Federal Team



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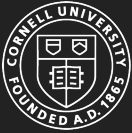
Prior
[prahy-er]

adjective

preceding in time or in order;
earlier or former; previous:

Synonyms:

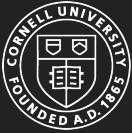
Preceding, Previous, Ahead, Before



What is a post-award prior approval request?

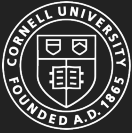
- A change to an awarded project that, per the terms and conditions of the award, requires approval of the sponsor *prior* to implementing the change.





What is a post-award prior approval request?

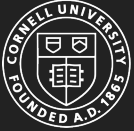
- Many sponsors include in award documents provisions which allow for a specific action to take place *only* when a request has been made by the awardee and approved by the sponsor.
- Prior approval means prior to taking that action which requires approval. Usually, a timeline specified by the sponsor.
- The need for prior approval by a sponsor should be communicated to OSP who will assist the unit/PI with developing the request and will submit it to the sponsor for consideration.
- The sponsor is within their rights to say “no” and deny the request.



How do I know when prior approval is required?

- Know your terms and conditions
- Avoid assumptions
- Prior-Approval vs. Required Notification
- Interpretation may come into play
- Watch for cascading prior approval requests

When in doubt, contact your GCO.

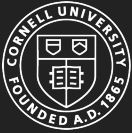


Spectrum of Agreement Types

Unrestricted Gift ➡ Grant ➡ Cooperative Agreement ➡ Contract



Ordered by level of control, sponsor involvement, expectation, and deliverables



Common Prior Approval Request Types

Budget Revision

Carryforward of Budget into Subsequent Years

Change in Principal Investigator (PI) or Key Person

Changes in Cost Share

No Cost Extensions

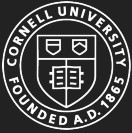
Participant Support Costs

Pre-Award Costs

Principal Investigator (PI) takes a long break (disengagement)

Scope of Work Change

Subawards

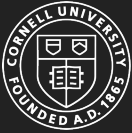


No-Cost Extension (NCE)

Request to extend the project period beyond the original project end date without any additional funds.

- Two types:
 - **Grantee Approved**
 - Some federal sponsors allow a first NCE to be “grantee-approved” with notification.
 - Notification **MUST** be submitted on time or authority to initiate “grantee-approved” NCE will be lost.
 - **Sponsor Approved**
 - One-time extensions **require** prior approval from the Federal agency when:
 - The terms and conditions of the Federal award prohibit the extension;
 - The extension requires additional Federal funds;
 - The extension involves any change in the approved scope of the project.

If an agreement is silent about NCEs, prior approval is required

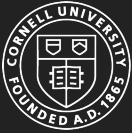


Requests to Rebudget

When the budget approved by the sponsor is not consistent with the actual project needs and the award terms require sponsor review and approval.

- Also called “rebudgeting”, “budget revision” or “budget reallocation”.
- Award may require prior approval for budget changes that:
 - Transfer 10% or more of award total between cost categories
 - Transfer 10% or more of cost category between cost categories
 - Transfer funds between indirect and direct cost categories
 - Transfer funds from participant support
 - Make any change to the budget (!!!)

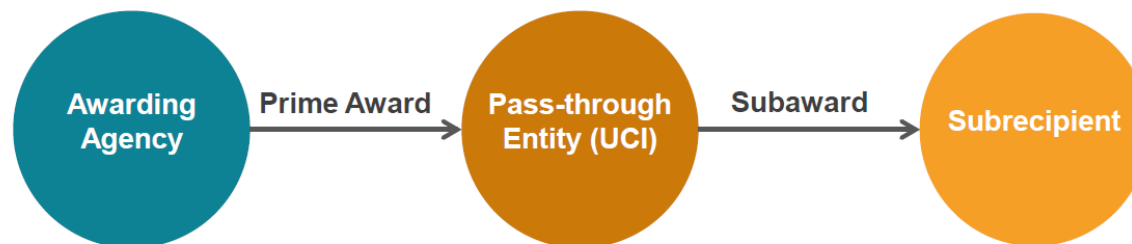
If an agreement is silent about rebudgeting, further review is needed by OSP/SFS

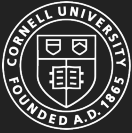


Adding a Subaward

When the proposal awarded by the sponsor did not include a subaward that the PI now wants to add.

- Award may require prior approval of only certain subawards or situations:
 - Subawards which exceed a specified amount or % of the total award
 - Fixed-price subawards
 - Subawards with international institutions
 - Subawards to federal entities under a Federal award
- Some sponsors and awards do not require prior approval.





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CORNELL PROCESS!

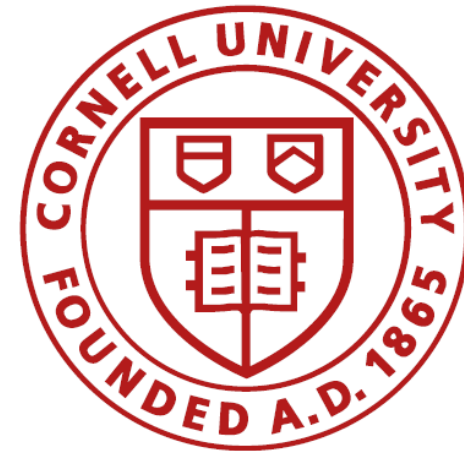
Adding Subawards After Award Received

Generally, need to **send to sponsor**

- Subaward Scope of Work
- Subaward Budget and Budget Justification
- Justification on WHY subaward is needed
- Updated Cornell Budget

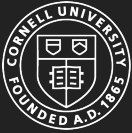
OSP Needs

- Sub Commitment Form
- Subaward Budget, Budget Justification, Scope of Work



You must create a new subaward in RASS!
<https://guide.rass.cornell.edu/sponsored-projects/initiate-a-subaward/>

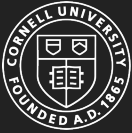
cu_subawds@cornell.edu



Travel

- Sponsors may:
 - allow any travel (assuming allowable in accordance with cost principles)
 - only allow travel included in proposal
 - require post-travel report
 - require all travel be pre-approved
 - require all foreign travel be pre-approved

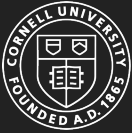




Changes in Senior/Key Personnel

Senior/Key Personnel - individuals who contribute to the scientific development or execution of a project in a substantive measurable way. The PI is always considered senior/key personnel. Many sponsors will make clear who they consider senior/key personnel.

- **Absence of Senior/Key Personnel (Disengagement)**
 - Generally defined as the absence from the project for any continuous period of three months or more.
 - Each sponsor will have their own definition.
 - [Cornell Policy 6.2.1 - Leaves for Professors and Academic Staff](#)
- **Change of Senior/Key Personnel**
 - The permanent removal or replacement of Senior/Key Personnel from the project.
- **Reduction of Effort by Senior/Key Personnel**
 - Typically, the reduction effort dedicated to the project by 25% or more.
 - Each sponsor will have their own definition.



PI Transfers

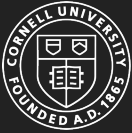
- Two types:
 - **Incoming:** When a PI is moving from another institution to Cornell.
 - **Outgoing:** When a PI is leaving Cornell for another institution.
- Depending on the situation, this change may result in different prior approval actions including:
 - PI Transfer
 - Change of PI
 - Addition of a Subaward
 - Request to Rebudget
 - Change in Scope of Work/Objectives
 - Termination
 - Etc.

OSP Roundtable

“Transfer of Sponsored Projects”, presented by: Bella DiFranzo & Rajni Aneja
https://vod.video.cornell.edu/media/t/1_zptpf5c9

NCURA Magazine Article

“Award Transfers: Anticipated Issues to Forestall Them”, authored by: Bella DiFranzo & Jamie Sprague
https://www.osp.cornell.edu/Education/protected/NCURA/Award%20Transfers_NCURAMagazine_OctNov2018.pdf



Change in Scope of Work or Objectives

A change in scope is a change in the direction, aims, objectives, purposes, or type of research training identified in the approved project.



Potential indicators of a change in scope include

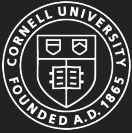
Change in the specific
aims approved at the
time of award

Change from non-
human subject research
to research involving
human subjects

Substitution of one
animal model for
another

Shift of the research
emphasis from one
disease area to another

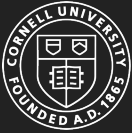
Application of a new
technology (e.g.
changing assays,
equipment)



Purchase Equipment

- General Purpose vs Specialized
- Threshold Defined by Sponsor
- Watch Timeframe





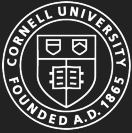
Carry-over or Carryforward funds



- Carryforward is a process through which unobligated funds remaining at the end of one budget period may be carried forward to any subsequent budget period.
- Carryforward has three "states," and the determination is stated in the notice of award (NOA)
 - Automatic
 - Prohibited
 - Restricted

Remember!

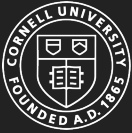
When in doubt, talk to your GCO and SFS Accountant!



Foreign component or other foreign involvement

- Foreign component - Any significant scientific part of a project that occurs outside the United States.
 - Work may be done by the grantee or by a researcher employed by a foreign organization
 - Designation applies whether or not grant funds are spent on the work
- Cautious approach is advised!





CORNELL PROCESS!

Enter amendment/prior approval requests in RASS

<https://guide.rass.cornell.edu/sponsored-projects/submit-change-requests/>

Submit all change requests directly in RASS!

Make sure to add enough information and attachments to your request for the GCO to understand and act.

Questions? Reach out early and often and loop in your GCO!

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Novelation Research Management System

Profile & Settings | Site Admin | Grants & Contracts

Panel shortcuts
collapse all | expand all

- ✓ Award Details
- ✓ Key Personnel
- ✓ Compliances
- Budget & Dates
- ✓ Terms

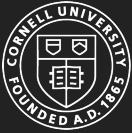
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Request Award Amendment

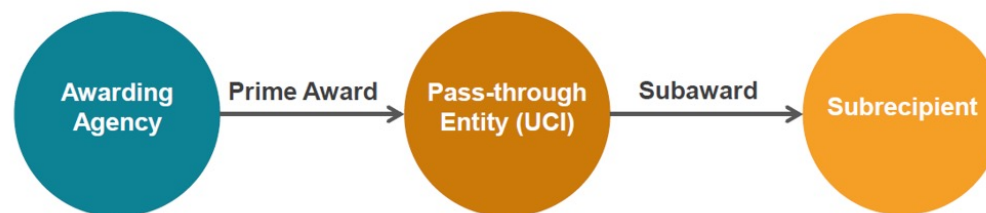
Award Amendment Requests

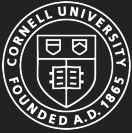
Type	Title	Requesting user	Request Date	Status	Status Date	Effective Date	Due Date	Action
Budget Revision		Demo CI-User WBB	01/16/2020 11:05 AM	Submitted to OSP	01/16/2020 11:05 AM			[Search]



Subaward Considerations

- If Cornell is the Subrecipient
 - Prior Approval Requests flow from Cornell to the Pass-Through Entity (our immediate sponsor)
 - Approval requests may take longer.
 - Just because our sponsor (i.e. the PTE) is likely to approve it, doesn't mean that the prime sponsor will.
- When Cornell has a subrecipient that needs to make changes:
 - We *may* need prime sponsor prior approval.





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What about a post-prior approval?

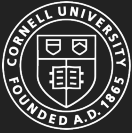
I already did the thing... but didn't get permission ahead of time from my sponsor. What do I do now?



Post- prior approval does not exist. This is asking for forgiveness and approval after the fact.

There is no guarantee that the sponsor will approve the request.

Please contact your GCO ASAP.



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Questions, Comments, Concerns?

