

## **TURAC 2024**<sup>†</sup>

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# Navigating Complexities of Award Changes

### Land Acknowledgement Statement

"Arizona State University, Northern Arizona University, and the University of Arizona collectively acknowledge that the campuses are situated on the ancestral lands of twenty-two federally recognized tribes located across Arizona. These universities collectively honor the past, present, and future generations of Native Americans, who have lived here for millennia and will forever call this place home. Committed to diversity, the institutions integrate Indigenous knowledge into their practices and strive to cultivate sustainable relationships with Native Nations through education, partnerships, and community service."





Tri-University
Research
Administration
Conference

## Navigating Complexities of Award Changes

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#### Overview

- What is an award change?
- What needs to be considered when making an action plan?
- Commonly needed pieces
- Case study



## What is an award change?

- No cost extension
- At Risk Request
- Change in scope
- Budget/ cost share change
- Key personnel changes
- Removing or adding sub awards
- Internal allocation adjustments
- Request for additional funds

Review the request with the PI. It is important to completely understand the situation and the intended outcomes to make a clear path forward.

# You have been notified of a change – now what?

Is sponsor approval needed to complete the change?

What documents (if any) need to be submitted to the sponsor?

What is the process to internally document and process the change in university systems of record.

## Prior Approval Matrix



Provides guidance on which award actions require sponsor prior approval before execution



This is used guide next steps in administrative action to manage award changes

## Research Terms and Conditions Appendix A Prior Approval Matrix November 12, 2020

	Reference	RTC Overlay	NSF	DOE	NIH	USDA	DOC	NASA	DHS-GFAD	DHS-FEMA
rior Written Approval (prior approval)*	200.407			ě.	ĝ.	ĝ				
se of grant agreements (including fixed amount awards), cooperative agreements, and contracts	200.407(a)		ŝ		É	Ş	É	Ē		
Changes in principal investigator (PI), project leader, project partner, or scope of effort.	200.201(b)(5)	Required	Required	Required	Required	Required	Required	Required	Required	Required
ost sharing or matching	200.407(b)									
Use of unrecovered indirect costs, including indirect costs on cost sharing or matching.	200.306(c)	Waived	Waived	Waived	Waived	Waived <sup>15</sup>	Waived	Waived	Required	Waived
Use of current fair market value to determine the value of non-Federal entity contributions of services and donations of property for the purposes of cost sharing or matching.	200.306(d)(2)	Waived	Waived	Waived	Waived	Waived	Waived	Waived	Waived	Waived
Costs of the fair market value of equipment or other capital assets and fair rental charges for land when the Federal award supports activities that require use of equipment, buildings or land.	200.306(h)(2)	Required	Required	Required	Required	Required	Required	Required	Required	Required
rogram Income	200.407(c)									
Use of program income during the period of performance (additive method).	200.307(e)(2)	Waived	Waived	Waived	Waived <sup>5</sup>	Waived	Waived	Waived <sup>20</sup>	Waived	Waived
evision of budget and program plans	200.407(d)									
Change in the scope or the objective of the project or program.	200.308(c)(1)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Change in a key person specified in the application or Federal award.	200.308(c)(2)	Required	Required <sup>14</sup>	Required	Required	Required	Required	Required	Required	Required
Disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project by the approved Project Director (PD) or PI.	200.308(c)(3)	Required	Required <sup>14</sup>	Required	Required <sup>6</sup>	Required	Required	Required <sup>21</sup>	Required	Required
Inclusion, unless waived, of costs that require prior approval in accordance with Subpart E - Cost Principles.	200.308(c)(4)	Required	Waived <sup>1</sup>	Required	Waived <sup>7</sup>	Required	Required	Required	Required	Required
Transfer of funds budgeted for participant support costs to other categories of expense.	200.308(c)(5)	Required	Required <sup>2</sup>	Required	Waived <sup>8</sup>	Required	Required	Required	Required	Required
Subawarding, transferring or contracting out of any work under a Federal award, including fixed amount subawards as decribed in 200.333. This provision does not apply to the acquisition of supplies, material, equipment or general support services.	200.308(c)(6)	Required	Required	Required	Waived <sup>9</sup>	Waived <sup>16</sup>	Required	Required	Required	Required
Changes in the approved cost-sharing or matching provided by the non-Federal entity.	200.308(c)(7)	Required	Required	Required	Required	Waived <sup>17</sup>	Required	Required	Required	Required
Need for additional Federal funds to complete the project.	200.308(c)(8)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Incur project costs 90 calendar days before the Federal awarding agency makes the Federal award.	200.308(e)(1)	Waived	Waived	Waived	Waived	Waived	Waived	Waived	Required	Waived
Incur project costs more than 90 calendar days pre-award.	200.308(e)(1)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Initiate a one-time extension of the period of performance by up to 12 months.	200.308(e)(2)	Waived	Waived	Waived	Waived	Waived	Waived	Waived	Required	Waived
Subsequent no-cost extension or extension of more than 12 months.	200.308(e)(2)	Required	Required	Required	Required	Required	Required	Required	Required	Required
Carry-forward of unobligated balances to subsequent budget periods.	200.308(e)(3)	Waived	Waived	Waived	Waived <sup>10</sup>	Waived	Waived	Waived	Required	Waived
Transfer amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa.	200.308(e)(4)	Waived	Waived	Waived	Waived <sup>11</sup>	Waived	Waived	Waived	Required	Waived
Restrict the transfer of funds among direct cost categories or programs, functions and activities for Federal awards in which the Federal share of the project exceeds the simplified acquisition threshold and the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the total budget as last approved by the Federal awarding agency.	200.308(f)	Waived	Waived	Waived	Waived <sup>11</sup>	Waived	Waived	Waived <sup>22, 23</sup>	Required	Waived
Making any fund or budget transfers between construction and non-construction work.	200.308(h)(5)	Required	Required	Required	Required	Required	Required	Required	Required	Required

## Backup for the request

- Budget
- Budget justification
- o SOW
- Post doc mentoring plan
- Revised IRB, IACUC
- Investigator documents
- Technical justification
- PI approval
- Institutional approvals
- Subaward documents/ revisions





## Case Study

# Tri-University Research Administration Conference

#### Scenario

A PI has notified you that they are leaving the university. They would like to take their NASA award with them, but the NASA program officer advised that the award must remain at the current institution, with funds issued to the new institution via a sub award.

## Initial questions

#### PI Change

- Does institutional policy allow a person not on payroll to be a PI on a sponsored project?
- What is needed to change a PI?
- Is prior approval needed?

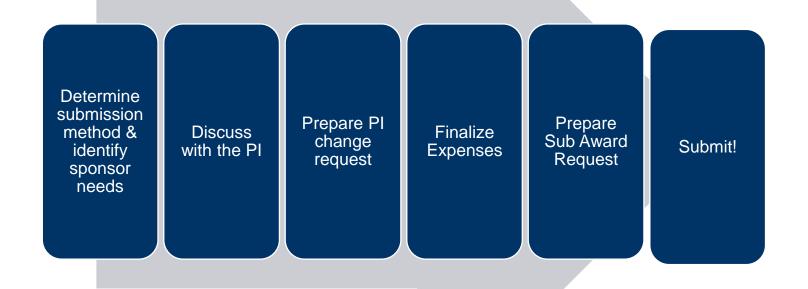
#### Adding a sub award

- What is needed to add a sub award to an existing sponsor project?
- Does this impact the scope of the project?
- Is prior approval needed?

### What does the prior approval matrix tell us in the situation?

	Reference	RTC Overlay	NSF	DOE	NIH	USDA NIFA	DOC	NASA	DHS-GFAD	DHS-FEMA
Prior Written Approval (prior approval)*	200.407									
Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts	200.407(a)									
Changes in principal investigator (PI), project leader, project partner, or scope of effort.	200.201(b)(5)	Required	Required	Required	Required	Required	Required	Required	Required	Required

### Plan of Action



# Identify sponsor needs

- Check the award document for guidance on what needs to be included
- Review sponsor generate terms and conditions references online.

#### What does NASA GCAM tell us to do?

Change in Key Personnel	Occurs upon recipient request to change key personnel (e.g., PI, Co-I, etc.) on an award.	GOs must coordinate with the award's TO to ensure that the key personnel change is reasonable and to determine if the proposed replacement has the technical abilities to successfully implement the award.
		If approved, the GO will document the correspondence in the official award file.

Sub-awards not	The issuance of new	GOs must coordinate with the award's TO to
previously	sub-awards or	ensure that there is a programmatic need for
proposed and	transferring or	the project to be sub-awarded if sub-awards
approved	contracting out of any	have not previously been proposed by the
	work under the Federal	recipient and approved.
	award that is not in the	
	original proposal.	The GO will document in writing the actions
		taken in the official award file.

# Determine submission method

- Sponsor systems
- Weblinks
- Email
- When in doubt ask!

## Consult with the PI

- Outline the plan and needs
- Identification of new internal PI
- Finalize costs on existing project to define the amount of the sub award.
- Confirm any changes to the scope of work
- Make connection with the program officer

# Documents for a PI Change

- Documents for a PI change varies by sponsor. See award document of sponsor specific guidance for complete details
- Gather any internal approvals
- Biosketch in sponsor format
- Current and pending in sponsor format
- Technical justification for change
- Statement on the impact of the scope of work



## Finalize internal expenses

- Finalize any outstanding expenses that need to hit the account
  - Payroll
  - Outstanding operational encumbrances
  - Travel
  - Gas cylinders
- Determine if any costs need to stay in the main account
- Account for F&A on the subaward

## Documents for new sub award

Scope of Work

Budget

**Budget Justification** 

Biosketch

**Current & Pending** 

Conflict of Interest

F&A rate agreement

Internal documents to set up the sub award





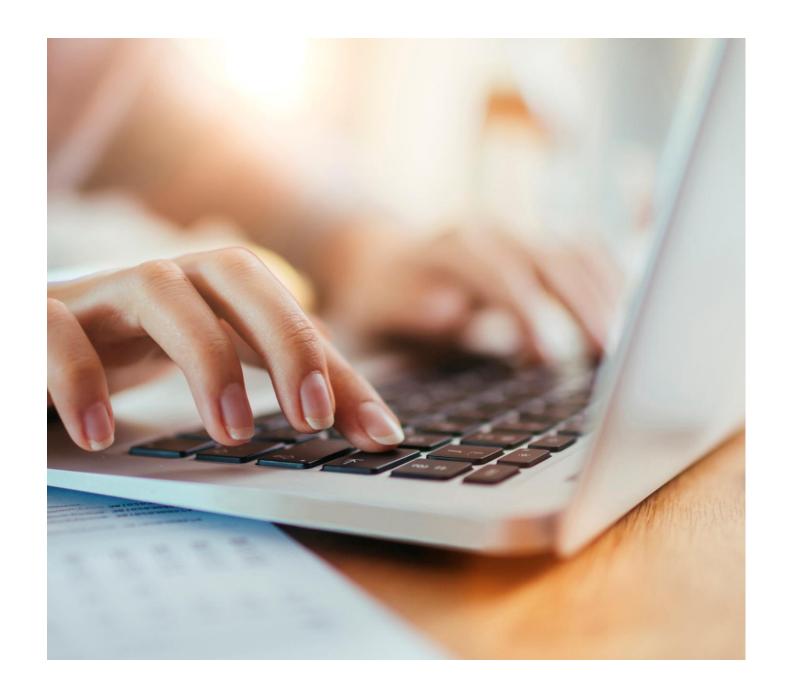
## Submit!

## Follows Ups

- Address concerns or clarifications from the sponsor
- Follow up with the sponsor as needed to keep the process moving
- Confirm you have all internal pieces squared away to prevent internal delays

## Execute Internal Changes

- PI & Unit Change
- · Process the sub award
- Allocation changes





#### Questions?

