



Section 500: Award Management

OSR Policy 500.4 — Mandatory Prior Approvals

Responsible Officer: Director
Responsible Unit: Award Management
Effective date: July 1, 2008
Last revised on: April 1, 2009

Policy Statement

I. General

Technical communications between PIs and their counterparts within sponsoring agencies are authorized and encouraged, but direct communication between PIs and sponsor agency program directors on matters that may affect contractual agreements and award financial status is to be referred to OSR.

As directed by the regulations of [\(OMB\) Circular A-110](#), the University is required to obtain prior approval from any sponsoring agency when a financial or technical change is desired or warranted in an award. This includes changes to:

- The scope of work or objective.
- Key personnel.
- Absence of a Principal Investigator (PI) for more than three months and/or an addition or reduction in fulltime effort equal to or exceeding 25%.
- A need for additional funds.
- Conversion of stipend funds to another category.
- Transfer or subcontracting of work not funded in award.
- Request a no cost extension of the project.
- Other changes as specified in the award/proposal agreement.

In addition, an agency may authorize pre-award costs up to 90 days, a one-time extension of up to 12 months, or the carryover of funds to subsequent funding periods. Agencies also may restrict transfers of funds between direct cost categories.

Prior approvals are coordinated by written request to the appropriate Award Manager in the Office of Sponsored Research (OSR). All requests must be in writing and approved by OSR on behalf of the University.



II. Requirements of Federal Demonstration Project (FDP)-Managed Projects

When prior approval is required for FDP projects, the PI is required to convey the request in writing to the appropriate OSR Award Manager for review. Upon OSR approval, the request will be forwarded to the sponsoring agency for approval.

Final approval of such requests is contingent upon the authorization of the granting agency's Grant Contracting Officer.

Reason for Policy

This policy is established in adherence to the University's compliance obligations as a recipient of sponsored funding, as presented in the federal regulations of OMB Circular A-110.

Exclusions/Exceptions

Agency Project Officers do not have the authority to grant prior approval requests for FDP-managed projects. The University only recognizes the granting agency's Grant Contracting Officer approval for subsequent transactions to be taken.

Federal agencies may waive any requirements, with the exception of a change in scope or the need for additional funds. Therefore, it is important to review the terms and conditions of each award for waivers, authorizations required for pre-award spending, or transfer of funds.

Procedures and Related Policies

Any procedures deemed necessary by the University will be based upon the sponsoring agency's particular requirements in conjunction with other necessary guidelines. The proper [OSR Award Manager](#) should be consulted in all instances. The Award Manager may consult with others in OSR, the agency, and/or departmental representatives to provide guidance or handle requests.

To facilitate inquiries or change requests about any award, OSR may require the departmental administrator to provide OSR staff with the following information:

- Award Account Number
- FRS Account Number(s)
- Funding Agency Account Number
- Name and Phone Number of Principal Investigator
- Name and Phone Number of Departmental Administrator
- Any applicable subcontractors or consultants, applicable account numbers, contacts and phone numbers
- Detailed explanation of the desired action or anticipated change.

Related policies include:

- [OSR Policy 500.3](#) [Expanded Authority under the Federal Demonstration Project \(FDP\)](#)



- [OSR Policy 400.6](#) [Pre-Award Spending](#)

OSR Research Tool Kits

None.

Contacts

Questions and concerns can be submitted online at [Ask OSR](#) or by using the [OSR staff directory](#). Within [RAMSeS](#), the “*Speak to Someone*” option assists in locating the staff member best suited to address project-specific issues.

References

 [Research Administration Glossary at Carolina](#)

1. The Federal Demonstration Partnership (FDP) website.
2. FDP General Terms and Conditions on the National Science Foundation (NSF) website.
3. OMB Circular A-110, *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations*.

Revision History

Prior Revisions: The policies in the *Office of Sponsored Research Policies & Procedures Manual* supersede any OSR policies, procedures and appendices previously included in the *University Business Manual*, a publication of UNC Chapel Hill’s [Division of Finance](#).

