



UNC
RESEARCH

Prior Approval Requests

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<http://research.unc.edu/offices/sponsored-research/index.htm>



PRIOR APPROVAL

What Determines Prior Approval, In Order?

Contract or Grant

Sponsor Policies

Expanded Authority

FDP

PRIOR APPROVAL



PRIOR APPROVAL

What is the FDP?

The Federal Demonstration Partnership (FDP)

- A cooperative initiative among 10 Federal agencies and 120 institutional recipients of federal funds working together to streamline research administration processes
- 4 types of membership:
 - Research Institution
 - Emerging Research Institution
 - Federal Agencies
 - Affiliate Organization



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What is the FDP?

The Federal Demonstration Partnership (FDP)

- Work in phases every 4 years (currently in Phase V) working off of a 4-year strategic plan.
- Current initiative based mostly on the Faculty Administrative Burden Survey.
- Created a standard FDP Subaward for ease in subcontracting among FDP organizations.



Federally Sponsored Projects

Research Terms and Conditions Prior Approval and Other Requirements Matrix* ** October 2008

	AFOSR	ARO	AMRMC	EPA	NASA	NIH	NSF	ONR	USDA	DOC	DOE
Cost-related Requirements (cont.)											
Inclusion of unrecovered F&A costs as cost sharing	Permitted										P
Transfer of funds between construction and non-construction	Prior approval required										R
Use of program income earned during the project period	Funds added to the amount available for the project										Same
Use of program income earned after the project period	No obligation to the federal government										23
Property-related requirements											
Title to supplies with value of more than \$5,000 at the end of a	R	R	R	W	W	W	W	R	W	W	W
Acquire real property	Prior approval required										R
Encumber real property acquired with federal funds	Prior approval required										R
Use real property acquired with federal funds for other non-federal projects rather than compensating the federal government for its fair	Prior approval required										R
Encumber equipment acquired with federal funds	Prior approval required										R
Trade in equipment purchased with project funds to buy replacement	Permitted										P
Own equipment upon acquisition without conditions or without obligation to the sponsor at termination of project	Permitted										P
Funding agencies' rights in data	Not waived										Not waived
Use of valuation methods other than the lesser of book value or fair market value for contributed capital assets	Permitted										P
Procurement requirements associated with the simplified acquisition threshold	Wherever FDP Terms and Conditions incorporate A-110 provisions referring to the "Small Purchase Threshold," the term "Simplified Acquisition Threshold" is substituted.										Same
Equipment threshold	Even if institutions establish a threshold for equipment lower than \$5,000, the FDP provisions relating to equipment apply only to those items costing \$5,000 or more.										Same
Project Management Requirements											
Monthly submission of Cash Transaction Reports when advances exceed \$1 million/year	Not required										24
Up-front specification of interrelationship among projects	Not required										24
Publication acknowledgment and disclaimers	Required										R
Additional requirements for use of human subjects beyond those imposed by federal law	none	none	17	none	none	none	none	none	none	none	none
Additional requirements for use of anatomical substances beyond those imposed by federal law	none	none	17	none	none	none	none	none	none	none	none
Use of sponsor budget forms for budget revisions	18	18	18	18	18	19	20	18	18	18	18
Use of electronic records to meet record retention requirements	Permitted										P

17 Army Surgeon General approval also required

18 Not required, but budget should be in same general format as original

19 Not required for SNAP awards; but others use "Next Period Budget" form page from PHS2590.

20 Must be submitted electronically via the NSF FastLane system at <https://www.fastlane.nsf.gov>

21 Required for the PI and any other individuals specifically named in the Notice of Award

22 Prior approval required for non-profits

23 For universities - no obligation to the federal government; for non-profits see special terms and conditions

24 Not required for universities

* Any of the waivers noted above may be over-riden by a special term or condition of award.

** Only the full text of the Research Terms & Conditions and the Agency-specific Requirements (ASR) available electronically at: <http://www.nsf.gov/bfa/dias/policy/rtrc/index.jsp> are authoritative.

PRIOR APPROVAL

What is the Expanded Authority?

- **Expanded Authority is one of the most notable accomplishments of the FDP.**
- **Participating Federal Agencies publish a matrix of authorities granted to Universities in good audit standing.**
 - **Incur 90-day Pre Award Costs**
 - **Initiate a one-time NCE up to 12 months (10-day notification)**
 - **Carry forward unobligated balances (depending on sponsor and award)**
- **Increases university autonomy**
- **Decreases administrative burden on Federal sponsors**



Federally Sponsored Projects

Activity Type	Federal Internal Approval	Federal Sponsor Approval
Additional Funding	-	X
Alterations and Renovations	When < \$25k	When >\$25k or \$300k total
Capital Equipment Purchase	Not in Proposal	Costing > \$25k
Carryover of Funds	N/A if automatically provided by Award	Required if not automatically provided by award
Change in Project Objective or Scope	-	X
Foreign Travel	Not in Proposal	If considered new Foreign Component
Institution Change	-	X
Key Personnel Change/Reduction	If not named in Award	If named in Award
New Foreign Component	-	X
No-Cost Extension (NCE)	First 12 month NCE	First NCE >12 months, Second NCE
Patient Care Costs	-	New/Reduction
PI Status	Leave < 3 months, effort reduction <25%	Leave >3 months, effort reduction ≥25%
Change in PI	-	X
Pre-Award Spending	Period <90 days	Period >90 days
Trainee Expenses	-	Rebudgeting Stipends, Tuition and Fees
New Subrecipient	Not transferring substantive portion of project, or scope change	Substantive programmatic work transferred to 3 rd Party
Significant Rebudgeting	Change <25% of total costs, rebudgeting in a modular grant	Scope Change, Change of >25% total costs

Non-Federal Sponsored Projects

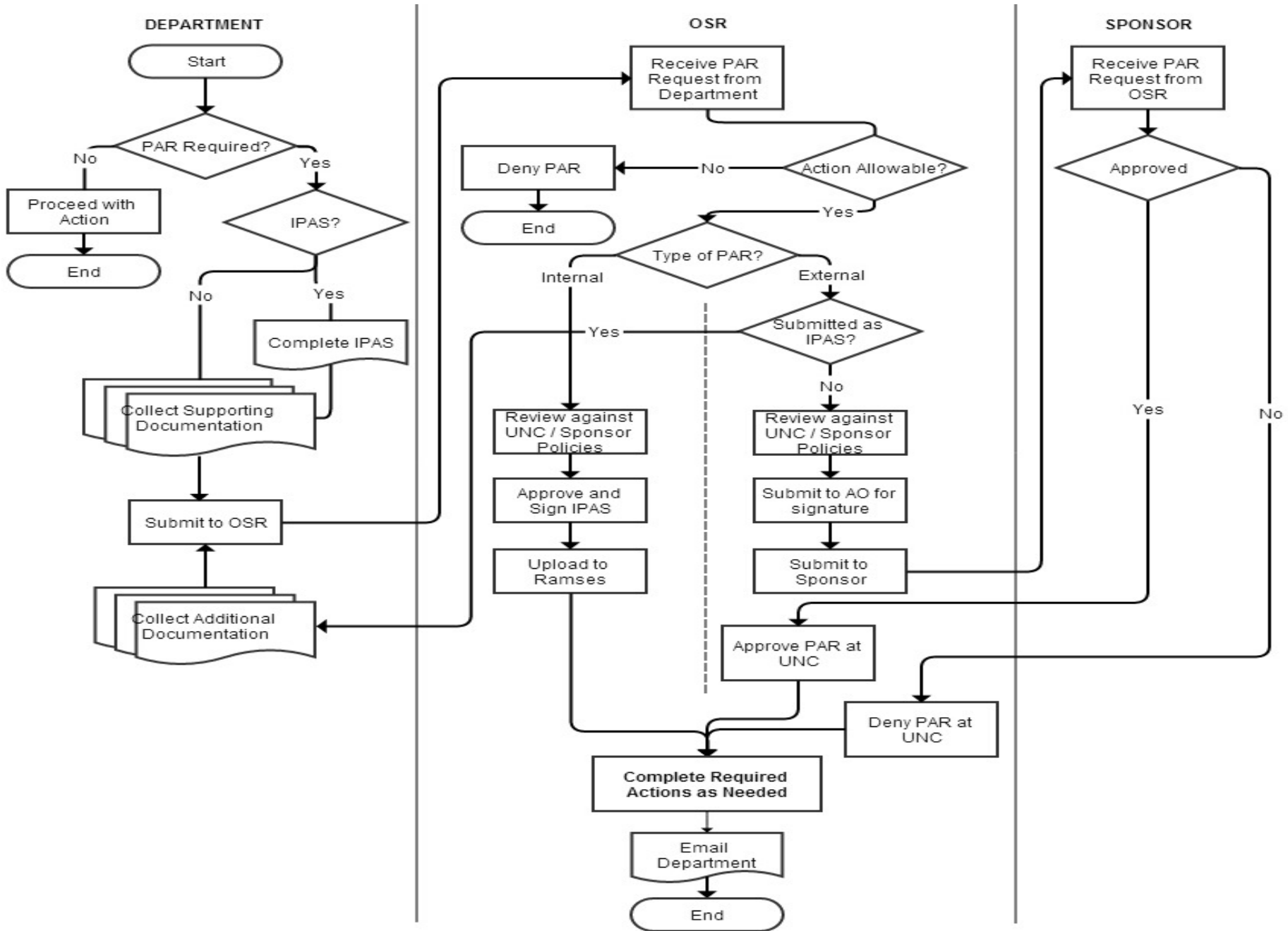
Activity Type	Non-Federal Internal Approval	Non-Federal Sponsor Approval
Additional Funding	-	X
Alterations and Renovations	-	X
Capital Equipment Purchase	Requested in Proposal	Not in Proposal
Carryover of Funds	N/A if allowed by Grant terms and conditions	Likely Required when not previously specified
Change in Project Objective or Scope	-	X
Foreign Travel	-	X
Institution Change	-	X
Key Personnel Change/Reduction	X	-
New Foreign Component	-	X
No-Cost Extension (NCE)	-	X
Patient Care Costs	X	-
PI Status	-	X
Change in PI	-	X
Pre-Award Spending	-	X
Trainee Expenses	X	-
New Subrecipient	-	X
Significant Rebudgeting	-	X

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Exceptions to FDP and Expanded Authority

- NSF required approval of budget transfers from trainee or participant support budgets, and approval of cost share changes.
- AFOSR, ARO, and ONR require approval for all NCE.
 - Incur 90-day Pre Award Costs
 - Initiate a one-time NCE up to 12 months (10-day notification)
 - Carry forward unobligated balances (depending on sponsor and award)
- Increases university autonomy
- Decreases administrative burden on Federal sponsors





DEPARTMENT

Start

PAR Required?

No

Yes

Proceed with Action

End

IPAS?

No

Yes

Complete IPAS

Collect Supporting Documentation

Submit to OSR

Collect Additional Documentation

OSR

Receive PAR Request from Department

Action Allowable?

No

Yes

Deny PAR

End

Type of PAR?

Internal

External

Submitted as IPAS?

No

Review against UNC / Sponsor Policies

Approve and Sign IPAS

Upload to Ramses

Review against UNC / Sponsor Policies

Submit to AO for signature

Submit to Sponsor

Approve PAR at UNC

Deny PAR at UNC

Complete Required Actions as Needed

Email Department

End

SPONSOR

Receive PAR Request from OSR

Approved?

Yes

No

Receive PAR Request from OSR

Division of Responsibilities

PI Responsibility

Identifying any instances that might constitute a change to the proposed project

Department Responsibilities

Supply and prepare any necessary documents required to complete a request for Prior Approval

Central Office Responsibility

Review the Prior Approval Request, obtain further information as necessary, communication with the Sponsor

Types of Prior Approval

Internal Approval

- * Provided under Expanded Authorities
- * Applicable primarily to Federal Sponsors
- * Central Office is authorized to review and approve the request

External/ Sponsor Approval

- * Approval must be requested formally from the Sponsor
- * Applicable to most Non-Federal Sponsors
- * Must be processed through Central Office prior to submission to the Sponsor

OSR Internal PAR Review

- * The Program Administrator is able to approve the IPAS.
- * They will sign the form indicating either approval or disapproval of the request.
- * A copy of the signed IPAS will be then uploaded into RAMSeS.
- * The Program Administrator will then inform the Department via email with their determination.

OSR External PAR Review

- * The Program Administrator will submit the PAR to a Signing Official authorized to sign on behalf of the Vice Chancellor for Research.
- * The Signing Official will perform a cursory review as needed and sign the request.
- * The Program Administrator will then submit the PAR with all associated documents to the Sponsor for their review.
- * The Program Administrator will communicate the Sponsor's determination to the department.
- * If approved, the department can begin any necessary actions to complete the now approved request



QUESTIONS or COMMENTS?

THANKS FOR JOINING US!



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