Managing Project Changes on Federal Awards

OSP Chat Session
Thursday, October 18, 2012
Life Cycle of a Sponsored Project

Phase I: Find Funding/Proposal Development
- Principal Investigator
- Collaborators
- Department & College
- OSP
- Division of Research

Phase II: Proposal Approval/Submission/Tracking
- Principal Investigator
- Collaborators
- Department & College
- OSP

Phase III: Just-in-Time Award Negotiation/Acceptance
- Principal Investigator
- OSP
- GFA

Phase IV: Conduct Project/Report Progress/Close-Out
- Principal Investigator
- Collaborators
- GFA
- OSP
- Various NIU Units (Accounting, International Programs, Procurement)
Your Research May Help to Reform the Federal Awards Process

Proposal Development
Building Teams, Forming Collaborations

Find Funding Opportunities

Research findings extracted into new Funding Opportunities

Spending, Reporting, Changes, Close-out

Grant/Contract Negotiation, Just-in-Time, Award Acceptance

Proposal Submission & Tracking

Conduct Research, Compliance, Publications, Inventions, Innovation
Managing Project Changes on Federal Awards: Best Practices

Changes are Inevitable...It’s Knowing How to Manage the Changes That is Important.

"I'm under the pressure of time restraints. Our grant runs out in two weeks."

© Original Artist
Managing Project Changes on Federal Awards: Best Practices

• The Federal Office of Management and Budget (OMB) Circulars dictate what project changes will require prior agency approval and what changes may require prior approval.

• The OMB provides significant authority to the federal grant-making agencies to transfer the approval of certain project changes to the grantee (informally referred to as “expanded authorities”).

• It is NIU’s responsibility, as the grantee, to ensure project changes are managed in accordance with the award.
Managing Project Changes on Federal Awards: Best Practices

**Why Involve OSP and GFA?**

1. We can interpret regulations & advise on whether agency approval is necessary
2. We can assist in crafting a strong request
3. Changes that do not receive appropriate agency or institutional approval can result in:
   - Disallowed costs
   - Termination of the award
   - A-133 or agency-specific audit findings
   - Institutional sanctions
### Managing Project Changes on Federal Awards: Best Practices

<table>
<thead>
<tr>
<th>Project Changes that Routinely Require Agency Approval</th>
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<tbody>
<tr>
<td>- Change of Principal Investigator (PI) or other key persons specified in award document</td>
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<tr>
<td>- Change of Grantee</td>
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<td>- Change of Scope of Work (SOW) or Program Objectives</td>
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<td>- PI absence for more than three continuous months or a &gt;25% reduction in effort</td>
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<td>- Need for additional funding</td>
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<td>- Need to incur pre-award costs &gt; 90 days prior to award</td>
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<td>- 2nd No Cost Extension</td>
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<th>Project Changes that NIU can Routinely Approve</th>
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<tr>
<td>- Initial 12 month no cost extension beyond the original project end date</td>
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<tr>
<td>- Ability to incur pre-award costs &lt;90 days of award</td>
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<tr>
<td>- Re-budgeting of allowable project costs (except for funds allotted to training allowances – e.g. stipends)</td>
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<tr>
<td>- Purchase project related equipment</td>
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*OSP and GFA will help you determine whether agency approval is necessary.*
Managing Project Changes on Federal Awards: Best Practices

All project changes require institutional approval and must be submitted via the Institutional Prior Approval (IPAS) Process at NIU.

http://www.osp.niu.edu/osp/_pdf/managingprojectchanges.pdf

IPAS Form:
http://www.osp.niu.edu/osp/forms/index.shtml
Managing Project Changes on Federal Awards: Best Practices

When Agency Approval is Required:

1. PI completes Institutional Prior Approval System (IPAS) form; submits to Department Chair. Agency request is attached to IPAS form with a signature block for Authorized Inst. Official.

2. Chair reviews proposed project change to determine any impact to department resources.

3. Chair endorses IPAS; PI submits to GFA where GFA reviews for budget impact and “allowability” of change.

4. GFA forwards IPAS form and agency request to OSP for final institutional review, approval and submission of request to agency.

5. OSP sends e-notice via email to PI, GFA, and Chair acknowledging approval of request and submission to the agency. Request is tracked & filed in OSP. Agencies have thirty (30) days to respond.

6. Agency will notify OSP if the request is approved or denied. OSP sends e-notice via email to PI, Chair, and GFA acknowledging agency’s decision. OSP and GFA update records as appropriate.
Managing Project Changes on Federal Awards: Best Practices

When Institutional Approval Only is Required:

- **PI completes Institutional Prior Approval System (IPAS) form; submits to Department Chair.**

- **Chair reviews proposed project change to determine any impact to department resources.**

- **Chair endorses IPAS; PI submits to GFA where GFA reviews for budget impact and “allowability” of change.**

- **For non-financial changes (e.g. no cost extensions) GFA forwards IPAS form to OSP for final institutional review, approval and when appropriate, notification to the agency of the change.**

- **OSP sends e-notice via email to PI, GFA, and Chair acknowledging approval of request and when necessary, confirmation of notification to the agency.**

- **OSP and GFA update records as appropriate reflecting project change.**
Frequently Asked Questions:

Q: How do I know if agency approval is required or not?
   A: Your OSP Award Coordinator or GFA administrator can help you determine whether agency approval is required. Please contact these individuals before initiating the IPAS form to ensure your request is processed as quickly as possible.

Q: If agency approval is necessary, when should I submit my request?
   A: Agency approvals must be obtained prior to implementing the planned change. Agencies have up to thirty (30) days to review and respond to your request so the best rule of thumb is to discuss any potential program changes with OSP and/or GFA as early as possible.

Q: Why is the IPAS form necessary?
   A: The IPAS form is a tool used by OSP and GFA to consistently screen for any compliance concerns that may require further institutional approvals, agency approval or notification. In addition, the form allows that OSP and GFA obtain confirmation from the department that the proposed change does not significantly impact department resources.
Frequently Asked Questions:

Q. Why do I need an Institutional signature on my request?
   A. Agencies often want to know that the project change request has been reviewed by the appropriate individuals at the institution. Endorsing the request provides the agency with this confirmation and can avoid delays in obtaining agency approval.

Q: Who do I contact if I need assistance completing the IPAS form?
   A. You may contact the OSP Award Coordinator or your GFA administrator.

Q. How do I handle re-budgeting on my grant?
   A. Your GFA administrator can work with you to manage any re-budgeting needs you may have. For re-budgeting requests that require prior agency approval, your GFA administrator will help you to prepare the request and submit it through the institutional review process. OSP will endorse these requests and submit the request to the agency.

Q. What is the difference between agency approval and agency notification?
   A. Some institutionally approved project changes (e.g. 1st no cost extensions) still require notification to the agency that the change is being made. Some agencies, such as NSF, require that notification of the change be made within a specific timeframe. If this doesn’t happen, NIU may forfeit its ability to internally approve the change. An agency notification is different from a request in that the institution does not need to wait for agency approval to proceed with the change.
Questions?

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