

## Post-Award Actions, Procedures, and Guidelines – revised Oct 2019

### 1) Extensions of Time

#### *a) Grantee (ISU)-approved no-cost extensions*

- i) Agency-specific sections of the Uniform Guidance **may** allow institutions the ability to approve an initial extension of time on a federal project, up to 12 months, per competitive segment.
- ii) OSPA sends a notification to the sponsor that we are exercising our expanded authority to extend the period of performance without prior approval.
- iii) Extension of time requires a reasonable justification. "To spend remaining funds" is not a justification for an extension.

#### *b) Sponsor-approved no-cost extensions*

- i) For subsequent extensions of time request and approval from the Sponsor is required.
- ii) Any extension of time beyond the initial grantee-approved period.
- iii) Any extension of time requiring prior approval.
- iv) OSPA/OIPTT submits a written request to the sponsor.
- v) The detail required in request may vary by award or sponsor. Second requests for extension of time typically require a more compelling justification.

### 2) NCE Request Form

- a) The internal form is not required if PI initiates electronic request via Research.gov **for NSF** awards.
- b) For all other sponsors an internal NCE form is required. The NCE request form can be found at <http://www.ospa.iastate.edu/no-cost-extension-request>. Requests are received by OSPA-Awards team and forwarded to the appropriate Award Administrator (or OIPTT, if applicable) for Sponsor submission.
- c) NCE internal request forms should be requested at least 45 days prior to, and no sooner than 90 days before, the project end date.

### 3) Rebudgeting

- a) Requests should be made prior to costs being incurred.
- b) Review the approved budget and check award terms for re-budgeting requirements or contact your OSPA/OIPTT Award Administrator.
- c) If applicable, check Uniform Guidance.
- d) Agency specific terms and certain budget categories may dictate whether prior approval is required.

#### 4) Rebudget Request Form

- a) The PI or GC may submit the internal Rebudget Request Form. The Rebudget Request form can be found at <http://www.ospa.iastate.edu/forms>. Email the completed form to OSPA or OIPTT, depending on the sponsor type.
- b) Sponsor prior approval requires a completed rebudget form.
- c) A Rebudget request form is not required when:
  - i) Prior approval has been waived under expanded authority except for internal purposes for adding subawards and adding funds into PSC
  - ii) The agreement is fixed price
  - iii) Rebudgeting more than \$25,000 to purchase unbudgeted equipment on sponsored projects under Federal research terms and conditions requires submission of the Rebudget Request Form due to materiality and potential audit concerns. Please note that the \$25,000 threshold is cumulative for the project, and not a per item amount.
- d) Contact your OSPA/OIPTT Award Administrator with any questions.

## 5) Secondary Award Line (SAL) Request

- a) Internal ISU form to establish a Secondary Award Line under the same award
- b) The form is used when multiple Worktags are necessary for one sponsored project/award.
- c) The form serves to either create a new Secondary Award Line, or allocate additional funds to an existing Secondary Award Line.
- d) To initiate a Secondary Award Line request, download the form from <http://www.ospa.iastate.edu/forms> and routes it for signatures.
  - i) The amounts entered in each Secondary Award Line budget category typically must be equal to or less than the budget line amount of the Primary Award Line.
  - ii) Fully signed forms are submitted to OSPA or OIPTT.

## 6) Addition of Subaward

- a) Most agencies require prior approval before issuing a subrecipient agreement that is not listed in the original sponsor-approved budget.
- b) Always check sponsor guidelines for requirements regarding addition of a subrecipient.
- c) If sponsor approval is required, provide the following documents to the OSPA/OIPTT Administrator:
  - i) The basis for selection of the subrecipient.
  - ii) Letter of commitment from subrecipient, must be signed by authorized official.
  - iii) A clear description of the work to be performed/statement of work.
  - iv) A separate detailed budget and budget justification for the subaward (approved by subrecipient authorized official)
- d) A corresponding rebudget request for the ISU award may also be required.
- e) The PI must complete and sign the Subrecipient Request Form, which is required for all new subrecipient agreements. The Subrecipient request form can be found at <http://www.ospa.iastate.edu/forms>.

## 7) Change of PI or Key Personnel: External and Internal processes

- a) Types of requests that require prior sponsor approval include:
  - i) Replacing a PI (also includes replacing PI with an existing Co-PI).
  - ii) Adding a Co-PI.
  - iii) Removing a Co-PI.

*b) External Change Process*

- i) Depending upon the sponsor type, send an email to [ospa-awards@iastate.edu](mailto:ospa-awards@iastate.edu) or [industry-contracts@iastate.edu](mailto:industry-contracts@iastate.edu) with the following information and documentation:
  - (1) A clear description of the change (i.e. who is taking over, and why the current PI will no longer be involved, etc.);
  - (2) A current bio sketch for proposed PI (when required)
  - (3) Current and pending support for proposed PI (when required)
  - (4) A justification for the proposed PI's credentials for taking over the project.
- ii) OSPA/OIPTT will submit a request to the sponsor including the above information and follow up as necessary.
- iii) For NSF awards ONLY: The PI may initiate the requested change via Research.gov, the request is then forwarded to OSPA for submission.
- iv) All other sponsors: OSPA will submit a written request to the sponsor including the above information.

*c) Internal Change Process: Revised GoldSheet*

- i) Necessary to make any internal administrative change to a sponsored project.
- ii) Sponsor approval may be required prior to processing the revised GoldSheet changes.
- iii) See also: "[Post-Award Administrative Changes to a Sponsored Project](#)" on OSPA's [website](#).

*d) Disengagement of PI for Significant Period*

- i) Typically applies to federal and federal flow-through awards.
- ii) If disengagement is greater than 3 months:
  - (1) PI will need to make arrangements for oversight of the project.
  - (2) PI to notify OSPA/OIPTT award administrator and provide disengagement and arrangement details.
  - (3) ISU is required to request prior approval from the sponsor in writing.
    - a. Request must include who will assume the role and responsibilities of lead PI during PI's absence. The request should include the new PI's CV and OSPA signature/approval.
- iii) To initiate a request the PI must submit above information to OSPA.
  - v) For NSF awards ONLY: OSPA will submit request via Research.gov at least 30 days prior to disengagement.
  - vi) All other Sponsors: OSPA/OIPTT will submit a written request at least 30 days prior to disengagement.

*e) PI Reduction in Time Devoted to the Project*

- i) Typically applies to federal and federal flow-through awards.
- ii) Prior approval is required when the PI's effort devoted to a project is reduced by 25% or greater:

(1) For NSF awards ONLY: PI should consult with OSPA and with the NSF Program Officer. If either determines that the reduction of effort will substantially impair the successful execution of the project, the Program Officer will consult with the NSF Grants Officer. The NSF Grants Officer may:

- 1. Request the grantee to nominate a replacement PI acceptable to the NSF Program Officer;
- 2. Initiate termination procedures; or
- 3. Negotiate an appropriate modification to the grant.

(2) All other sponsors: The PI will notify OSPA/OIPTT and provide justification and details of reduced effort.

- 1. OSPA/OIPTT will request prior approval for the reduction in effort from the sponsor in writing.

*Example: Dr. Bailey, PI, is listed with 20% effort on the award proposal. If Dr. Bailey's actual effort drops to 15% or less, sponsor approval is required.*

## 8. Other Post Award Actions

- a) PI Transfers from ISU: Determine what awards will remain at ISU or be transferred.
  - If transferring award:
    - i) Departmental/Chair approval of award transfer.
    - ii) Determination of unobligated balances on awards to transfer (SPA).
    - iii) Confirmation of new Primary Place of Performance.
    - iv) Date of transfer.
    - v) Documents to be completed by PI:
      - (1) Progress Summary
      - (2) Description of Work to be Accomplished
      - (3) All Technical/Progress Reports submitted to Sponsor
    - viii) Carry Forward of Unobligated Balance related to competitive segments.

## 9. Pre-Award Costs (Typically not allowed on federal sourced contracts)

- a) Typically applies to federal and federal flow-through awards
- b) Allowable project costs incurred prior to the award start date
  - i) Pre-award spending must be necessary for the effective and economical conduct of the project; costs must be allowable and appropriate.
- c) Most federal agencies permit institutional approval under expanded authority for pre-award spending up to 90 days prior to award start date.
- d) All federal agencies require prior approval for any pre-award spending greater than 90 days prior to award start date.
- e) To initiate request, email [ospa-awards@iastate.edu](mailto:ospa-awards@iastate.edu)
  - i) Provide justification for spending prior to start date of award.
  - ii) If sponsor approval is required, the request will be submitted to the sponsor by OSPA.
  - iii) Prior approval should be granted before charging pre-award expenditures
  - iv) If sponsor requires additional information, OSPA will request it.

## 10. Advanced Grant Worktag Request

- a) Used to establish Grant Worktag in order to begin spending on an award prior to execution of award agreement.
- b) Not recommended for contracts.
- c) PI must provide evidence of sponsor's intent to fund the award.

- d) To initiate request, PI or Grant Coordinator must complete the request form found at <http://www.ospa.iastate.edu/forms>, route for appropriate signatures, and submit to OSPA/OIPTT.

## 11. Changes in Scope of Work

- a) Prior approval from all sponsors is required for any change in scope.
- b) To initiate request, PI should forward the following information to OSPA/OIPTT:
- i) Justification for the change in scope
  - ii) Detailed description of the change
  - iii) Revised budget, if necessary
- c) OSPA/OIPTT will prepare and submit the request, and follow-up as necessary.
- i) For NSF awards ONLY: PI may initiate request via Research.gov and forward to OSPA for submission.

## 12. Sponsor Amendments and Modifications

- a) Types:
- i) Additional funding on previously awarded projects (incremental/continuation funding)
  - ii) Approval of OSPA/OIPTT requested changes
  - iii) Sponsor administrative changes
  - iv) Other
- b) OSPA/OIPTT actions taken after receipt of amendment/modification:
- i) Review of amendment/modification
  - ii) Update of KC award record and notification to SPA
  - iii) Copy of amendment/modification emailed to PI, Grant Coordinator and RRC, in no additional funds
  - iv) All amended awards available in KC Award Viewer
- c) Considerations:
- i) If sponsor contacts PI or Department directly regarding contractual issues, please forward that communication to the appropriate OSPA/OIPTT Award Administrator.
  - ii) OSPA/OIPTT is the authorized representative for the University; all official award documents (even if they do not require signature) need to go to OSPA/OIPTT for review and approval.
  - iii) OSPA and OIPTT are here to assist PIs and Departments. Please contact us if you have any questions or need guidance.

## 13. Resources

- a) OSPA Request Forms: [www.ospa.iastate.edu/forms](http://www.ospa.iastate.edu/forms)
- b) OSPA Handbook:  
<http://www.ospa.iastate.edu/sites/default/files/imported/docs/OSPAHandbook080911.pdf>
- c) OSPA FAQ: <http://www.ospa.iastate.edu/proposal/faq/faq>
- d) OSPA-Awards/Post-award Information: <http://www.ospa.iastate.edu/awards>
- e) OIPTT website: <http://www.techtransfer.iastate.edu/>
- f) OIPTT Tip Sheets: <https://www.techtransfer.iastate.edu/for-isu/working-with-isurf/tip-sheets/> -
- g) NDA/MTA Request Forms: <http://www.techtransfer.iastate.edu/for-isu/non-disclosure-agreements-and-material-transfer-agreements/>
- h) VPR website: <https://www.research.iastate.edu/>
- i) SPA website: <http://www.controller.iastate.edu/spa/homepage.html>