

OSPA/SPA Procedure Change for Rebudgets on Sponsored Awards

To reduce workload and to create efficiencies for researchers, grant coordinators and central administrative staff, the Office of Sponsored Programs Administration (OSPA) and Sponsored Programs Accounting (SPA) are updating the Rebudget procedure.

New Procedure

OSPA and SPA will no longer request or process Rebudget Forms for:

- Awards subject to Federal research terms and conditions (except when terms may require it)
- Fixed price agreements
- Federal contracts (except when terms may require it)
- Industry agreements (except when terms may require it)

In addition, de-obligations of funds and encumbrances for subrecipient agreements will not require a Rebudget Form. If funds provided to a subrecipient are to be de-obligated prior to the termination of the subrecipient agreement, researchers should contact OSPA to create a de-obligation amendment for the subrecipient.

Exceptions

Rebudgeting due to changes in the scope of work on any sponsored project will continue to require the submission of the Rebudget Form to OSPA. Sponsor approval is required for all changes in scope of work. OSPA will review award terms and conditions to determine what is needed by the sponsor for the request. Other documents may be needed from PI/Dept/Center/Institute.

The \$25K re-budgeting requirement for unbudgeted equipment on sponsored projects under Federal research terms and conditions will also remain in effect due to audit concerns. Please note that the \$25K threshold is a cumulative amount and not a per item amount. Please use the Rebudget Form for these requests.

Process for Sponsored Awards that Require Sponsor Approval of Re-Budgeting

Researchers and grant coordinators should not submit a Rebudget Form until the changes to the budget rise to the required level of sponsor approval (i.e. if the sponsor requires review of budget revisions totaling 10% of the budget, do not submit a Rebudget Form until the revisions to the budget total 10%).

Additionally, OSPA and SPA will use the sponsor budget approval form (if it exists) in lieu of the Rebudget Form as long as the sponsor budget line items conform to the current ISU accounting system budget categories (or object codes after conversion to Kuali Financial System).

Implementation

OSPA and SPA will implement this ISU internal practice immediately to reduce the processing of unnecessary paperwork.

Who to Contact with Questions:

If you are unsure about the terms and conditions of your award and depending on the Sponsor Type of the award, please direct questions to:

For Business/Industry and Commodity Sponsors: ospa-industry@iastate.edu

For all other sponsor types: ospa-awards@iastate.edu

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

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AFOSR ARO AMRMC EPA NASA NIH NSF ONR USDA DOC DOE

General Requirements												
Change in Scope	Prior approval required											R
Absence or Change of PI	R	R	R	R	R	R	21	R	R	R	R	R
Need for Additional Funding	Prior approval required											R
Subaward of "significant part" of programmatic effort	R	R	R	R	R	2	R	R	3	R	R	1
Pre-award costs (90 days)	Prior approval waived											W
Pre-award costs (more than 90 days)	Prior approval required											W
Initial no-cost extension of up to 12 months (per competitive segment)	R	R	W	4	W	W	W	R	5	W	W	W
Subsequent no-cost extension or extension of more than 12 months	Prior approval required											R
Carry-forward of unexpended balances to subsequent funding	W	W	W	W	6	7	W	W	W	W	W	22
Cost-related Requirements												
Rebudgeting among budget categories	W	W	W	W	W	8	W	W	W	W	W	22
Rebudgeting between direct and F&A costs	W	W	W	W	W	8	W	W	W	W	W	22
Rebudgeting of funds allotted for training allowances (direct payment to trainees) to other categories of expense.	W	W	W	W	W	9	R	W	W	W	W	W
Equipment not in approved budget	W	W	W	W	W	8	W	W	W	W	W	22
Capital expenditures for improvement of equipment not in the	Prior approval waived											22
Alterations and Renovations costing less than \$25,000	W	W	W	W	W	11	W	W	W	W	W	W
Foreign Travel	W	10	W	R	W	W	W	W	W	W	W	W
Inclusion of costs requiring prior approval in Cost Principles	W	W	W	W	W	12	W	W	W	W	W	22
Faculty consulting compensation that exceeds base salary	Prior approval waived											22
Restrictions on costs not explicitly unallowable under Cost Principles	none	none	none	none	none	14	15	none	16	none	13	13

R Prior approval required. "Prior approval" means prior written approval from the sponsor. Prior approval can take the form of the sponsor's acceptance of the proposal and/or proposal budget and subsequent incorporation into the award, or written approval of a separate request submitted by the recipient.

W Prior approval requirement waived

- 1 Waived except when subaward would be more than 25% of the total dollars of the award
- 2 Waived unless change in scope and except when subawardee is foreign
- 3 Waived except when subaward(s) would be more than 50% of the total dollars of the award; required for any subaward to federal agencies
- 4 Waived except for extensions that would result in a project period in excess of five years
- 5 Waived only for first-time requests for extensions of 12 months or less
- 6 Uncommitted carryforward funds are to be included in the continuation proposal if they are "substantial."
- 7 Waived except when award indicates prior approval is required
- 8 Waived unless change in scope
- 9 Waived except for Kirschstein-NSRA grants
- 10 Waived, but trip report is required within 30 days after trip completion. See agency specific requirements, Article No. 17, Foreign Travel Reporting Requirements.
- 11 Waived for alterations and renovations costing up to \$300,000, unless change in scope or rebudgeting into A&R exceeds 25% of budget period total
- 12 Waived, but costs not specifically covered in the Circulars are subject to NIHGPS.
- 13 Interest penalties for late payment are not allowable
- 14 Prior approval required for patient care costs if change in scope
- 15 Prior approval required to modify the amount of cost sharing reflected on Line M of the award budget.
- 16 Non-working meals and compensation for harm to persons or property are unallowable; also other unallowable costs for awards made under statutory authority cited in Article 3 of the ASR are: graduate assistant tuition remission, F&A in excess of statutory amount, and fixed and real property.

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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	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	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	none
Use of sponsor budget forms for budget revisions	18	18	18	18	18	19	20	18	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/rtc/index.jsp> are authoritative.