TIGER TIPS RESOURCES FOR AUBURN RESEARCHERS Guidance on Prior Approvals

Occasionally, a Principal Investigator (PI) identifies a need to change or deviate from the conditions of their sponsored awards. In some instances, these changes require prior approval from an authorized official of the sponsor. In other cases, prior approval from the Office of Sponsored Programs (OSP) is sufficient. The level at which prior approval may be granted depends upon the type of award and the sponsor's specific policies for that specific award.

When the sponsor requires prior approval, requests must be in writing and submitted to OSP who in turn will submit the change request to the sponsor's authorized official for a decision. Requests for retroactive approval are to be avoided. **An authorized official from OSP must sign all prior approval requests to sponsors**. If "internal" approval is allowed, a brief memo requesting approval of the change and forwarded by the PI (e-mail is acceptable), should be sent to OSP for processing.

For changes that may affect the technical or scientific work of the project, the PI should have preliminary discussions with his/her technical counterpart at the sponsor (i.e., the Project Officer or other similar individual). This technical counterpart is rarely the individual who can make an official decision on behalf of the sponsor, but this person's recommendation is often given significant weight by the official decision-maker.

When Auburn has Expanded Authority

To reiterate, when the sponsor has given the University expanded authority, the PI is responsible for preparing and submitting all requests to OSP for a decision. Once approval has been granted, OSP maintains a copy of the written approval and processes the approved documents.

When Approval from the Sponsored is Required

The PI is responsible for preparing and submitting all requests in writing to OSP following the instructions for approval before they are submitted by OSP to the authorized official at the sponsor.

Common Reasons for which Prior Approval is Required

Re-budgeting: Re-budgeting is the process by which the PI produces a revised plan for spending the awarded funds. It may be necessary to produce a new budget if there is a change in project scope, a need for supplemental funding, or the generation of unexpected program income. Most sponsors place restrictions on budget revisions, including limits on moving funds from one category to another. **Significant changes** to the budget almost always require prior approval by the sponsor's authorized official.

Change in Scope/Effort: In general, most sponsors require that they be informed of any changes that may affect the approved scope of the actual research being performed. These changes often involve a change in the objective of the study, but may also involve the absence or change of a PI (see below), a change of the grantee institution, a change in the approved use of animals or human subjects, or other factors.

Absence or Change of Key Personnel: Prior approval of the sponsor's authorized official is generally required for any absence of the PI lasting three months or more. In some instances, a change in other key personnel on the project also requires prior approval.

Equipment: Subject to the terms and conditions of the award, the PI, upon consultation with OSP, may often approve the acquisition of items of equipment not listed in the approved grant budget, provided that the cost of each item is less than the sponsor's threshold for prior approval. Any items costing more than the sponsor's threshold require the prior approval of the sponsor's authorized official. Some sponsors prohibit the purchase of equipment within the last six months of the project period, so a deviation from this restriction will also require prior approval from the sponsor's authorized official.

International Travel: The sponsor's terms and conditions must also be followed with regard to international travel. If not previously proposed and required for approval by a sponsor, requests for international travel should first be submitted with a detailed justification to OSP for submission in turn to the sponsor's authorized official. Requests for international travel should be made at least 30 days in advance before the anticipated travel date.

Use of Unobligated Balance: Unless otherwise determined by the terms and conditions of the award, prior written approval from the sponsor's authorized official is required when a request is made to carry a balance at the end of one funded project cycle over to a new budget period.

Approval of Subcontract and Sub-agreements not Included in Proposal: Subcontracts and sub-agreements that were not included in the proposal may require prior approval from the sponsor's authorized official before executing a formal agreement and commencing work. The choice of a particular subcontractor must also be documented with regard to the subcontractor's qualifications to perform the work and the project's need for such services.