

FDP Prior Approval and Other Requirements Matrix April 2004

AFOSR ARO AMRMC DOE EPA NASA NIH NSF ONR USDA

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

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 is required for A&R in excess of \$25K, even if the A&R is accomplished with institutional funds designated as cost sharing
- 11 Waived for alterations and renovations costing up to \$300,000, unless change in scope
- 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 unallowable for awards made under statutory authority cited in Article 3 of the ASR are:

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Cost-related Requirements (cont.)										
Inclusion of unrecovered F&A costs as cost sharing	Permitted									
Transfer of funds between construction and non-construction	Prior approval required									
Use of program income earned during the project period	Funds added to the amount available for the project									
Use of program income earned after the project period	No obligation to the federal government									
Property-related requirements										
Title to supplies with value of more than \$5,000 at the end of a project	R	R	R	W	W	W	W	W	R	W
Acquire real property	Prior approval required									
Encumber real property acquired with federal funds	Prior approval required									
Use real property acquired with federal funds for other non-federal projects rather than compensating the federal government for its fair market value	Prior approval required									
Encumber equipment acquired with federal funds	Prior approval required									
Trade in equipment purchased with project funds to buy replacement equipment	Permitted									
Own equipment upon acquisition without conditions or without obligation to the sponsor at termination of project	Permitted									
Funding agencies' rights in data	Not waived									
Use of valuation methods other than the lesser of book value or fair market value for contributed capital assets	Permitted									
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.									
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.									
Project Management Requirements										
Monthly submission of Cash Transaction Reports when advances exceed \$1 million/year	Not required									
Up-front specification of interrelationship among projects	Not required									
Publication acknowledgment and disclaimers	Required									
Additional requirements for use of human subjects beyond those imposed by federal law	none	none	17	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
Use of sponsor budget forms for budget revisions	18	18	18	18	18	18	19	20	18	18
Use of electronic records to meet record retention requirements	Permitted									

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>