

## FDP Prior Approval and Other Requirements Matrix April 2004

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| 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 by the sponsor

W Prior approval requirement waived by the sponsor, Purdue Prior Approval form still applies.

- 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

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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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| <b>Cost-related Requirements (cont.)</b>   |  |      |    |      |      |      |      |      |      |      |
|--|--|------|----|------|------|------|------|------|------|------|
| 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  |      |    |      |      |      |      |      |      |      |
| <b>Property-related requirements</b>   |  |      |    |      |      |      |      |      |      |      |
| 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. |      |    |      |      |      |      |      |      |      |
| <b>Project Management Requirements</b>   |  |      |    |      |      |      |      |      |      |      |
| 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>