

FDP Prior Approval and Other Requirements Matrix April 2004

AFOSS 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

W Waived for one program, please contact Account Manager for clarification.

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.

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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>