

**GALLAUDET UNIVERSITY
INSTITUTIONAL PRIOR APPROVAL SYSTEM (IPAS)
FOR MANAGEMENT OF FEDERAL GRANTS**

Many Federal agencies have transferred the authority to approve a number of types of post-award changes, most of which involve rebudgeting of grant funds, to grantee institutions. With the transfer of authority comes a serious institutional responsibility to review any such requests for changes to ensure that they are in absolute compliance with relevant Federal regulations, all applicable grant conditions, and audit requirements. The Office of Sponsored Programs (OSP) is authorized to accept this responsibility on behalf of the University as outlined in the Gallaudet University Administration and Operations Manual, #2.09.

The following procedures have been developed to assist Principal Investigators in preparing requests for changes in Federally funded projects. **Please note that these procedures refer to PRIOR approval; expenses incurred by a project before approval is requested and received from OSP are subject to disallowance.** Ex post facto requests for approval of changes must be referred to the granting agency.

All requests for prior approval must be in writing, well-justified, and accompanied by supporting documentation where necessary to ensure revisions are reasonable and appropriate.

Items Requiring Institutional Prior Approval (where allowed by granting agency):

- requests to carry funds over from one budget period to the next;
- requests to make transfers of funds among budget categories, except for a limited number of specific cases;
- requests for a one-time no-cost extension of up to 12 months, provided the reason for such an extension is not simply to expend unliquidated grant resources;
- requests for travel exceeding approved budget by \$1,000 or 25%, whichever is greater (excluding the US Department of Education grants);
- purchase of capital equipment to be used principally or solely for research if not identified in the original agency-approved budget;
- incurring of pre-award costs, for expenditures to be incurred within 90 days prior to the effective date of a new or competing renewal award, at the unit's risk.

Items Requiring Agency Prior Approval

- any change in the scope or objective of project;
- change of Principal Investigator and/or key personnel;
- the absence for more than three months, or 25% or more reduction in time devoted to the project, by the Principal Investigator;
- need for additional Federal funding;
- transfer of funds allotted for training allowances into other categories;
- subagreement or transfer of any significant portion of work, unless approved in the original award;
- budgeting of pre-award costs to be incurred more than 90 days prior to award;
- rebudgeting among direct cost categories for awards in which the Federal share of the project exceeds \$100,000 and the cumulative amount of such transfers exceeds or is expected to exceed 10% of the total budget as last approved by the awarding agency. For the Public Health Agency (including the National Institutes of Health), approval is required for cumulative expenditures of 25%, or \$250,000, whichever is less.

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Instructions

MAKING A REQUEST UNDER THE INSTITUTIONAL PRIOR APPROVAL SYSTEM (IPAS)

Nota Bene: Approval for any changes outlined on the previous page must be obtained PRIOR TO implementing those changes. Requests for approval of changes that have already occurred will not be reviewed and cannot be approved by the University. Please consult the Office of Sponsored Programs before submitting the IPAS form.

Principal Investigators should complete and sign the attached forms before securing the signatures of the department chair and dean or unit budget officer. The request is then submitted to the Director, Office of Sponsored Programs, for final approval.

Each request must include a well-detailed justification explaining the reason for a deviation from the original, approved budget and/or work plan.

Each request will be reviewed for propriety in relation to the objectives of the project and for compliance with the regulations, policies, and procedures of both the University and the sponsoring agency.

Once an IPAS request has been approved, the Grants Accounting Office will be notified, and the appropriate changes will be reflected in the FMS.

Principal Investigators should refer to specific grant conditions from the sponsoring agency that may be attached to the initial award letter or notice for further details on budget restrictions and/or post-award changes.

MAKING A REQUEST TO THE SPONSORING AGENCY

Those changes requiring approval from the sponsor should be described in a letter from the Principal Investigator to the appropriate agency official. The letter must be reviewed and approved by the department chair and the dean/unit budget officer, and countersigned by the Director of the Office of Sponsored Programs, who will review each request. Once the letter has been approved, the Office of Sponsored Programs will forward the request to the sponsor.

REQUEST FOR PRIOR APPROVAL OF CHANGES IN FEDERAL GRANTS

Principal Investigator	Budget Period (Dates)
Agency	Gallaudet Account Number
Project Title	

Check the type of change requested below:

- Fund carryover.
- Capital equipment to be used principally or solely for research if not identified in the original sponsor-approved budget.
- Travel exceeding approved budget by \$1,000 or 25%, whichever is greater.
- Pre-award costs for essential expenditures to be incurred within 90 days prior to the effective date of the grant, at the unit's risk.
- One-time no-cost extension of up to 12 months. Federal guidelines do not permit extensions simply to expend unliquidated grant balances. Explain need for additional time, and provide a new termination date.
- Budget transfer: see below.

A detailed justification is required for any change requested.

Transfer	from	Category/Code	to	Category/Code
\$ _____		_____		_____
\$ _____		_____		_____
\$ _____		_____		_____
\$ _____		_____		_____

Certification of Principal Investigator: This request is proper in relation to and consistent with the approved project objective(s). Rebudgeting will not hinder completion of the approved project, nor increase the total amount to be expended.

	Signature of Principal Investigator	Date
Please sign and print names below:		
Department Chair		Date
Dean/Unit Budget Officer		Date
Director, Office of Sponsored Programs		Date