

Prior Approval Policy

Policy Number: 600-016
Effective Date: April 3, 2007
Last Updated: April 2, 2009¹
Issuing Authority: Vice President for Research and Compliance
Responsible Offices: Office of Sponsored Programs/Research Administration (OSP/RA, Office of Sponsored Programs/Post Award Service Unit (OSP/PASU)

Purpose:

To ensure that Howard University and all related entities, business units, subsidiaries and affiliated organizations including, but not limited to, Howard University Hospital (hereinafter referred to collectively as “Howard University”) obtain and document prior approval when required by the terms and conditions of a sponsored program award or by sponsor requirements.

Policy:

It is the responsibility of the Principal Investigator/Program Director (PI/PD) to adhere to the conditions of the sponsored award. Occasionally, the PI/PD identifies a need to change or deviate from the sponsor-approved proposal. In some instances, these changes require prior approval of an authorized official at the sponsor. In other cases, prior approval from the Office of Sponsored Programs is sufficient. The level at which approval may be granted depends upon the type of grant or contract and the sponsor’s specific policies for that type of grant or contract.

When the sponsor requires prior approval, such requests are to be put in writing and submitted to OSP/RA in advance of the change for OSP/RA’s submission to the authorized official at the sponsor for a decision. Requests for retroactive approval are to be avoided. **An authorized official from the Office of Sponsored Programs must sign all requests to sponsors.** If “internal” approval is sufficient, a brief memo requesting approval of the change and signed by the PI/PD only, should be sent to OSP/RA. After a decision is made by OSP/RA concerning the request, this memo will be kept with the grant as internal documentation.

Business Process Description:

For changes that may affect the technical or scientific work of the project, the PI/PD 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 the person’s recommendation is often given significant weight by the official decision-maker.

When Approval from the Sponsor is Required: The PI/PD is responsible for preparing and submitting all requests in writing to OSP for approval before they are submitted by OSP to the authorized official at the sponsor.

¹ Minor changes to enhance clarity, assure consistency with other policies or correct misspellings and other grammatical errors have been made after the initial approval date.

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When Howard University has Expanded Authority: When the sponsor has given Howard University expanded authority, the PI/PD is responsible for preparing and submitting all requests to OSP for a decision. Once approval has been granted, OSP maintains a copy of the sponsor's written approval (email, letter, etc.) and processes the approved documents.

Some of the most common reasons for which prior approval is required include:

Re-budgeting: Re-budgeting is the process by which the PI/PD 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 authorized official of the sponsor. (See [Budget Revision Policy](#).)

Project Relatedness: When the same person serves as PI/PD on two or more federal awards, or when two or more projects with different PI/PD's involve interrelated theoretical approaches, or study the same phenomena, the PI/PD(s) may request that "relatedness" be established. If two or more projects are determined to be "related", they may be treated as a program for purposes of allocating costs. A cost that is allocable to the program may be charged to any one of the awards that make up the program, in any proportion. To establish "relatedness", a written request from OSP/RA must be approved by authorized officials of the sponsors funding the projects in question.

Change in Scope/Effort: In general most sponsors require that they be informed of any changes that may affect the scope of the actual research being performed. These often involve a change in the objective or emphasis of the study, but may also involve the absence or change of a PI/PD (see below), a change of the grantee institution, a change in the approved use of animals or human subjects, or other factor. Usually a significant change (decrease) in the percentage effort devoted by the key project personnel to the project is considered to affect the scope of the research and will require approval from the authorized official of the sponsor. (See [Effort Reporting Policy](#).)

Absence or Change of Key Personnel: The prior approval of the authorized official of the sponsor is generally required for any absence of the PI/PD lasting three months or more. Change of other key personnel on the project also requires prior approval. The Dean and Department Chair must approve all PI/PD personnel changes before OSP/RA is asked to approach the authorized official at the sponsor for approval.

Equipment: Subject to the terms and conditions of the award, the PI/PD 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 authorized official at the sponsor. 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 authorized official at the sponsor. (See [Sponsored Program Equipment Management Policy](#) and the [Direct and Indirect Cost Charging Policy](#).)

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International Travel: The sponsor's terms and conditions must also be followed with regard to international travel. Requests for international travel should first be submitted with a detailed justification to OSP/RA for submission in turn to the authorized official at the sponsor. Requests for international travel should be made at least 30 days in advance before the anticipated travel date. If the sponsor approves the request for international travel, OSP/RA will forward the request to the President, whose decision is final. (See Direct and Indirect Cost Charging Policy)

Use of Unobligated Balance: Unless otherwise determined by the terms and conditions of the award, the authorized official at the sponsor will determine whether or not a balance at the end of one funded project segment can be carried forward to a new budget period. Prior written approval from the authorized official at the sponsor is required in these instances.

Change in Stipends and Tuition Remission: Any changes in the proposed stipend and/or in tuition remission usually require written approval by the authorized official at the sponsor. Requests for changes must be submitted to OSP/RA with justification and approval of the appropriate dean. (See Student Stipends and Tuition Reimbursement Policy)

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

Roles and Responsibilities:

Office of Sponsored Programs/Research Administration:

- **Research Administrator (RA):** The RA is responsible for coordinating prior approval requests with the sponsor. This is typically supported by a memorandum from the PI/PD. When approval is obtained, the RA retains written documentation of the sponsor approval.
- **Manager:** The OSP Manager provides oversight for prior approval requests by monitoring the work completed by the RAs.

Office of Sponsored Programs/Post Award Services Unit:

- **Post Award Services Unit Accountant:** The Accountant is responsible for coordinating prior approval requests with the sponsor for rebudgeting requests. This is typically supported by a memorandum from the PI/PD. When approval is obtained, the Accountant retains written documentation of the sponsor approval.
- **Manager:** The OSP/PASU Manager provides oversight for prior approval requests by monitoring the work completed by the Accountants.
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Academic Departments

- **Principal Investigator/Project Director (PI/PD):** The PI/PD is responsible for following prior approval guidelines outlined by the sponsoring agency. Each PI/PD is responsible for submitting documentation, typically a memorandum, to OSP/RA for prior approval requests. For changes that may affect the technical or scientific work of the project, the PI/PD should have preliminary discussions with his/her technical counterpart at the sponsor.

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Office of the President

- **President of Howard University:** The President must approve all international travel in advance.

Related Policies:

- Budget Revisions Policy
- Effort Reporting Policy
- Sponsored Program Equipment Management Policy
- Direct and Indirect Cost Charging Policy
- Student Stipends and Tuition Reimbursement Policy
- Subcontract Execution and Approval Policy

Forms and Links:

- Office of Management and Budget (OMB) Circulars: A-21, “Cost Principles for Institutions of Higher Education”
<http://www.whitehouse.gov/omb/query.html?col=omb&qt=a-21>
- Office of Management and Budget (OMB) A-110, “Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Institutions”
<http://www.whitehouse.gov/omb/query.html?col=omb&qt=a-111>
- OVPRC Website: <http://ovprc.howard.edu>