

OSPA – Awards Team

Post-Award Actions 101

- 1) Extensions of Time
 - a) Grantee (ISU)-approved no-cost extensions
 - i) Agency-specific sections of the Uniform Guidance may allow institutions the ability to approve an initial extension of time on a project, up to 12 months, per competitive segment.
 - ii) OSPA sends a notification to the sponsor that we are exercising our ability to extend the period of performance without prior approval.
 - iii) Extension of time must still be reasonable and provide a justification. “To spend remaining funds” is not a justification for an extension.
 - iv) All subsequent extensions of time must be requested and approved by sponsor.
 - b) Sponsor-approved no-cost extensions
 - i) Any extension of time past the initial grantee-approved period; OR:
 - ii) Any extension of time when prior-approval has not been waived in the Uniform Guidance (or Research Terms and Conditions, once approved).
 - iii) OSPA/OIPTT sends a request to the sponsor.
 - iv) Level of detail required in request may vary by award or sponsor.
- 2) NCE Request Form
 - a) Not required if PI initiates electronic request via Research.gov.
 - b) All other methods of submission require submission of NCE request form found via <http://www.ospa.iastate.edu/no-cost-extension-request>. Requests are received by OSPA-Awards team and forwarded to the appropriate Award Administrator (or OIPTT, if applicable) for submission.
 - i) PI or GC may submit OSPA NCE form.
 - c) Requests usually required at least 45 days prior to, and no sooner than 90 days before, the project end date.
- 3) Rebudgeting
 - a) Request should be made prior to cost being incurred.
 - b) Check original budget and award terms for rebudgeting requirements.
 - c) If applicable, check Uniform Guidance.
 - d) Participant Support Costs
 - i) Typically occurs on specific National Science Foundation and Department of Education funded projects – sometimes on USDA-NIFA projects.
 - ii) Requires Program Officer approval.
 - iii) Request made via Research.gov (NSF) or letter of request to Grants Officer.
 - iv) See also: “[ISU Participant Support Costs Guidance document](#)” on SPA’s [website](#).
- 4) Rebudget Request Form
 - a) PI or GC may submit OSPA Rebudget Request form found via <http://www.ospa.iastate.edu/forms> and email to OSPA or OIPTT, depending on sponsor type
 - b) Required when prior approval is needed by sponsor.

- c) Not required when:
 - i) Prior approval has been waived in the Uniform Guidance
 - ii) Fixed price agreements
 - d) If in doubt, please ask your Award Administrator!
- 5) Child Account Budget
- a) Internal ISU form that does not require sponsor involvement
 - b) Used when multiple accounts are needed for one sponsored project.
 - c) Form is used to either create a new child account, or allot additional funds to an existing child account.
 - d) To initiate request, Lead Unit GC may download form from <http://www.ospa.iastate.edu/forms>, and route for signatures
 - i) The amounts entered in each child account budget category normally must be equal to or less than the same budget category of the parent account
 - ii) Fully authorized forms to be submitted to OSPA/OIPTT, depending on sponsor type.
- 6) Addition of Subaward
- a) Most agencies require prior approval before issuance of a subrecipient agreement not listed in sponsor-approved budget.
 - b) Check sponsor guidelines for requirements regarding addition of a subrecipient.
 - c) If sponsor approval is required, the request to sponsor should include:
 - i) letter of commitment from subrecipient
 - ii) a clear description of the work to be performed
 - iii) the basis for selection of the subrecipient
 - iv) a separate detailed budget and budget justification for each subrecipient (approved by that institution's OSPA)
 - d) A corresponding rebudget request may also be required.
 - e) Once approval is received, the PI must complete and sign the OSPA Subrecipient Request Form, which is required for all new subrecipient agreements. This form is found via <http://www.ospa.iastate.edu/forms>.
- 7) Change of PI or Key Personnel
- a) Types of requests that require prior sponsor approval include:
 - i) Replacing a PI
 - ii) Adding a Co-PI
 - iii) Removing a Co-PI
 - iv) Making a Co-PI a PI (or vice versa)
 - b) External Change Process
 - i) Depending upon the sponsor type of your project, send an email to ospa-awards@iastate.edu or industry-contracts@iastate.edu with the following information and documentation:
 - (1) A clear description of the change (i.e. who is taking over, and why the current PI will no longer be involved, etc.);
 - (2) A current biosketch for proposed PI;

- (3) A justification for the proposed PI's credentials for taking over the project.
 - ii) OSPA/OIPTT will draft a letter to the sponsor including the above information.
 - (1) PI's signature may be required on this letter.
 - iii) OSPA/OIPTT will submit the request to the sponsor, and follow up as necessary.
 - iv) For NSF awards ONLY: PI may initiate request via research.gov and forward to OSPA for submission.
 - v) All other sponsors: OSPA will submit a written request to sponsor including above information.
- 8) Internal Change Process: Revised GoldSheet
- a) Necessary to make any internal administrative change to a sponsored project.
 - b) If sponsor approval is required, Revised GS will not be processed until approval is received.
 - c) See also: "[Post-Award Administrative Changes to a Sponsored Project](#)" on OSPA's [website](#).
- 9) Disengagement of PI for Significant Period
- a) Applies to federally-sourced awards only
 - b) If greater than 3 months:
 - i) PI will need to make arrangements for oversight of the project.
 - ii) PI to notify OSPA and provide disengagement and arrangement details
 - iii) ISU is required to request prior approval from the sponsor in writing
 - (1) Request must include who will be in charge during PI's absence, including their CV and written concurrence.
 - c) To initiate request, PI must submit above information to OSPA
 - i) For NSF awards ONLY: OSPA will submit request via research.gov.
 - ii) All other sponsors: OSPA will submit a written request to sponsor at least 30 days before disengagement.
- 10) PI Reduction in Time Devoted to the Project
- a) Applies to federally-sourced awards only
 - b) If reducing PI's time devoted to project by 25% or more:
 - i) For NSF awards ONLY: Consult with OSPA and with the NSF Program Officer. If either determines that the reduction of effort will substantially impair the successful execution of the project, the Program Officer will consult with the NSF Grants Officer. The NSF Grants Officer may:
 - (1) Request the grantee to nominate a replacement PI acceptable to the NSF Program Officer;
 - (2) Initiate termination procedures; or
 - (3) Negotiate an appropriate modification to the grant.
 - ii) All other sponsors: PI to notify OSPA and provide details of effort committed and reduced actual effort to be incurred
 - (1) ISU is required to request prior approval from the sponsor in writing
 - (2) OSPA will submit a written request to sponsor
 - c) Example: Dr. Bailey, PI, is listed with 20% effort in an award's proposal. If Dr. Bailey's actual effort drops to 15% or less, sponsor approval is needed.

11) Other Post Award Actions

- a) PI Transfers from ISU
 - i) Departmental/Chair approval of transfer
 - ii) Determination of unobligated balance to transfer
 - iii) Confirmation of new Primary Place of Performance
 - iv) Date of transfer
 - v) Documents to be completed by PI:
 - (1) Progress Summary
 - (2) Description of Work to be Accomplished
 - vi) See also: "[PI Transfer Tips](#)" on OSPA's [website](#)
- b) Carry Forward of Unobligated Balance
- c) Delinquent Final Reports

12) Pre-award Costs

- a) Applies to federally-sourced awards only
- b) Allowable project costs incurred prior to the award start date
 - i) Pre-award spending must be necessary for the effective and economical conduct of the project; costs must be allowable.
- c) Most federal agencies permit institutional approval of pre-award spending up to 90 days prior to award start date.
- d) All federal agencies require prior approval for any pre-award spending more than 90 days prior to award start date.
- e) To initiate request, email ospa-awards@iastate.edu
 - i) Provide justification for spending prior to start date of award and a general breakdown of how the funds will be used, including dollar amounts.
 - ii) Request should be received and approved by sponsor prior to charging costs to award.
 - iii) If sponsor approval is needed, the request will be submitted to the sponsor by OSPA.

13) Advanced Account Request

- a) Used to establish account number in order to begin spending on an award prior to its arrival and set-up.
- b) Not recommended for contracts.
- c) PI must provide evidence of sponsor's intent to award funds.
- d) To initiate request, PI or GC to complete request found via <http://www.ospa.iastate.edu/forms>, route for appropriate signatures, and submit to OSPA/OIPTT.

14) Changes in Scope of Work

- a) Prior approval from all sponsors is required for any change in scope.
- b) To initiate request, PI should forward the following information to OSPA/OIPTT:
 - i) Justification for the change in scope
 - ii) Detailed description of the change
- c) OSPA/OIPTT will prepare and submit the request, and follow-up as necessary.

- i) For NSF awards ONLY: PI may initiate request via research.gov and forward to OSPA for submission.

15) Sponsor Amendments and Modifications

- a) Types
 - i) Additional funding on previously awarded projects (incremental funding)
 - ii) Approval of requested changes
 - iii) Sponsor administrative changes
 - iv) Other
- b) OSPA/OIPTT actions taken after receipt of amendment/modification:
 - i) Review of amendment/modification
 - ii) Update of KC award record and notification to SPA
 - iii) Copy of amendment/modification emailed to PI, GC and RRC
- c) Considerations:
 - i) If sponsor contacts PI or Department directly regarding contractual issues, please forward that communication to the appropriate OSPA/OIPTT Award Administrator.
 - ii) OSPA/OIPTT is the authorized representative for the University; all official award documents (even if they do not require signature) should go to OSPA/OIPTT for review and approval.
 - iii) OSPA and OIPTT are here to assist PIs and Departments. Please contact us if you have any questions or need guidance.

16) Resources

- a) OSPA Request Forms: www.ospa.iastate.edu/forms
- b) OSPA Handbook: <http://www.ospa.iastate.edu/sites/default/files/imported/docs/OSPAHandbook080911.pdf>
- c) OSPA FAQ: <http://www.ospa.iastate.edu/proposal/faq/faq>
- d) OSPA-Awards/Post-award Information: <http://www.ospa.iastate.edu/awards>
- e) OIPTT website: <http://www.techtransfer.iastate.edu/>