

Expanded Authorities Overview



Many Federal agencies have transferred the authority to approve a number of types of post-award changes, most of which involve re-budgeting 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.

One way that sponsored projects administration has been streamlined is through the Institutional Prior Approval System or "IPAS." By using the IPAS form, project directors can obtain OSP's approval of certain actions under expanded authorities granted to the university under many federal grants. *This is not applicable to contracts.*

Authority to approve the action(s) requested is subject to the understanding that the general level of effort and scope, and the objectives of the approved project will not be altered, and that the proposed action is reviewed in advance and is consistent with grant conditions. ***The authority to approve changes in Project Directors and changes in objectives or scope of approved projects has been retained by all sponsors.*** It is the responsibility of the Project Director to determine that funds are available for the requested IPAS action.

For actions requesting approval to charge specific expenditures prior to the start date of the grant (must be within 90 days of the official start date), submit a memo indicating the costs items and amount to grants accounting. Please contact Buff Rosen-Boyd at extension 5142 for further details.

Federal regulations require formal notification from OSP on all no-cost extensions. Therefore, this type of request must be made at least 15 days prior to the expiration date. Also, the IPAS explanation must include a statement of funds remaining and plans for spending these funds. An explanation, including the rationale for the requested action(s,) and the impact of requested action(s) on the project budget, including the availability of funds, must always be provided. If this request involves the purchase of scientific equipment, indicate the cost of the item(s) and the availability of similar equipment. Any additional information useful in evaluating this request should be included.

Requests made under IPAS, as for all expenditures on sponsored projects, must be otherwise allowable, reasonable and allocable in accordance with Federal cost principles and the specific grant conditions.

Upon receipt by OSP, the request will be reviewed for consistency with University and Federal policies. If questions arise during the review, OSP will consult with the Project Director. Approved copies of the IPAS will be forwarded to the Project Director.

IPAS Matrix

Review the IPAS Matrix below to identify agency-specific (10 different federal agencies) requirements for nine different IPAS actions.

IPAS Form:

The IPAS form is available, both as an MS Word document template and in PDF format. Select the format that is most convenient for you from the [OSP's Forms](#) page.

IPAS MATRIX

The table below provides agency-specific requirements for nine different actions for 10 federal agencies - covering *most* scenarios relating to NEIU's Institutional Prior Approval System. Please contact the Office of Sponsored Programs for additional clarification.

EXPENDITURE OR ACTION		NSF (National Science Foundation)	NIH (National Institutes of Health)	DOE (Department of Education)	ONR (Office of Naval Research)	USDA (U.S. Department of Agriculture)	AFOSR (Air Force Office of Scientific Research)	ARMY Med (U.S. Army Medical Department)	ARMY (U.S. Army)	EPA (Environmental Protection Agency)	NASA (National Aeronautics and Space Admin.)
1	Pre-award costs (up to 90 days)	U	U	U	U	U	U	U	U	U	U
2	No cost time extension (up to 12 months)	U #1	U #1	U #1	A #1	U #1	A	U #1	U #1	U #1	U #1
3	Carry-over of un-obligated funds	N #2	N #3	N	N	N	N	N	N	N	ASR
4	Absence or Change of PI	A	A	A	A	A	A	A	A	A	A
5	Relatedness of two or more Projects	A #4	A	A	A	A	A	A	A	A	A
6	Foreign travel	U	U	U	U	U	U	ASR	ASR	U	U
7	Subcontracting	N #6	N #6	N #6	N #6	N #5 or #6	N #6	N #6	N #6	N #6	N #6
8	Capital equipment	U	U	U	U	U	U	A	A	U	U
9	9. Re-budgeting	N #7	N #7	N #7	N #7	N #7	N #7	ASR #7	ASR #7	N #7	N #7

Any award could contain a specific prior approval requirement which supercedes these general terms and conditions.

A = Awarding Agency Prior Approval

U = University Prior Approval (IPAS)

N = No Prior Approval Necessary

ASR= See Agency Specific Requirements located at NSF's FDP page.

#1 Agency must be notified within 10 days prior to expiration date with supporting reasons.

#2 For un-obligated balances in excess of 20%, a statement is required on NSF Annual Grant Progress Report.

#3 For unsolicited balances in excess of 26% see ASR.

#4 Under no circumstances will NSF be identified as head agency.

#5 Approval required if more than 50% of the work performed is to be subcontracted.

#6 Subcontractor must be identified in approved budget otherwise A.

#7 Agency prior approval required for re-budgeting for participant for trainee support costs.