

Post Award Administration – Prior Approval

Note: Unless otherwise indicated, the excerpts below are from the HHS Awarding Agency Grants Administration Manual (Hot Links Provided)

Authorities

The Department of Health and Human Services (DHHS) policies provide the recipients the maximum allowable flexibility to make post-award changes in programmatic plans and budgets consistent with governing statutory, regulatory, administrative, and policy requirements.

Responsibilities

Most prior-approval requests have both programmatic and business implications, therefore the Grants Management Officer (GMO)/Grants Management Specialist (GMS) and the Project Officer (PO) will evaluate the request for their respective areas either programmatic or business implications of a given activity.

The Grants Management Specialist (GMS) and the Project Officer (PO) roles are defined roles, each of which must be appropriately performed to ensure a compliant grant process and contribute to achievement of program/project outcomes. These roles can be carried out in a responsible manner only when there is effective interaction between the GMS and PO.

Grants Management Officer is responsible for reviewing the request with Project Officer, as necessary, and for informing the grantee in writing of the final disposition of the request. Only responses signed by the GMO are to be considered valid.

Documents Impacting the Administration of Grants/Cooperative Agreement

Governing statute/program legislation - Public Health Act

Program regulations - Terms and Conditions of the Award

Grants Administration Regulation - 45 CFR Part 74

Policy Requirements

- ⇒ HHS Grants Policy Directives (CDC's Use Only)
www.hhs.gov/grantsnet/
- ⇒ HHS Grants Policy Statement (External for the Grantee) -
www.hhs.gov/grantsnet/
- ⇒ HHS Awarding Agency Grants Administration Manual (AAGAM)
(CDC's Use Only) <http://intranet.hhs.gov/grantsinfo/gpdstable.html>.

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Office of Management and Budget (OMB) - Educational Institutions (even if part of a State or local government) follow:

- ⇒ [A-21](#) - High Institutions of Higher Education Cost Principles, [Relocated to 2 CFR, Part 220](#)
- ⇒ [A-110](#) - Grants and Cooperative Agreements to Institutions of High Education, Hospitals and other Non-profit Organizations - Administrative Requirements, [Relocated to 2 CFR, Part 215](#)
- ⇒ [A-122](#) - Non-profit Organizations under Federally-sponsored Agreements - Cost Principles, [Relocated to 2 CFR, Part 230](#)

Mandatory Receipt and Control Points

- ⇒ *PGO/GMS* - Official receipt and control point for all requests for prior approval.
- ⇒ *PO* - Requests for prior approval are incorrectly or inadvertently receives (he/she should date and time stamp) and immediately forwarded them to responsible *GMS*.

Prior Approval Response Time

The CDC is required to respond to requests for prior approval within 29 (based on CDC Key Performance Indicator (KPI) calendar days of receipt or advise the recipient when it can expect a response, but should try to respond as soon as possible and not use the full 29 days (or longer) as a means of "disapproving" the request by allowing the request to be overtaken by events.

The 29-day response requirement will be calculated from receipt by the CDC, whether the *GMO* or the *PO* receives the request. For requests other than e-mail requests, receipt will be determined from the date of the request, the postmark

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CDC Prior-Approval Not Required

Grantees are given a certain degree of flexibility in making post-award programmatic and budget revisions on the basis of an approved grant/cooperative agreement. Unless otherwise restricted by the terms of the award, grantees have the flexible to re-budget within and between budget categories in the approved total direct cost budget of the project to meet unanticipated requirements or to accomplish certain programmatic changes and using as a guideline, *"significant re-budgeting" threshold as long as the re-budgeting does not result in a change in scope of the program.

*"Significant re-budgeting" is a threshold that serves as a quantitative indicator of a possible change in scope. Significant re-budgeting occurs when, under a grant/cooperative agreement where the Federal share exceeds \$100,000, cumulative transfers among direct cost budget categories for the current budget period exceed 25 percent of the total approved budget (inclusive of direct and indirect costs and Federal funds and required matching or cost sharing) for that budget period or \$250,000, whichever is less. For example, under a grant in which the Federal share for a budget period is \$200,000, if the total approved budget is \$300,000, cumulative changes within that budget period exceeding \$75,000 would require prior approval).

The sample letters are not an all inclusive list of the types of costs and activities that require CDC prior approval.