



NOAA

March 2020

2020 Financial Assistance Workshop

Post Award Actions

Acquisition and Grants Office
Grants Management Division





Post Award Actions



What is a Post Award Action?



- Modifications to an approved project such as a revision to the budget, change in scope, or an extension of the project period
- Many require prior approval from the Grants Officer in accordance with 2 CFR Part 200.308 “Revision of budget and program plans”
- As work progresses and changes occur, modifications may be needed during the life of your financial assistance award





Post Award Activity



- The Recipient Authorized Representative approves the request for submission to NOAA
- The Program Office forwards their recommendations to the Grants Office who makes the final determination
- If the request generates an amendment, the authorized representative must accept the finalized amendment



When Submitting Post Award Request

- Submit the correct Award Action Request
- Submit appropriate documentation
- Ensure post award requests are consistent with terms and conditions of the award
- Submit actions timely
- Specific conditions are satisfied



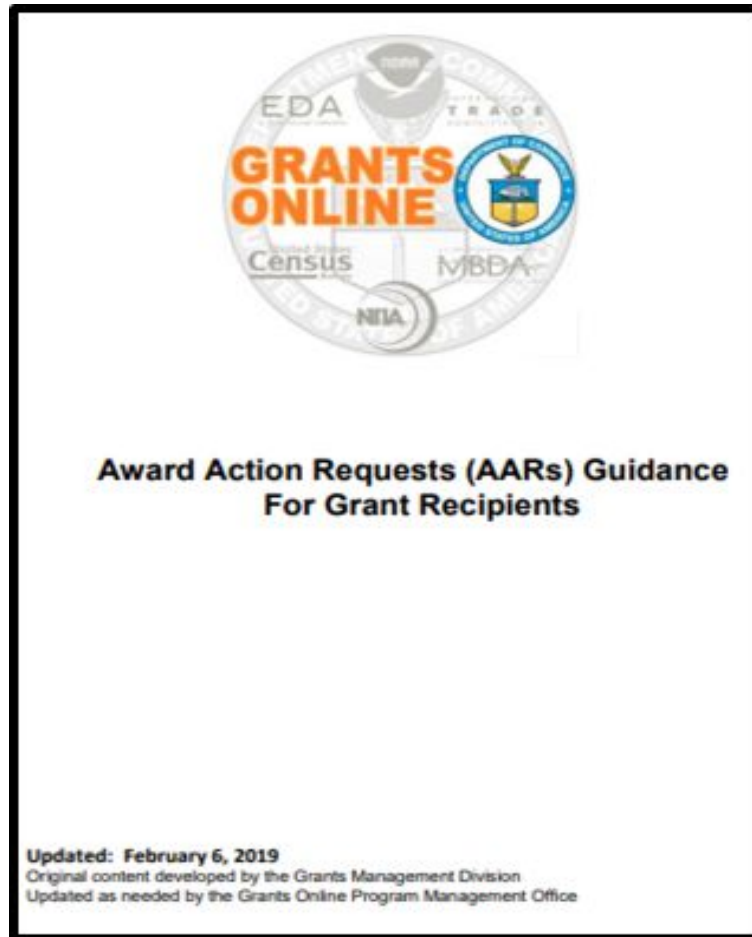
Post Award Actions

- No Cost Extension – Prior Approval Required *
- No Cost Extension – Prior Approval Waived (Research Terms & Conditions)
- Extension to Closeout
- Change in Scope*
- Change in PI
- Foreign Air Carrier
- Change in Key Personnel
- Disengagement for more than 3 months or 25% Reduction by PI
- Satisfy Specific Conditions
- Termination by Consent *
- Other
- Inclusion of Cost Requiring Prior Approval in Cost Principles
- Transfer of Funds Budgeted for Participants Support Costs to Other Categories of Expense
- Subaward, Transfer or Contract Out Work Under the Award if Not Described in the Approved Application *
- Rebudget – Prior Approval Required
- Rebudget – Prior Approval Waived (Research Terms & Conditions)
- Pre-Award Cost More than 90-days
- Submit Additional Closeout Documents

***creates an amendment**



Award Action Request Guidance





7. Award Action Request Guidance

**** NEW **** For the NEW Award Action Request guidance that corresponds to the 2 CFR Part 200 updates, [click here: NEW Award Action Request Guidance](#)





Satisfy Specific Award Conditions

Also known as SACs

- 
- 
- SACs with a due date must be satisfied by the due date
 - Select the correct SAC to satisfy
 - Submit evidence/justification of SAC completion
 - Attach supporting documentation

Examples:

- 
- 
- National Environmental Policy Act (NEPA)
 - Indirect Requirements
 - NMFS - evidence of required licenses
 - Evidence of Single Audit submission



Satisfying SACS

Quiz!



Which SAC do I need to submit an award action request to satisfy by closeout?



Special Award Conditions

Unpaid Delinquent Tax Liability or Felony Conviction Restrictions	Prior to drawing down Federal funds under your current award, you are required by the Consolidated and Further Continuing Appropriations Act, 2015 (Pub. L. 113-235) to sign and date Part [I or II] of the attached Tax Liability Certification Form. Your signature is required within 90 days from receipt of your award. This requirement is pursuant to Financial Assistance Memorandum 2015-01 which states that it will remain in effect until rescinded or replaced by a superseding Financial Assistance Memorandum affecting future appropriations that contain similar requirements.	CD-450	Administrative	10/12/2016
Substantial Involvement Special Award Condition For Cooperative Agreement	This award is created as a cooperative agreement because of the substantial involvement of NOAA scientists in the award activity. NOAA scientists will collaborate with Cooperative Institute scientists, research associates, and students on research projects of mutual interest throughout the award period.	Amendment 4	Programmatic	



Inclusion of Costs Requiring Prior Approval in Cost Principles

- Per §200.308(c), recipients must request prior approval from the Federal agency for the inclusion of costs that require prior approval in accordance with the Cost Principles
- The cost amount and a justification are required
- The request does not normally result in an amendment to the award; however, the Federal Agency can determine that an amendment is needed

Examples: equipment purchase approval, entertainment costs, program income

Prior Approval: Pre-Award Costs Over 90 days

- NOAA has waived prior approval for pre-award costs up to 90 days prior to award
- Prior approval is required for pre-award expenses incurred more than 90 days prior to award
- All pre-award costs are incurred at the recipient's risk
- Does not result in an amendment to the award



Prior Approval: Rebudget



- Prior approval required if cumulative transfer of funds among **direct cost** categories exceeds 10% of the total budget
- Prior approval required if adding a new budget line item
- Non-Federal entities should submit revisions on the SF-424A and budget narrative to reflect requested changes
- Does not normally result in an amendment to the award



Prior Approval Waived: Rebudget (Research Awards)

- All Recipients governed by the Research Terms and Conditions can transfer between line items without prior approval
- Recipients can use this AAR to submit budget revisions or may describe the changes in the next progress report

https://www.nsf.gov/bfa/dias/policy/fedrctc/appendix_a.pdf



Prior Approval: Inclusion of Special Costs



Quiz!

Yes/No:



If I have unanticipated equipment needs, do I need to submit a prior approval request in order to purchase the equipment?





Prior Approval: Pre-award Costs



Quiz!

True or False:

Prior approval is not required for costs incurred 45 days before the award start date.



True or False:

Prior approval allows me to begin the project early.





Prior Approval: Rebudget



Quiz!

True or False:



In Year 1, I have rebudgeted 6%, and in Year 2, I have rebudgeted 8% more, do I have to request prior approval?





Prior Approval Waived: Rebudget



Quiz!



True or False:

Under my research award, I don't need to submit a post Award Action Request in Grants Online when I rebudget funds.



Prior Approval: Change in Scope

- Prior approval is required for a change in the scope:
 - Change in the specific goals and objectives
 - Shift of the research emphasis
 - Change in the project areas or species
 - Change in the amount of work
- Requests should include clear justification and supporting documentation
- The NEPA approving official reviews these requests
- The Financial Assistance Law Division (FALD) reviews these requests
- This action generates an amendment

Prior Approval: Change in Principal Investigator

- A resume or CV is required for the new PI
- Submission is required in grants online
- Requires Federal Agency prior approval
- Does not result in an amendment
- DOC's Ethics Office may be consulted if the PI is a former NOAA employee

Prior Approval: Foreign Air Carrier for Travel

When using a foreign air carrier, prior approval is required in compliance with the Fly America Act.

- Implementing Regulations 41 CFR §§ 301–10.131 through 301-10.143 (includes exceptions)
- Does not result in an amendment

Prior approval necessary, and an exception must be used:

- Bilateral/multilateral “Open Skies Agreements”
- No other air carrier available

No prior approval necessary if:






- Tickets purchased through code-sharing
- Itinerary uses american air carriers

Prior Approval: Subaward, Transfer or Contract

- Prior approval required for subawarding or contracting out of any work under a Federal award not in the approved application
- Does not apply to the acquisition of supplies/material, general support services, etc.
- Provide a description of the work and documentation of competition
- Results in an amendment to the award








Prior Approval: No Cost Extension

- 
- 
- 
- 
- 
- Must be submitted in Grants Online at least 30 days prior to the expiration of the award
 - The request should clearly justify why the extension is needed
 - Explain what activities are remaining to be accomplished under the award and what funds are still available to support the activity
 - Requires the attachment of a budget of remaining funds
 - Generates an amendment to the award



Prior Approval Waived: No-Cost Extension




- 
- 
- 
- 
- 
- All non-federal entities with a research award are granted authority to initiate a one-time no-cost extension to the award for one year without prior approval.
 - Grants Office must be notified in writing at least 10 days prior to expiration of the award with an explanation of the reason for the extension
 - No-cost extension prior approval waived must be used before the no-cost extension prior approval required
 - Does not generate an amendment to the award



Prior Approval: Extension to Closeout



Allows for an extension to closeout beyond the standard 90 days.


- 
- Up to 90 days beyond original closeout period
 - All activities during the extension must be for closeout
 - Finalize financial, progress, tangible property reports
 - Liquidate obligations incurred
 - Recipients are able to draw down funds during the extension
 - Does not result in an amendment
- 
- 





Termination by Consent



Per §200.339, the Federal award may be terminated with bilateral consent.



This may be used if the Recipient finishes the project tasks prior to the award end date and anticipates completion of financial transactions within 90 days of the requested termination date.

- 
- Must include a letter including the rationale signed by the Authorized Representative
 - Must select a termination date
- 



Other

- For requests that are not relevant to any other category
- Work with your Federal Program Office (FPO) to determine if you should submit a request under “Other”
- Requires both a description and a justification
- Include email correspondence with FPO to document concurrence
- Could result in an amendment



Prior Approval: Change in Scope


Quiz!

My project is changing. What are my next steps?

1. I submit an Award Action Request.
2. I consult the Federal Program Officer assigned to my project?
3. I compare the changes to the original intent of the award/Statutory Authority.
4. It's not a big deal. I will add the changes to my next Progress Performance Report.




Prior Approval: Change in Principal Investigator




Quiz!

Yes or No:




I told my Federal Program Officer about the Change in Principal Investigator. Do I need to submit a prior approval Award Action Request in Grants Online?


True or False:



I updated the Principal Investigator information in Grants Online, so I do not need agency approval.




Prior Approval: Subaward, Transfer, or Contract




Quiz!

True/False:



A PI at my institution is moving to another institution. The PI would like to transfer the grant to the new institution. This can be accomplished by submitting an award action request to transfer.





Prior Approval: Subaward, Transfer or Contract



Quiz!



Yes or No:




I originally planned to do the work in house, but now, I don't have the capacity. Do I need to submit a prior approval Award Action Request to subaward/subcontract?






Prior Approval: Extensions



Quiz!



True or False:



No Cost Extensions and Extensions to the Closeout Period Extensions mean I can continue project activities.



True or False:



I can receive additional funding for my award during the period of my No Cost Extension.

Questions?

You may also submit questions to
GMD.Services@noaa.gov

Please remember to complete your surveys, and contact your respective Grants Management Specialist with any additional questions.

