

NOAA

April 2021

2021 Financial Assistance Workshop

Post Award Actions

Acquisition and Grants Office
Grants Management Division





Post Award Actions



- 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*
- *OMB COVID-related flexibilities & Grants Online requests*
 - *M-20-11, M-20-17, M-20-26 (expired)*
 - *M-21-20 and [NOAA Guidance](#)*





Post Award Activity



- The Recipient Authorized Representative initiates the request for submission in Grants Online



- The Program Office forwards their recommendation to the Grants Office who makes the final determination regarding the processing of the request







- If the request does generate a Grants Office approved amendment, the Authorized Representative must accept the final approved amendment for the process to be completed






Steps for Submission of Post Award Requests

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1. Submit the correct Award Action Request in Grants Online
 2. Submit appropriate, supporting documentation
 3. Ensure requests are consistent with terms and conditions of the award
 4. Submit actions timely
 5. Satisfy standard and specific conditions, as applicable
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**Bundle post award actions - consult with your grants specialist!*



Post Award Actions - Amendment Required

- No Cost Extension – Prior Approval Required *
- Change in Scope*
- Termination by Consent *
- Subaward, Transfer or Contract Out Work Under the Award if Not Described in the Approved Application *
- Rebudget – Prior Approval Required *(amendment requirement coming soon)*
- Inclusion of Cost Requiring Prior Approval in Cost Principles *(amendment requirement coming soon)*

***creates an amendment**



Post Award Actions: No Amendment Required



- No Cost Extension – Prior Approval Waived (Research Terms & Conditions)
- Extension to Closeout
- Change in PI/Project Director
- Foreign Air Carrier for Travel
- Change in Key Personnel
- Disengagement for more than 3 months or 25% Reduction by PI
- Satisfy Specific Conditions





Post Award Actions - Don't Generate Amendments



- Transfer of Funds Budgeted for Participants Support Costs to Other Categories of Expense
- Rebudget – Prior Approval Waived (Research Terms & Conditions)
- Pre-Award Cost More than 90-days
- Submit Additional Closeout Documents
- Other



Award Action Request Guidance



Updated: January 14, 2021

Original content developed by the Grants Management Division Updated as needed by the Grants Online Program Management Office





Satisfy Specific Award Conditions (SACs)

- SACs with a due date must be satisfied with an AAR by the due date
- Administrative SAC's (e.g. New Award, Multi- Year) must be satisfied by the end of the award
- Select the correct SAC to satisfy
- Submit evidence/justification of SAC completion
- Attach supporting documentation





Satisfy Specific Award Conditions (SACs)



Name: Delinquent Single Audit



Description: In accordance with 2 CFR Part 200 Subpart F Audit Requirements and the Department of Commerce Financial Assistance Standard Terms and Conditions (Section D.01), you are required to submit a current Single Audit to the Federal Audit Clearinghouse within nine months from your organizations Audit Fiscal Year End Date. The Federal Audit Clearinghouse database was checked as of 04/01/2021, and your organization's FY 2020 was not listed. Therefore, you may be considered to be in non-compliance with Department of Commerce requirements. Please submit your current Single Audit to the Federal Audit Clearinghouse within 60 days from receipt of this award. Failure to comply may result in a High-Risk designation prohibiting your immediate access to funds through the Automated Standard Application for Payments (ASAP) System. The SF-270 'Request for Advance and Reimbursement', will be the method of payment, until receipt of your current Single Audit.

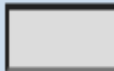


Association Edits:



Response Required:

Due Date (mm/dd/yyyy) ▼



05/31/2021



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

Example: equipment purchase



Prior Approval: Pre-Award Costs Over 90 days



- NOAA has waived prior approval for pre-award costs up to 90 days prior to award, per 200.308(d) and NOAA standard terms and conditions



- 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





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 current budget and the reallocation to the budget





Prior Approval Waived:Rebudget (Research Awards)



- All Recipients governed by the Research Terms and Conditions can transfer between line items without prior approval
- Recipients must report deviations on their RPPR
- Recipients are not required to submit this AAR



Prior Approval: Change in Scope

- Prior approval is required for:
 - 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 may review these requests
- Federal Assistance Law Division (FALD) reviews these requests



Prior Approval: Change in Principal Investigator



- A resume or CV is required for the new PI
- DOC's Ethics Office may be consulted if the PI is a former NOAA employee
- NOAA performs a risk review on the new PI






Prior Approval: Foreign Air Carrier for Travel





When using a foreign air carrier, prior approval is required in compliance with the Fly America Act ([49 U.S.C § 40118](#))

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- Implementing Regulations 41 CFR §§ 301–10.131 through 301-10.143 (includes exceptions)

Prior approval necessary, and an exception must be used:

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

No prior approval necessary if:

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



Prior Approval: Subawards, Transfers or Contracts



- 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



Prior Approval Required: 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 for use of remaining funds
- No new work!



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 Grants Online 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
- No new work!









Prior Approval: Extension to Closeout



Allows for an extension to the closeout period up to 120 days

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- 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
 - Extension to Closeout link is available for 120 days after period of performance
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Termination by Consent



- Per §200.340, the Federal award may be terminated with bilateral consent
- Discuss with your NOAA Grants Specialist first before initiating request
- May be used if recipient anticipates completion of project within 90 days of requested termination date
- Must include a signed letter by the Authorized Representative
- Must select a termination effective date





Other Award Action Request



- For requests that are not relevant to any other category
- Work with your Federal Program Office (FPO) and Grants Management Specialist 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 (*if applicable*)
- May or may not result in an amendment



Links Additional Resources

<http://www.gsa.gov/portal/content/103191>

https://www.commerce.gov/sites/default/files/2020-11/DOC%20Standard%20Terms%20and%20Conditions%20-%2012%20November%202020%20PDF_0.pdf

<https://www.noaa.gov/organization/information-technology/federal-grants-management-user-resources>

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

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.

