

STANDARD OPERATING PROCEDURE (SOP)	
SOP Number: 17 Effective Date: 09/14/2018 Last Reviewed: 03/21/2022 Title: Budget Revisions and Prior Approvals	Sponsored Programs Contact Information Business Hours: 8:00 a.m. to 4:30 p.m., Monday-Friday (excluding holidays). Main: 920-424-3215 E-mail: OSP@uwosh.edu ; Website: www.uwosh.edu/sponsoredprograms

I. Overview

The University of Wisconsin Oshkosh is required to comply with budget revisions and changes to program or project plans in accordance with the Uniform Guidance 2 C.F.R. 200.215, 200.220 and any agency-specific policies or award terms. The purpose of this procedure is to establish uniform procedures for budget revisions, reallocations or programmatic changes in accordance with federal regulations provided in the Uniform Guidance and with agency-specific award terms.

II. Applicability

This procedure applies to all faculty and staff at UW Oshkosh who are managing a grant, contract or cooperative agreement supported by external funds. OSP staff must be aware of and familiar with federal sponsor requirements for re-budgeting or for requesting sponsor prior approval for specific programmatic changes.

III. Procedure Details

The University is required to assess potential deviations from the budget and program plans during the performance period of the grant. Subsequently, the University must take appropriate action to address those deviations, including requesting prior approval and/or taking internal administrative action. Most funding agencies will allow a departure from the original budget provided that:

- 1) Expenditures are necessary for project completion
- 2) Expenditures are allowable according to the [Uniform Guidance Subpart E Cost Principles \(2 CFR 200.400-476\)](#).
- 3) Prior approval from the funding agency is obtained, when necessary, prior to the change. A [Prior Approval Matrix](#) is available on the Federal Demonstration Partnership (FDP) website and lists funding agency requirements for prior approvals.

Prior Approval requests, when required by the funding agency, must be submitted following their process. Other sponsors may require that the PI submit a written letter including the need and justification for the change. The University will allow significant budget revisions or program changes upon sponsor approval.

Examples that would require sponsor Prior Approval under federal awards are included below:

- 1) Change in Scope of Work or objective(s) of the project. This applies even if there is no budget revision associated with this change. Significant re-budgeting, typically greater than 10% of the award amount, may be viewed as a Scope of Work change.
- 2) Change in a Key Person specified in the application or award document

- 3) The absence of the PI/PD for three or more months, or a 25% reduction in time devoted to the project
- 4) Request for additional federal funding
- 5) Transfer of amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa (if approval is required by the specific funding agency). This will require University approval in addition to sponsor approval.
- 6) Transfer of funds for participant costs (trainee allowances or stipends) to other expense categories
- 7) Transfer of funds to a subrecipient or contracting out work if not previously written into the funded proposal
- 8) Any additional requirements outlined by the sponsor (see their award terms and conditions) or contact the assigned Program Officer

Process for Requesting Budget Revisions:

- 1) The Principal Investigator of the award should work with OSP and Grants Accountant on any proposed budget revision. If the proposed revision is considered minimal (does not fit the definition of a significant change above), then the revision or budget reallocation can be handled internally. The PI should provide the following:
 - i) Justification for the intended change
 - ii) Proposed budget revisions
- 2) OSP and/or Grants Accountant will review the sponsor's terms of award or contact the Program Officer to determine if prior approval is required.
 - a) If Prior Approval is required: The PI will follow the sponsor's standard process for requesting prior approval. This may include OSP reviewing and submitting the Prior Approval request once the PI has prepared the justification and revised budget.
 - i) Agencies such as NIH and NSF have a designated Prior Approval Request system located within Research.gov (NSF) and eRA Commons (NIH).
 - ii) Any communication to the sponsor should include:
 - (a) Proposed budget reallocation
 - (b) Justification for the change
 - (c) Award Number
 - (d) Beginning and end dates of the budget period affected.
 - b) If Prior Approval is not required: The PI will work with the Grants Accountant to make the appropriate reallocations internally.
 - c) OSP will review and submit the Prior Approval request following funding agency procedure.
 - d) OSP will notify the PI promptly regarding whether the request was approved or denied.
 - e) Documentation of these requests should be kept in the project file for future reference

IV. Policy Links:

V. Contact Information

For questions or comments, please contact OSP@uwosh.edu or 920-424-3215

VI. Revision History:

September 14, 2018
 September 17, 2018
 March 21, 2022