Modifications to an Award

Administrative Modifications are changes to an existing award that do not affect the approved budget total or the approved performance period of the award but changes term(s) or condition(s) of the award. These changes normally lift a restriction set in the award terms. The changes may be initiated by the Principal Investigator, the department or the Sponsor. Administrative modifications need to be updated in RAS.

RSC Responsibilities:

- Confirm that prior approval from the sponsor is required. For NIH, approval may be provided by either the GMO or UCSF’s expanded authority
- Format budgetary information into Sponsor-specific budget guidelines, if required
- Work with PI to prepare request and budget justification for request, if required
- Document communications with sponsor via CACTAS
- Follow up with sponsor until response is received
- If approved, confirm that compliance requirements (e.g. PI status, COI, IRB/IACUC approvals, approval of all parties) are still in place, and request setup by CGA via CACTAS

PI Responsibilities:

- Inform RMS of the need for a modification to the award
- Write and confirm scientific and budget justifications specifying why modification is necessary, if required by sponsor
- Approve modification request. For Multi-PI awards, all PI’s must approve request.

Department Responsibilities:

- Inform RMS of the need for a modification to the award
- Provide RSC with budgetary information in a workable format, if required
- Verify information prepared by RSC and PI. Convey any relevant information to RSC

Types of Modifications

- Carryforward
- Change in Key Personnel
Carry Forward

Carry forward consists of unobligated funds remaining at the end of any budget period that, with the approval of the sponsor, may be carried forward to another budget period to cover allowable costs of that budget period (whether as an offset or additional authorization). When the sponsor is the NIH, carry-forward approval may be provided by either the GMO or UCSF’s expanded authority.

Change in Key Personnel

Key Personnel are those considered to be of primary importance to the successful conduct of a research project.

- For the NIH, key personnel are named in the Notice of Award (NoA). See the NIH definition of key personnel for additional information. Prior approval is required if the Key Personnel will withdraw from the project; be absent for any continuous period of 3 months or more; reduce of the level of effort devoted to project by 25 percent or more from what was approved in the initial competing year award. NOTE: Selecting Yes in the RPPR constitutes a prior approval request to the agency and the issuance of a subsequent year of funding constitutes agency approval of the request.
- For other sponsors, RSC will review and determine if prior approval is required.
- **Summary of NIH Policy regarding Senior/Key Personnel and Key Investigator:** This chart provides definitions, who designates, requirement, and references for proposals, other support, prior approval and COI.

Change in the Status of Award PD/PI

If the PD/PI of an award changes departments or steps down from the position of PD/PI on the project, the sponsor will need to be notified prior to the effective date of the change and the following University requirements must be met:

1. If the award PD/PI changes departments and takes the award with them (for example: most research grants and individual instructional grants), the change can be handled internally unless sponsor approval is required per the terms of the award.
   - The change must be approved by the exiting PD/PI, Department Chair of the initial department and the Chair of the department the PI is moving to. Concurrence is then provided by an Institutional Officer.

2. If the award PD/PI leaves the department or the institution, but the award will stay with
administering department (example: Institutional Training Grants), a request to change the PD/PI of the award must be approved by the Sponsor prior to initiating an Administrative Modification of the award.

- The prior approval request must be signed by the exiting PD/PI, the new PD/PI and the Department Chair. The concurrence of an Institutional Officer is required prior to submission to the Sponsor.

3. If the award PD/PI steps down from the PD/PI role and assigns a new PD/PI from a different department:

- A prior approve request must be sent to the sponsor.
- The approval of both PIs and their respective Department Chairs must be obtained prior to receiving Institutional concurrence (all parties must be in agreement to the change and outcome of the change, such as change in the provider of the facilities and resources used by the project).

If the PI is transferring to a different institution, please see Relinquish Award.

**No Cost Extension (NCE)**

Request for additional time (without additional funds), extending the last year or budget period of an existing award. Unless the sponsor has delegated UCSF the authority to extend an existing award, UCSF must seek permission from the sponsor. RMS has the authority to approve the 1st time NCE Award under expanded authorities in the eRA Commons. All other awards typically require sponsor approval.

**Rebudget**

Rebudgeting is the reappropriation of a portion of the approved budget from one budget category to another and does not involve the increase or decrease of the approved budget total. For example, removing technical staff because the service will be performed by an outside vendor will require moving personnel funds to other direct costs.

- For the NIH, a change of 25% or more in any budget category or a change from equipment to another category of the approved budget of a non-modular grant may require prior approval if the incurrence of costs is associated with or is considered to be a change in the scope. (For example: the shifting of substantive programmatic work to a third party through a consortium agreement will result in the shifting of personnel, supplies and a portion of indirect costs to consortium/contractual costs.)
- For non-NIH sponsor, RMS will check grant guidelines to determine when prior approval is required for re-budgeting.

Other actions that may result in a change in scope and subsequent change in budgeting:

- Change in status of Key Personnel (i.e., change in effort or departure)
- Change in use of animals or involvement of human subjects
- Shift in the research emphasis
The Placing or Lifting of Restrictions

The sponsor may place a restriction on the spending of funds until compliance requirements are met. In the rebudgeting example, if a third party consortium agreement is to conduct human subjects research, and was not originally on the approved proposal and budget, the sponsor may approve the change in scope and rebudgeting of funds with a restriction on subcontract funds until compliance requirements are met.

Early Termination or Relinquishment of an Award

Early termination is the process required to end an award before the published expiration date. Approval of the administering department is first required. An award can then be terminated early given prior written approval from the sponsoring agency. Please go here for more information.

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