

## Guide to SPA Prior Approvals for HMS Federally Sponsored Awards

Most federal awards at HMS fall under the FDP guidelines for prior approval (<http://spa.wustl.edu/fdp/fdpmatrixapril04.pdf>), meaning the grantee institution has authority to approve certain actions without seeking agency prior approval. This is also referred to as “Expanded Authorities.”

Notable *exceptions* to expanded authorities include:

- Change of PI
- Change in the scope of work
- New subaward to a foreign institution
- Subsequent no-cost extensions after the initial one

Approvals that fall under FDP/expanded authorities, but which require oversight by HMS/SPA are listed below, with corresponding action the department should take in seeking SPA approval (e.g., sending an email or UPAS form). **Requests for approvals must be received by SPA in advance of any action taken, and in advance of the need for action.**

Approval type	Explanation	How to request approval
<b>Pre-award expenditures</b>	Pre-award costs incurred up to 90 days prior to award start date	Send <u>Advance Account Request form</u> . If account already exists, email your SPA rep. with date pre-award spending is to start and approximate amount to be spent.
<b>No-cost extension</b>	Initial no-cost extension, up to 12 months	Email your SPA rep. <b>at least 15 days before current award end date</b> with award number, new end date, approximate remaining balance, and justification for extension.**
<b>Equipment re-budgeting*</b>	Purchase of equipment (over \$5k) not specifically included in the approved budget, <i>except for</i> change of model/vendor, or price change of 25% or less on previously approved items	Send <u>UPAS form</u> : equipment, re-budgeting, and explanation sections
<b>New subaward*</b>	Addition of (domestic) subaward not in the original proposal	Send <u>UPAS form</u> : re-budgeting and explanation sections; as well as subcontracting institution’s documentation (budget, scope of work, signature).

\*Note: the UPAS form is NOT necessary for general re-budgeting.

\*\*The fact that funds remain at the expiration of the grant is not, in itself, sufficient justification for an extension without additional funds.

**For any questions on these or other approvals, please contact your SPA representative.**