

CDC Prior Approvals for Non-research Awards

Office of Financial Resources, Office of Grants Services

CDC anticipates that recipients may need to make post-award changes to budget and programmatic plans during the period of performance to accomplish award objectives. This guidance provides CDC recipients with an overview of prior approval requests for post-award changes, and also describes the documentation recipients must submit for these requests. Additionally, the document provides links to other prior approval resources and tools to assist recipients with prior approval request submissions in the GrantSolutions system.

Types of Activities Requiring Prior Approval

When recipients propose certain types of budget and programmatic-related changes from pre-award plans, prior approval may be required. See below for a description of typical activities which require prior approval. Recipients should review their terms and conditions of the Notice of Award (NoA) for a full listing of activities that require CDC prior approval for their specific award.

- **Budget Revision**
 - Significant rebudgeting – occurs when cumulative redirections among direct cost budget categories deviate (increase or decrease) by more than the rebudgeting threshold identified in the NoA. Typically, the rebudgeting threshold for CDC awards is 25 percent of the total approved budget in the budget period.
 - Budget revisions made by a recipient with a high-risk condition noted in the NoA – these changes require a prior approval, regardless of amount.
 - Implementation of a new activity or entering into a sub-award that is not specified in the approved budget.
 - Change in indirect cost rate – costs incurred by a recipient for common or joint objectives and cannot be identified specifically with a particular project or program.
 - Changes related to cost sharing or matching – occur in instances such as the addition of funding from a supplemental award, which results in CDC recalculating cost sharing or matching amounts.
 - Transfer of substantive programmatic work – required for a recipient to transfer substantive programmatic work to a subaward.
 - Change in scope – an activity whereby the objectives or specific aims identified in the approved application are significantly changed by the recipient after award.
- **Carryover of Funds** – the process by which unobligated federal funds remaining at the end of a budget period may be carried forward to another budget period within the period of performance to cover allowable costs of that budget period (whether as an offset or additional authorization). Recipients with [expanded authority for carryover](#) do not require prior approval to use unobligated funds for approved activities/costs that fall within the scope and objectives of the project.
- **No-Cost Extension** – a limited period of time beyond the end of the period of performance needed to complete project activities.
- **Change of Principal Investigator (PI) or Other Key Personnel** – when key personnel specified on the NoA change.

Submission

Recipients should submit prior approval requests at least **30 days** before the date of the proposed change to allow for an adequate and timely review, and to ensure continuity of projects. Additionally, recipients should submit requests at least **120 days** prior to the end of budget period, to ensure timely GMO approval. The requests must be submitted to the assigned Grants Management Specialist/Officer (GMS/GMO) through a prior approval amendment in GrantSolutions. Prior approval must be granted by the GMS/GMO before a recipient undertakes any of the activities

contained in their request.

To initiate an amendment requiring prior approval, requests for non-research awards should be submitted via the [GrantSolutions](#) amendment process by the Authorized Organizational Representative (AOR), identified as the Administrative Official (ADO) role in GrantSolutions. ***If requests are submitted in GrantSolutions by the Principal Investigator/Project Director or Financial Official, recipients must include a cover letter on official letterhead signed by the AOR.*** Prior approval requests submitted without official AOR system authorization/access, or AOR letter with signature, will be returned without processing.

If an AOR signed prior approval request cover letter is required, it should be on official letterhead and include the items below.

- Date
- Recipient name and award number
- Point of contact – name, phone number, and email address
- A brief description of the request

If an amendment involves a budget worksheet (i.e., Budget Revision or Carryover) it should be submitted individually (not combined with other prior approval requests).

Required Documentation

CDC requires recipients complete GrantSolutions online forms specific to the type of prior approval amendment. The GMS/GMO may also require recipients to upload additional supporting documentation in GrantSolutions. Recipients should submit the GrantSolutions information and the required supporting documentation in GrantSolutions at the same time. All requests (with AOR signature if request not submitted by AOR, as described above) must include a cover letter uploaded to GrantSolutions with a brief description of the request.

The most common prior approval amendments are listed in the table below, along with the required GrantSolutions online forms and additional supporting documentation required for approval. The third column provides links to additional resources, including job-aids which include step-by-step information for how to complete the online forms within GrantSolutions and upload additional required documentation. Recipients should review the documentation requirements below, and then use the job-aids as a reference when submitting their requests in GrantSolutions. Recipients are encouraged to contact the GMO/GMS of record on their most recent Notice of Award for specific questions concerning a prior approval request.

Prior Approval Amendment	Required GrantSolutions Forms and Supporting Documentation	Additional Resources
<p>Budget Revision (see page 1, under the bullet "Budget Revision" for a list of typical, budget-related activities for this amendment). A budget revision only occurs for funds awarded in the current active budget period.</p>	<ul style="list-style-type: none"> • Cover letter (with AOR signature if request not initiated by AOR) which includes: <ul style="list-style-type: none"> ○ A brief description of the request; include a statement that the budget revision remains within the scope of the Notice of Funding Opportunity (NOFO). Provide justification for any change in scope of approved activities, if applicable. ○ A budget narrative outlining proposed changes, following the CDC Budget Preparation Guidance ○ Summary table which displays columns for the Original Budget, Difference from Original Amount, and New Revised Budget Total • Indirect Cost Rate Agreement (if applicable) • SF-424A Budget Information Non-Construction (recipient can complete within GrantSolutions or 	<p>Please use the Prior Approval Budget Revision Cover Letter Template to draft the cover letter.</p> <p>If an award has more than one component, please use the Prior Approval Budget Revision Cover Letter Template- Multi-component Awards to draft the cover letter.</p> <p>For instructions on how to submit the request in GrantSolutions, go to Budget</p>

Prior Approval Amendment	Required GrantSolutions Forms and Supporting Documentation	Additional Resources
	<p>upload a completed PDF form) available on grants.gov.</p>	<p>Revision Amendment for Grant Recipients (Redirection of Funds), Non-Research Grants Job Aid.</p>
<p>Carryover of Funds (using funding from the prior budget period to conduct grant activities)</p> <p>Note: If approved for Expanded Authority, prior approval is only required for carryover if you plan to use unobligated funds for activities not supported by your approved workplan (i.e., new in-scope activities); submit the carryover amendment under the current active budget period in GrantSolutions.</p>	<ul style="list-style-type: none"> • Cover letter (with AOR signature if request not submitted by AOR) which includes: <ul style="list-style-type: none"> ○ A brief description of the request; include a statement that the budget revision remains within the scope of the NOFO and will be used to support the ongoing activities. ○ A budget narrative outlining proposed changes, following the CDC Budget Preparation Guidance ○ Summary table which displays columns for the Original Budget, Proposed Carryover, and New Revised Budget Total • Indirect Cost Rate Agreement (if applicable) • Copy of Annual Federal Financial Report (FFR) (see GrantSolutions Quick Sheet for instructions to obtain a copy of an FFR) • SF-424A Budget Information Non-Construction (recipient can complete within GrantSolutions or upload a completed PDF form) available on grants.gov. 	<p>Please use the Prior Approval Carryover Cover Letter Template to draft the cover letter.</p> <p>For instructions on how to submit the request in GrantSolutions, go to Carryover of Funds Amendment for Grant Recipients, Non-Research Grants Job Aid.</p>
<p>Change in Project Director (PD)/ Principal Investigator (PI) Key Personnel</p> <p>Note: a PD/PI change should be submitted separately from any other key personnel changes.</p>	<ul style="list-style-type: none"> • Cover letter (with AOR signature if request not submitted by AOR) with a description of the request including new PD/PI effective date • “Change Project Director” GrantSolutions online form • New PD/PI CV/resume with contact information 	<p>Please use the Prior Approval PD/PI Change Cover Letter Template to draft the cover letter.</p> <p>For instructions on how to submit the request in GrantSolutions, go to Change PD/PI Amendment for Grant Recipients, Non-Research Grants Job Aid.</p>
<p>Change in (other) Key Personnel</p> <p>Note: other key personnel changes should be submitted for all personnel changes that are not the PD/PI.</p> <p>Also, if a change in key personnel requires a budget change, the Budget Revision amendment is also</p>	<ul style="list-style-type: none"> • Cover letter (with AOR signature if request not submitted by AOR) with a description of the request including: <ul style="list-style-type: none"> ○ Name and position title of the key personnel that is changing ○ Address, phone, and email address for new key staff ○ Proposed effective date of the change • New key personnel resume or CV 	<p>Please use the Prior Approval Other Key Personnel Change Cover Letter Template to draft the cover letter.</p> <p>For instructions on how to submit the request in GrantSolutions, go to Change Key Personnel Amendment Grant Recipients, Non-Research Grants Job Aid.</p>

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required. Verify with the assigned GMS/GMO whether to submit the request in conjunction or separately.		
No-Cost Extension	<ul style="list-style-type: none"> • Cover letter (with AOR signature if request not submitted by AOR) with a description of the request including: <ul style="list-style-type: none"> ○ Specific recipient activities that will continue and why ○ Timeline for completing the activities ○ Reason recipient was unable to complete activities within the period of performance • “Project Period Revision” GrantSolutions online form • Budget revision(s) should be completed prior to submitting a No-Cost Extension 	<p>Please use the Prior Approval No-Cost Extension Cover Letter Template to draft the cover letter.</p> <p>For instructions on how to submit the request in GrantSolutions, go to No Cost Extension Amendment Grant Recipients, Non-Research Grants Job Aid.</p>
Notification of Contractor or Consultant	<ul style="list-style-type: none"> • Cover letter (with AOR signature if request not submitted by AOR) with a description of the request including the required elements for contractor or consultant approval in accordance with the CDC Budget Preparation Guidance 	<p>Please use the Prior Approval Contractor/Consultant Cover Letter Template to draft the cover letter.</p> <p>For instructions on how to submit the request in GrantSolutions, go to Notification Contractor Consultant Amendment Grant Recipients, Non-Research Grants Job Aid.</p>
Organization Name Change	<ul style="list-style-type: none"> • Cover letter (with AOR signature if request not submitted by AOR) with a description of the request including: <ul style="list-style-type: none"> ○ The new organization name that has been updated in SAM.gov under existing Unique Entity Identifier (UEI) ○ Effective date ○ UEI number • Supporting documentation from recipient’s legal counsel indicating name change was made in accordance with applicable laws • SF-424 Application for Federal Assistance Version 4 (pdf form). A new SF-424 is required for each CDC grant (showing new name and PD/PI). 	<p>Please use the Prior Approval Organization Name Change Cover Letter Template to draft the cover letter.</p> <p>For instructions on how to submit the request in GrantSolutions, go to Organization Name Change Amendment Grant Recipients, Non-Research Grants Job Aid.</p>
Release of Restrictions on NoA	<ul style="list-style-type: none"> • Cover letter (with AOR signature if request not submitted by AOR) with a description of the request including justification for release of funding restrictions, contractor restrictions, etc. • Any supporting documentation requested in Notice of Award (NoA) 	<p>Please use the Prior Approval NoA Restrictions Cover Letter Template to draft the cover letter.</p> <p>For instructions on how to</p>

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		submit the request in GrantSolutions, go to Release Restriction Amendment Grant Recipients Non-Research Grants Job Aid.
Termination	<ul style="list-style-type: none"> • Cover letter (with AOR signature if request not submitted by AOR) with a description of the request including: <ul style="list-style-type: none"> ○ Termination justification with the effective date ○ If partial termination, portion to be terminated 	Reach out to your GMS/GMO for assistance in submitting a termination request.

